Independent scrutiny in social security


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Membership of the Disability and Carers Benefit Expert Advisory Group Workstream on Scrutiny
The social security system is changing with devolution of disability and ill health-related benefits, support for carers and a range of other payments. There is a public interest in ensuring that the Scottish Government translates its policy intentions into workable legislation and that this is done in a timely, accurate way. The assurance that comes with independent scrutiny, to complement parliamentary scrutiny, is one element of this. The Scotland Act 2016 rules out a role in Scottish social security matters for existing UK scrutiny and advisory bodies (the Social Security Advisory Committee and the Industrial Injuries Advisory Council). Consultation on the Social Security (Scotland) Bill asked for views on how scrutiny should be undertaken to address this gap. Responses were published in February 2017.

The Social Security Minister has asked the Disability and Carers Benefits Expert Advisory Group to take a closer look at the scrutiny question. We established a short-life workstream, led by Judith Paterson. Working over the autumn, workstream members have met three times, including a stakeholder event in Glasgow, to grapple with key issues: scrutiny of regulations, treatment of employment injury assistance (currently industrial injuries), oversight of how the Scottish system is faring against the principles in the Bill and standards to be set out in the Charter, and how arrangements should relate to the Scottish Parliament and to existing UK bodies.

This report sets out our findings and recommendations to the Minister. We present this report to help inform the Scottish Government’s thinking and the Scottish Parliament’s deliberations on Stage Two of the Bill in the New Year.

I would like to thank Judith Paterson for leading the process with great skill and energy against a tight timescale; workstream and advisory group members for their valuable insights; Parliamentary Committee members and public bodies consulted; and Nicola Radley for steering the workstream with patience and meticulous attention to detail, ensuring the report was completed on time.

Jim McCormick
Chair
Role, purpose and principles of scrutiny

The purpose of scrutiny is to play its part in improving outcomes for people from the social security system.

Scrutiny of the social security system will play an important role in providing independent assurance of how the Scottish Government translates policy into workable legislation and delivers social security assistance to people. Scrutiny will play a unique role in driving learning and improvement in the system leading to better outcomes for people.

Key characteristics of a scrutiny body

- Appropriate expertise and experience including in social security law and practice
- Able to draw on wider experience eg through Experience Panels
- Scientific expertise for employment injury assistance matters
- Ability to recognise unintended consequences of policy across a variety of sectors
- Impartial
- Not politically aligned
- Genuinely independent
- Transparent and open
- Proportionate in its nature and scope to the scrutiny requirement
Scrutiny of social security regulations

The questions we asked
Who should undertake scrutiny of secondary legislation in Scotland?
What should be the role of a scrutiny body?

Who we consulted
Attendees at workshop; Social Security Committee; Delegated Powers and Law Reform Committee; Reference groups.

What evidence we looked at
DPLR Committee Social Security (Scotland) Bill at Stage 1 report (31/10/17, SP Paper 214); SSAC triennial review and annual reports; IIAC triennial review and annual reports; Crerar review, September 2007.

What people said to us
Independent, expert scrutiny of regulations is necessary.
Guaranteeing independence through statute is necessary for the credibility of a scrutiny body – but not sufficient. Early tasks will be identifying key external stakeholders and relationship building, and developing a robust organisational culture of independence.
The resource committed to scrutiny should be proportionate to its role and functions.

With the first wave of assistance due to be delivered by summer 2019, there is a concern about how to set up a scrutiny body quickly enough. A suggestion is to have an interim group to support the shaping of permanent scrutiny arrangements while having a membership sufficiently experienced and diverse to also provide advice on regulations at an early stage.

Comments
There is demonstrable value in having statutory scrutiny in the UK system.
The UK’s Social Security Advisory Committee (SSAC) is an advisory non-departmental public body (NDPB). SSAC has an effective and positive working relationship with DWP while remaining a widely trusted independent body.

SSAC’s role is to provide advice to the UK Secretary of State for Work and Pensions on benefits that remain reserved to Westminster. It is not permitted to advise Scottish Ministers on devolved benefits and Scottish Ministers cannot refer regulations to SSAC.

In the Scottish context, with a framework statute leaving much to regulation, there is a greater need for scrutiny of regulations.

A scrutiny body’s primary role should be advising government on social security regulations at the drafting stage to provide assurance to Ministers and to Parliament.

At UK level, there are exceptions to statutory scrutiny eg, within 6 months of primary legislation or for reasons of urgency.

