**Social Security (Amendment) (Scotland) Bill – SAMH Submission**

**Introduction and Summary**

SAMH welcomes the opportunity to help inform the work of the Scottish Parliament’s Social Justice Committee in regards to the Social Security (Amendment) (Scotland) Bill. Social security plays a vital role in supporting people with mental health problems to live independent, dignified lives.

This Bill, while technical, has the potential to improve the Scottish social security system. While we are broadly supportive of most of the measures in the Bill, it will be vital that people with lived experience of mental health problems and social security are fully involved in developing guidance and practice arising from changes made by the Bill.

**Summary of Key Points**

* We welcome provision in Part 1 that will allow Scottish Ministers to change the legal framework for the Scottish Child Payment (SCP). This will mean eligibility for the SCP will no longer be tied to the UK social security system.
* While welcoming removal of specific Covid-19 provisions, we are calling for discretion and flexibility in regards to deadlines for ‘late applications’ for social security benefits. This must recognise the impact that someone’s mental health can have in meeting deadlines for applications.
* We are pleased that the Bill includes “exceptional circumstances” clauses, providing discretion to Scottish Ministers and the Tribunal to accept late applications for re-determinations and appeals beyond a year. We believe the impact of someone’s mental health must be fully considered when evaluating exceptional circumstances.
* We welcome provisions in the Bill allowing someone to withdraw a request for a re-determination. This new right must be accompanied by safeguards including access to independent advice and advocacy, with no one pressured to withdraw a re-determination request, or doing so due to stress arising from the re-determination process.
* We agree with provisions allowing Scottish Ministers to make a new determination following identification of an error in cases where appeal proceedings have begun. This should cut down the need for unnecessary often stressful appeals. We welcome that a person’s consent will be needed to make the new award determination, and that it comes with full challenge rights.
* We strongly welcome the new right to challenge liability in regards to overpayments
* The Bill clarifies rules around repayments where someone has an appointee or representative. We cautiously agree with the Government that the claimant rather than appointee should be liable for overpayment in cases of ‘good faith’ error. We stress the need for a compassionate approach to repayment processes recognising financial and mental health risks to the individual.
* Where an appointee or representative has disregarded the needs of the person they are representing, including through financial exploitation, we welcome that the appointee will be liable for repaying overpayments.
* We are concerned about provisions in Part 6 of the Bill regarding information for audit. These proposals were not consulted on by the Scottish Government and allow someone’s benefit to be suspended or ultimately stopped if they do not co-operate with requests for information for audit. We do not feel this is proportionate and risks people with mental health problems having their benefits stopped. While we welcome some of the proposed safeguards around this (including the right for support to comply with information requests) we feel more stakeholder and social security claimant engagement is needed on these proposals.
* The Bill increases the areas of Scottish social security that the Scottish Commission on Social Security must scrutinise. This is a welcome reform as the Commission plays a key role in ensuring developments of the Scottish social security system align with the Scottish social security principles. We believe this vital scrutiny role should be separate from a policy advisory role.

**Part 1 - Types of Social Security Assistance**

*The Policy Memorandum explains that Part 1 of the Bill (Types of Social Security Assistance) creates the legal framework that would allow new benefits for care leavers and for children to be introduced in future. This would allow the proposed ‘Care Leaver Payment’ to be created and allow Ministers to introduce regulations to change the way the Scottish Child Payment operates and align it more closely with other forms of assistance delivered by Scottish Ministers, such as the Best Start Grants and Best Start Foods.*

**Top of Form**

**1. Do you have any views on this part of the Bill?**

**In particular, do the provisions in Part 1 raise any concerns for you in relation to the social security principles?**

The links between mental health and poverty are clear and mutually reinforcing, with people more likely to have poor mental health when experiencing poverty and more likely to experience poverty when living with a mental health problem.[[1]](#footnote-1) The Joseph Rowntree Foundation’s Poverty in Scotland 2022 report found that half of all adults in Scotland reported a negative impact on their mental health due to the cost of living crisis, rising to 82% for people in very insecure households.[[2]](#footnote-2) The same report also found in particular that single parent families, families with a baby and families with a disabled child reported higher negative mental health impacts resulting from the cost of living crisis.[[3]](#footnote-3) The Scottish Child Payment has a key role to play in helping alleviate this financial and mental distress.

