

**Survey of charities' use of the Minimum Income Standard to help them assess the financial needs of individuals and households**

Report on results of on-line survey and follow-up interviews

Donald Hirsch

CENTRE FOR RESEARCH IN SOCIAL POLICY

LOUGHBOROUGH UNIVERSITY

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## 1. Introduction

The Centre for Research in Social Policy (CRSP) at Loughborough University has been carrying out research on a minimum income standard for the UK for the past decade. Since 2008, Joseph Rowntree Foundation, the funder of the research, has been publishing annual reports summarising the findings, and since 2009, an online calculator has allowed users to calculate a minimum income requirement for most households in the UK.

Over this period, charities in the benevolent sector (ie those offering assistance, including financial aid, to eligible individuals or households with limited means) have increasingly been using MIS as a tool for the assessment of financial need. This has not come about as a result of any systematic process. It started with random charities becoming aware of MIS and deciding to use it on their own initiative. Over time, these disparate cases of adopting MIS have to some degree been reinforced by exchange of information about MIS, including through the Association of Charitable Organisations, with members of the MIS research team addressing their annual conference on two occasions. The research team has given advice to numerous organisations using or considering the use of MIS, but on a responsive rather than proactive basis. In 2013, a survey of charities helping people in need, carried out for the Association of Charitable Organisations, found that 40% of responding organisations used the Minimum Income Standard to determine need<sup>1</sup>.

Thus there is clear evidence that MIS is being well used in the sector. However, there has up to now been no systematic assessment of the nature and extent of this use (the above-mentioned survey looked broadly at the sector, and included just one question about MIS). It is worth finding out more about this usage, for two main reasons. First, because there is scope for cross-sector learning about how the MIS benchmark can be used, what issues such usage raises, and how others have addressed these issues. Secondly, because a shared understanding of what MIS represents and how best to apply it can contribute to its character as a recognised

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<sup>1</sup> Jacinta Belai (2013) *Changing for Good Trusts and Foundations that give grants and other support to individuals in need*. London: Association of Charitable Organisations. Page 17

*standard.* Just as MIS as a research process involves building consensus among the general public about what is an adequate minimum living standard, so there is potential for charities to reach a degree of consensus about the value and appropriate usage of MIS: its widespread recognition and usage helps validate it as an accepted criterion for assessing people's means against their needs.

In order to gather information about charities' use of MIS, CRSP in partnership with the ACO invited all 120 ACO members to take part in an online survey about awareness and use of MIS. It followed up this survey with ten telephone interviews with charities that use MIS, to explore this usage further. This paper summarises the results of the survey and the interviews. A further stage of this process involves follow-up telephone discussions with charities who do not at present use MIS but, in answering the survey, indicated that they would like to know more, bringing in knowledge about how MIS can be used and how it is being used by others.

## **2. The survey and summary of responses**

### ***2.1 Response***

In total, 120 contacts in different ACO organisations were contacted and invited to complete an online "SurveyMonkey" survey. In addition, 30 participants in a workshop at a conference being held by the Maritime Charities Group were invited to participate (some of these overlapped with ACO members).

A total of 51 responses to the survey were received. This represents a response rate of approximately one third. Given that there is a strong possibility of response bias in favour of those already interested in MIS, the results cannot be used to say accurately how many benevolent charities use MIS overall. Rather, they give an interesting profile of how MIS is being used by a significant proportion of those involved in benevolent giving.

### ***2.2 Awareness and usage of MIS***

Of those responding, three quarters (39) had heard of MIS, and all but two of these expressed some awareness of what MIS represents, how it is carried out or how it can be used. Interestingly while the majority of those who had heard of MIS "understand broadly how it can be used" (22) and/or "know the basics of what it

represents” (24), much fewer (13) “know broadly how the research is carried out”. In other words, people in the sector tend to be aware that MIS produces a standard useful for means-testing applicants for grants, but only a minority feel knowledgeable about how this standard is produced.

Almost all of the 39 organisations who said that they had heard of MIS either use it at present (22), had considered using it in the past (9, of whom 7 might consider it again in the future) or had not previously considered it but thought they might do so in the future (6), leaving only two who had heard of it and did not consider it relevant for them.

