

CONSULTATION ON WELFARE FUNDS (SCOTLAND) BILL

1.0 EXECUTIVE SUMMARY

- 1.1 The Scottish Parliament Welfare Reform Committee has asked for views on the draft Welfare Funds (Scotland) Bill. This follows a previous consultation by the Scottish Parliament which included a draft bill and to which the council responded in February 2014. Many of the matters on which they ask for views were covered by that earlier response. There is also a separate consultation from the Finance Committee about the financial memorandum attached to the Bill.
- 1.2 The Scottish Welfare Fund (SWF) was launched in April 2013 on an interim basis. It replaces parts of the former Social Fund previously administered by the Department of Works and Pensions (DWP). SWF is currently operated by local authorities using their powers to advance wellbeing. It provides help to vulnerable members of the community through Crisis Grants and Community Care Grants. Crisis Grants provide a safety net in a disaster or emergency. Community Care Grants provide support to those about to leave care to live on their own in the community, or to assist others to stay in the community. The interim scheme is operated under a set of national ministerial guidance which was put together jointly by CoSLA and the Scottish Government.
- 1.3 The draft bill sets out a new legislative framework for the SWF and the detail will be further set out in regulations and guidance which are not yet available for scrutiny. Ministers' intention is that the interim scheme will form the basis of the new permanent scheme to be set out in legislation. The main change relates to second tier reviews which are now proposed to be carried out by the Scottish Public Services Ombudsman (SPSO). Up to now, these have been carried out by local authorities at no additional cost.
- 1.4 In addition the draft bill allows for additional monies to be paid into the fund by the local authority. That second aspect is not a feature of the current fund and should be resisted as it could have a financial implication. Local authorities already have powers to make these types of payments under the powers to advance well-being so this has no advantage but could create an expectation if funds provided by the Scottish Government were not adequate that the local authority should supplement these from its own resources.
- 1.5 The main consultation poses 10 questions and a draft response to each of these is attached for consideration and amendment. Responses are due by Thursday 28 August 2014. The financial memorandum consultation poses another 9 questions and responses are due by Friday 29 August 2014, and again a draft response is attached. Responses to both should be no more than 4 pages of A4 in length.

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2.0 INTRODUCTION

2.1 The Scottish Parliament Welfare Reform Committee has asked for views on the draft Welfare Funds (Scotland) Bill. Additionally the Finance Committee has asked for views in relation to the financial memorandum relating to this Bill. The Bill seeks to put the interim arrangements for the Scottish Welfare Fund (SWF) on a statutory footing. The SWF was launched in April 2013 on an interim basis operated by local authorities using their powers to advance wellbeing. It provides help to vulnerable members of the community through Crisis Grants and Community Care Grants. Crisis Grants provide a safety net in a disaster or emergency. Community Care Grants provide support to those about to leave care to live on their own in the community, or to assist others to stay in the community. The interim scheme is operated under a set of national ministerial guidance which was put together jointly by CoSLA and the Scottish Government. The scheme has worked reasonably well providing effective support to vulnerable members of the community but has been relatively expensive to administer given the volumes.

3.0 RECOMMENDATIONS

- 3.1 The draft response to the consultation from the Welfare Reform Committee attached at Appendix 1 is approved.
- 3.2 The draft response to the consultation from the Finance Committee attached at Appendix 2 is approved.

4.0 DETAILCurrent arrangements

- 4.1 Argyll and Bute Council received the following funding for SWF for 2013/14 which has been continued unchanged for 2014/15:

FUNDING PURPOSE	2014/2015 (£)	Monthly profile (£)
Community Care Grants	263,907	21,992
Crisis Grants	108,853	9,072
Total Programme Funding	372,760	31,063
Administration	55,550	

- 4.2 In the first 12 months to 31 March 2014, the Council awarded grants totalling £303,969 which is 81% of the budget available. We processed 2,310 applications and made 1,638 awards. There is an underspend of £68,791 which was ring fenced and carried forward into 2014/15. In the first 3 months to 30 June 2014 we

spent £75,347 which is also 81% of the available budget excluding the carried forward underspend.

