Glasgow City Council welcomes the opportunity to respond to the Welfare Reform Committee on the Bill’s proposals. Responses have been provided below against each question:

**General**

1. Are you in favour of the Bill and its provisions? Do you think the Bill fully achieves the Scottish Government’s aim of providing assistance for short term need and community care?

*GCC Response:* The Bill does allow the provision of assistance for short term need and community care. It is noted that the Bill specifies that the assistance is to an individual however in practice an individual will be considered in the context of their family circumstances.

2. The interim SWF scheme has already been running for two years. Do you feel that the Bill has suitably taken on the learning from this time?

*GCC Response:* The Bill represents very little change from the interim scheme, other than the changes to second tier review. This is welcomed as this should facilitate an easier transition for local authorities in moving to the statutory scheme. It also reflects that the interim scheme has generally operated well.

3. Is there anything else that you feel should be included in the Bill?

*GCC Response:* No. It is recognised that the Bill will be underpinned by regulations and guidance.

4. Will the Bill and its provisions have a particular impact on equalities groups?

*GCC Response:* No particular impacts have been identified by the council.

**Administration of Welfare Funds**

5. Do you agree with the proposal that local authorities have the option to outsource the provision of the fund to a third party or jointly administer the fund across local authority boundaries? What are the benefits or drawbacks to this approach?

*GCC Response:* Yes, the council does agree that this option should be available. This will allow councils the flexibility to ensure that the programme funding can be managed as efficiently as possible.
Review of decisions and the SPSO

6. What are your views on the proposed internal local authority review process?

GCC Response: It is reasonable that the local authority has an opportunity to review a decision to ensure that the decision-maker has followed guidance and has had all information available to them in coming to the decision.

7. Do you agree that the SPSO is the appropriate body to conduct secondary reviews?

GCC Response: It is recognised that for fairness and transparency that the second tier review is undertaken by a body external to the council and the SPSO is seen as an appropriate body to undertake that activity.

Further provision - regulations

8. What are your views on the level of detail that will be contained within the regulations? Is there any aspect which you feel would benefit from being on the face of the Bill?

GCC Response: No. The council’s view is that the level of detail in the Bill is reasonable noting that there will be an opportunity to comment on the regulations also.

Financial Memorandum

9. Do you think that the costs attributed to the running of the fund and the set-up of the SPSO to administer secondary reviews are realistic and proportionate?

GCC Response: It is the council’s intention to respond separately to the request from the Finance Committee to comment on the Financial Memorandum. The main risk identified by the council is the uncertainty around the demand for grants in future years as some key welfare reforms have yet to be implemented in Glasgow eg. the move from Disability Living Allowance to Personal Independence Payment.

This would have implications for both the programme funding and administration funding.

Other provisions

10. Do you have any comments on any other provisions contained in the Bill that you wish to raise with the Committee?

GCC Response: Section 4 paragraph 1 appears by the use of the word ‘may’ to give discretion to Scottish Ministers whether or not to create regulations that would require local authorities to conduct review. Should this not be a requirement and instead of ‘may’ use the word ‘will’ or ‘shall’. This would then align with the detailed and prescriptive paragraphs 3 and 4.