

Social Security (Scotland) Act 2018

Scottish Government Progress Report 2018-2019

**Laid before the Scottish Parliament by the
Scottish Ministers under section 20(1)(a)
of the Social Security (Scotland) Act 2018
SG/2019/197**

September 2019



Scottish Government
Riaghaltas na h-Alba
gov.scot

Contents

Section Number	Title	Page No
	Foreword	
1	Purpose of the Report	1
2	Introduction	2
3	Performance of the System and Delivery of the Charter	3
4	Equality Assessment and Data	11
5	Right to appeal and amendment to process for determining entitlement	13

Foreword



After months of Parliamentary consideration and debate, the Social Security (Scotland) Bill was formally enacted on 1 June 2018. This gave the Scottish Government and Parliament the authority to make legislation and deliver the social security powers devolved by the Scotland Act 2016.

The Social Security (Scotland) Act 2018 enables the Scottish Government to establish a new social security system better targeted at Scotland with dignity, fairness and respect at the heart of everything we do.

This report provides a progress update from Royal Assent until the end of March 2019. Much has been done in that time but we are not complacent and recognise that much more remains to be done. Over the next few years, the Scottish Government and Parliament, working with Social Security Scotland, will be driving forwards plans for delivering new disability assistance, redesigning the application process and reforming the parts of the current system which cause the most stress, anxiety and pain.

I am grateful to stakeholders for the support and assistance they have provided in delivering our new benefits and look forward to working with them further over the coming years and months to create a new system, designed to better meet the needs of the people of Scotland.

A handwritten signature in black ink, appearing to read 'S Sille'.

SHIRLEY-ANNE SOMERVILLE

Cabinet Secretary for Social Security and Older People

Section 1 Purpose of Report

1. This report is published under Section 20 of the Social Security (Scotland) Act 2018 (the Act) which requires Scottish Ministers to report annually on the performance of the Scottish social security system. The social security system is defined in the Act as the system for giving assistance to individuals in accordance with Part 2 of the Act and regulations made under Part 3. Part 2 covers the type of assistance which would be paid by Scottish Ministers and the processes for determining entitlement from application to appeal.

2. Section 20 of the Act also sets out the requirements for the content of the report. It must include what has been done in the past year to meet the expectations on Scottish Ministers set out in the Charter. The report should also contain an assessment of how the Scottish social security system has affected the circumstances of people whose finances are affected by a person in the household having a protected characteristic listed in section 4 of the Equality Act 2010 (for example age, disability). The report is to be published and laid in Parliament as soon as practicable after the end of the financial year.

3. This report covers the period from Royal Assent (1 June 2018) to 31 March 2019. It also contains an update on delivery of duties in Part 1 of the Act, such as advocacy and the establishment of the Scottish Commission on Social Security. This reporting is not required by the Act but is being provided during the implementation period to give a fuller picture of progress in delivering the new Scottish social security powers. This reporting may not be required in the longer term and will be reviewed at the appropriate time.

4. Social Security Scotland, the Executive Agency responsible for delivering the Scottish social security system, has also published an annual report. That report contains more of the detail on the performance of the Scottish social security system and operational delivery including information on the payments made by it up to the end of March 2019. Social Security Scotland's annual report also includes its audited annual accounts and delivery of its Strategic Objectives. Both reports together provide a full picture of delivery of the system.

Section 2 Introduction

5. The Act creates the legal framework under which 9 types of social security assistance will be given to people by Scottish Ministers. These forms of assistance are:

- Carer's assistance
- Cold-spell heating assistance
- Winter heating assistance
- Disability assistance
- Early years assistance
- Employment-injury assistance
- Funeral expense assistance
- Housing assistance
- Short-term assistance.

6. Scottish Ministers are also given the power to make regulations establishing schemes to top-up social security assistance paid to people by the UK Government. The Act provides directly for Scottish Ministers to make the Carer's Allowance Supplement, a top-up to Carer's Allowance, which is paid by the UK Government.

7. The Act sets out key features of the Scottish social security system. These include:

- The definition of 8 Scottish social security principles as a foundation for the system;
- The creation of a Scottish social security charter, which sets out standards for the provision of social security in Scotland that are aligned with the Scottish social security principles;
- The establishment of a Scottish Commission on Social Security which, amongst other things, is to be involved in the scrutiny of legislation and report on the extent to which the expectations set out in the Charter are being fulfilled;
- Duties on Scottish Ministers to promote the take-up of Scottish social security;
- A requirement for Scottish Ministers to ensure that suitable advocacy support is available for those who, due to a disability, need that help to navigate the Scottish social security system; and
- A requirement for Scottish Ministers to report annually to the Scottish Parliament on the performance of the Scottish social security system.