On timing, the Scottish Government anticipates a higher volume of regulations for scrutiny in the next few years with the first sets of regulations for each form of assistance. As the social security system matures, there are likely to be fewer – estimated four a year.

Good equality impact analysis of measures is essential to effective scrutiny.
## Recommendations/ advice

**There is a need for a body to undertake independent, expert scrutiny.**

Setting it up as an advisory non-departmental public body (NDPB), we consider, would align the scrutiny function with the most appropriate lines of accountability.

It should be set up in statute. Duties (on the scrutiny body and on Scottish Ministers) and powers to scrutinise subordinate legislation should be in statute.

There should be no exceptions to Scottish social security regulations that are within scope for scrutiny.

In particular, there should be no ‘urgency’ provision that bypasses proper scrutiny. We would expect a scrutiny body and the wider system to have sufficient flexibility to provide proper scrutiny in a timely manner.

Furthermore, regulations laid within six months of primary legislation should be within scope of formal scrutiny. We recognise that this presents challenges for government in the coming year. Making the necessary appointments to a scrutiny body and setting up governance arrangements takes time. Swift action should be taken to put these arrangements in place. However, acting at the earliest opportunity will still mean a gap in the first months of the Social Security (Scotland) Bill being enacted.

Consideration is required of how to bridge the gap. This may take the form of an interim body tasked with scrutinising the first wave of regulations and with advising on permanent scrutiny arrangements.

The resource committed should be proportionate to the task, but with the caveat that membership needs to be wide enough to bring the right expertise.

Relationship building, across Parliament and with stakeholders, will be a key early and ongoing task to ensure wide trust and effectiveness.

Governance arrangements should provide for a robust level of independence to ensure public confidence.
Scrutiny of employment injury assistance regulations

The questions we asked
Are there separate considerations for scrutiny of employment injury regulations?

Who we consulted
Industrial Injuries Advisory Council (IIAC); Industrial Injuries Disablement Benefit Reference Group; Attendees at workshop.

What evidence we looked at
Hugh Robertson, IIAC member, evidence to Social Security Committee, session 5/10/17; IIAC annual reports and triennial review.

What people said to us
There is a risk of duplication between UK IIAC and an equivalent Scottish body, with both bodies drawing on the same evidence and either coming to the same or contradictory conclusions.

The priority for government is a safe and secure transition meaning no radical system change at the outset. This suggests in the short term that the Scottish Government could rely on published IIAC reports.

Advice and scrutiny of regulations is necessary but setting up a separate advisory body for Scotland will cost money.

In whatever way scrutiny is configured in Scotland, it is still important to avoid unnecessary duplication with IIAC eg of research. Beyond the short term, a Scottish scrutiny body could operate with a Memorandum of Understanding with UK IIAC.

There could be a separation of roles – scrutiny of regulations on the one hand and advice and recommendations on prescribed diseases on the other.

There is no need for a separate scrutiny body for regulations. All can be undertaken by one scrutiny body.

A separate body could analyse medical/scientific findings and provide advice on industrial diseases for government. Their role could be extended to include prevention and risk assessment, distinguishing it from UK IIAC.

There could be shared membership between the scrutiny body and the separate advisory body.

IIAC has commissioned ad hoc research but does not advocate this as necessarily the best model to produce reports that are well tailored to requirements.

Comments
IIAC’s role is different from SSAC’s. IIAC advises on whether conditions are satisfied for prescribing a disease in relation to an occupation, and thus whether it should be a disease for which benefit is available. Without such advice, there is a constraint to changing rules in Scotland.

There is evidence of the undesirability of two bodies assessing the same scientific evidence and arriving at different conclusions. This suggests it may be unwise to set up a separate body for Scotland tasked with considering the same evidence while operating essentially the same system.

An assessment of risk in relying on IIAC reports in the short term would be valuable eg asking whether having to wait for published material would obstruct timely policy development in Scotland.
The constitution of a group competent to give expert advice in this field depends on what the scheme will be. But it is likely to require similar scientific expertise to IIAC, which is distinct from expertise required for other social security provisions.

The Independent Medical Expert Group which advises the MoD on medical and scientific aspects of the Armed Forces Compensation Scheme is a potential model for a separate technical advisory body.

Whereas ad hoc commissioning has the advantage of flexibility, assuming that there is a pool of experts from which such work can be commissioned, a standing body is more likely to develop valuable expertise.