As such it is essential that the Scottish Government utilise all their social security powers, including the Scottish Child Payment (SCP) to reduce poverty. In the context of the ongoing cost-of-living crisis, and given the clear correlation between poverty and mental health we believe the SCP needs to be secured and not subject to potential narrowing of eligibility due to future changes to UK benefits which underlie eligibility to SCP.

We agree with the proposals in part 1 of the Bill to change the legal framework for SCP, moving away from SCP being delivered though ‘top-up’ powers in section 79 of the Social Security (Scotland) Act 2018. The continued reliance on top-up powers as the statutory basis for the Scottish Child Payment means potential changes made by the UK Government, such as tightening eligibility to Universal Credit, would automatically tighten eligibility to the Scottish Child Payment, resulting in vulnerable families losing entitlement.

The creation, through this Bill, of secondary powers in relation to ‘childhood assistance’ is, we believe, the correct approach. This will ultimately allow Scottish Ministers to ensure SCP can be treated as a standalone payment, with eligibility not necessarily tied to the reserved UK social security system. We believe this provides the opportunity to future-proof SCP, and indeed widen eligibility in the medium and longer term. We believe this proposed reform strongly aligns with the Social Security Principles, as set out in the 2018 Act, in particular principle (e): “The Scottish social security system is to contribute to reducing poverty in Scotland”.

While we are strongly in favour of the proposed changes to the legislative footing of SCP, any longer term changes – such as expanding eligibility beyond receipt of qualifying UK benefits – will need careful consideration and involvement of people with lived experience (including of disability and mental health problems). One current positive in regard to SCP is the relatively simple application process. Any future widening of eligibility may necessitate a more complex application and assessment process. It will be important, if eligibility is widened, that any future application process is co-designed and minimises complexities or delays, in line with the Social Security Principles.

**Part 2 - Applications for Assistance**

*The Policy Memorandum explains that Part 2 of the Bill (Applications for Assistance) repeals COVID measures that allowed late applications when the reason for delay was related to Covid-19.*

**Top of Form**

**1. Do you have any views on this part of the Bill?**

**In particular, do the provisions in Part 2 raise any concerns for you in relation to the social security principles?**

We broadly agree that it is now appropriate for specific COVID-19 provisions, including in relation to late applications for assistance, to be removed. Indeed, we do not believe it is fair or proportionate for COVID-19 to be privileged above other health conditions or personal circumstances (including mental health conditions) which may impact someone’s ability to lodge an application within the statutory deadline.

As a principle we believe the Scottish Social Security System should maximise flexibility, while maintaining fairness, across the whole social security journey. While recognising that clear deadlines are required at various stages and provide clarity to people engaging with the system, discretion is required to ensure that people are not unduly excluded or disadvantaged due to personal circumstances, such as the impact of poor mental health.

Discretion is already built into much of the system. For example, Adult Disability Payment (ADP) regulations already allow for late applications, beyond the eight-week statutory deadline, where there is “good reason”. This approach should be taken more broadly across all Social Security Scotland benefits, with “good reason” provisions applied in a non-restrictive manner, recognising the wide array of circumstances that may impede someone’s ability to engage with the application process. Alongside this must be a continued focus on ensuring easy and timely access to independent advice and advocacy for anyone that would benefit from it.

We believe a fair and flexible approach to application deadlines would further the Social Security Principles, particularly principles (b) (“Social security is itself a human right and essential to the realisation of other human rights”) and (d) (“Respect for the dignity of individuals is to be at the heart of the Scottish social security system”).