- 4.3 Each month a decision is taken by the Strategic Management Team on what priority levels to pay out for the following month. In April and May 2013 we paid out high priority claims only. In June 2013 this was extended to high and medium priority claims and this was further extended in June 2014 to include low priority claims as the underspend was continuing. Currently, the council must not pay out more than its allocated funds within a year and should endeavour to ensure that at least all high priority needs are met. If there is any year-end underspend of SWF monies, these are ring-fenced and carried forward to the following year. All of these arrangements could change once the more detailed regulations are drafted.
- 4.4 The Council receives enough administration funding to employ 2 FTE staff to work on SWF. To date, the Council has needed to employ 4 FTE to handle the volume of claims. This based on a telephone service only with no face-to-face service and no out of hours service. There has also been significant supervisory and management time expended in dealing with reviews, supplier arrangements, monthly reporting requirements, and practitioner meetings which is not costed directly to this activity. Excluding these costs, it cost a total of £115k to pay out c £304k last year which is not administratively efficient.
- 4.5 The SWF has been operating to a high quality standard as the following statistics for 2013-14 show. Of the 668 claims refused locally, only 60 (9%) have gone to first tier review. Of these, 4 were withdrawn, 43 were upheld and 13 were changed. Of the 43 upheld, only 8 have gone on to second tier review at which stage 4 decisions were upheld and 4 were changed. Across Scotland 5.6% of all applications rejected have gone on to first tier review. Of these 57% resulted in a change of decision. 12.3% of tier 1 cases where the original decision was upheld (144 in total) went on to second tier review and 51% of these resulted in a change of decision. Reviews have to be carried out very quickly – within 2 days for a crisis grant and within 3 weeks for a community care grant. The timescales for second tier reviews are 1 week for crisis grants and 6 weeks for community care grants.

Draft Bill

- 4.6 The draft bill is a short bill with 8 sections only. Section 1 creates the fund from grants paid by Scottish Ministers and allows for additional monies to be paid into the fund by the local authority. That second aspect is not a feature of the current fund and should be resisted. Local authorities have powers to make these types of payments already under the powers to advance well-being. It would not be appropriate to supplement any shortfall in funding from the Scottish Government directly into this fund. Section 2 provides for the purpose of the fund and replicates the exceptions to reserved matters set out in The Scotland Act 1998 Schedule 5 as amended by the 2013 order (SI 2013/192). Section 3 allows for local authorities to get another body to administer the fund on its behalf or for local authorities to administer the funds jointly and this is welcomed. Section 4 requires arrangements to be made for first and second tier reviews of decisions. Section 5 allows for further regulations to be made under the negative procedure and illustrates a number of particular areas such regulations should cover (how applications will be made, and procedures to be followed, eligibility of individuals, circumstances to be supported, type of assistance, arrangements for reviews, reporting to Scottish Ministers). Section 6 stipulates that local authorities must have regard to guidance from Scottish Ministers when exercising this function and that the guidance will

relate to all local authorities and that Scottish Ministers should consult on such guidance. Section 7 provides for commencement and section 8 gives the short title of the Act.

- 4.7 The consultation asks for comments on these draft provisions and if there are any matters that should be added to the draft bill.

Make-up of the fund

- 4.8 The draft bill states that each local authority shall maintain a welfare fund comprising any grants paid into it by Scottish Minister plus any funds paid in by the local authority. This differs from the current arrangements where the Scottish Welfare Fund is wholly funded by the Scottish Government and there is no top up when the monies are spent irrespective of need. As outlined above, there has been plenty of resource to meet current levels of demand, primarily because the Scottish Government topped up the fund nationally by £9.2m on top of the DWP transfer funding of £23.8m

Second tier review

- 4.9 The previous consultation offered 3 options for second tier review and the option now favoured is that these should be carried by the Scottish Public Services Ombudsman (SPSO). In the interim scheme this has been done within local authorities using an impartial panel of officers unconnected with the service responsible for delivering SWF. There have been just 8 second tier reviews within the council over the first 12 months and 4 decisions were overturned in full or part (50%). The main reason for reviews is that insufficient evidence was given in the initial application and the decision maker was unaware of all the facts, and that new evidence is now available. We are concerned that the SPSO will struggle to meet the tight timescales for second tier reviews and that staff and claimants might have to travel large distances to attend review hearings, which would be costly for all involved. Estimates of the costs involved seem realistic, but are relatively high in relation to the amounts involved.