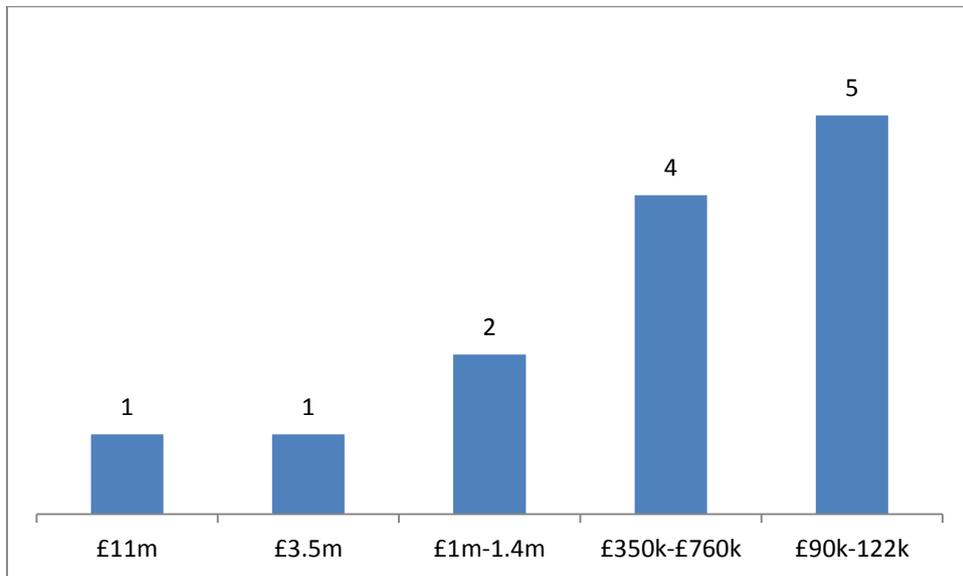
### ***2.3 Organisations using MIS***

The 22 responding organisations who presently use MIS all employ it to assess applicants’ incomes as a criterion in giving out grants, and all but three of these use it as their principal criterion for doing so. They include a very wide range of charities, supporting people from all walks of life from management accountants to dancers to retired army officers.

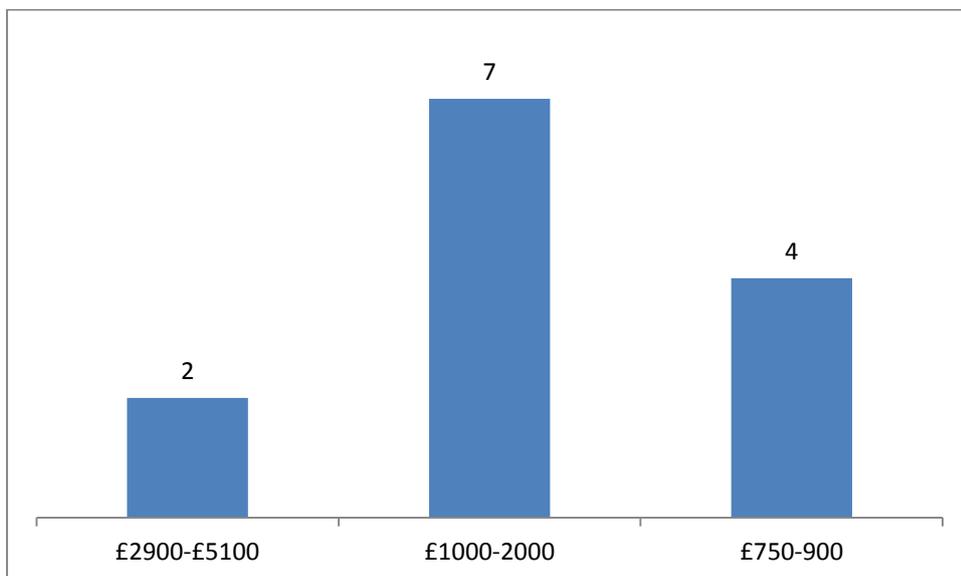
Thirteen of these organisations reported data on the grants that they give out. Ten of them used MIS as an assessment tool for all of their benevolent grants, and the remaining three used it for at least two thirds of their grants.