8. Section 87 of the Act also requires Scottish Ministers to report on the number of individuals who had the right to appeal against a Scottish social security decision and the number of individuals who exercised that right to appeal. The report must include a plan setting out how appeals data will be collected. Scottish Ministers must also indicate whether they consider that the process to determine entitlement needs to be amended.

9. Going forward, the requirement for, as well as the format and content of both the Scottish Government and Social Security Scotland's annual reports will be reviewed to ensure that material is not duplicated whilst maintaining the reporting requirements of the Act.

Section 3 Performance of the System and Delivery of the Charter

10. This section provides an update on the Scottish Government's activity to deliver the requirements of the Social Security (Scotland) Act 2018. As identified earlier, this information should be considered alongside Social Security Scotland's annual report which sets out the parallel and complementary activity that the Agency has carried out to deliver the Scottish social security system. It covers the period from 1 June 2018 to 31 March 2019.

Duty to promote take-up

11. Sections 8 and 9 of the Act require Scottish Ministers to prepare, publish and lay before Parliament a strategy to promote the take-up of Scottish social security assistance. The strategy should also set out a best estimate of take-up at the time of its preparation and how Ministers will seek to improve this. The first strategy will be published by 21 October 2019, one year from the commencement of the relevant sections of the Act. A second strategy must be prepared within 3 years of the section coming into force (i.e. before 21 October 2021). Thereafter, a new strategy must be laid in Parliament within 5 years of the preceding one.

12. The strategy is to cover the devolved benefits which are being delivered at time of publication. The Act also requires that, when preparing the strategy, Scottish Ministers must consult individuals who have received assistance from the Scottish social security system and those who represent individuals whose household income or expenditure is affected as a result of having a protected characteristic under the Equality Act 2010.

13. The Scottish Government has been working both internally and with stakeholders to develop the first take-up strategy. Activity in the period to March 2019 has focussed on raising awareness and promoting take-up of the new Best Start Grant payments, the first benefits that Social Security Scotland is delivering. The Scottish Government has been working to ensure that information regarding the Best Start Grant reaches its targeted audience to encourage uptake. A co-ordinated communications plan is being implemented and work is taking place with NHS boards, local authorities and third sector organisations which support those who may be eligible for benefits to raise awareness and encourage applications. A range of resources have been made available to stakeholders, including guidance documents, leaflets, posters, model articles and social media content that can be copied or adapted across a range of their channels.

Inclusive communication and accessible information

14. Section 4 of the Act requires that Scottish Ministers must have regard to the importance of communicating in an inclusive way. Inclusive in this context means ensuring individuals who have difficulty with speech, language or otherwise can receive information and express themselves in ways that best meet their individual needs. Communication support, including language interpretation, translation, and transcription of information in over 100 languages, is in place for the delivery of Best Start Grant, Carer's Allowance Supplement and Funeral Support Payment. Beyond this, Social Security Scotland is leading on the development of an Inclusive

Communications strategy. A Stakeholder Reference Group comprising representatives of 21 third sector organisations is being set up to help inform how that strategy will be embedded into all aspects of public engagement.

15. Section 5 of the Act requires that Scottish Ministers must have regard to the importance of providing information in a way that is accessible for individuals who have a sensory, physical or mental disability. Information for the first benefits to be delivered is available to clients in alternative formats, including braille, large print, audio channels and easy read. British Sign Language (BSL) users can contact the Agency through the Contact Scotland¹ provision for public sector bodies, ensuring they are able to access the social security system. Contact Scotland is a Scottish Government service that connects deaf BSL users across the country through an online BSL interpreting video relay service with all of Scotland's public authorities and voluntary organisations.

16. However, it is recognised that there are limitations in the current Contact Scotland provision to support future benefit delivery. The Scottish Government are therefore currently preparing a business case to procure a service tailored to communication support for deaf and hearing impaired Social Security Scotland clients. Work is also ongoing to develop a range of contact channels, offering greater choice of how clients can engage with the Agency, as well as introducing a standard for the physical accessibility of Social Security Scotland locations for face to face engagement.

