

Scottish Commission on Social Security recommendations	Accept/ Partially accept/ Decline	Scottish Government Response
<p>Recommendation 1: As part of the continuing updating of the relevant impact assessments, the Scottish Government should work with stakeholders, including those engaged in supporting individuals experiencing domestic or financial abuse, to develop an understanding of the potential for abuse by a partner and what additional mitigations may need to be put in place.</p>	<p>Accept</p>	<p>As part of the impact assessment process, officials have met with relevant Scottish stakeholders to discuss the changes being made. These discussions included the mitigations which already exist in relation to financial abuse and the new mitigations which will be introduced as part of the amendment regulations. For Best Start Foods there is already a rule which ensures an application from the pregnant person will always be prioritised and awarded in preference to an application from their partner. As part of the regulation changes we are extending this rule so that it also applies where an application is received from both the pregnant person and the individual they are dependent upon or the partner of that individual. Where more than one application is received in relation to a pregnancy and neither application is from the pregnant person, Scottish Ministers will decide who to award Best Start Foods, having regard to the circumstances of the pregnant person.</p> <p>We also discussed the steps that have been taken by Social Security Scotland to raise awareness with staff of financial abuse so that they are able to identify potential abuse and take appropriate action. Social Security Scotland have internal guidance for Client Advisors which explains what financial abuse is and how it may be identified. This guidance includes how to respond and when to contact the police.</p> <p>Furthermore, training is also being arranged for staff in Social Security Scotland who manage Best Start Foods applications on Risk of Harm and Safeguarding. This is intended to raise awareness and improve understanding of domestic abuse – including coercive control and financial abuse.</p>

		Stakeholders did not identify any additional mitigations that they felt were necessary. However, officials will continue to engage with relevant stakeholders to ensure that the mitigations being put in place are working as intended.
Recommendation 2: The Scottish Government should publish clear, accessible guidance on who is likely to be able to receive an alternative form of payment of Best Start Foods, the process for requesting one and how to challenge decisions. Individuals who receive a pre-paid card should receive guidance on the type of retailers who can accept the card and how to request the addition of their local retailer to the list of approved retailers.	Partially accept	<p>Social Security Scotland recognises the need to provide an alternative method of payment in rare and limited circumstances. Social Security Scotland will ensure the required processes are in place internally for clients who may require this extra support. There will be consideration given to the external content that may be required.</p> <p>Clients receive a number of leaflets and advice on what goods they can use their allpay card to buy. Social Security Scotland will review the literature provided and identify where this information could be strengthened to make clearer which type of retailers can accept the card.</p> <p>Clients are encouraged to contact Social Security Scotland with any issues using the card, including where it is not accepted by their local retailer. We will review these concerns and seek to resolve them.</p>
Observation 1: In the longer term, consideration could be given to aligning both language and processes with the wider Scottish social security system	Noted	We continue to consider alignment between the five family payments and these regulations build on work already done, including auto-award of Best Start Grant Early Learning and School Age payments. Further alignment of the five family payments is desirable and bringing Best Start Foods under the 2018 Act would further assist with that policy aim. However, there are several dependencies to be able to bring Best Start Foods under the 2018 Act, including moving to a cash payment. We are operating under an increasingly challenging programme of delivery which will see us deliver several new benefits, including Carer Support Payment, in the coming years. This impacts our ability to move to a cash payment . Ongoing work in this area is complex and remains a priority within our ambitious benefit delivery programme.

		<p>Social Security Scotland delivers specific marketing, communication and engagement activity to raise awareness of Best Start Foods, how to apply and how to use the pre-paid card. However, this is also complemented by and included in wider marketing, communication and engagement activity to promote the package of five family payments – including Scottish Child Payment, Best Start Grants and Best Start Foods. Key messaging around these payments uses the same language to help raise awareness and encourage take-up of all the financial support available to families and carers to support their children as they grow.</p>
<p>Observation 2: SCoSS welcomes the proposed removal of the income thresholds that apply to qualifying benefits for Best Start Foods, which will extend eligibility to previously excluded low-income groups and has potential to improve take-up and efficiency by simplifying eligibility criteria.</p>	Noted	<p>The Scottish Government is pleased that SCoSS welcomes this change. We estimate that around 20,000 additional children will be eligible for Best Start Foods following the removal of income thresholds and other extensions of eligibility.</p>
<p>Observation 3: SCoSS welcomes the introduction of advance applications for Best Start Foods and of provision for backdated awards of qualifying benefits to confer eligibility for Best Start Foods.</p>	Noted	<p>The Scottish Government is pleased that SCoSS welcome this change. As SCoSS notes, these changes align processes more closely with Scottish Child Payment and Best Start Grants, and have the potential to make it easier for individuals to receive their full entitlement. As a result, these changes could potentially improve take up.</p>
<p>Observation 4: SCoSS welcomes the extension of the eight-week 'run-on' for Best Start Foods</p>	Noted	<p>This change will ensure all pregnant women and children continue to benefit from the support that Best Start Foods provides when their family's income is</p>

awards to qualifying benefits other than Universal Credit.		in transition. The Scottish Government is pleased that SCoSS welcome this change.
Observation 5: SCoSS broadly welcomes the changes being made to the rules for eligibility for Best Start Foods, acknowledges the challenge of communicating complex eligibility criteria and notes the importance of clear and unambiguous guidance documentation for applicants, administrators etc.	Noted	Ahead of the new regulations coming into force, Social Security Scotland will be creating and sharing resources to support eligible people, and stakeholders supporting eligible people, to understand the changes and how and when to apply. Information will also be shared with relevant stakeholders via a series of events to ensure they have all the information and guidance that they need to support eligible people to apply.
Observation 6: SCoSS welcomes the prioritisation of Best Start Foods applications from the pregnant person themselves during pregnancy where there are competing claims from eligible applicants, and the commitment to introduce further provisions for adjudicating between competing claims.	Noted	<p>The amendment regulations will expand the existing rule so that where Best Start Foods is being paid to the individual the pregnant woman is dependent on, or the partner of that individual and an application is received from the pregnant person and they are eligible, the pregnant person's claim will be approved and the claim from the individual the pregnant person is dependent on or the partner of that individual will be ended. This change will ensure that the pregnant person will always be able to access Best Start Foods payments in their own right as it is paid to support their nutrition. The Scottish Government is pleased that SCoSS welcome this change.</p> <p>The final amendment regulations will also include a provision which will allow Scottish Ministers to decide who should be awarded Best Start Foods where there are multiple claims in relation to a pregnancy but no claim from the pregnant person themselves. In this scenario, the decision will be made taking into account the circumstances of the pregnant person.</p>
Observation 7: The Scottish Government should continue to	Noted	We remain committed to moving to a cash payment, we are currently scoping when this can be done and are confident we will be able to make this change

<p>consider the case for payment of Best Start Foods by bank credit as the default, with a view to ensuring the scheme respects individuals' dignity as much as possible, without putting at risk the eligibility of those with no recourse to public funds.</p>		<p>in the future. However, operating under an increasingly challenging programme of delivery which will see us deliver several new benefits, including Carer Support Payment, in the coming years means we are not able to move to a cash payment in 2023-24.</p> <p>Ongoing work in this area is complex and remains a priority within our ambitious benefit delivery programme. As part of this work, we will consider how any change may impact on those who have no recourse to public funds.</p>
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