Other matters for comment

- 4.10 This is an opportunity for the council to comment generally on any concerns in relation to SWF. In officers' view, the SWF is working well in fulfilling its aims of providing assistance quickly and more conveniently to our citizens. We have a good national contract in place through Scotland Excel and that means we can provide good value and service for community care grants. However administration is complex in terms of finding out detailed requirements (e.g. for carpets) helping arrange delivery, paying invoices etc. The low level of reviews indicates high confidence and understanding of the decisions being made. Some suggested comments are set out in a preamble section to the consultation response.

5.0 CONCLUSION

- 5.1 Policy and Resources Committee is asked to consider the draft responses at Appendices 1 and 2 and to suggest amendments before approval.

6.0 IMPLICATIONS

- 6.1 Policy: This will create the new permanent legislative arrangements for the Scottish Welfare Fund.

- 6.2 Financial: Provides for the ability of the council to contribute to the new welfare fund to supplement monies from Scottish Government. There is no budget for any such contributions.
- 6.3 Legal: In line with The Scotland Act 1988 schedule 5.
- 6.4 HR: None.
- 6.5 Equalities: Maintains equalities impacts of existing interim scheme.
- 6.6 Risk: Low risk as it largely confirms interim arrangements which are working well.
- 6.7 Customer Service: Provides no change to service to customer as it confirms interim arrangements.
- Appendix 1: Draft consultation response to Welfare Reform Committee
Appendix 2: Draft consultation response to Finance Committee

Douglas Hendry
Executive Director Customer Services
15 July 2014

For further information please contact Judy Orr, Head of Customer and Support Services Tel 01586-555280 or Fergus Walker, Revenues and Benefits Manager Tel 01586-555237

Background papers

Consultation on Scottish Welfare Fund: Council 13 February 2014

Link to draft bill:

[http://www.scottish.parliament.uk/S4_Bills/Welfare%20Funds%20\(Scotland\)%20Bill/b51s4-introd.pdf](http://www.scottish.parliament.uk/S4_Bills/Welfare%20Funds%20(Scotland)%20Bill/b51s4-introd.pdf)

Link to Financial Memorandum:

[http://www.scottish.parliament.uk/S4_Bills/Welfare%20Funds%20\(Scotland\)%20Bill/b51s4-introd-en-bookmarked.pdf](http://www.scottish.parliament.uk/S4_Bills/Welfare%20Funds%20(Scotland)%20Bill/b51s4-introd-en-bookmarked.pdf)

Welfare Funds (Scotland) Bill – call for written evidence from Welfare Reform Committee, The Scottish Parliament

Preamble to consultation response

Argyll and Bute Council welcomes the opportunity to respond to this consultation. The Council considers that the interim scheme has provided an effective source of support to some of the most vulnerable in our communities. However it notes that many applicants are not eligible for support from the Scottish Welfare Fund as their hardship often reflects a delay in processing their benefit application and they have to be referred back to DWP for a short term benefit advance. Others were initially not eligible as their hardship stemmed from a benefit sanction and they were excluded from the scheme until April 2014. With the introduction of the new claimant commitment, the incidence of claimant sanctions is expected to rise. The council is aware that this is in line with UK government policy but is concerned about the impact on the welfare of some of the most vulnerable members of our community.

The Council considers that the introduction of SWF has worked well. Although volumes of applications have reduced from those experienced by DWP, this is in part due to the reduced reliance on cash for support and the increased use of goods and vouchers. Whilst undoubtedly less popular with claimants, this means that assistance is much more targeted. The new national contract from Scotland Excel has also meant that better value can be obtained through increased purchasing power. The council considers these aspects to be a major improvement. The council has also welcomed the fact that grants do not have to be repaid and would be keen to see this element enshrined in legislation.

One of the key differences between Scotland and England is that a national scheme has been introduced in Scotland and it has not been left to individual local authorities to introduce different schemes for each local authority area as in England. This means that there is consistency of decision making. It should be noted that in Wales the decision was taken to have a single scheme operated by an outsourced company – Northgate – rather than by individual local authorities. It is disappointing that the consultation provides no information about how well each of the different approaches taken in England, Wales and Scotland is working. Such a review would be welcomed before the new guidance and detailed regulations are drafted.