Advocacy

17. Section 10 of the Act requires Scottish Ministers to make independent advocacy support available to disabled people who, as a result of their disability, require such support to claim Scottish social security benefits. Section 11 of the Act requires Scottish Ministers to prepare and publish advocacy service standards which services providing social security advocacy support on behalf of Scottish Ministers must comply with.

18. The Scottish Government developed a set of draft advocacy standards which were drawn from existing standards, including those developed by the Scottish Independent Advocacy Alliance (SIAA)², the Action for Advocacy's '*Code of Practice for Advocates*'³, the Scottish Government's '*Independent Advocacy: Guide for Commissioners*'⁴, and draft standards for Children's Hearing advocacy. The draft standards were shared with SIAA for initial consideration and some revisions were then made. These revised standards were subsequently used a basis for early engagement with service users and providers. Sessions were held during November 2018 in Aberdeen, Inverness, Dumfries, Glasgow and Edinburgh. Focus group sessions with members of the Experience Panels were held during late February and early March 2019, where attendees were asked to comment on the draft standards.

¹ <https://contactscotland-bsl.org/>

² <https://www.siaa.org.uk/publications/>

³ <https://qualityadvocacy.org.uk/wp-content/uploads/2018/05/Code-of-Practice-1.pdf>

⁴ <https://www.gov.scot/publications/independent-advocacy-guide-commissioners/>

19. A short-life working group of organisations with an interest in advocacy support, many of which had been involved in developing the provision in the Act, was established in December 2018 to review the feedback from the workshops and to make suggestions on improving the draft standards. During the period to March 2019, the group met 3 times and discussed revisions to the standards. Draft standards, as agreed by the group, will be subject to formal consultation in summer 2019 before being finalised.

20. The Scottish Government is considering the options for a procurement exercise around tendering for the provision of advocacy support. The intention is to undertake the procurement over the autumn, with a contract awarded before the end of the calendar year. This will allow the service to be in place around summer 2020, in time for the delivery of the first devolved disability benefits.

Scottish Commission on Social Security

21. The Scottish Commission on Social Security (SCoSS) was established under Section 21 of the Act as a body independent of both Scottish Ministers and the Scottish Parliament. Its functions and operation are specified within the Act. The SCoSS's primary role is to provide independent and expert scrutiny of the Scottish social security system, including proposals for regulations for types of assistance. The SCoSS has been established as an Advisory Non-Departmental Public Body, supported by a Secretariat supplied by the Scottish Government.

22. The key sections of the Act came into force on 21 January 2019, establishing the body as a legal entity, with the Chair and Members taking up their appointments from 23 January 2019. Appointments were made by Scottish Ministers following a public appointments process regulated by the Commissioner for Ethical Standards in Public Life in Scotland. As part of this process, a selection panel was convened to carry out a 'fit and proper person' test on all individuals who applied, which included ensuring that every potential candidate understood the social security principles of dignity, fairness and respect.

23. The SCoSS wrote to both the Scottish Parliament and Scottish Ministers on 8 February 2019 to say that it was 'open for business' and ready to start carrying out its functions. The first regulations to be scrutinised by the body will be those for the Young Carer Grant.

Charter and Measurement

24. Section 1 of the Act, which set out the 8 Scottish social security principles, came into force on 22 October 2018. The Act also required Scottish Ministers to prepare a charter to reflect these principles. The charter was unanimously approved by Parliament on 6 February 2019.

25. A core group of people with lived experience of the existing social security system was established to co-produce the charter. The group was made up of people with a wide variety of experiences and perspectives. Most were disabled people with a range of different health conditions, many had experience of several benefits. The group was balanced for gender and geographical location

26. The core group worked on the development and presentation of the charter content, drafting and redrafting, with advice from stakeholders including Inclusion Scotland, Scottish Human Rights Commission Scottish public Services Ombudsman and government officials. The work was carried across seven full day workshops. For a full report on the role of the core group see Developing the Scottish Social Security Charter; co-design in action⁵.

27. In order to ensure wider participation in the development of the charter beyond the core group, the Scottish Government also engaged with people through additional focus groups and individual interviews. The groups represented in this work were:

- Minority ethnic women;
- Young carers under the age of 25;
- People with experience of the asylum process;
- LGBTI people;
- Island dwellers;
- Women who have experienced domestic violence;
- People with experience of terminal illness; and
- Parents.

28. A survey of all 2,400 Experience Panel members was also carried out to ensure that other voices were heard and that as many different experiences and needs were represented.

