WELFARE REFORM COMMITTEE
WELFARE FUNDS (SCOTLAND) BILL
SUBMISSION FROM WEST DUNBARTONSHIRE COUNCIL

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?

Yes

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?

Yes

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

No

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

None

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?

Yes, though we believe more in the option to jointly administer the fund across local authority boundaries. We feel that the scheme being jointly administered by another LA would work best and be more efficient if the administrative and policy approaches of Councils involved in the joint administration are consistent regarding eligibility, controls over payments, reviews, etc. Some of the likely benefits and drawbacks are listed below:

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<th>Benefits</th>
<th>Drawbacks</th>
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<td>☐ Could provide efficiencies in running costs</td>
<td>Each LA has access to information from the DWP CIS system. That combined with their own information reduces the information a customer requires to provide and improves the speed of the decision making. If this was carried out by third party/another LA, appropriate data sharing mechanisms would need to be put in place and agreed with the DWP. Should that not be possible it could create delays in the process.</td>
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<tr>
<td>Benefits</td>
<td>Drawbacks</td>
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<td>☐ Could provide consistency of administration – avoiding “post code lottery” issues if Councils could align policy in a single administrative approach</td>
<td>Re processing by a third party, there would need to be proper links in place around data sharing to avoid customers having to provide evidence of income/residence where they do not need to do this at present, thereby delaying decision making.</td>
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Review of decisions and the SPSO

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

No issues with this

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

Yes

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?

Happy with level of detail and do not believe it should be changed, the discretionary element of the scheme around decisions is key.

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?

For WDC we do not believe this model will deliver any savings as this has not been factored into our costs when working out our admin costs. Furthermore, WDC only had 3 reviews in 2013/14, so transferring responsibility elsewhere will not reduce our costs.

Other provisions

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

None

Arun Menon
Business Support Manager
West Dunbartonshire Council
28 July 2014