The volume of grants given out using MIS varied considerably, both in overall terms and in terms of average grant size, as shown in Figures 1 and 2. Figure 1 shows that a small number of charities are giving over £1m a year, but more typically it is between £100,000 and £1 million. Figure 2 shows that average grants are typically between £1000 and £2000, with no organisation reporting a much smaller average, but two reporting averages that were much larger.

**Figure 1 Number of organisations by value of grants given out in the last reporting year**



**Figure 2 Number of organisations by average size of grants given out in the last reporting year**



Overall, the survey shows that MIS is being well used in a sector giving out a large volume of money each year (of the order of £100m in 2013 according to the survey referred to earlier). In general, respondents were highly positive about MIS. One comment however reflected the fact that this tool will not be suitable for all charities:

*“We base the decision on the financial help we give on disposable income and when looking at expenditure we take into account geographic and other factors. The MIS is useful but not nuanced enough for our purpose”*

Just one comment suggested a negative reaction to MIS:

*“Rumours from other charities that it creates more problems than it solves”*

(This comment however came from a charity that also requested to find out more about MIS, and would consider using it in the future).

### **3. Follow-up interviews: a profile of how charities use MIS and why**

As a second stage of this exercise, ten interviews were carried out with charities that reported making use of MIS. The interviews explored with them their reasons for doing so, the characteristics of people that they helped through benevolent grants and how exactly MIS is being applied. The interviews gave a rich profile of commonalities and differences in the ways in which a range of charities interact with the Minimum Income Standard. The interviews were carried out on a non-attributable basis, but all charities taking part were happy to be named as users of MIS, and their names are listed in the acknowledgements below. Note that while the following description principally draws on the information given by these ten organisations, the findings are strengthened by the author’s prior contact with other charities using MIS, whose experiences confirm a number of themes and trends reported by the organisations taking part in the interviews.

#### ***3.1 Context: the role of benevolent giving and who is being helped***

Benevolent charities support a very wide range of individuals and households facing financial difficulties. Many help current and former members of a professional or occupational group and their dependents. Some help people in a particular geographical area or demographic group. Some charities help groups whose characteristics may make them vulnerable, such as those where low pay or insecure employment is widespread, while others support members of generally well-paid professions when they encounter hard times, such as through redundancy or ill health.

In this context, the charities interviewed typically gave help to people in the following types of situation:

- Someone who is retired or unable to work, and has insufficient income. Here, there is often a long-term need for support.
- Someone of working age who has insufficient income at present, but prospects of improving it in the future. Here, charities identify a combination of short-term financial assistance and in many cases help and advice in getting back into work or improving their earnings (for example by retraining).
- Someone making a transition to a new financial situation – in which a lifetime change such as retirement or relationship breakup requires a change in lifestyle, but short term help can help someone through this transition.
- Someone who faces a large additional cost which they are unable to afford, for example someone who has been injured or become disabled and needs some expensive specialist equipment.

Most of the charities interviewed gave to a combination of people in these different circumstances. A number noted however that the balance has changed over time. In particular, several respondents drew attention to a growing vulnerability of people of working age both to instability in the labour market and to insufficiencies in the benefits system:

*“The older generation are having an easier time than those following them”*

*“Pension Credit has made it harder to see where there is a [financial] need for older people”*

*“Benevolent funds are becoming ever more important as [working age] benefits come crashing down.”*

Pensioner poverty has declined in recent years, while working age poverty has increased. This does not mean that charities have systematically shifted the balance of their giving away from pensioners. Much depends on trends for specific groups. A recent report on maritime charities, for example, noted that long-term decline in the numbers working in the merchant navy and fishing fleet creates a beneficiary group

that are on average older in that case<sup>2</sup>. Nevertheless, charities are increasingly aware of the effects of greater precarity in the labour market and the obvious effects of recession and austerity on working age people on low incomes. Aware of this, some charities reported having done more to make younger groups aware of the help that they can give, particularly in their early years of employment as they are finding their feet.

### **3.2 Rationale: adopting MIS as an assessment criterion**

Asked what caused them to adopt MIS as a tool in assessing eligibility for financial assistance, all respondents replied in a similar vein: they wanted to ensure that assessment is done on a sound and consistent basis, and previous systems had fallen short in their ability to do so.