29. A stakeholder group consisting of 27 organisations was convened to provide feedback and advice to the core group. This included groups working with or representing people whose household income is lower because a member of the household has one or more protected characteristics.

30. A measurement framework is currently being developed with a new core group of people with lived experience of social security systems (Core Group 2) and will be published in the autumn. The framework will show how the Scottish Ministers will measure and report on the progress towards achieving the commitments in the charter. Work will then begin to collect bespoke information to populate the framework and a report including the results will be published annually starting late 2020.

Carer's Allowance and Carer's Allowance Supplement

31. In October 2015, the First Minister committed to increasing the level of Carer's Allowance (CA) to that of Jobseeker's Allowance (JSA), in recognition of the important role that carer's play and their immense contribution to our society. The Act provides the mechanism to deliver this increase through Carer's Allowance

⁵ <https://www.gov.scot/binaries/content/documents/govscot/publications/research-and-analysis/2019/01/developing-scottish-social-security-charter-co-design-action/documents/writing-scottish-social-security-charter-co-design-action/writing-scottish-social-security-charter-co-design-action/govscot%3Adocument/00544865.pdf>

Supplement (CAS), an additional payment made twice a year to Carer's Allowance recipients in Scotland, initially as a lump sum of the weekly difference between CA and JSA. CAS is paid automatically to carers who are living in Scotland and receiving CA on the relevant qualifying date. There are two qualifying dates each financial year – one for each payment.

32. Since September 2018, Social Security Scotland made 157,670 Carers Allowance Supplement payments to 86,305 carers who were eligible in either or both of the eligibility dates in 2018. Each payment was £221, giving a total expenditure of £34.8 million. Further statistics relating to Carer's Allowance at February 2019 and Carer's Allowance Supplement April 2019 eligibility will be released in August 2019.

Best Start Grant

33. The first replacement benefit to be paid by the Scottish Government was the Best Start Grant (referred to as Early Years Assistance in legislation) Pregnancy and Baby Payment, which opened for applications in December 2018. The Pregnancy and Baby Payment replaced and expanded on the UK Government's Sure Start Maternity Grant by:

- Providing eligible families with £600 on the birth of their first child and £300 on the birth of any subsequent children;
- Not putting a limit on the number of children that are supported; and
- Extending the application window from 24 weeks pregnant to 6 months after the birth, giving clients longer to apply.

34. Around 11,505 families received the Pregnancy and Baby Payment from 10 December 2018 to 31 March 2019. Two further Best Start Grant payments – Early Learning and School Age – will be introduced by the end of June 2019. The Best Start Grant Early Learning Payment will be a new £250 payment to help with the costs of early learning when a child is between 2 and 3½ years old. The Best Start Grant School Age Payment will be a new £250 payment to help with the costs of preparing for school around the time a child might start Primary 1.

Young Carer Grant

35. The Scottish Government ran a consultation from 17 September to 10 December 2018 about proposals to introduce a new Young Carer Grant. This would be an additional payment of £300 to young carers aged 16 to 18 who do at least 16 hours of caring a week, but do not qualify for Carer's Allowance. It will help to improve young carers' quality of life, assisting them to take part in employment, social or leisure opportunities. The analysis of responses will be published later this year. Regulations for the new grant are being drafted and will be subject to scrutiny by the Scottish Commission on Social Security before being laid in the Scottish Parliament for parliamentary consideration. The Scottish Government aims to start paying Young Carer Grant from autumn 2019.

Job Grant

36. A consultation on a new Job Grant was launched on 16 January, running until 9 April 2019. The Job Grant is not provided for by the Social Security (Scotland) Act 2018. Instead, an Order under section 63 of the Scotland Act 1998 will give the Scottish Government further powers to arrange assistance under section 2 of the Employment and Training Act 1973. This Order needs to be agreed with the UK Government and will set the limits within which Job Grant can be provided. Work to agree its contents is underway. The consultation set out the Scottish Government's proposals for a cash payment to support young people with the costs associated with transitioning back into work after a period of time out of paid employment, and asks questions about the key eligibility criteria and the payment format of the Job Grant (including any unintended consequences and potential impacts). The responses to the consultation will be analysed and the Scottish Government's response will be published in due course.

Funeral Support Payment

37. From May to August 2018 the Scottish Government ran a consultation on the Funeral Expense Assistance Regulations to gather views and identify any gaps, issues or unintended consequences with the draft legislation. An independent analysis of consultation responses was published in November 2018.