**Part 3 - Determinations and Re-determinations of Entitlement to Assistance**

*Part 3 of the Bill (Determinations and Re-determinations of Entitlement to Assistance) sets out changes to the rules about challenging decisions about benefits.*

*A determination is the point at which Scottish Ministers decide whether an individual is or is not entitled to assistance. When an individual disagrees with the determination, they have a right to re-determination.*

*Once a re-determination has been made, the individual has a right to appeal should they still disagree with the outcome.*

**1. Do you have any views on this part of the Bill?**

**In particular, do the provisions in Part 3 raise any concerns for you in relation to the social security principles?**

* COVID-19 provisions

As with our comments in regards to Part 2 of the Bill, we are broadly in favour of the provisions in Part 3 that relate to COVID-19 provisions.

We welcome that the Bill, while removing specific COVID-19 exemptions to deadlines for lodging a re-determination or appeal, does not revert to the pre-pandemic position. We are pleased that the Bill includes “exceptional circumstances” clauses, providing discretion to Scottish Ministers and the Tribunal to accept late applications for re-determinations and appeals beyond a year.

How the “exceptional circumstances” clauses are used in practice will be key. We believe clear guidance for decision-makers and the Tribunal is necessary, in particular providing clarity on what is an “exceptional circumstance”. Furthermore, any guidance should be produced with people with lived experience of mental health problems, and a broad range of relevant stakeholders. The impact of mental health problems should be fully considered when producing guidance for the new clauses.

* Withdrawal of request for re-determination

We agree with provisions in the Bill that will allow claimants to withdraw a request for re-determination. In a rights-based social security system individual claimants should have the right to withdraw a re-determination request if they wish. That said, and while we accept this principle, safeguards will need to be in place to ensure claimants have adequate independent advice and advocacy to make an informed decision to withdraw a re-determination request.

Challenging an award decision can be a stressful experience, particularly for people living with mental health problems. People supported by SAMH told us that challenging benefit decisions –such as PIP award decisions (prior to the introduction of Disability Assistance) – has negatively affected their mental health.[[4]](#footnote-4) While we welcome safeguards in the Scottish system, such as clear timescales for Social Security Scotland to undertake a re-determination, and the availability of Short Term Assistance (STA), it is critical we avoid situations where people are withdrawing requests for re-determinations due to stress associated with the process. We would like to see evaluation of the re-determination process in Scotland made an early priority as the Scottish system continues to mature. Examination of the process and people’s experience of re-determination should be included in the work of the upcoming independent review of Adult Disability Payment, to ensure any emerging barriers to engagement with the re-determination process are identified and addressed.

If the Bill becomes law it will be essential that clear information and support is provided to claimants outlining the impact that withdrawal of a request for re-determination will have on any STA they receive.

* Re-determinations after the period allowed

We agree with the Scottish Government that the best approach is converting the current practice (of Social Security Scotland completing a re-determination beyond the statutory deadline, where an appeal is not lodged) into a legal requirement. This will provide clarity and legal certainty to the process and for clients.

While supportive of the policy proposal, we would urge that all efforts are made to ensure the statutory deadline for re-determinations are met, to avoid delays in decision-making and stress to clients.

* New determination of entitlement after error

We broadly agree with provisions in the Bill that allow Scottish Ministers to make a new determination following identification of an error in cases where appeal proceedings have begun. We believe these provisions will mitigate the need to continue an often stressful appeals process. Undertaking an appeal, including appearing at Tribunal, can be a distressing experience for claimants, so any reduction of the need to appear at Tribunal is welcome.

In particular, we welcome provisions at 49A (1) and (2), which ensure that a new determination can only be made with the consent of the claimant, and that the new determination must result in the claimant receiving more assistance than the original determination.