*“We were looking around for an assessment system that was more systematic, transparent and fairer than the one that we had cobbled together.”*

Among the terms repeatedly used to describe the attractions of MIS were:

*“Fairness”* – the desire to judge all applicants on the same basis, rather than favouring one person’s needs unduly over another.

*“Transparency”* – the ability of applicants and others to understand what is being used as the basis for financial need; and

*“External validation”* – the legitimising of the criteria from outside the charity, to demonstrate that it was not making arbitrary or perverse judgements about whether people have the resources to meet their needs.

The widespread perception was that long-held systems for assessing need had either been arbitrary (“plucked from thin air”, said one respondent), or applied a system whose basis was lost in the mists of time. An important feature of charities’ financial assessment has often been to ask people to fill in detailed forms about their expenditure levels on different items, as a basis for judging whether they are in genuine need. Yet this requires judgements about what is too much or too little to spend on a particular area of life, which can be highly subjective, and also may

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<sup>2</sup> Catherine Walker and Deborah Fairclough (2017) *Navigating Change- A Review Of the UU Maritime Welfare Charity Sector Summary Report*, Page 7.

involve value judgements about the choices that people make about how they spend their money, rather than considering whether they have enough overall.

Charity officers reassessing these systems have been drawn to MIS because it provides a consistent basis for considering whether people have enough income overall to support an adequate household budget, without having to judge whether someone is going short of one necessity because of other spending choices that they have made. Charity officers also like the fact that it allows different household types to be assessed on a common basis, adjusted for their different levels of need.

Some had looked around to find such a tool and MIS seemed the most suitable. Others have heard of other charities using the standard, or become aware of MIS through the Association of Charitable Organisations (ACO). An interesting observation was that seeing other charities using MIS helps to build confidence that this is a recognised standard:

*“When we presented the information to trustees, we felt it was a trusted source, that other charities are also using.”*

In this way, just as is the case in recognised education standards (a nationally recognised examination) or safety standards (a set of safety criteria that everyone conforms to), the status of an income standard can be reinforced through usage. While there is no perfect criterion for saying “what is an adequate income”, MIS is a standard that derives from building consensus among members of the public, and its acceptance in usage by organisations can extend its status as a standard accepted through consensus by society. This in itself is useful to charities who want to use criteria of social need that are externally recognised rather than appearing to rest on arbitrary internal criteria.

Finally, modern charities are attracted by what MIS represents, as a standard of living that is about more than mere survival and meeting of material needs, but also allows participation in society. Respondents made it clear that they want to ensure that beneficiaries are able to live at a decent level. They certainly did not want retain Dickensian notions of deterring people from falling back on charity other than to achieve the most basic means of subsistence in the moral framework of the

workhouse. The language of MIS is reflected in the ways in which charities using it project themselves in public:

*“Our work is targeted at people who cannot afford an adequate standard of living to take part in society”* (Officers’ Association website)

### **3.3 How MIS is applied – principles**

At its most basic, MIS offers a criterion for determining who is in financial need, giving a basis for bringing people up to a minimum level if they fall below it. Some of the charities interviewed did aim to provide such a means-tested top-up, within the limits of the resources available. However in practice, MIS is being applied in different ways in different cases, with no single model prevailing. Three key aspects of difference are:

- Whether MIS acts as *gateway* to support or as a *target* income to attain.
- Whether *MIS itself* is treated directly as adequate income level, or just as a tool in a *bespoke* calculation.
- To what extent support based on MIS is seen as a *temporary* stepping stone or as a *long-term* means of support.

#### *Gateway or target?*

A first step in using MIS as a benchmark is for a charity to assess whether the applicant’s household has disposable income below the level suggested by MIS. Those above this level may be considered ineligible for support – although most of the charities interviewed said that they could consider people with incomes above MIS if they could still demonstrate that they were in need. More important was that being below MIS would confer eligibility without having to demonstrate need through a detailed account of their current expenditure.

