

Title of Policy	Personal Independence Payment (Transitional Provisions) Amendment (Scotland) Regulations 2020
Summary of aims and desired outcomes of Policy	<ul style="list-style-type: none"> • To automatically extend awards of Disability Living Allowance (DLAC) for clients in Scotland approaching their sixteenth birthday to age 18.
Directorate: Division: Team:	Social Security Directorate Social Security Policy Division Disability Benefits Team

Executive Summary

1. The Social Security (Scotland) Act 2018 (the 2018 Act) sets out the broad framework for the delivery of devolved social security in Scotland. On 1 April 2020, the Scottish Ministers took executive and legal competence for disability benefits under the Social Security Contributions and Benefits Act 1992, and the Welfare Reform Act 2012, covering a range of benefits including Disability Living Allowance for Children (DLAC), Attendance Allowance (AA) and Personal Independence Payment (PIP).
2. These benefits will continue to be delivered during a transition period by the Department for Work and Pensions (DWP) under the terms of an Agency Agreement agreed with the Scottish Government, and subject to the direction of Scottish Ministers, to ensure the safe and secure devolution of disability benefits.
3. In a statement to the Scottish Parliament on 28 February 2019, the Cabinet Secretary for Social Security and Older People set out the Scottish Government's vision for disability assistance in Scotland.
4. As part of that announcement, the Scottish Government set out a commitment that children who are entitled to DLAC immediately prior to their sixteenth birthday would have their award extended until their eighteenth birthday, rather than be asked to apply for PIP. It is the intention of the Scottish Government that this will allow continuity for families during those crucial transition years when a child becomes an adult.
5. These Regulations will ensure that young people resident in Scotland who are entitled to DLAC immediately prior to their sixteenth birthday, and whose sixteenth birthday falls on or after 1 September 2020, will not be required to apply for Personal Independence Payment (PIP) at age 16 as is currently the case. Instead, their award of DLAC will be extended until they reach age 18, and they will then be invited to claim PIP or Disability Assistance for Working Age People (DAWAP). DAWAP will be the replacement benefit for PIP in Scotland.
6. The Personal Independence Payment (Transitional Provisions) Amendment (Scotland) Regulations 2020 describe the changes being made to the eligibility criteria for Personal Independence Payment by the Scottish Government.
7. The Scottish Government intends to replace DLAC, PIP and AA with new forms of assistance under the 2018 Act, although it is not intended that significant changes will be made to the criteria for each new devolved benefit. These new benefits will be delivered by Social Security Scotland on behalf of the Scottish Ministers, with most determinations carrying a right of appeal to the First-Tier Tribunal for Scotland's Social Security Chamber.
8. Child Disability Payment (CDP) will replace DLAC and like DLAC, this benefit will be available to disabled children aged from 3 months to 16 years old. Where an individual is entitled to CDP immediately prior to their sixteenth birthday, as with DLAC, their award will be extended until the client reaches age 18.

9. The Scottish Government intends to begin accept applications for assistance from new clients who do not receive either a UK or Scottish Government disability benefit first, and at a later date, existing DWP clients will transfer to Social Security Scotland without having to make a new application and Social Security Scotland will handle all aspects of the client's case.

10. The public sector equality duty is a legislative requirement that requires the Scottish Government to assess the impact of applying a proposed new or revised policy or practice. Policies should reflect that different people have different needs. Equality legislation covers the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.

11. This Equality Impact Assessment (EQIA) has considered the potential effects of the extension of child DLAC awards to age 18 and how it impacts on groups with protected characteristics, presented below in the **Key findings** section. The findings here are based on stakeholder engagement and feedback, desk based research and analysis of the Scottish Government's consultation on Disability Assistance more widely.

12. This EQIA has identified potential impacts in a narrowly defined set of circumstances as a result of the extension of child DLAC awards to age 18. Whilst generally the evidence and data gathered indicate that overall the policy will have a positive impact on young disabled people, further modifications have been made to ensure that clients are not subject to unfavourable treatment on the basis of national origin as set out below. It therefore builds on the Social Security (Scotland) Act 2018¹ framework of a new system that is underpinned by dignity, respect and a human rights based approach.

13. This impact assessment is one of a package to accompany the regulations. The others are: Business and Regulatory Impact Assessment (BRIA); Child Rights and Wellbeing Impact Assessment (CRWIA); and Island Community Impact Assessment (ICIA).

