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Social Security Committee Comataidh Tèarainteachd Sòisealta

Stage 1 Report on the Social Security Administration and Tribunal Membership (Scotland) Bill



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Social Security Committee

To consider and report on matters relating to social security (including the delivery and payment of benefits that help address poverty) falling within the responsibility of the Cabinet Secretary for Social Security and Older People.



<http://www.scottish.parliament.uk/parliamentarybusiness/CurrentCommittees/social-security-committee.aspx>



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Introduction

1. The Bill was introduced on 27 April 2020 by the Cabinet Secretary for Social Security and Older People. In a letter to the Committee of 1 May 2020, the Cabinet Secretary explained why she regarded the Bill as urgent and requested an expedited scrutiny timetable. The Committee was happy to assist.
2. The Social Security (Scotland) Act 2018 (the 2018 Act) provides the legislative framework for devolved social security. The policy memorandum for this Bill says:

“The Bill is not about substantive policy development but rather a small series of fixes to the legislative framework for social security in Scotland”

Overview

3. The Bill is short and makes provision in five areas:

- **Appointees:** to allow Ministers to appoint a person to receive benefit payments on behalf of someone else if the claimant is a child or, if an adult, where the claimant agrees to the appointment. (Section 1)
- **Non-disclosure of health information:** to allow Ministers to withhold health information from a claimant if it would be harmful to reveal it. (Section 2)
- **Top-up Benefits:** to enable regulations that create ‘top-up’ benefits to include provisions on offences and investigations. (Sections 3 to 6)
- **Terminal illness:** to allow health professionals, other than doctors, to verify that a claimant is terminally ill for the purposes of fast-tracking their disability benefit claim. (Section 7)
- **Tribunals:** to allow the temporary appointment of judges from other jurisdictions to sit on Scottish tribunals, including the Scottish Social Security Chamber of the First-tier Tribunal. (Sections 8 and 9)

Cost of the Bill

4. The cost for the main policy driver for the Bill, extending the fraud offences provisions to cover Scottish Child Payment, is estimated at £405,000. Broadly, overpayment of benefits due to fraud is estimated to be between 1% and 6%. A fraud rate of 3% for Scottish Child Payment could represent increased benefit expenditure of £4.7m.
5. The cost of the appointee process will be 'relatively small' and the cost of the tribunals provisions will be up to £455,000 (the cost of five salaried members).¹

Committee consideration

6. On 30 April 2020 the Committee agreed its approach to stage 1 scrutiny and signed-off a call for written views. The impact assessments associated with the bill were provided to the Committee on 6 May and published on 15 May. By 17 May the Committee had received [14 submissions](#). Except for the provisions on appointees, respondents did not object to the measures in the Bill. We held a single evidence session on 21 May. We are grateful for those who were able to make their views known to us in the short time available.
7. The Delegated Powers and Legislative Reform Committee considered the Bill in private on 12 May and was content with the delegated powers provisions. The Finance and Constitution Committee did not consider the Bill.

Appointees for children

8. Appointees can receive and manage benefits on behalf of someone else. This Bill will enable an appointee to be made for a child. The policy memorandum refers specifically to Child Disability Payment which will provide financial support for children who have either a physical or mental disability or who are terminally ill.
9. Currently for reserved benefits, the DWP will usually appoint a child's parents to manage any claim for benefits and to receive payments on a child's behalf until the age of sixteen. This is not the case for devolved benefits. Instead, the Policy Memorandum states that "most parents and some other persons will already have the parental right to act as a child's legal representative and so do not need to be formally appointed." However, there will be other situations where a child does not live with anyone with legal authority or who is willing to act on the child's behalf. The 2018 Act does not allow appointees for children.