One way of interpreting a benchmark of income adequacy is to support those falling below it to increase their incomes up to the minimum. This is the principle behind some means-tested state benefits such as Pension Credit. It can be harder for charities to make such a commitment, given their finite funds. However, some charities with relatively plentiful financial resources aim to some degree to top up incomes to the MIS level. But they tend to put certain limits on this. One large charity that systematically makes up the difference between applicants’ disposable

income and the MIS threshold nevertheless caps such assistance at 30% of the MIS rate relevant for that household. In other words, a household with disposable income worth 70% of MIS would be topped up to the MIS level, but one with 65% would be topped up to 95% of MIS. Other charities try to be relatively generous in supporting people to maintaining a living standard referenced to MIS over a limited period, but not over the longer term (see below).

Other charities use MIS as a gateway, but not as a target level of support. One, for example, has a standard grant level of £600 a quarter, rising to £725 for those with dependents, for which applicants are eligible if their income is below MIS. Some charities with more modest resources would like to bring applicants to the MIS level, but accept that they can only get them part of the way there. In such cases, they often focus on meeting particularly pressing needs such as rent arrears. One charity dealing with single mothers who may be able to benefit from retraining, but could not pay for childcare while attending courses, helps them by paying childcare costs in this situation. A number of respondents reported a particular emphasis on dealing with direct costs arising from disability where people have lost their jobs through injury – such as buying specialist equipment.

Thus, helping people who are below MIS sometimes involves bringing them up to this level, but in other cases triggers more selective support, to deal with particular needs which feel worth prioritising. In this way, while MIS has reduced the “discretionary” element in assessing whether people are in need, some charities retain a high degree of discretion in determining what help people eligible for support will receive.

#### *Adapting MIS as a threshold*

Some charities stick strictly to the MIS threshold as published to determine eligibility. Most commonly, they interpret this as having disposable income, after paying housing costs, at the level suggested in the MIS data. Others adapt the threshold to meet their objectives.

In one case, a charity serving a professional group takes the view that people who fall on hard times but have been used to the lifestyle common among these professionals should be supported, at least temporarily, at a level higher than the

national minimum. They multiply MIS disposable incomes by 1.5 to reach their starting point.

This however is atypical. The other organisations interviewed saw the MIS level as an appropriate standard to provide a minimum, but sometimes added in certain allowances or disregards to reflect people's actual living circumstances. For example, in two cases, they made an allowance for a car, which could be included even for households without children, for whom cars are not considered essential by MIS groups. One approach was to make a set-rate car allowance for pensioners who used one, at a level devised before MIS came into use. In the other case the actual amount spent on a car, within limits, was deductible for people making a time-limited claim helping to tide them over a period of crisis. The view here was that people may not be in a position immediately to give up a car by adapting their lifestyle.

Two charities interviewed were prepared to make an adjustment for domestic fuel costs to above the level specified in MIS. One respondent remarked that they found these particularly low for pensioners. This is not surprising, given that the baseline minimum heating model in MIS is based in living in a well-insulated flat, whereas most pensioners live in houses, many of which are not very fuel-efficient. The MIS minimum income calculator allows fuel costs to be adjusted.

Another charity added 11% to the MIS threshold, not to represent a higher standard of living but to allow for additional costs incurred by individuals that it does not cover, particularly servicing debts, a cost that affects many of its beneficiaries.

Thus, while charities seek the external validation of MIS as a benchmark of needs, they are not slavishly bound by it. This does not mean that they simply pick and choose what parts of MIS they accept according to arbitrary criteria. The transparency of MIS budgets and the rationales that underpin them allow them to make careful judgements about when a variation may be appropriate in relation to their charity's objectives. They particularly value the way in which MIS allows an assessment of need that is consistent across groups:

*"We want to treat everyone equally. It's the best way of being even-handed"*

*“The MIS calculator is an incredibly efficient method to get baseline information on different people’s needs”*

The decision by most of the charities interviewed to disregard income used to pay for housing raises an important issue, which a number of interviewees mentioned. This is that while someone paying a high rent or mortgage is not in a position immediately to move to a cheaper property when they fell on hard times, there is bound to be some limit to the level of comfort in which a charity would want to maintain people, especially over a long period, by paying for their housing. However, while this could theoretically cause a charity to question the level of mortgage that it was willing to pay, in practice none of the interviewees reported having significant number of applications from people with unreasonably high housing costs.

*“We don’t often have someone with high standards of living who have dropped very low”.*

Some however did report that covering a mortgage could be expensive and could only be done over a limited period, as discussed below.