Background

Policy Aims

14. In a statement to the Scottish Parliament on 28 February 2019², the Cabinet Secretary for Social Security and Older People set out the Scottish Government's vision for the further devolution of a number of benefits under the Social Security (Scotland) Act 2018, including the following disability benefits: Disability Living Allowance (DLAC), Attendance Allowance (AA) and Personal Independence Payment (PIP).

¹ <http://www.legislation.gov.uk/asp/2018/9/contents/enacted>

² <https://www.gov.scot/publications/devolution-of-benefits-ministerial-statement/>

15. As part of that announcement, the Scottish Government set out a commitment that children who are entitled to DLAC immediately prior to their sixteenth birthday would have their award extended until their eighteenth birthday, rather than be asked to apply for PIP. It is the intention of the Scottish Government that this will allow continuity for families during those crucial transition years when a child becomes an adult.

16. These regulations ensure that the Department for Work and Pensions will not issue invitations to apply for PIP to any young person in Scotland whose sixteenth birthday falls on or after 1 September 2020.

17. This policy will help deliver numerous Social Security Outcomes, it is closely aligned with the Healthier, Wealthier and Fairer Strategic Objectives, and contributes to the following National Outcomes:

- We respect, protect and fulfil human rights and live free from discrimination;
- We tackle poverty by sharing opportunities, wealth, and power more equally;
- We live in communities that are inclusive, empowered, resilient and safe;
- We grow up loved, safe and respected so that we realise our full potential.

Who was involved in this EQIA?

18. In July 2016 the Scottish Government launched a public consultation to support the development of a framework that would become the Social Security (Scotland) Bill. This received more than 200 responses to questions relating to disability benefits with an even split between organisational and individual responses. In particular comments were invited on a partial Equality Impact Assessment which represented the Scottish Government's work on the impact of social security policy on people with protected characteristics prior to the consultation. 521 formal written responses were submitted, of which 241 were from organisations and 280 from individual respondents. Of the 241 organisational responses, 81 were received from stakeholder groups relating to children/young people, equalities and human rights, disability and long term conditions and carers. The independent analysis of the responses along with the Scottish Government response were published on 22 February 2017. In addition, the Equality Impact Assessment that was published alongside the Social Security (Scotland) Bill was used to inform the partial Equality Impact Assessment for these Regulations.

19. The Scottish Government has set up Social Security Experience Panels, and over 2,400 people across Scotland registered as panel members when the Panels opened in 2017. The Panels involve people with lived experience of the benefits that are coming to Scotland. In July 2019 recruitment to the Experience Panels was reopened, and we have been working with relevant stakeholders to specifically target young people, ethnic minorities, and people in remote and rural areas.

20. The Consultation on Disability Assistance built on the work on the Experience Panels and was published on 5 March 2019. In line with the principles of dignity, fairness and respect, the Scottish Government sought the views of the people of Scotland on the three proposed disability assistance benefits, namely Disability Assistance for Children and Young People (now known as CDP), and replacement benefits for PIP and AA. The consultation closed on 28 May 2019, having received 263 replies, of which 74 were from stakeholder organisations and 189 were from individuals.

21. An initial framing exercise for the partial Equalities Impact Assessment relating to disability assistance was carried out in 2017 involving a range of internal Scottish Government stakeholders. In addition to highlighting a number of positive impacts and potential barriers, the exercise enabled significant data gaps to be identified. This in turn led to the targeted consultation with stakeholders representing people with protected characteristics which was undertaken during the Consultation on Disability Assistance between 5 March and 28 May 2019.

22. The Scottish Government has also undertaken ongoing consultation with stakeholders through our independent Disability and Carers Benefits Expert Advisory Group (DACBEAG) as well as the Ill Health and Disability Benefits Stakeholder Reference Group. DACBEAG is chaired by Dr Jim McCormick and comprises experts from a range of professional backgrounds. This group, which is independent of the Scottish Government, was established to advise Scottish Ministers on specific policy options for disability assistance and carers benefits due to be delivered in Scotland.

23. The Ill Health and Disability Benefits Stakeholder Reference Group was set up in March 2016 to inform and influence the development of policy options relating to devolved Disability Assistance. This group has advised on the potential impact of policy decisions as well as user and stakeholder engagement.