Appointees for adults with capacity

10. The 2018 Act already provides for appointees for adults who lack capacity. This Bill will enable an appointee to be put in place for any adult *with capacity*, where the adult consents.
11. For an adult claimant with capacity, the only requirement for an appointee is that the claimant consents to the appointment and that the appointment must be terminated if consent is withdrawn. The policy memorandum gives no detail about how it will be ensured that consent is explicit, informed and freely given.
12. Respondents including Child Poverty Action Group (CPAG), Citizens Advice Scotland (CAS), Equality and Human Rights Commission (EHRC), Scottish Association for Mental Health (SAMH), Epilepsy Scotland and the Law Society of Scotland (the Law Society) called for safeguards to protect the appointee system from abuse including provision to interview the claimant and appointee, challenge any decision to appoint and resolve disputes.
13. Craig Smith (SAMH) said:
 - ” “We are concerned by the lack of safeguards around the appointee, how the appointeeship is monitored and how people can raise concerns about a vulnerable person or how the vulnerable person themselves can raise concerns.” ²
14. EHRC and the Law Society of Scotland advised that without safeguards in primary legislation, the appointee system is not compliant with human rights requirements. The Law Society said:
 - ” “We are concerned that the current system of appointeeship set out in section 58 of the Social Security (Scotland) Act 2018 lacks sufficient safeguards to ensure full compliance with Articles 6 and 8 of the European Convention on Human Rights and with the UN Convention on the Rights of Persons with Disabilities. We are concerned that the proposed provisions on appointees in the current Bill replicate these issues in relation to adults who may be capable but may also be more vulnerable and susceptible to abuse.” ³
15. The Law Society suggested looking to the Adults with Incapacity (Scotland) Act 2000 which includes:
 - ” “clear procedures for appointment and termination, principles which guide the actions of the attorney and promote involvement of the individual, supervision by the Office of the Public Guardian, obligations to account, and recourse to legal remedies when things go wrong.” ³
16. In contrast to the current DWP system where, to avoid delay and distress, an appointee is automatically made for a terminally ill person, the proposals in this Bill would require consent from a terminally ill claimant before an appointee could be put in place. CPAG observed:

” “The proposals for adults may cause difficulties in relation to terminally ill people – which appears to be the main group that they are intended to help.”⁴

17. The Cabinet Secretary advised that work is currently underway with stakeholders on how the current provisions in the 2018 Act (for adults with incapacity) will operate. She advised:

” we will put in place appropriate and proportionate safeguards on which we will consult more fully on due course.

Source: Social Security Committee 21 May 2020 [Draft], The Cabinet Secretary for Social Security and Older People (Shirley-Anne Somerville), contrib. 41⁵

18. In respect of the new provisions in this Bill for appointees for children and adults with capacity who consent, she added:

” As for other appointee arrangements, we will ensure that appropriate safeguards are in place, and we are developing guidance to make sure that there is a robust and flexible process to ensure that the right to social security is protected.

Source: Social Security Committee 21 May 2020 [Draft], The Cabinet Secretary for Social Security and Older People (Shirley-Anne Somerville), contrib. 41⁵

19. We welcome the Cabinet Secretary's undertaking to work with stakeholders to develop appropriate procedures and guidance for appointees. We also welcome her confirmation that she is “perfectly relaxed” about the guidance being put on a statutory footing.

20. In a subsequent letter of 29 May, the Cabinet Secretary advised that “to form the basis for more substantive engagement with stakeholders”, a discussion paper is being prepared. We note that this will be shared with the Committee ahead of stage 2 and that the guidance to be developed from this will also cover appointees for adults without capacity.

21. The letter also repeats the Cabinet Secretary's view that to retain flexibility “the detail around the operational delivery of the appointee provisions is best set out in guidance, rather than fixed in law.”

22. The Committee agrees that it may be useful for some adults with capacity to be able to nominate an appointee to collect benefits on their behalf. The principal safeguard is that the adult must give consent. It would be helpful if the Scottish Government could give examples of circumstances in which a claimant's rights would be safeguarded by having an appointee, other than in cases of terminal illness.

23. Whilst we agree that operational detail sits best in guidance, the Committee's view is that this Bill should outline the general safeguarding principles that will underpin the guidance. These may include providing for mechanisms to challenge appointee decisions, undertaking periodic reviews and resolving disputes. We look forward to sight of the discussion

paper and the guidance as it is being developed and recommend that the guidance should be statutory.