38. When the payment launches in Scotland in summer 2019, the aim is to process applications within 10 working days of receipt of a completed application including the required evidence. Payments would be made as soon as practicably thereafter. It will be a one-off payment to support people on low income benefits with a contribution towards funeral costs, replacing the DWP Funeral Expenses Payment in Scotland.

39. Funeral Expense Assistance regulations were laid in Parliament on 18 January 2019. The response to the consultation and the impact assessments for regulations were also published on this date. Although in practice, the new payment will be known as Funeral Support Payment, the benefit will continue to be referred to in legislation as Funeral Expense Assistance, consistent with the Social Security (Scotland) Act 2018.

Disability Assistance

40. The Scottish Government has undertaken user-centred design for Disability Assistance, utilising feedback from people with lived experience to support the development process. Research phases for each form of Disability Assistance were carried out in 2018, including significant user-research into the experiences of people in receipt of DLA, PIP and AA, and this research will continue to influence the design of disability benefits.

41. The Scottish Government launched a consultation on 5 March 2019, running until 28 May. This set out policy proposals relating to the three forms of Disability Assistance that will replace Disability Living Allowance for Children (DLAC), Personal Independence Payments (PIP) and Attendance Allowance (AA). The analysis of

consultation responses will be published in the autumn and the Scottish Government will publish a report shortly after that sets out its response to feedback on the policy proposals described in the consultation document.

42. Respondent feedback from this consultation, along with feedback from user research, the Experience Panels and the Disability and Carer Benefits Expert Advisory Group, will support the drafting of regulations for each form of Disability Assistance. This commitment to genuine engagement with disabled people, their families and stakeholders will ensure that Disability Assistance in Scotland better meets the needs of the people it is designed to support.

Uprating

43. In order to deliver Carer's Allowance Supplement as quickly as possible, the Scottish Government entered into an Agency Agreement with the Department for Work and Pensions to deliver Carer's Allowance to recipients in Scotland on behalf of the Scottish Ministers in the short term.

44. The Agency Agreement commits the Scottish Ministers to annually uprate Carer's Allowance at the same rate as applied by the Department for Work and Pensions. Uprating of Carer's Allowance was through a Carer's Allowance Order and regulations considered by the Scottish Parliament under powers conferred under UK legislation.

45. The Carer's Allowance Supplement was uprated as required under section 81 of the Social Security (Scotland) Act 2018 and through a published statement to the Scottish Parliament as a letter to the Social Security Committee⁶.

46. Carer's Allowance and Carer's Allowance Supplement were uprated by the September 2018 Consumer Price Index (CPI) of 2.4% from April 2019.

47. In February 2019, Scottish Ministers gave a commitment that the Scottish Government would keep alternative methods of uprating under review and would engage with the Scottish Parliament and the SCoSS in the consideration of the uprating measures that may be applied by Scottish Ministers. A comprehensive report, including analytical evidence, will be provided to the Committee and the SCoSS in autumn 2019.

48. Sections 77 and 78 of the Act, which place a duty to uprate certain benefits on Scottish Ministers (including a duty to consider the effects of inflation), will be commenced later in 2019. There will be a duty to consider the effects of inflation on all devolved benefits that are being delivered at that time and to report to the Scottish Parliament on what the Scottish Ministers intend to do as a result of the changes to inflation. There will be a duty to uprate Funeral Support Payment and Young Carer Grant for the 2020/21 financial year. CA and CAS will also require to be uprated following a similar process to the 2019/20 uprate.

⁶https://www.parliament.scot/S5_Social_Security/General%20Documents/20181212CabSecCarersAllowance.pdf

Offences and Investigations

49. The Scottish Government consulted on the content of the draft Code of Practice for Investigations and the information gathering powers contained within the proposed Investigation of Offences Regulations between 6 August and 29 October 2018. As a result of the responses to the consultation, the Scottish Government is engaging with stakeholders to address the concerns raised. The Scottish Government intends to lay revised regulations in the Scottish Parliament in the autumn of 2019.

50. In the interim period and to allow Social Security Scotland to undertake investigations using existing powers, the Scottish Government aims to publish a Non-Statutory Code of Practice in summer 2019. This will allow people to understand the standards Social Security Scotland should meet when undertaking fraud investigations and what people should expect if they are under investigation. When a final draft of the Investigation of Offences Regulations has been approved by the Scottish Parliament, a final Code of Practice explaining how the powers of investigation given by the regulations will be used will be laid in the Scottish Parliament in line with the duties laid out in section 76 of the Social Security (Scotland) Act 2018.