In our consultation response prior to publication of the Bill we outlined concerns about any automatic end to a claimant’s appeal in cases where a new determination is made.[[5]](#footnote-5) Ultimately, in a rights-based system we believe this should be the decision of the claimant, who in some circumstances may wish to proceed with the appeal against the original determination (or re-determination). This may be the case in instances where Social Security Scotland’s ‘new’ determination (following the identification of official error etc.) does not make an award to which the client believes they may be entitled at Tribunal. We are reassured that the Bill ensures explicit consent is required from the claimant to proceed with the new determination and that claimants will have full challenge rights (re-determination and appeal rights) against the new determination.

The policy memorandum to the Bill also provides some reassurance, outlining that robust guidance will be developed to ensure Social Security Scotland staff support clients and their representatives to understand options and implications of accepting the new determination. We believe this guidance should be co-produced with stakeholders and importantly social security clients, including people living with mental health problems. It is essential that there is no undue pressure placed on people to accept a new determination.

**Part 4 - Assistance Given in Error**

*Part 4 of the Bill (Assistance Given in Error) makes changes to the rules relating to overpayments and recovering ‘assistance provided in error’. The Policy Memorandum explains that currently an individual is not liable for overpayments that are not their fault or they could not reasonably have known about.*

**1. Do you have any views on this part of the Bill?**

**In particular, do the provisions in Part 4 raise any concerns for you in relation to the social security principles?**

We supported provision in the 2018 Act that liability for repayment of overpayments should not fall on the claimant where the overpayment was neither their fault nor an error that a person could have reasonably been expected to notice. To ensure this is a practical reality the right to challenge liability is essential. We therefore support proposals in this Bill (section 13) that introduce a right to review and appeal liability for overpayments. The lack of this right was an oversight in the 2018 Act. We believe this new right will further the Social Security Principles, particularly principle (g) on continuous improvement to the social security system and principle (d) on Respect for the dignity of individuals is to be at the heart of the Scottish social security system.

While the full mechanism of the right to review and appeal is to be set out in secondary legislation, we believe this should as far as possible replicate existing processes for re-determination and appeal challenges against determination decisions.

* **Liability of individual for assistance given in error**

Provision in section 9 of the Bill will ensure that an individual will be liable for repaying overpayments made in error in cases where an individual’s appointee or representative made the error. As with rules already established in the 2018 Act, there is no liability for the individual in cases where they (or their appointee / representative) did not cause or contribute to that error, or if it was an error the individual (or their appointee / representative) could not reasonably be expected to have noticed. The individual will also not be liable for repayment in cases where the appointee has acted in a way that breached their duties to the individual – for example through financial exploitation.

We cautiously accept the Scottish Government’s rationale that the individual, rather than the appointee or representative, should be liable for the repayment in circumstances of good faith errors by an appointee. In most cases the individual would have benefited from the error. Appointees are a critical safeguard for individuals who may lack capacity or who find engaging with the social security system. As the Scottish Social Security appointee system is still new and differs from the DWP system, we believe the Scottish Government and Social Security Scotland should, in the medium term, explore how the system is working in practice and if there barriers to appointee uptake. In regards to appointees supporting ADP claimants, this could be reviewed as part of the planned independent ADP review.

While we cautiously accept the proposal, we do urge the Scottish Government and Social Security Scotland to take a compassionate approach to repayment arrangements. Any approach must take into consideration the individual’s financial status, and, importantly, the impact that repayment may have on their mental health. We also urge the Scottish Government and Social Security Scotland to be generous when using ‘reasonableness’ provisions in determining liability for overpayments arising from individual or appointee errors.

* **Liability of individual for assistance given in error and Liability of individual’s representative for assistance given in error**

We welcome new provisions (section 10 of the Bill) that ensure liability for overpayments does not fall on the individual claimant in instances where the claimant’s representative/appointee has used the overpaid money for a purpose which is a breach of their duties as a representative. We believe this provides an important safeguard to (the hopefully small number of) claimants who are victims of financial exploitation or harm from their representative/appointee.