Non-disclosure of health information

24. Linked to the provision for a claimant, who consents, to have an appointee, is the provision to enable Scottish Ministers to withhold information “which would be likely to cause serious harm to the physical or mental health of the recipient.”⁶ Information would be withheld if a registered medical practitioner or a registered nurse informs Scottish Ministers that disclosure of the information could cause serious harm to the physical or mental health of the claimant.
25. The Policy Memorandum discusses this in the context of appointees for people who are terminally ill and states that this provision is a response to the Chief Medical Officer's Guidance. In its submission, Macmillan Cancer Support refers to:
- ” “some cases early on in Universal Credit rollout of people finding out they may have had less than 6 months to live through their UC journal.”⁷
26. However, this non-disclosure provision is not limited to cases of terminal illness. It would allow health information to be withheld in any circumstance where disclosing it would cause serious harm to a person's physical or mental health.
27. SAMH called for more clarity and a definition of “serious harm to physical or mental health.”²
28. The Law Society expressed concerns:
- ” “These provisions allow the Scottish ministers to withhold information to which the person seeking it, including the individual himself or herself, would otherwise be entitled. We are concerned that such a requirement may not be human rights-compliant.”³
29. Both CPAG and the Law Society questioned the suggestion in the Policy Memorandum that an appointee could be useful where a claimant is capable but Scottish Ministers find it necessary to withhold information considered harmful to the claimant. The Law Society points out:
- ” “It is difficult to envisage how an adult could be made aware of and agree to the need for an appointee without being made aware of the information that Scottish Ministers consider harmful to them.”³
30. The Cabinet Secretary said:
- ” Social Security Scotland will withhold information only when a medical practitioner has decided that disclosure of that information would be likely to cause the patient serious physical or mental harm. We anticipate that that will happen very rarely, but it is possible.

Source: Social Security Committee 21 May 2020 [Draft], Shirley-Anne Somerville, contrib. 66⁸

31. **The Committee understands the rationale for, in some cases, withholding information from a claimant where there has been a diagnosis of terminal**

illness. The Committee would be grateful for other examples of information that might be withheld on the basis that it could cause serious harm. Where an appointee is already in place, the Committee can envisage how this could more easily protect a claimant's rights, but only where an appointee was already in place. It is difficult to see how an appointee could be put in place, with the claimant's consent, whilst withholding information that is considered harmful.

Top-up of reserved benefits

32. The Bill will allow criminal offences and powers to investigate offences to be created for top-up benefits such as the Scottish child payment. None of the respondents objected to ensuring consistency.
33. One of the offences is a failure to notify a change of circumstances. Where a benefit tops up a reserved benefit it was pointed out that there may be confusion about which agency needs to be notified. CPAG suggested that it should not be necessary to notify both DWP and Social Security Scotland. We agree.
34. Benefit overpayments are currently dealt with through the Sheriff Court. The 2018 Act included provision for regulations to be made to enable overpayments to be dealt with by the First-tier Tribunal. The Bill would extend this regulation making power to include overpayments of top-up benefits, such as the Scottish Child Payment.
35. The Health and Social Care Alliance and CAS seek the transfer of jurisdiction to be on the face of the 2018 Act (by way of an amendment to this Bill) rather than left to regulations. CAS explained:
- ” “despite consensus around the principle of challenge in a Tribunal in Parliament and subsequently from discussions with stakeholders, regulations have not been brought forward at the time of writing.”⁹
36. In our call for views, we asked whether there were provisions, other than those on criminal offences, that apply to other benefits that should also be extended to top-up benefits.
37. CPAG suggested that the duty to inform people about possible eligibility to other benefits, as provided in section 53 of the 2018 Act, would be a useful addition. Given the Committee's recent work on benefit take-up, we support this and welcome the Cabinet Secretary's response:
- ” The proposal that has been put forward is an interesting one, and I will certainly be looking at it with great interest.