### Recommendations/ advice

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<th><strong>The role of scrutiny of regulations and that of expert advice based on scientific and medical research should be separated.</strong></th>
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<tr>
<td>We are not persuaded there is a need for a separate scrutiny body for employment injury assistance regulations. Indeed there is value in these regulations being scrutinised by the same body that scrutinises all other Scottish social security regulations. We therefore recommend that one scrutiny body has a statutory duty to scrutinise all social security regulations.</td>
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<td>For scientific advice, in the first instance, the Scottish Government could rely on IIAC’s published reports. We recommend exploring with IIAC informal good working relationships to optimise information sharing, given there can be no formal advice-giving to Scottish Ministers.</td>
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<tr>
<td>As policy in Scotland on employment injury assistance diverges from that in the rest of the UK, there will be a need for independent medical and scientific advice beyond that available from IIAC. Options include commissioning ad hoc reports, or setting up a panel of experts.</td>
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The resource committed should be proportionate.
General advisory role – provide advice in response to specific request or on own initiative

The questions we asked
Should a scrutiny body have a general advisory role in addition to its primary role of scrutinising regulations?

Who we consulted
Attendees at workshop.

What evidence we looked at
SSAC triennial review and annual reports; IIAC triennial review and annual reports.

What people said to us
There are other opportunities to provide expert advice beyond statutory scrutiny of regulations, for example, advice on guidance, or on the system more widely.

Comments
SSAC provides advice to the Secretary of State for Work and Pensions and by extension to the UK Parliament. SSAC has an independent work programme through which it produces reports and offers advice on areas it considers are important and in which the committee can add value. The Secretary of State can seek advice from the Committee. Duties, powers and constitution of SSAC are assigned through the Social Security Administration Act 1992 sections 170 and 172 to 174 and Schedule 6 and Part 1 of Schedule 7.

To be effective, a scrutiny body must be independent. There should be clear duties set out for the scrutiny body. In deciding what areas of risk or improvement should be considered, an independent body may take account of a range of inputs and views but should be free to reach its own conclusions.

Ministers should certainly be able to request advice but should avoid commissioning it as a requirement.

Recommendations/advice

Beyond its statutory role in scrutinising regulations, a scrutiny body should also perform a general advisory role to Scottish Ministers and by extension to Parliament. How this responsibility is framed should emphasise the independence of the scrutiny body and also be mindful of the resource available.
Scrutiny of guidance

The questions we asked
Should a scrutiny body have a formal duty to consider draft guidance?

Who we consulted
Attendees at workshop; Delegated Powers and Law Reform Committee.

What evidence we looked at
SSAC annual report 2016/17 (section on guidance); DPLR Committee Social Security (Scotland) Bill at Stage 1 report: noted rules on discretionary housing payments are entirely framed through guidance.

What people said to us
Producing guidance often comes late in the process of developing and operationalising policy. It should be considered earlier. Including guidance in a formal scrutiny process could bring more focus on the user experience and user testing at an earlier stage.

There is a lot of guidance, beyond the capacity of any body to scrutinise effectively. An option may be to consider scrutiny of the process rather than content of guidance – eg was it tested appropriately, is there enough guidance in place. There could also be a role for considering whether guidance once in operation is working effectively.

Comments
Scrutiny of guidance is not formally undertaken by SSAC.

The changing nature of social security legislation means far more discretionary decision making is in guidance. Formally including this would update the UK scrutiny model.

Some rules are entirely or mostly provided for in guidance not regulations – eg discretionary housing payments, Scottish Welfare Fund, overpayment recovery. These are as important as regulations and so the same scrutiny would support effective development – eg in relation to unintended consequences, impacts, policy delivery – and would provide assurance.

Recommendations/ advice

We are persuaded of the need for some proportionate scrutiny of guidance. We recommend that a scrutiny body should have a formal role in considering guidance.

In determining which guidance should be subject to scrutiny, consideration should be given both to the capacity of the scrutiny body to undertake the task effectively, and the extent to which rules are provided for in guidance rather than in regulation. For example scrutiny of overpayment recovery guidance could be in scope.

Consideration of effective operation of guidance could also form part of any thematic advice to government.

This should complement consultation on guidance the Scottish Government undertakes with individuals and stakeholders.
Scrutiny of UK/Scotland systems interactions and overlap

The questions we asked
Is there a need for scrutiny of interactions between the UK and Scottish social security systems?
Which option best fits the need?

Who we consulted
Professor Grainne McKeever; Workshop attendees; Social Security Committee.