The Scope of the EQIA

24. The scope of this EQIA is the impact of:

- the automatic extension of child Disability Living Allowance (DLAC) awards for children entitled to DLAC in Scotland immediately prior to their sixteenth birthday, to age 18, will ensure that young disabled people will not be required to apply for Personal Independence Payment (PIP) until they reach age 18;

on young disabled people who have one or more protected characteristic.

Data Sources

25. A variety of information sources were used in compiling this EQIA, including:

- Scottish Health Survey 2018³;

³ <https://www.gov.scot/publications/scottish-health-survey-2018-summary-key-findings/>

- Scotland's Census 2011⁴;
- NRS Scotland Mid-year Population Estimates⁵; and
- Social Security Experience Panel findings.

General Data

26. The Scottish Health Survey 2018 provides an accurate estimate of the number of disabled children and young people in Scotland. Within the 12-15 age group, 15% of children have a limiting longstanding illness⁶. For young people aged 16-24, 19% of young people have a limiting longstanding illness.

27. In 2019, there were 55,962 children aged 15 in Scotland⁷, and 3,372 children in Scotland aged 15 who were entitled to DLAC⁸. This represents around 6% of the population.

28. UK wide, disabled people have higher poverty rates than the general population. Disabled people make up 28% of people in poverty. A further 20% of people who are in poverty live in a household with a disabled child. In Scotland 410,000 households in poverty (42%) include a disabled person⁹. Disabled young adults in the UK aged 16-24 years have a particularly high poverty rate of 44%.¹⁰

29. Scotland-wide, there are higher levels of child material deprivation in households containing a disabled person, at 20% compared to households without a disabled person (at 8%). There are higher rates of food insecurity among disabled people (18%) compared to non-disabled people (5%). There is a higher likelihood of living in relative poverty after housing costs with a disabled person in the household (24% of families with a disabled person compared to 17% of families with no disabled members).¹¹

30. Disability and unemployment / under-employment are positively correlated. 14% of 'workless families' (defined as families where parents are predominately out of work or have little connection to the labour market; who live in social rented accommodation and are reliant on benefits for their income) have one or more children with a disability or long-term illness. A further 17% of 'struggling to get by' families (unemployed or working part-time, half of which are single-parent families) have one or more children with a disability or long-term illness¹². Child material deprivation in households containing a disabled person reaches 20% compared to 8% of households without a disabled person.

⁴ <https://www.nrscotland.gov.uk/statistics-and-data/census>

⁵ <https://www.nrscotland.gov.uk/statistics-and-data/statistics/statistics-by-theme/population/population-estimates/mid-year-population-estimates/mid-2019>

⁶ Scottish Health Survey (2018) <https://www.gov.scot/publications/scottish-health-survey-2018-supplementary-tables/>

⁷ NRS Scotland Mid-Year Population Estimates (2019) <https://www.nrscotland.gov.uk/statistics-and-data/statistics/statistics-by-theme/population/population-estimates/mid-year-population-estimates/mid-2019>

⁸ DWP Stat-Xplore (Accessed May 2020)

⁹ https://www.npi.org.uk/files/3414/7087/2429/Disability_and_poverty_MAIN-REPORT_FINAL.pdf

¹⁰ <https://www.jrf.org.uk/income-and-benefits>

¹¹ <http://www.gov.scot/isbn/9781787816909>

¹² <https://www.gov.scot/publications/poverty-perspective-typology-poverty-scotland/pages/5/>

31. Even where one or more parent in the household is in employment, within families with a disabled child, the same level of income secures a lower standard of living than it would for a disabled person. Research conducted by the Papworth Trust¹³ showed that the annual cost of bringing up a disabled child is three times greater than for a non-disabled child. Disabled people face higher costs than non-disabled people, such as the cost of specialist equipment, therapies and home adaptations to manage a condition¹⁴. Travel costs too, may be higher as families have to afford the cost of taxis to and from hospital where it is not possible to use public transport (and/or public transport may not be available).

32. For disabled children receiving DLAC immediately prior to their sixteenth birthday, the DWP will write to the child's parents (or appointee) approximately five months before the child's sixteenth birthday to explain that the child will be invited to apply for PIP. The invitation to apply for PIP is not issued until the child's sixteenth birthday. If no application for PIP is received, the DWP will end the child's award of DLAC¹⁵.