Source: Social Security Committee 21 May 2020 [Draft], Shirley-Anne Somerville, contrib. 101¹⁰

38. **The Committee is content with the proposals to allow criminal offences and powers to investigate offences to be created for Scottish Child Payment and any other top-up benefit. However, the Scottish Government is requested to confirm how, and to whom, claimants of Scottish Child Payment and any other top-up benefits will be expected to notify a change of circumstance.**
39. **The Scottish Government is asked to explain the delay and confirm its timetable for bringing forward regulations to transfer jurisdiction from the sheriff court to the First-tier Tribunal.**

40. **The Scottish Government should bring forward amendments at stage 2 to ensure that the duty to inform people about their eligibility for other benefits applies to “top-up” benefits as it does for any other form of assistance as provided for in Chapter 2 of the 2018 Act.**

Diagnosing terminal illness for disability assistance purposes

41. Section 7 would allow health professionals, other than doctors, to verify that a person is terminally ill for fast-tracking a claim for disability benefit.
42. The professionals who are authorised will be set out in regulations but must include registered nurses. Scottish Ministers may set out other requirements such as training qualification and experience or having a professional relationship with the claimant.
43. Most of the respondents who expressed a view on this provision had been involved in discussions about the terminal illness provisions in the 2018 Act. It appears that the restriction in the 2018 Act to ‘medical practitioner’ was an oversight due to the short timescale for considering the proposal. None of the respondents opposed the extension to registered nurses, but there were mixed views to any further extension.
44. It was suggested that specialist nurses already have the required skills and experience, but that continuing professional development should be provided. This could include, for example, information about eligibility and how to work with the clinical guidance (FATE, Macmillan, Marie Curie/MND). The Alliance and Parkinson's UK Scotland/PSPA/MSA sought reassurance that nurses employed in the third sector would be able to act under the terminal illness rules.
45. The Committee asked which health professionals will be covered by this provision. In response, the Cabinet Secretary explained:

” It is critical that we get that right, but it is also critical that what we do allows us enough flexibility to deal with changing circumstances in the health professions. Previously in the bill process, we discussed whether we could say, for example, that it would be “specialist nurses”, but there is no agreed definition of “specialist nurse” or the training that would be required for a person to be called a specialist nurse.

Source: Social Security Committee 21 May 2020 [Draft], Shirley-Anne Somerville, contrib. 70¹¹

46. In her letter of 29 May, the Cabinet Secretary contrasts the Scottish Government's approach with that of the DWP, stating:

”The Department for Work and Pensions only define in guidance, not regulations, who may complete their DS1500 form which certifies terminal illness according to their rules. We have chosen to use primary legislation, accompanied by regulations, to define who is able to make the diagnosis and certify as this provides a legally binding solution.”

47. **The Committee supports an extension to who can verify that a person is terminally ill for the purpose of fast-tracking a claim for disability benefit. The Committee also supports the general approach taken; to make**

provision in primary legislation that is then supported by regulations. The Committee looks forward to sight of the draft regulations in due course.

Tribunal membership

48. Part 2 of the Bill would allow temporary appointments of judges and former judges from other jurisdictions to Scottish First-tier and Upper Tribunals. Although the provisions are not restricted to social security, they will allow a greater pool of expertise for the social security chamber of the First-tier Tribunal.
49. Judges in devolved tribunals are paid on fee-based system. In the reserved tribunals system there is a mix of fee and salaried appointments. The policy memorandum states:
- ” “Within the reserved Social Entitlement Chamber, salaried judges provide the strategic judicial leadership required to maintain consistency and efficiency of decision-making across a high volume of membership and cases, which is thought to be critical to the effective and efficient running of the reserved social security jurisdiction.” ⁶
50. These sections in the Bill were not addressed to any degree in the written submissions although Epilepsy Scotland noted that “communication with current tribunal members about upcoming transition arrangements has been poor.” It added that on transferring from the reserved to the devolved system: “extensive training is required, given the different ethos and culture of Scottish social security.” ¹²
51. The Law Society acknowledged the expertise of existing judicial office-holders but suggested bringing judicial office-holders over from the reserved system should be a temporary measure. It explained:
- ” “efficient delivery is at the heart of the new system, but there is also the opportunity to develop decision-making and resolution under a distinctive approach to social security under Scots law.” ³
52. We asked the Cabinet Secretary whether the provision for temporary judicial appointments is a temporary measure. She responded:
- ” The ability to make temporary appointments will not itself be temporary. The ability to temporarily authorise existing judges to sit on the Scottish tribunals is not new. The Tribunals (Scotland) Act 2014 sets out a list of those who can be temporarily authorised to sit on the Upper Tribunal. The amendments that are provided for under the bill widen that list to allow more types of judges, with current and former judges to be temporarily authorised to sit in the First-tier Tribunal and Upper Tribunal.