What evidence we looked at

What people said to us
There is a need. For example, eligibility for Best Start Grant and Funeral Payment in Scotland depends on universal credit (UC) entitlement. UC is a UK benefit. So changes to UC entitlement (scrutinised by SSAC) affect eligibility for Best Start Grant and Funeral Payment. There are currently no structures in place to scrutinise the impact of changes to UC on these payments in Scotland and the people who will get them.

The need for scrutiny of regulations across the UK and Scotland systems is significant in the short term as benefits transfer to Scotland.

Longer term, as benefits diverge, there will be a continued need to ensure a good alignment of systems for individuals.

All three options (as set out in the paper by Professor McKeever – see below) had merit, and there were trade-offs between flexibility, clarity and influence with governments.

The MoU option was a flexible model but difficult to implement in the context of a formal duty having been ruled out. Having overlapping membership risked those members carrying too much weight.

Pragmatically, setting up informal good relationships may be the most effective solution in the short term. This could be set up more quickly than a formal relationship. As a way of working, with active support of both bodies, it may also result in a better quality output than a model which may not command the full support of all parties.

It could be reviewed with the option of formalising aspects of the relationship over time which may involve incorporating elements of each of the three options.

Comments
With SSAC providing scrutiny of UK benefits but not those devolved to Scotland, there is a gap in scrutiny of the way in which devolved benefits interact with social security in the rest of the UK.

Co-operation between governments and Parliaments exists eg, through the Joint Ministerial Committee on Welfare, and through UK and Scottish Parliamentary Committees meeting together.

There remains a need for independent, expert scrutiny and advice on interactions between systems which can be drawn upon by joint government and parliamentary groups.
Options set out by Professor McKeever include:

- Memorandum of Understanding between Scottish scrutiny body and SSAC/IIAC to jointly provide UK-wide advice to the Scottish Government and to DWP
- overlapping members - ex officio membership positions being created on SSAC/IIAC and Scottish scrutiny body
- informal good relationships – eg, information sharing via visits, presentations, good chair-to-chair relationships

While the Scottish Government is ruled out from asking advice from SSAC, parliament is not.

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<th>Recommendations/ advice</th>
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<tr>
<td>There is a need for independent, expert scrutiny of the interactions between Scottish and UK social security systems.</td>
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<td>The need exists now, with aspects of UC already shared between the Scottish and UK governments, and will grow as benefits begin to transfer to Scotland.</td>
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<td>We think this would be best achieved in the medium term by the establishment of good informal working relationships between SSAC and IIAC and a Scottish scrutiny body. This should aim to optimise information sharing and co-operation with a view to supporting each scrutiny body to better inform joint government and parliamentary groups, and respective governments of interactions between UK and Scottish systems.</td>
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<td>This should be reviewed after three years of operation, and options for formalising the relationship explored afresh, in the light of experience and the current context.</td>
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Oversight of standards and of aims set out in the Charter

**The questions we asked**

What kind of oversight of Scottish social security performance and decision making standards should there be, including in relation to the focused aims to be set out in the Charter?

Could the role of existing bodies be expanded to fulfil this role?

What should the Charter say about oversight of the social security system?

**Who we consulted**

Audit Scotland; Scottish Public Sector Ombudsman; Social Security Committee; Attendees at workshop.

**What evidence we looked at**

Scottish Public Sector Ombudsman annual report; Northern Ireland Social Security Standards Committee reports; Former GB statutory oversight bodies (decision making standards committee, administrative justice and tribunals council) reports; Social Security (Scotland) Bill and accompanying documents; Social Security in Scotland: the scrutiny landscape, Scottish Government Social Security Directorate, November 2017; Crerar review.

**What people said to us**

There is a need for assurance of quality and consistency in decision making and other aspects of performance.

People’s experience of the benefits system will span both UK and Scottish benefits.

SPSO role is in resolving individual complaints. It cannot of its own initiative investigate based on patterns of complaint.

SPSO expects to see a relatively small number of complaints because most will arise through the appeals process through the separate tribunal system.

Audit Scotland gives independent assurance to the people of Scotland that public money is spent properly, efficiently and effectively, ensuring that public sector bodies and government are held to account for this. This includes thematic reviews on major issues of public concern, based on its own assessment of risk. Focusing on governance, management systems and overall performance and outcomes, it does not consider front-end delivery and decision making where this involves technical social security considerations, professional judgements of staff or individual cases.