33. We asked Experience Panel respondents if they felt 16 was the right age to transfer from DLAC to PIP¹⁶. Almost all respondents felt that 16 was not the right age to transition. It was suggested that 18 was a more suitable age. Transitioning to PIP at 16 was seen to be 'an extra stress on the parents' and many thought that children were still too young at 16 to move on to PIP. Respondents suggested that 18 was more 'age appropriate' and that an extra two years would 'give the parent more time to teach their child about their benefits'.

34. In total, 47,213 people in Scotland as at October 2019¹⁷ have lost entitlement to disability benefits, representing a minimum loss per client of £1,200 per year, scaling up to £7,740 per year, depending on which elements of DLAC they were entitled to.

Key findings

35. A summary of the available evidence and data collected to help inform this EQIA is provided in the table below:

¹³ Papworth Trust, Disability in the United Kingdom 2010, in <https://www2.le.ac.uk/departments/law/research/cces/documents/the-energy-penalty-disability-and-fuel-poverty-pdf>

¹⁴ <https://www.jrf.org.uk/income-and-benefits/>

¹⁵ <https://www.gov.uk/guidance/the-personal-independence-payment-pip-toolkit#when-pip-affects-existing-DLAC-claimants>

¹⁶ <https://www.gov.scot/publications/social-security-experience-panels-disability-living-allowance-DLAC-children-visual-summary/>

¹⁷ DWP Stat-Xplore, accessed 5 May 2020

Protected characteristic	Evidence gathered
Age	<ul style="list-style-type: none"> • As of August 2019, 40,132 children in Scotland were receiving DLAC¹⁸, representing 4.4% of children under age 16¹⁹. • The peak age for entitlement to DLAC is at age 11, with 3,823 children receiving an award of DLAC. • Our Experience Panel research highlighted²⁰: <ul style="list-style-type: none"> ○ Almost all respondents to an Experience Panel survey felt that 16 was not the right age to transition to PIP. It was suggested that 18 was a more suitable age. ○ The threat of an impending face-to-face assessment was so stressful that their children refused to attend, which meant a financial loss to the family income of the disability benefit as well as Carer's Allowance.
Disability	<ul style="list-style-type: none"> • 12% of all children under age 16 have a limiting longstanding illness, whilst 19% of all young people aged 16-24 have a limiting longstanding illness²¹. • 38% of children with a limiting longstanding illness had a mental health condition, 28% had a respiratory condition, and 12% had musculoskeletal condition²². • As of August 2019, 40,132 children in Scotland were receiving DLAC²³, representing 4.4% of children under age 16²⁴. • 21 children entitled to DLAC in Scotland were terminally ill, representing 0.5% of all Scottish child DLAC cases²⁵.

¹⁸ DWP Stat-Xplore, accessed 5 May 2020

¹⁹ NRS Mid-Year Population Estimates (2019), <https://www.nrscotland.gov.uk/statistics-and-data/statistics/statistics-by-theme/population/population-estimates/mid-year-population-estimates>

²⁰ <https://www.gov.scot/publications/social-security-experience-panels-disability-living-allowance-DLAC-children-visual-summary/>

²¹ Scottish Health Survey (2018), <https://www.gov.scot/publications/scottish-health-survey-2018-supplementary-tables/>

²² op cit.

²³ DWP Stat-Xplore, accessed 5 May 2020

²⁴ NRS Mid-Year Population Estimates (2019), <https://www.nrscotland.gov.uk/statistics-and-data/statistics/statistics-by-theme/population/population-estimates/mid-year-population-estimates>

²⁵ op. cit.