Source: Social Security Committee 21 May 2020 [Draft], Shirley-Anne Somerville, contrib. 83¹³

53. **The Committee recognises that a power to temporarily authorise existing judges to sit on tribunals is not new and is required to address a current lack of capacity in Scottish tribunals. We do not object to these provisions but we do ask the Scottish Government to reflect on the opportunity created by the establishment of a new distinct Scottish social security**

system and how, longer term, the devolved tribunal system for this will be supported by an appropriate pool of judges.

Other issues

54. A number of respondents suggested additional issues that could usefully be taken forward in this Bill. CAS, CPAG and the Alliance called for the ability to enable carer and disability benefits to be suspended rather than stopped, for example when a claimant goes into hospital. This was also recommended by SCOSS in its report on the draft Child Disability Payment regulations ¹⁴

55. CPAG explained:

” “The power to make an award of benefit but to suspend payment is used by the DWP in circumstances such as when claimants go into hospital or care homes, or are in legal detention. Payments are also suspended prior to terminating a claim when, for example, the DWP has lost touch with a claimant. All these issues will arise in the Scottish social security system. ” ⁴

56. **The Committee agrees that the Scottish social security system should make provision for carer and disability benefits to be suspended. We are pleased that the Cabinet Secretary has indicated her intention to bring forward the necessary amendments at stage 2.**

Consultation

57. Before concluding our report, the Committee felt it was important to note that there was no specific public consultation on this Bill prior to introduction.
58. We acknowledge that many of the issues have raised in other consultations. Terminal illness provisions were considered during a confidential consultation on the clinical guidance on terminal illness and the issue of appointees for children has been raised previously by stakeholders, including the Scottish Commission on Social Security. On the tribunals measures, “consultation has been limited to the judicial stakeholders charged with the operation of the Scottish Tribunals System, the Ministry of Justice and Her Majesty’s Court and Tribunals Service (HMCTS).”⁶
59. Although many of our respondents had informal discussions with the Scottish Government, these generally concerned the terminal illness provisions. There appears to have been little stakeholder discussion on the detail of the appointee provisions.
60. In general, the lack of consultation was not raised as a concern however it was highlighted in the joint submission from Parkinson’s UK Scotland, PSPA and MSA Trust, We draw the Scottish Government’s attention to their comments about the increasing use of “managed consultations” not advertised publicly:
- ” “the range of stakeholders approached is predetermined - which can exclude important voices from influencing policy and legislation that affects their communities of interest.”¹⁵

61. **The Scottish Government must do more to ensure that opportunities to contribute and shape policy, as it is being developed, are publicly offered to all. In the case of this Bill, the proposals on appointees would have benefited from more stakeholder input.**
62. **We agree with the respondents who suggested the Scottish Government should consult those such as the Social Security Experience Panels and the Disability and Carer Benefits Expert Advisory Group, particularly on the proposals for appointees. We welcome the Cabinet Secretary’s agreement to now do this.**

Conclusion and recommendation to the Parliament

- 63. The Committee draws the Scottish Government's attention to the approach taken in this Bill to safeguards for appointees (not creating any legislative provision) and compares that to the approach taken to who can diagnose terminal illness (primary legislation accompanied by regulations).**
- 64. The Committee supports the general principles of the Bill and in doing so looks forward to engaging positively with the Scottish Government on the issues raised around appointees and ensuring appropriate safeguards for claimants and those acting on their behalf.**

Annex A - Evidence

Written evidence

The Committee received the following written submissions in response to its call for views:

- [deafscotland](#)
- [Friends at the End SCIO](#)
- [Macmillan Cancer Support](#)
- [Epilepsy Scotland](#)
- [Scottish Association for Mental Health](#)
- [Health and Social Care Alliance Scotland](#)
- [Citizens Advice Scotland](#)
- [Hospice UK](#)
- [Joint Submission from Marie Curie and MND Scotland](#)
- [Equalities and Human Rights Commission](#)
- [Child Poverty Action Group](#)
- [Enable Scotland](#)
- [Joint Submission from Parkinson's UK, PSPA and the MSA Trust](#)
- [Law Society of Scotland](#)