Because of the short time for introduction, the opportunity was lost to commission a single national computer system to support the scheme and each local authority had to make its own arrangements. There are 4 main systems in use. There is now an opportunity to commission a single hosted national system to support the new permanent scheme, with a single set of parameters and interface facilities. This would be consistent with the national public sector ICT strategy.

There is also an opportunity to consider the efficiencies of a single consolidated team to support telephone and on-line applications with the benefits of economies of scale. It would be much easier now to build in local variations in referrals, as this has all been worked out and is now known. This council has serious concerns about the administration costs of the current scheme which is currently very expensive to administer for small authorities with relatively low volumes despite making use of the Scotland Excel contract. This would be one way to improve its cost efficiency. The opportunity should be taken to ensure that the new permanent scheme is designed with key improvements in efficiency in mind.

General

Q1. Are you in favour of the Bill and its provisions? Do you think the Bill fully achieves the Scottish Government's aim of providing assistance for short term need and community care?

Response:

The Bill enshrines in legislation the interim arrangements for the delivery of the Scottish Welfare Fund and is to be welcomed.

It is clearly aimed at meeting the stated objective of providing assistance for short term need. It is framed potentially more widely than the definition in the current interim scheme which covers short term need in an emergency or crisis where there is an immediate threat to health or safety. The current scheme does not provide assistance in other situations where short term need might also arise. If there is an extension to the scheme (which will not be clear until the regulations and guidance are drafted), this would need to be matched by the provision of commensurate funding.

The community care provisions are restricted to qualifying individuals, unlike the provisions relating to short term need. Whilst this is presumably essential in order to meet the requirements of The Scotland Act 1998, they are quite restrictive. A local authority might wish to support other disadvantaged groups in a similar way but is unable to do so under this scheme.

This council would like to see a more detailed section specifically on the purpose of the Scottish Welfare Fund. The current section mirrors what is included in SI 2013/192 The Scotland Act 1998 (Modification of Schedule 5) No. 2) Order 2013, but does not include anything additional which would set these arrangements apart from those enacted in England and Wales. Whilst this provides more latitude for future regulations, it does not reflect some of these distinctive differences which we think are valuable and should be retained. The main differences are that it is a national scheme and that assistance is by way of grants and not loans. It has not been left to individual local authorities to introduce different schemes in each local authority area and this provides some consistency of decision making. Whilst the bill makes reference to the need to have regard to guidance issued by Scottish Ministers, it does not enshrine the principle of a national scheme with local delivery.

Q2. The interim SWF scheme has already been running for two years. Do you feel that the Bill has suitably taken on the learning from this time?

Response:

The bill is framed at a high level and does not contain any detailed regulations which might reflect the learning from the interim scheme. The main change that it makes from the interim scheme is to create a formal second tier review process to be undertaken by the SPSO – see comments on Q7 below.

Q3. Is there anything else that you feel should be included in the Bill?

Response:

See comments made under Q1 above.

Q4. Will the Bill and its provisions have a particular impact on equalities groups?

Response:

The guidance on the fund will influence who is successful by specifying eligibility criteria. These are not set out in the Bill so we can make no comment on the potential

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impact on equalities groups. The current guidance does highlight certain vulnerabilities which may align with protected characteristics. The guidance for the interim scheme was broadened to now include people subject to DWP sanctions, and the definition of families has been widened to include families without children. These changes should be carried forward to the permanent scheme.

Administration of Welfare Funds

Q5. Do you agree with the proposal that local authorities have the option to outsource the provision of the fund to a third party or jointly administer the fund across local authority boundaries? What are the benefits or drawbacks to this approach?

Response:

Yes. Local authorities should have the flexibility to determine how best to administer the scheme including outsourcing the scheme administration. The Bill provides no details on how the administration of the scheme will be funded. The interim scheme has proved expensive for smaller authorities to administer costing well in excess of the funds provided for this purpose. Local authorities should therefore have the flexibility to join together to achieve economies of scale should they choose to do so.

Review of decisions and the SPSO

Q6. What are your views on the proposed internal local authority review process?