Protected characteristic	Evidence gathered
	<ul style="list-style-type: none"> In 2018, 1,050 children (1%) within early learning and childcare registrations were either assessed or declared as disabled.²⁶ 14% of those registered had additional support needs²⁷.
Gender	<ul style="list-style-type: none"> 71% of children under 16 in receipt of DLAC are male, with a significantly higher proportion of male children receiving DLAC on the basis of a learning disability than female children²⁸. Research has found on average, a fivefold increased prevalence of ADHD in youth prison populations (30.1%), with youth prison populations more likely to be male.
Marriage and civil partnership	<ul style="list-style-type: none"> No data is available about young disabled people under this protected characteristic grouping. There were no comments during the consultation on marriage and civil partnership.
Pregnancy and maternity	<ul style="list-style-type: none"> No data is available about young disabled people under this protected characteristic grouping. There were no comments during the consultation on pregnancy and maternity.
Race	<ul style="list-style-type: none"> Just under 4% of Scotland's population belong to minority ethnic groups, and 7% of our total population communicate in home languages other than English. This number rises to 9.1% within the population of children registered for Early Learning & Childcare in Scotland.²⁹
Religion and belief	<ul style="list-style-type: none"> No data is available about young disabled people under this protected characteristic grouping. There were no comments during the consultation on religion and belief.
Sexual orientation	<ul style="list-style-type: none"> In 2015, 4.5% of young in Scotland identified their sexual orientation as "Lesbian, Gay, Bisexual or other"³⁰.

²⁶ <https://www2.gov.scot/Topics/Statistics/Browse/Children/Pubs-Pre-SchoolEducation/ELCAdditionalTables2018>

²⁷ Autism spectrum, English as an additional language, family issues, including additional support for bereavement, and young carers, speech and communication issues, learning difficulties and dyslexia, looked after, physical or motor impairment, or physical or mental health problems, social, emotional and behavioural difficulties, visual or hearing impairment or are deafblind.

²⁸ DWP Stat-Xplore, accessed 5 May 2020

²⁹ <https://www2.gov.scot/Topics/Statistics/Browse/Children/Pubs-Pre-SchoolEducation/ELCAdditionalTables2018>

³⁰ Scottish Surveys Core Questions 2016

Protected characteristic	Evidence gathered
	<ul style="list-style-type: none"> • In 2017, 22% of the LGBTI young people (age 13 to 25 years of age) who completed an online survey (though self-selecting) for LGBT Youth Scotland³¹ reported having a disability. • 84% of LGBTI young people and 96% of transgender young people who completed the LGBT Youth Scotland survey have experienced mental health problems and associated behaviours.³² • Many of the young people we engaged with had already undergone a PIP assessment in the current system and had experienced homophobia/ transphobia by assessors. They spoke of dismissive and disrespectful attitudes towards their shared living arrangements with same-sex partners.
National Origin	<ul style="list-style-type: none"> • Approximately 10 clients per year who are entitled to DLA will move from elsewhere in the United Kingdom to Scotland, who would not come within the extension of DLA to age 18, because they were not resident in Scotland when they reached age 16³³.

Impact of extension of DLAC awards to age 18 on those in protected groups and further considerations

36. We have not identified evidence of potentially negative impacts of the policy to people who have one or more protected characteristics.

37. We recognise that there is limited data about young disabled people from certain protected characteristic groups, in particular in relation to gender reassignment, marriage and civil partnership, pregnancy and maternity and religion and belief.

Age

38. We anticipate that the automatic extension of DLAC awards for children in Scotland approaching their sixteenth birthday to age 18 will have a positive impact on young disabled people. This will delay the need for young disabled people to have a PIP assessment, at a time when they and their family have so many other challenging life events to contend with. It will also mitigate a further drop in household income, at a time when other child benefits and respite care stop.

Disability

³¹ LGBT Youth Scotland: *Life in Scotland for LGBT Young People 2017*

³² LGBT Youth Scotland: *Life in Scotland for LGBT Young People 2017*

³³ DWP Stat-Xplore, accessed 5 May 2020

39. Whilst some clients may see an increase in entitlement when moving from DLAC to PIP, we believe that automatically extending an award of Disability Living Allowance for clients in Scotland approaching their sixteenth birthday will have a positive impact on young disabled people by avoiding what is seen as a difficult face-to-face assessment process.

40. This will ensure continuity of entitlement for young disabled people, and will also have an indirect impact on family members who provide care and consequently are entitled to Carers Allowance. Moving from DLAC to PIP presents a substantial risk of loss of income for young disabled people and their families, as well as potential loss of passported benefits, and access to the Motability scheme.