Oral evidence

[Official report - 21 May 2020](#)

Extracts from minutes

10th Meeting, 2020 (Session 5), Thursday 21 May 2020

1. Decision on taking business in private: The Committee agreed to take items 3 and 4 in private. The Committee also agreed to take its consideration of a draft Stage 1 report on the Social Security Administration and Tribunal Membership (Scotland) Bill in private at a future meeting.

2. Social Security Administration and Tribunal Membership (Scotland) Bill: The Committee took evidence on the Bill at Stage 1 from—

- Craig Smith, Public Affairs Officer, Scottish Association for Mental Health (SAMH);
- Jon Shaw, Welfare Rights Adviser, Child Poverty Action Group (CPAG);

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- Shirley-Anne Somerville, Cabinet Secretary for Social Security and Older People,
- Stephanie Virlogeux, Lawyer, Scottish Government
- Walter Drummond-Murray, Head of Reserved Tribunals and Civil Courts Team, Scottish Government;
- Chris Boyland, Bill Manager, Social Security Scotland.

3. Social Security Administration and Tribunal Membership (Scotland) Bill (in private): The Committee considered the evidence heard earlier in the meeting.

- [1] Financial Memorandum - Social Security Administration and Tribunal Membership (Scotland) Bill. (2020, April 27). Retrieved from <https://beta.parliament.scot/-/media/files/legislation/bills/current-bills/social-security-administration-and-tribunal-membership-scotland-bill/introduced/financial-memorandum-social-security-administration-and-tribunal-membership-scotland-bill.pdf>
- [2] Scottish Association for Mental Health. (2020). Written submission.
- [3] The Law Society of Scotland. (2020). Written submission.
- [4] Child Poverty Action Group. (2020). Written submission.
- [5] Social Security Committee 21 May 2020 [Draft], The Cabinet Secretary for Social Security and Older People (Shirley-Anne Somerville), contrib. 41, <http://www.scottish.parliament.uk/parliamentarybusiness/report.aspx?r=12656&c=2257660>
- [6] Policy Memorandum - Social Security Administration and Tribunal Membership (Scotland) Bill. (2020, April 27). Retrieved from <https://beta.parliament.scot/-/media/files/legislation/bills/current-bills/social-security-administration-and-tribunal-membership-scotland-bill/introduced/policy-memorandum-social-security-administration-and-tribunal-membership-scotland-bill.pdf>
- [7] Macmillan Cancer Support. (2020). Written submission.
- [8] Social Security Committee 21 May 2020 [Draft], Shirley-Anne Somerville, contrib. 66, <http://www.scottish.parliament.uk/parliamentarybusiness/report.aspx?r=12656&c=2257685>
- [9] Citizens Advice Scotland. (2020). Written submission.
- [10] Social Security Committee 21 May 2020 [Draft], Shirley-Anne Somerville, contrib. 101, <http://www.scottish.parliament.uk/parliamentarybusiness/report.aspx?r=12656&c=2257720>
- [11] Social Security Committee 21 May 2020 [Draft], Shirley-Anne Somerville, contrib. 70, <http://www.scottish.parliament.uk/parliamentarybusiness/report.aspx?r=12656&c=2257689>
- [12] Epilepsy Scotland. (2020). Written submission.
- [13] Social Security Committee 21 May 2020 [Draft], Shirley-Anne Somerville, contrib. 83, <http://www.scottish.parliament.uk/parliamentarybusiness/report.aspx?r=12656&c=2257702>
- [14] Scottish Commission on Social Security. (2020, March 9). The Disability Assistance for Children and Young People (Scotland) Regulations 2020: scrutiny report on draft regulations. Retrieved from <https://www.gov.scot/publications/the-disability-assistance-for-children-and-young-people-scotland-regulations-2020-scrutiny-report-on-draft-regulations/>
- [15] Parkinson's UK Scotland, PSPA and MSA Trust. (2020). Written submission.