Section 4 Equality Assessment and Data

51. The Act specifies that the annual report should contain an assessment of how the Scottish social security system has affected the circumstances of people whose finances are affected by a person in the household having a protected characteristic listed in section 4 of the Equality Act 2010 (for example age, disability).

52. The assessment of the impact on those with protected characteristics is necessarily partial given only BSG has been paid in the period of the report. There are two types of effect – one is the direct impact of the benefit experienced by a recipient, secondly, the extent to which that impact is more or less likely to be experienced by those with protected characteristics.

53. The Scottish Government are able to identify those instances, where having a protected characteristic will directly impact on financial circumstances (e.g. the cost of disability or pregnancy). Other impacts are more indirect (e.g. discrimination affecting access to employment), and are more difficult to quantify or assess the role benefits play in counteracting them.

54. The Best Start Grant Pregnancy and Baby Payment is a direct grant to households where there is someone who is, or has recently been pregnant, which is one of the protected characteristics. 11,505 families received the payment before 31 March 2019, and their household finances were increased accordingly. 26 per cent received the £600 payment for a first birth, and 74 per cent the £300 for a subsequent birth⁷. 63 per cent of applications were from those under 30⁸. Further information is being gathered from the optional equalities monitoring questionnaire that accompanies the application process and it is hoped that it will provide further insight into who applies for Best Start Grant.

55. With respect to Carer's Allowance Supplement, it is not possible from current data to say what the relationship is between the carer and the person who receives care. However, it is likely that a proportion of recipients will be providing care to a member of their household who must be a person in receipt of a specified disability benefit. In those circumstances, the additional support provided in 2018/19 – up to £442, through two payments of £221 – was a contribution to the carer's income which may have had an impact on the household overall.

56. Women are disproportionately represented in the client group for Carer's Allowance Supplement, being 69 per cent of the client group for Carer's Allowance. In addition, 45 per cent of claimants for Carer's Allowance are aged over 50⁹.

55. Further insight into Social Security Scotland's client base may be gained through a forthcoming all-client survey that will ask clients about their experiences and protected characteristics on an annual basis. In addition, qualitative research will be undertaken with clients to gather insights into the impact they believe the benefit had on their quality of life, supporting an evaluation of the impact of the devolved benefits. Evaluations for Carer's Allowance Supplement and Best Start Grant (interim) will be published during 2020.

⁷ [Social Security Scotland Analytical Performance Report for the financial year 2018-19](#)

⁸ [Best Start Grant: high level statistics to 28 February 2019](#)

⁹ [Carer's Allowance at February 2019](#)

Section 5 Right to appeal and amendment to process for determining entitlement

56. Sections 46 to 49 and sections 61 of the Act provide for the right to appeal to the First-tier Tribunal (FtT), including a right to appeal against certain process decisions by Scottish Ministers. An individual may appeal to the FtT having first sought a redetermination of the initial decision. The Social Security Chamber of the FtT for Scotland came into being on 22 November 2018 to hear appeals against determinations made by Social Security Scotland. The Tribunal is administered by the Scottish Courts and Tribunal Services, which is independent of the Scottish Government. The new chamber became operational on 10 December 2018 and currently hears appeals in relation to Best Start Grant entitlement. It will increase in size and capacity as more benefits are delivered by Social Security Scotland.

57. Section 87 of the Act requires Scottish Ministers to report on the number of individuals who had the right to appeal and the number who took up this right. Social Security Scotland's annual report sets out the data on redeterminations and appeals, but during the reporting period around five appeals were received but no hearings took place.

58. Scottish Ministers must indicate, as part of this report, whether it is appropriate to amend the process for determining entitlement. Given the volume of appeals is low and there is no clear indication of issues around the application and determination process Scottish Ministers do not consider that there is any need for change at this time.

59. Appeals data will be kept under review and, as required, Scottish Ministers will report annually on whether the determination process needs to be amended.



Scottish Government
Riaghaltas na h-Alba
gov.scot

© Crown copyright 2019

OGL

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3 or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk.

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at www.gov.scot

Any enquiries regarding this publication should be sent to us at

The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

ISBN: 978-1-83960-202-3 (web only)

Published by The Scottish Government, September 2019

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS641302 (09/19)

W W W . g o v . s c o t