Gender Reassignment and Sexual Orientation

41. We were told by LGBTI young people that they typically came out to their families at around 17-18 years of age, and often had to leave the family home at this age too. This was clearly already a period of extreme stress and difficulty for them emotionally and financially. For these individuals, remaining on DLAC until 18 may have a negative effect as they would have to face the challenge of applying for PIP on their own at a time when they likely would face other significant life decisions as adults as well. For this group, 16 might be a preferable age to undergo the PIP application and assessment as they would be more likely to be living in their parents' home and have greater support at that time.

42. We are aware that there is no one-size-fits-all 'perfect' age at which to transition to PIP/ the replacement adult disability payment. We have consulted widely on extending the upper age limit of Disability Living Allowance, both with our stakeholder organisations and with the public during the consultation period. We will continue to monitor and consult with this group so as to mitigate any unintended consequences.

Race

43. Although we do not have statistics showing the number of children and young people within Scotland who claim disability benefits and who belong to minority ethnic groups, we know that non-white ethnicities generally (including adults) make up 3.7% of those with a reported learning disability or developmental disorder.³⁴

44. We are aware of the particular barriers faced by ethnic minorities in applying for disability benefits, especially those with English as a second language. To address this, specific work has been undertaken with ethnic minorities alongside the main Experience Panels. This work has given us a depth of information about the barriers faced by these groups, and ideas for how Social Security Scotland can address these barriers when the Agency begins delivering disability benefits.

Religion or belief

³⁴ 2011 census

45. We have not identified any particular barriers resulting from our policy approach which may affect people with the protected characteristic of religion or belief.

Marriage and Civil Partnership

46. We have not identified any particular barriers resulting from our policy approach which may affect people with the protected characteristic of marriage or civil partnership.

National Origin

47. We have identified that a small number of clients resident outside of Scotland who reach age 16 on or after 1 September 2020, and subsequently move to Scotland would potentially face unfair treatment compared to a client who is resident in Scotland on reaching age 16, by not being allowed to remain on DLA until age 18.

48. This would engage Article 14 and Article 1 of Protocol 1 of the European Convention on Human Rights (ECHR). Article 14 provides that rights under the Convention (and by extension, the Human Rights Act 1998) shall be secured without discrimination on any ground, such as national or social origin. Article 1 of Protocol 1 provides for the peaceful enjoyment of property, which in this context includes social security assistance.

49. As a result of identifying this impact, we have amended the policy so that for clients who are entitled to DLA whilst resident elsewhere in the UK and reach age 16 on or after 1 September 2020, but subsequently relocate to Scotland, these clients will be allowed to remain on DLA until they reach age 18. If the client has already applied for PIP and had a determination made on their application, they will remain on PIP.

Monitoring and review

50. On-going stakeholder engagement with key organisations – such as the Child Poverty Action Group, Rights Advice Scotland, Young Scot, DACBEAG, and our Ill Health and Disability Benefit Stakeholder Reference Group – will provide the Scottish Government with an opportunity to monitor the impact of the changes made by these regulations.

51. The Communities Analysis Division within the Scottish Government will also run a comprehensive evaluation programme to consider the impact of the changes made by these regulations, with a full suite of equalities data for new applicants.

52. The Scottish Ministers have also committed to engaging with, and reporting regular progress to, the Islands Strategic Group to ensure that those representing the interests of island communities and others with experience of the current system, are fairly represented in the development and delivery of the Scottish social security system.

Recommendations and conclusion

53. This EQIA process has identified that overall, the automatic extension of child Disability Living Allowance (DLAC) awards for children entitled to DLAC in Scotland immediately prior to their sixteenth birthday to age 18 has potential to have positive impacts for those who share protected characteristics.

54. For children moving from DLAC to PIP, a substantial number of those children will lose vital financial support at a key transitional stage in their life. Whilst some young people may be entitled to a higher award under PIP, we have sought to balance this with the need to protect young people's overall entitlement and to address the impact that loss of entitlement may have upon families and carers as a result of the loss of other benefits such as Carers Allowance.

55. Whilst the extension will be an automatic process, we are cognisant that groups who share protected characteristics may face difficulties in accessing or understanding their entitlements due to language or other communication barriers. The Scottish Government is committed to mitigating these barriers both within Social Security Scotland and by ensuring that advocacy will be available to signpost people to third sector organisations where necessary. Interpreter services and assistance to complete application forms will be available once the Scottish Government begins delivering disability benefits.

Authorisation

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