

CALL FOR EVIDENCE RESPONSE FORM

SOCIAL SECURITY COMMITTEE

SOCIAL SECURITY (SCOTLAND) BILL

SUBMISSION FROM *Royal Blind and Scottish War Blinded*

Control of a number of existing social security benefits is being passed from the UK Government to the Scottish Government. The Parliament would like your views on the Scottish Government's plans before they become law. The Social Security Bill is the proposed law.

1. The Bill aims to provide a framework for the creation of the Scottish social security system. In addition the Scottish Government has chosen to put most of the rules about the new benefits in Regulations. It believes that putting the rules in Regulations will make things clearer and less confusing. Parliament cannot change Regulations, only approve or reject them. The Scottish Government intends to develop Regulations with external help.

Q. Do you have any views on this approach?

The approaches seem sensible but there is a need to clarify who will provide the 'external help' that the Scottish Government say will help develop Regulations? (Consider input from a cross section of people including people with vision impairment, professional organisations and user groups, parents/carers, recipients of social security.)

2. The Bill proposes that the Scottish social security system will be based on the following seven principles:
 - Social security is an investment in the people of Scotland.
 - Social security is a human right. It is essential to accessing other human rights.
 - Respect for the dignity of individuals is at the heart of the Scottish social security system.
 - The Scottish Government has a role in making sure that people are given the social security assistance they are eligible for.
 - The Scottish social security system will be designed with the people of Scotland, and based on evidence.
 - The Scottish social security system should always be trying to improve. Any changes should put the needs of those who require social security first.
 - The Scottish social security system is efficient and delivers value for money.

Q. What are your views on these principles and this approach? Please explain the reason for your answer.

The Principles in the main are good, however clarity and transparency on 'eligibility' and the criteria used to decide this would be helpful. Clarify 'based on evidence' and explain/give examples of where the 'evidence' will come from.

Q. Are there other principles you would like to see included?

That the principles will be transparent and fair.

CALL FOR EVIDENCE RESPONSE FORM

3. The Bill proposes that there will be a publicly available social security 'charter'. This will say how the Scottish Government will put the seven principles above into practice. It will also say what is expected from people claiming benefits. A report on the charter will be produced by the Scottish Government each year.

Q. Do you agree with the idea of the charter? Please explain the reason for your answer.

Yes, however the Charter needs to be accessible to all, including those with vision impairment and be clear in its language. Also consider the accessibility of the Charter for those with Learning Disabilities. Consider whether the Charter is enforceable or just a statement of intent.

Q. Is there anything specific you would like to see in this charter?

No comment.

4. The Bill proposes rules for social security which say:
- how decisions are made and when they can be changed
 - how to apply and what information people have to provide
 - how decisions can be challenged
 - when overpayments must be repaid
 - what criminal offences will be created relating to benefits.

Q. Do you have any comments on these rules?

No comment.

5. The Scottish Government will take over responsibility for some current benefits. The Bill does not explain how they will work in detail. This will be set out in Regulations at a later date. The current benefits which will be run by the Scottish Government are:
- disability assistance (including disability living allowance, personal independence payment, attendance allowance and severe disablement allowance)
 - carer's allowance
 - winter fuel payments
 - industrial injuries disablement benefit
 - cold weather payments
 - funeral payments
 - sure start maternity grants

Q. What are your thoughts on the schedules in the bill in regard to these benefits?

Schedule appears to be reasonable as long as current benefits remain in place until an adequate replacement for these is made. Importance of a seamless transition so that no one in receipt of benefits falls through the net. It is important that the disabling effects of a visual impairment are taken into account whatever the cause and whether or not the sight impairment is present alongside other independence-limiting conditions.

CALL FOR EVIDENCE RESPONSE FORM

6. The Bill proposes that a new type of short-term assistance will be introduced. This will be for someone who is challenging a decision to stop or reduce a Scottish benefit.

Q. What are your views on this proposal?

The proposal may give rise to longer waiting times on decisions being made.

7. The Bill includes the power for the Scottish Government to be able to top up 'reserved' benefits (ones controlled by the UK Government), but does not say how these will be used. The Scottish Government also has the power to create new benefits. This is not included in the bill.

Q. Do you agree with these proposals?

Yes.

8. The Bill proposes that carer's allowance should be increased as soon as possible to the level of jobseeker's allowance (from £62.10 to £73.10 a week).

Q. What are your thoughts on this proposal?

Agree in principal with the proposal.

9. The Bill proposes that discretionary housing payments continue as they are. They will still be paid by local authorities. The Bill does not require any local authority to have a discretionary housing payments scheme but if they do, they must follow Scottish Government guidance on running it.

Q. Do you agree that discretionary housing payments should continue largely as they are?

No comment.

Q. Do you have any other views on the proposals for discretionary housing payments?

No comment.

10.Q. Is there anything else you want to tell us about this Bill?

The Bill should be fully accessible to all, be written in Plain English and be available in a variety of languages and formats, including Braille and Large Print.