Response:

The proposals allow local authorities to review decisions in certain as yet unspecified circumstances. Under the interim scheme, all applicants have had the right to request a review of their decision by a different decision maker within a certain time period in a broad range of circumstances. The reviewing officer cannot reduce or remove an award. This type of review is in line with the review mechanism for housing benefits and council tax reduction scheme applications and has operated in tight timescales. It is an appropriate mechanism.

Q7. Do you agree that the SPSO is the appropriate body to conduct secondary reviews?

Response:

The main advantage of having second tier reviews carried out by SPSO is in consistency of decision making and perceived impartiality. However this is at the expense of added cost. The current arrangements of having such reviews carried out at local by individual local authorities appear to have been working well and do not need replacing. The financial memorandum suggests that the cost per second tier review by SPSO could range from £625 per case (if review numbers continue to be low) to c £200 per case if they quadruple from current levels. These costs are considered disproportionate to the average value of a claim which is £88 for 2013/14. They represent an increase on current admin cost funding of 8% for less than 0.2% of the case load.

The SPSO is not currently equipped to be able to handle second tier reviews in the tight timescales needed for the Scottish Welfare Fund. There is concern that applicants and local authority staff would be required to attend appeal hearings in person at some distance which would be time consuming and costly for all. Currently second tier reviews are handled at local authorities and contact made with the relevant participants by telephone which is more convenient for all and much less costly.

Further provision - regulations

Q8. What are your views on the level of detail that will be contained within the regulations? Is there any aspect which you feel would benefit from being on the face of the Bill?

Response:

The content of the regulations as described by section 5 in the Bill appears comprehensive and appropriate. There are advantages in this detail being in regulations in order to allow these to be updated more easily should the need arise. As already stated in the response to question 1, we would prefer to see the decision that the scheme is to be one of grant payments rather than loans to be included in the bill and not left to regulations because of the fundamental nature of this decision.

Financial Memorandum

Q9. Do you think that the costs attributed to the running of the fund and the set-up of the SPSO to administer secondary reviews are realistic and proportionate?

Response:

No – the costs incurred by local authorities in running the fund have been understated. There has been no attempt to collate actual costs of operating the Scottish Welfare Fund in its first full year of operation by local authorities. The costs incurred by this council have been well in excess of the funding provided. This has had a detrimental knock-on effect on other services provided. In 2013/14 this authority processed 2,310 applications and made 1,638 awards and received funding of less than £24 per case. This included making the decision, recording applications and decisions, reviewing decisions where necessary, fulfilling the awards and providing data to Scottish Government. The administration costs are possibly reasonable where the volumes allow for some economies of scale, but they are understated for smaller local authorities due to the complexities surrounding the provision of goods as opposed to cash.

In contrast, the budget for SPSO of £400,000 for reviewing up to 2,000 cases per annum appears realistic.

Other provisions

Q10. Do you have any comments on any other provisions contained in the Bill that you wish to raise with the Committee?

Response:

Section 1(b) should be removed. Local authorities already have powers to make welfare payments under the Powers to Advance Wellbeing and there is no need to confuse monies specifically provided by Scottish Ministers for this welfare fund with other monies provided by local authorities. Any additional monies provided by local authorities should not necessarily be restricted by the terms of the statutory guidance and the detailed regulations which will be laid in future.

Section 6(3) has been revised from the earlier draft and no longer requires Scottish Ministers to consult every local authority to which the guidance relates before issuing, varying or revoking guidance. This omission should be rectified. Individual local authorities operate the scheme and their views and learning should be taken into account.

Finance committee questionnaire

This questionnaire is being sent to those organisations that have an interest in, or which may be affected by, the [Welfare Funds \(Scotland\) Bill](#) (FM) (page 9 of the [Explanatory Notes](#)).

In addition to the questions below, please add any other comments you may have which would assist the Finance Committee's scrutiny of the FM.

Consultation

1. Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?

Response

Yes, Argyll and Bute Council responded to the consultation issued in November 2013 entitled "Consultation on draft Welfare Funds (Scotland) Bill and options for challenging decisions made by local authorities on applications to the Scottish Welfare Fund".