**Part 5 - Appointees**

*The Policy Memorandum explains that Part 5 of the Bill (Appointees) allows an individual who has been appointed to manage a person’s DWP benefits to also manage their Social Security Scotland benefits. This should be for a short period.*

*Where an appointee uses any funds outside of their common law or statutory duties, and does so in bad faith, they will be liable to repay those funds to the individual they represent*.

**Top of Form**

**1. Do you have any views on this part of the Bill?**

**In particular, do the provisions in Part 5 raise any concerns for you in relation to the social security principles?**

SAMH was instrumental in shaping provisions in the Social Security Administration and Tribunal Membership (Scotland) Act 2020 around the process for appointing appointees. We successfully lobbied for safeguards including the introduction of third party certification of an appointee – to ensure they act in the best interest of the client – where the client has capacity, and the requirement for statutory guidance for the appointee system.[[6]](#footnote-6)

Appointees have wide-reaching powers to act on the client’s behalf, including making applications for benefits, appealing award decisions and, importantly, receiving award payments. It is essential that an appointee is an appropriate person who will act in the interests of the client. We are pleased that the Scottish social security appointee provisions are more rigorous than the equivalent DWP system.

While we believe safeguarding should be maximised, we accept the rationale for the provisions in the Bill allowing a DWP appointee to act as an appointee in relation to the Scottish Social System, for a limited time in limited circumstances. We believe on balance that these provisions are proportionate and will avoid the risk of harmful delays in payments of awards, particularly in cases of terminal illness or, for example, for a Funeral Support Payment where timely assessment and payment is essential.

While we accept that the provisions are proportionate in a limited number of cases, we believe that the appointee should, as soon as practically possible, be subject to the Scottish appointee process (outlined in section 85A and 85B of the Social Security (Scotland) Act 2018). We welcome section 14 85B (b) of this Bill which states that the Scottish process must apply as soon as “reasonably practicable”. We believe this provision should be understood as restrictively as possible, to minimise exposure with any appointee outwith the Scottish process safeguards.

Bottom of Form

**Part 6 - Information for Audit**

*The Policy Memorandum explains that Part 6 of the Bill (Information for audit) places new duties on clients to provide information to Social Security Scotland.*

*Currently Scottish Ministers can only request information to determine entitlement to assistance. The Bill would give Ministers the power to require individuals to co-operate with requests for information needed to audit the monetary value of error and fraud in the Scottish social security system as a whole. Ministers will have the power to suspend a client’s benefit if they fail to meet the deadline for providing information.*

**Top of Form**

**1. Do you have any views on this part of the Bill?**

**In particular, do the provisions in Part 6 raise any concerns for you in relation to the social security principles?**

We recognise that accurate auditing of the Scottish Social Security system is essential, both to ensure ongoing improvement of the system, with accurate system-wide data on issues such as overpayments/errors (Social Security Principle (g)), and to ensure monitoring of the efficiency of the system (Social Security Principle (h)). Accurate audit data will allow identification of systemic issues and therefore provide evidence to support interventions to address issues, at a Social Security Scotland practice level or through highlighting the need for legislative action.

While we recognise the importance of maximising the accuracy of auditing of the system, we are concerned about the proportionality of provisions in the bill. Section 87B “Obtaining information for audit” provides powers to Scottish Ministers to suspend someone’s entitlement if they do not cooperate with requests for providing information in relation to their award, payment, or entitlement for the purposes of auditing. The new provisions in the Bill also ultimately allow Ministers to end someone’s entitlement entirely (though an unscheduled review of their entitlement) if they continue to not cooperate with information requests following award suspension. We believe the decision to suspend or ultimately end someone’s entitlement risks the health and wellbeing of the claimant, as well as risking financial harm.