#### *Temporary help and long-term support*

An important distinction for all the charities interviewed was between people who need ongoing help and those who are facing a temporary crisis. Many benevolent funds market themselves as being there for people for “when things go wrong”. The prevailing view was that MIS could enable the charity to help people make ends meet while they were getting through a crisis or dealing with a life change. This could involve injury, redundancy or bereavement. There was a strong emphasis on helping people put their lives back in order, rather than making them permanently “dependant” on the charity’s help. Sometimes this was formalised by putting explicit time limits on assistance, although with flexibility to make exceptions. Several charities mentioned that they are trying to move away from a history of helping people on low incomes for indefinite periods.

For people who had lost their jobs or were facing difficulties in relation to employment, this creates an emphasis on complementing financial assistance with advice and other services that will help beneficiaries to regain a decent working income. However, charities also recognise that this is not always possible or

appropriate. A retired person on a low income, or someone who is unable to work because of serious disability, may have no means of improving their income. For this reason, most of the organisations interviewed recognised that some people would need ongoing help.

However, this was not always the case. A respondent from a charity that imposes time limits on support explained that for people with a permanent drop in their income, the payments were intended to give them some space to adapt their lifestyle, not to give ongoing help. This could potentially mean moving to a home that was affordable over the long term. Such a policy needs to be seen in the context of people who may have been living a relatively comfortable lifestyle, and who may still be able to afford a minimum living standard without assistance, or with only a small amount of help, if they move to more modest accommodation. One respondent recalled the case of a well-paid professional who had had a breakdown aged about 60, and was seriously over-extended on housing commitments. In this case, the charity supported these commitments while the family down-sized, and then reduced to a lower level of support covering non-housing costs once they had done so.

### ***3.4 How MIS is applied – practicalities***

Data on the Minimum Income Standard are published online in a variety of formats, none of them specifically designed as a guide for charities in making means-tested assessments. This has led to a number of different methods used in order to make assessments. For example:

- Some charities assess households using the online Minimum Income Calculator, which requires users to answer three questions about household composition, and then produces a budget and earnings or pension requirement for that household type. Typically, they consider the total expenditure requirement produced by the calculator, subtract housing costs, and compare this to the income net of housing costs of the applicant. It would be less appropriate to compare the salary requirement with actual salary, since this makes an assumption about housing expenditure that will vary greatly from one case to another.
- Others use summary budgets published as a spreadsheet for each of 11 main household types. This has the advantage of being easier to handle where a

spreadsheet tool is required. It is less sensitive to the age of children than the calculator.

- One charity uses the standard budgets in these spreadsheets for people without children, but adds on additional amounts for children of different ages and birth order, published in the appendix of the annual “cost of a child” report, produced for the MIS team for the Child Poverty Action Group. This produces similar results to the calculator, but is set out as a set of data values that can be entered in a single spreadsheet, rather than requiring the online calculator to be used for each case.
- Other organisations use MIS information more partially. One charity with a previously established set of benchmarks simply uses changes in MIS budgets over time as a fair basis for uprating them over time. Another makes partial use of MIS budgets for selected categories, by calculating a “residual” figure of allowed expenditure, after subtracting actual spending in a range of areas where it is considered that households have limited discretion.

There may in principle be a case for producing a more bespoke tool for benevolent funds to make assessments, in the form of a set of detailed spreadsheets performing the work of the calculator, with a user guide. However, it was notable that the respondents to this survey, who were applying the MIS data in a variety of different ways, each seemed broadly happy with their current system. This would suggest that trying to encourage them to change to a single standardised system may not be desirable. However, there may be scope for further discussion about whether new tools could be valuable for charities new to MIS.

### ***3.5 What difference MIS has made***

Survey respondents emphasised that they felt that the consistency and external validation offered by MIS in making assessments was in itself considered to be of value. But were they coming to very different decisions as a result of using this tool? For some, it made little difference. Charities whose benevolent purposes were targeted at groups likely to be on relatively low incomes found that most applicants passed eligibility tests regardless of whether MIS was used in the assessment. Nevertheless, one of these charities commented that knowing how far they were below MIS helped trustees make balanced decisions about how much help to award each applicant.