Parliament is the key body for holding government to account, including in relation to performance standards.

Oversight should be statutory, independent and able to give an all-round view of system performance and Charter principles, drawing together intelligence from Audit Scotland, SPSO and other relevant bodies.

A separate oversight body is desirable, with its configuration taking into account any expanded role there may be of existing bodies.
Relevant scrutiny and oversight bodies could come together to cooperate and coordinate their activity.

Thematic reports (eg, on take-up, errors, appeals) will drive learning and improvement.

There should be a way to identify and share good practice. A public sector model to drive improvement, similar to SPSO complaint handling procedures, could be explored.

In government’s quality improvement strategy for social security delivery, there should be an emphasis on pro-actively seeking feedback from people who use the system and those who support them, and consistently recording and addressing issues identified. For example, systematic ways for external agencies to gather and report on issues (like CPAG’s Early Warning System) should be supported and given a formal route into oversight/quality improvement structures.

Experience Panels should have a continuing role in informing continual improvement, and should be owned by the agency rather than directly by Government. There could be an informal link with a Scottish scrutiny body who should have the right to access all analysis and data derived from panels beyond the published information.

Robust and transparent data on performance, including on Charter indicators around principles is necessary for effective scrutiny and the agency should be required to generate this data.

The principles appear to drive different ways of capturing relevant information:

- dignity and respect (individual voice, experience panels)
- take up (audit data, evaluation of campaigns and local initiatives)
- value for money (Audit Scotland performance management data)

Comments

Oversight bodies on social security were abolished in GB but remain in Northern Ireland.

For Scotland, there is a heightened need for assurance for Parliament and the public eg, because of:

- a new agency
- new social security processes
- a Charter with duties on government
- multiple social security systems (UK, Scotland, local) meaning more complexity in delivery.

If someone’s Charter rights are not respected, then individual redress is appropriate (eg complaints procedure, Ombudsman). All bodies operating within the system, including scrutiny bodies, would need to ensure the principles were embedded in their work.

The oversight structures currently in place (Audit Scotland, SPSO) present important gaps eg, oversight of:

- decision making standards
- targets and aims in the Charter
- the system, applying feedback from experience of those who use it

If not addressed, gaps in oversight arrangements will limit Scottish Government’s opportunities to improve the social security system, and Parliament’s ability to hold government to account.
Recommendations/advice

There is a need for independent oversight of performance and standards.

External scrutiny should not become a burden on the system. However, extending the role of existing bodies such as Audit Scotland and SPSO will still leave important gaps, particularly in relation to meeting the principles of the Charter.

We consider that one expert independent scrutiny body can combine the roles of scrutiny of regulations and oversight of performance and standards. This will allow for a more integrated consideration of the efficacy of the system as well as a cost-effective solution.

A number of scrutiny bodies will be involved in oversight of Charter aims and system performance. Each contribution to oversight should be clearly set out and co-ordinated.

There should be a duty placed on the social security scrutiny body to co-ordinate and collaborate with others also involved in scrutiny with a view to clarifying roles, co-ordinating activity and sharing information. There should be parallel duties on other relevant bodies, for example, through a MoU.

There must be a requirement on government to provide robust and transparent data on performance.

There should be an independent review of oversight arrangements after a period to ensure they remain fit for purpose eg, after three years of agency operations.

Arrangements for redress and oversight should be explained in the Charter, for example, what individual redress is appropriate where someone’s rights are not respected, who checks what government does and how to get independent information about that.
Accountability and relationship with Parliamentary scrutiny

The questions we asked
How can independent, expert scrutiny add value to scrutiny performed by Parliament?

Who we consulted
Attendees at workshop; Social Security Committee; DPLR Committee; Audit Scotland.

What evidence we looked at
DPLR Committee Social Security (Scotland) Bill at Stage 1 report (31/10/17, SP Paper 214); Guide to Public Bodies in Scotland, December 2011.

What people said to us
Scrutiny should be independent of both government and Parliament.

Independent scrutiny should complement and enhance parliamentary scrutiny, not duplicate or substitute.

Independent scrutiny needs to add value to any enhanced parliamentary scrutiny of regulations there may be (e.g., if Parliament decides to adopt a super affirmative process for subordinate legislation).

It is difficult to anticipate what the most appropriate circumstances are to trigger the super affirmative process. This carries the risk of important regulations unintentionally not being given enhanced scrutiny, and underlines that it doesn’t take the place of independent expert scrutiny.