We are concerned that these proposals were not consulted on, and would urge the Committee and Scottish Government to seek a wide array of stakeholder and lived experience views on their proportionality. In particular, we believe secondary legislation or guidance arising from these provisions should recognise and excuse people from the requirement to interact with information requests, where the individual is experiencing poor mental health, or is subject to compulsory treatment. It is essential to prioritise an individual’s wellbeing and that vulnerable people are not subject to information requests or the threat of benefit suspension. As stated below we believe the Section 87C “good reason” clause for withdrawal of an information request must be generously understood and applied by Scottish Ministers.

While concerned about the proposals at Section 87B of the bill, we do welcome that there will be a right to request a review of any decision by Ministers to suspend entitlement. We also welcome that the Bill provides a number of essential safeguards in regards to support with requests to claimants for information for audit. We particularly welcome the explicit right to independent advocacy in regards to complying with information requests (Section 87E). We also welcome (Section 87D) that people will have a right to support, including from another person “a supporter” when engaging in the process, and the Bill rightly states that supporter can be present during any interview, telephone or video call as part of cooperating with a request for information.

Section 87C provides a right to seek withdrawal of an information request, using a “good reason” test for Scottish Ministers to consider the request for withdrawal. If these provisions become law we believe the Scottish Government must work with stakeholders and, importantly, people with lived experience of the social security system, disability, and mental health problems to ensure guidance around the provisions is robust. We believe the risk to someone’s mental health, or ongoing impact on mental health problems should be fully considered when determining “good reason” for granting a withdrawal of an information request. We know that engagement with the social security system can be extremely challenging for people living with mental health problems, and this needs to fully considered when engaging claimants in information for audit purposes.

**Part 7 - Recovery from Compensation Payments**

*The Policy Memorandum explains that Part 7 of the Bill (Recovery from Compensation Payments) will apply where a person who gets social security payments as a result of injury, accident or disease, is also awarded compensation.*

*The person or organisation making the compensation payment must deduct the value of the social security payments from the amount paid to the individual and pay it instead to Scottish Ministers.*

*The provisions mirror those of the current DWP scheme, with the intention that devolved assistance will be treated in the same way as reserved benefits.*

**1. Do you have any views on this part of the Bill?**

**In particular, do the provisions in Part 7 raise any concerns for you in relation to the social security principles?**

No comment

**Part 8 - Scottish Commission on Social Security**

*Part 8 of the Bill (Scottish Commission on Social Security) brings additional regulations into the scope of the Scottish Commission on Social Security’s scrutiny and makes changes to its governance arrangements following recommendations from an independent review.*

*The Scottish Commission on Social Security (SCoSS) is an independent body, separate from the Scottish Government, set up to provide scrutiny of the Scottish social security system. The Bill proposes to extend its scrutiny function to ensure that it is able to scrutinise administrative regulations in addition to regulations about each form of assistance. The Bill will also remove the Commission’s accounting and auditing duties, replacing them with a duty to prepare an annual report, and remove its status as a Body Corporate, ensuring that the level of governance is proportionate and that SCoSS can focus on its advisory and scrutiny role.*

**Top of Form**

**1. Do you have any views on this part of the Bill?**

**In particular, do the provisions in Part 8 raise any concerns for you in relation to the social security principles?**

The Scottish Commission on Social Security (SCoSS) provides a vital role in providing independent scrutiny of the Scottish Social Security System. The 2018 Act does not provide clear powers for SCoSS to scrutinise administrative and other regulations, with the 2018 Act restricting scrutiny to regulations made under Chapter 2 “Types of Assistance to be Given” and Section 79 on the use of top-up powers.[[7]](#footnote-7) We very much welcome that this Bill extends the scope of scrutiny by SCoSS to a much wider array of regulations made through the 2018 Act. Of particular importance are regulations on: suitably qualified persons for the purpose of assessments; advocacy service standards; and rights and duties regarding re-determinations.

We believe the extension of scrutiny by the Commission to these parts of the 2018 Act will provide an invaluable safeguard for people supported by the Scottish Social Security system. Particularly, as set out in the 2018 Act, the Commission, when preparing a report on regulations to Scottish Ministers must have regards to both the Scottish social security principles, and any relevant international human rights instruments.

