Introduction

West Dunbartonshire Council (WDC) believes that the key aims of any reform should be improving outcomes and opportunities for people and communities. It is important to create positive outcomes so that any changes reshape, integrate and deliver better and personalised services to people who need them, in particular the most disadvantaged.

While Scotland will receive additional powers, these are likely to come with a reduction in funding. It would therefore require careful consideration as to how best Scotland might deliver services. A consideration which should be taken into account is how local these services should be delivered.

A general view from local authorities is likely to be that services should be delivered as close to the community as possible and that local authorities, may be best placed to deliver such services.

Whilst local delivery is desirable any additional role in delivery needs to be adequately resourced, particularly at a time when resources are becoming tighter. If adequate funding is not available (even if not delivered by local authorities) there is potential significant reputational damage to the Scottish Government and Councils (if they were involved). Another consequence could be a failure to deliver services in a personalised manner.

Personal Independence Payments, Disability Living Allowance, and Carer’s Allowance

These devolved powers only support people for the additional costs associated with living with a disability. They do not replace the loss of income people may have suffered through reductions in other aspects of welfare support, e.g. Employment and Support Allowance. The latter is not a devolved power and subject to UK Government policy including sanction and conditionality.

One option may be to align the delivery of these services with existing local authority benefits administration services, linking to employment support, benefits maximisation and local integrated health and care services. This would allow a person centred approach concentrating on what is important to the individual but at the same time also making improvements to their quality of life. The integrated health and care services could fulfil the role of undertaking health assessments, allowing tangible outcomes for
people to improve their quality of life based on their needs and an overall agreed personal outcome that would avoid multiple assessments by different agencies. There is also the added advantage of not using private companies to undertake this assessment. Councils have already successfully implemented the Scottish Welfare Fund and managed a significant increase in demand for Discretionary Housing Payments illustrating the ability to professionally manage such payments.

**Universal Credit (housing element and administrative arrangements) and Discretionary Housing Payments**

These are welcome adjustments to Universal Credit, however these are limited in scope and the main scheme and legislation is not a devolved power.

There is a concern about the inflexibility of the scheme and the ability to protect some of the most vulnerable in society. A particular concern is the Housing element being paid directly to a tenant instead of the landlords which may result in increased rent arrears and the threat of eviction. It is welcome that payments are paid direct to the landlord unless the tenant requests this.

The variation of frequency appears to be a welcome power, however given the way that the DWP will make these payments i.e. in arrears, this will not be in the best interest of the claimant. It is not something that professional officers think should be pursued at this time. If DWP change the way this is administered in the future, WDC would support such a change.

A key element of risk for Councils around Universal Credit relates to how services to homeless people are funded. Currently these are through Housing Benefit and there is currently a risk that UC will significantly reduce the funding available to support such people – at a cost to local authorities. This Universal Credit change was intended to reduce costs in the over-priced London market and if the Scottish Parliament can use any of its devolved powers to mitigate this financial risk this would be welcomed.

**The Work Programme and Choice**

These proposals are welcomed.
The Regulated Social Fund, new benefits, top ups and delivery of benefits overall

More information is needed to enable full comment. It is possible there could be integration with the Scottish welfare fund for weather fuel payment, cold weather payments, funeral payments and sure start maternity payments or perhaps other local authority services that may simplify how customers can access services. The impact of this could be an improved service providing support when they need it.

The administration costs of delivering the current welfare fund have not been fully met by the Scottish government. While we accept the possible integration with other delivery mechanism within the Council, WDC have severe reservations about taking on further administration costs in this area without confirmation of funding arrangement of the fund itself and associated administration costs.