Our response stated:

"There is now an opportunity to commission a single hosted national system to support the new permanent scheme, with a single set of parameters and interface facilities. This would be consistent with the national public sector ICT strategy. There is also an opportunity to consider the efficiencies of a single consolidated team to support telephone and on-line applications with the benefits of economies of scale. It would be much easier now to build in local variations in referrals, as this has all been worked out and is now known. This council has serious concerns about the administration costs of the current scheme which is currently very expensive to administer for small authorities with relatively low volumes despite making use of the Scotland Excel contract. This would be one way to improve its cost efficiency. The opportunity should be taken to ensure that the new permanent scheme is designed with key improvements in efficiency in mind."

In relation to the proposals for second tier review we said:

"A local authority panel is the current method for second tier decisions. These reviews can be carried out quickly and at a relatively low cost. The latter is important as this needs to be proportionate. At present it is costing an excessive amount to administer the scheme particularly for smaller authorities despite having very low costs for second tier reviews. Increasing the bureaucracy of second tier reviews will further add to these costs without providing demonstrable value. The average award of a crisis grant cross Scotland is £60. Any review by SPSO or a tribunal is likely to cost many times the average award level, and it is inconceivable that they would be able to do this within a week. Whilst the average award value for a community care grant across Scotland is much larger at c £578 and the timescales are not so constrained, it is still likely that the costs of second tier reviews by these other bodies will be greater than any award."

2. If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?

Response

The financial memorandum makes no comment on the matters raised in our earlier response.

3. Did you have sufficient time to contribute to the consultation exercise?

Response

We asked for a week's extension to allow the response to be approved at our council meeting and this was agreed. We sent a draft of the response in advance of the original deadline so as not to delay review of comments.

Costs

4. If the Bill has any financial implications for your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details.

Response

The Council receives £55,000 to administer the scheme annually. This is enough administration funding to employ 2 FTE staff to work on SWF. To date, the Council has needed to employ 4 FTE to handle the volume of claims and provide cover for sickness and holidays. This based on a telephone service only with no face-to-face service and no out of hours service. There has also been significant supervisory and management time expended in dealing with reviews, supplier arrangements, monthly reporting requirements, and practitioner meetings which is not costed directly to this activity. Excluding these costs, it cost a total of £115k to pay out c £304k last year which is not administratively efficient. This cost is made up of £101k staffing costs and £14k on software and other costs of making payments. The council is significantly subsidising the costs and this is unsustainable. This is likely to be the case in many smaller councils. This means that the financial memorandum is significantly understating the real costs of administering the scheme.

5. Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?

Response

The estimated costs on local authorities in the FM are understated for the reasons set out in the response to question 4 above.

The figures quoted for set up and running costs for the SPSO appear reasonable. However, these are based on 2000 second tier review cases whereas the statistics show that there were only 144 such cases in 2013/14 across all of Scotland. If the lower cost based on 400 reviews were applicable, that would produce a cost per review of £1,736 compared to an average award of a crisis grant of £71 and community care grant average award of £644.

The figures for programme funding are set out at the budgeted levels of £33m. This compares to actual spend of £29m for 2013-14 with £4.26m to be carried forward to 2014-15. At present, it is not clear why the projections support this increasing back up

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to the full budget of £33m. This amount exceeds the monies spent by DWP. Also the arrangements for disbursing community care grant monies are tighter in that in most cases goods are provided rather than cash as previously and local authorities benefit from their consolidated buying power.

6. If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?

Response

No – this council is not content that it will be able to meet the ongoing administration costs of the SWF scheme within the monies being made available. The council will have to look at alternative arrangements for carrying out its responsibilities jointly with other bodies in order to realise some economies of scale, although this may be to the detriment of local arrangements.

7. Does the FM accurately reflect the margins of uncertainty associated with the Bill's estimated costs and with the timescales over which they would be expected to arise?

Response

It would be appropriate to collate actual costs for operating the interim scheme for 2013-14 to inform the FM. We are not aware that these have been requested from local authorities. This would help to reduce uncertainties.

Wider Issues

8. Do you believe that the FM reasonably captures any costs associated with the Bill? If not, which other costs might be incurred and by whom?

Response

See response to questions 5, 6 and 7 above re costs for local authorities. The only other potential costs would be for the voluntary sector who may act as advocates for potential welfare fund claimants and their costs are not captured.

9. Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs?

Response

Subordinate legislation will determine the shape of the scheme and will have an impact on the quantum of the costs. However these are not expected to be additional to the type of costs outlined within the financial memorandum.