In other cases, the initial income assessment could indeed vary as a result of MIS, significantly influencing the structure of the help given. One example of this was the charity referred to above that uses 1.5 times MIS as a benchmark living standard. Previously, it had used 1.5 times safety net benefit rates. This produced greatly different results across groups, because Income Support for working age adults is below half of Pension Credit, whereas MIS budgets are slightly higher for working age than for pensioners. As a consequence, people of working age on very modest incomes who had been excluded under the previous system are qualifying under MIS. The other side of this coin is that grants given to pensioners are potentially less generous than they would have been under the previous system. The charity was careful to ensure that pensioners who rely on its support did not suffer a sudden loss of income as a result, providing transitional protection for existing beneficiaries to limit the amount that help given in any one year can be lower than the previous one.

Several respondents reported that MIS has sometimes given them confidence to assess people as being in need who might not otherwise have appeared so. One charity had been used to helping single people, but as an increasing number of lone parents applied, found it difficult to make its own judgements about the level of their needs. The MIS findings have helped them appreciate how many different additional costs can arise from raising children. Another respondent told of an applicant who had a reduced income recovering from cancer, but who together with a working partner appeared to have reasonable income through partners' earnings. However a MIS assessment taking high mortgage costs into account deemed them eligible. The same charity rejected others with similar gross incomes whose overall assessment showed their disposable income to be higher than MIS. For another charity serving a client group with relatively fragile and modestly paid employment, it was not so much a matter of screening to see who is eligible, but rather encouraging potential beneficiaries to consider their needs more fully. They brought the perspective that it is not good enough simply to survive, but you need to participate in society. This charity sought to promote its clients' well-being, not just by giving them money but also by encouraging them to think about steps they could take to enhance their own income.

## 4. Conclusion

This survey and follow up interviews show that a wide range of charities use MIS to help consider whether potential beneficiaries are in financial need. They all value it as a tool for making a fair, systematic assessment against a consistent definition of need, across different types of household. Each charity adapts this use to its own purposes, and is able to do so because MIS provides transparent information about what it covers and why.

Yet it is clear that the adoption of MIS represents more than just making use of a handy tool. Each of the organisations interviewed also projected it as part of a process of modernisation. In most cases it had been taken up by charity officers who had come into the organisation and been dissatisfied with what felt like an unsystematic, arbitrary or judgemental form of assessing whether someone's income was sufficient to support their needs. Adopting MIS was part of a wider process of trying to ensure that the charity performs more efficiently its purpose of aiding people who fall on hard times. Often the updating of the criteria for giving financial help was accompanied by measures to improve services given by the charity, giving advice and other assistance to help people improve their lives.

This process of modernisation is taking place against a backdrop of change in the public welfare system. For working age people, the real level of benefits has fallen, and charities are acutely aware of the additional pressures that this puts on some of their beneficiaries. For pensioners, real-terms increases in the level of the state pension and Pension Credit have helped ease some previous financial pressures. In some cases this has stimulated a shift in support to some extent from pensioners to non-pensioners, and MIS has played a role in this. This phenomenon should not be exaggerated, since the client base and its needs are very specific to different charities. What can however be concluded is that where benevolent charities consider reorienting their work to give greater attention to certain underserved groups perceived to be in need, MIS gives an objective basis for judging whether this is justified in terms of the income sufficiency of new types of applicant. It helps disrupt any inertia in grant-giving patterns in century-old organisations, in cases where needs emerge beyond the particular demographic groups that they have traditionally served best.

This modernisation process can also be seen in terms of charities' philosophy and how they interpret their objectives. Their benevolent giving aims not just to address severe hardship and help people survive financial crisis, but also to support them at a reasonable standard of living, so that they can continue to meet their material and social needs in hard times. The definition of MIS, as a level of income that allows people to have enough for food, clothing and shelter, but also having choices and opportunities required to participate in society, resonates with these objectives. The concept of having choices helps challenge attitudes in which people on low incomes have sometimes been judged by the consumption choices that they make, rather than on whether their income is sufficient to live at a sufficient standard and make their own choices. Thus, charity officers feel that MIS helps reinforce the underlying purpose of benevolence in supporting recipients to live satisfactory lives, particularly at a time when the ethos in the public benefits system has in many ways moved in a more punitive rather than supportive direction.

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