For the enhanced scrutiny powers of the Commission to be realised in practice it will be essential that the Commission is funded and staffed appropriately.

The Bill does not address wider arrangements for advice and scrutiny beyond the role of the SCoSS. As we stated in our submission to the Scottish Government consultation, ‘Scotland’s social security system: Enhanced Administration and Compensation Recovery’, which informed this Bill, we strongly believe advice on policy development and scrutiny of draft legislation and regulations should remain separate.[[8]](#footnote-8) Bottom of Form

We have previously contributed to the Disability and Carers Benefits Expert Advisory Group (DACBEAG). Our experience is that the non-statutory basis of DACBEAG allowed flexibility and scope to provide wide-ranging advice to Scottish Ministers. Advice from DACBEAG has been crucial in helping support positive policy development over key areas of the Scottish Social Security system including Disability Assistance assessment processes, the use of additional evidence to support claims, and arrangements for independent advocacy.

We believe that the role DACBEAG has played in supporting policy development complements the formal role that the Scottish Commission on Social Security (SCoSS) has in scrutinising draft legislation and reporting on Scottish Government and Social Security Scotland compliance with the Social Security Charter.

With the interim term of DACBEAG concluded, consideration should be given to how it, or a successor body, operates in the future to minimise pressure on members and the secretariat. This could include a wider or ad-hoc, topic-specific membership, to reduce pressure on permanent members of the group. We believe DACBEAG or an equivalent should be re-instituted and retained at least until the conclusion of the independent review of Adult Disability Assistance, which will be fundamental in making recommendations for the long-term future of Adult Disability Assistance. The independent review may wish to consider and make recommendations on how independent advice is best used going forward.

**Additional comments**

**Top of Form**

**1. Do you have any other comments?**

No commentBottom of Form

Bottom of Form

Bottom of Form

Bottom of Form

1. Money and Mental Health Policy Institute [The-State-Were-In-Report-Nov21.pdf (moneyandmentalhealth.org)](https://www.moneyandmentalhealth.org/wp-content/uploads/2021/11/The-State-Were-In-Report-Nov21.pdf) [↑](#footnote-ref-1)
2. JRF [Poverty in Scotland 2022 | JRF](https://www.jrf.org.uk/report/poverty-scotland-2022) 2022 [↑](#footnote-ref-2)
3. JRF [Poverty in Scotland 2022 | JRF](https://www.jrf.org.uk/report/poverty-scotland-2022) 2022 [↑](#footnote-ref-3)
4. SAMH [personal\_independance\_payment\_report.pdf (samh.org.uk)](https://www.samh.org.uk/documents/personal_independance_payment_report.pdf) [↑](#footnote-ref-4)
5. [Response 216494730 to Scotland's social security system: Enhanced Administration and Compensation Recovery - consultation - Scottish Government consultations - Citizen Space](https://consult.gov.scot/social-security/scotlands-social-security-system/consultation/view_respondent?uuId=216494730) [↑](#footnote-ref-5)
6. SAMH [Blog | Building safeguards into our social security system | SAMH](https://www.samh.org.uk/about-us/news-and-blogs/blog-building-important-safeguards-into-our-social-security-system#:~:text=Over%20the%20last%20few%20months%2C%20SAMH%20worked%20hard,who%20is%20applying%20for%20and%20receiving%20a%20benefit.) [↑](#footnote-ref-6)
7. [Social Security (Scotland) Act 2018 (legislation.gov.uk)](https://www.legislation.gov.uk/asp/2018/9/section/97) [↑](#footnote-ref-7)
8. [Response 216494730 to Scotland's social security system: Enhanced Administration and Compensation Recovery - consultation - Scottish Government consultations - Citizen Space](https://consult.gov.scot/social-security/scotlands-social-security-system/consultation/view_respondent?uuId=216494730) [↑](#footnote-ref-8)