Lines of accountability should be aligned to the function of the scrutiny body.

Comments
As an advisory NDPB, the scrutiny body would be accountable to Ministers who would in turn be accountable to Parliament for the activities of the scrutiny body. Like other NDPBs it would also produce an annual business plan, and annual report and accounts. These would be presented to Parliament.

Advice to Ministers should be made publicly available to assist Parliament.

On the role of the Parliamentary Committees, expert advice on social security regulations ahead of being laid before Parliament helps government produce regulations that are better drafted and better deliver intended policy. This supports the Delegated Powers and Law Reform Committee and Social Security Committee in their work. In defining the scrutiny role in detail, care should be taken to avoid duplication.

E.g., Delegated Powers and Law Reform Committee and scrutiny body both advise on drafting of regulations. The scrutiny body brings a social security expertise to this task, and considers drafting in the context of fit with the wider UK system. This informs the final framing of the regulations. DPLR Committee provides its usual systematic consideration of drafting and powers, with enhanced assurance.

A scrutiny body needs to be independent both of government and Parliament, and trusted by others to act independently. This should be the prime consideration when deciding whether and to what
extent Parliamentary Committees should have the option of requesting advice of a scrutiny body, as well as being mindful of resource and capacity.

The form of a super affirmative process (if Parliament decides this is appropriate) will need to be decided in advance. It may involve giving the Parliament a 40 to 60 day opportunity to comment on proposed regulations ahead of being laid and may also involve a public consultation. Care needs to be taken that independent expert scrutiny does not duplicate, but adds value to this process and drives assurance.

A scrutiny body can decide on a case by case basis how to exercise powers, and should do this flexibly to avoid lengthening the process unduly while still providing timely advice to government and informing the parliamentary process.

On oversight of performance, Parliament is expected to have an annual report from Scottish Ministers on social security system performance. A scrutiny body that combines oversight functions should provide more independent insight, assisting Parliament in holding government to account.

### Recommendations/ advice

**Primary reporting should be to Scottish Ministers as the most appropriate line of accountability for the scrutiny/ advisory function.**

Reports should be published.

Parliamentary committees should have the option to request a more detailed discussion with the scrutiny body on the content of this public advice.

Primary duties of a scrutiny body should be in statute, and Parliament will have the power to place further duties by statute in the future should the need arise.

Independent expert scrutiny can sit alongside enhanced Parliamentary scrutiny of regulations through a super affirmative process. This needs to be exercised flexibly to avoid duplication, but should still involve a pre-Parliamentary scrutiny stage to provide added value. There should be consideration of the most effective sequencing of scrutiny.
Literature consulted


Delegated Powers and Law Reform Committee report: Social Security (Scotland) Bill at **Stage 1** 31 October 2017

Industrial Injuries Advisory Council **Triennial Review** 2015

Industrial Injuries Advisory Council **annual reports**


Reports of the former GB statutory oversight bodies: **Decision Making Standards Committee; Administrative Justice and Tribunals Council**

Scottish Government: **Public Bodies In Scotland: Guide to Strategic Engagement** December 2011


Scottish Public Services Ombudsman **Annual Report 2016-17**

Social Security Advisory Committee **Triennial Review** 2015

Social Security Advisory Committee **Annual Report 2016 to 2017**

Social Security Committee: Hugh Robertson’s evidence in **Official Report of meeting of 5 October 2017**

Social Security (Scotland) Bill and accompanying documents

Social Security Standards Committee of Northern Ireland **reports**

Contributors

Organisations represented at the workshop

Reference Groups:

Best Start Grant Reference Group
Carers Benefit Advisory Group
Funeral Payment Reference Group
Ill Health and Disability Benefits Stakeholder Reference Group
Industrial Injuries Disablement Benefit Reference Group
Organisations:

Carers Scotland; Child Poverty Action Group; Citizens Advice Scotland; Dignity Funeral Services; Disability Agenda Scotland; Dundee Carers Centre; Glasgow Disability Alliance; Joseph Rowntree Foundation; One Parent Families Scotland; Scottish Commission for Learning Disability; Scottish Government; Scottish Independent Advocacy Alliance; Scottish Recovery Network; Scottish Social Services Council; Social Security Advisory Committee; Scottish Trades Union Council; University of Ulster

Meetings

Audit Scotland
Delegated Powers and Law Reform Committee
Industrial Injuries Advisory Council
Scottish Public Services Ombudsman
Social Security Committee

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