

Equality Impact Assessment Results

Funeral Expense Assistance (Scotland) Regulations 2019

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Scottish Government
Riaghaltas na h-Alba
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Equality Impact Assessment Results

Title of Policy	Funeral Expense Assistance (Scotland) Regulations 2019
Summary of aims and desired outcomes of policy	<p>Funeral Expense Assistance (FEA) will provide a one-off payment to support people on certain benefits or tax credits with a contribution towards the cost of a funeral.</p> <p>FEA is intended to help improve the outcomes for bereaved families or friends by reducing the burden of debt they may face when paying for a funeral.</p>
Directorate, Division, Team	Social Security Directorate, Social Security Policy Division, Funeral Expense Assistance Policy Team

Executive Summary

1. This is a summary of the full Equalities Impact Assessment conducted on the Funeral Expense Assistance (FEA) policy to accompany the Funeral Expense Assistance (Scotland) Regulations 2019.
2. The Scottish Government is committed to replacing the UK Government's Funeral Expenses Payment (FEP) with the FEA, a new, expanded benefit to provide financial support to people on certain benefits or tax credits by providing a contribution towards the cost of a funeral.
3. FEA is one of a range of measures aimed at supporting people to arrange a funeral. The Funeral Cost Plan¹ sets these out in more detail.
4. This EQIA has considered the potential effects of the FEA and how it impacts on people with one or more protected characteristics. Our findings are based on desk based research; analysis of consultation responses; stakeholder engagement and feedback; and what we have heard directly from people with lived experience of applying for FEP and from people who may be eligible for FEA in the future.
5. All individuals who share protected characteristics will benefit from:
 - New assessment process to determine who is responsible for the funeral which will not only help people understand if they are entitled, but also widen eligibility compared to the current DWP Funeral Payment;
 - The annual increase in the value of the flat rate part of the FEA payment in line with inflation; and
 - Improved access as a result of a simpler application process with more channels to apply, and the introduction of a 10 working day processing time for completed applications (with payment as soon as practicable thereafter).
6. We found that FEA has potential to impact positively on those who share the following protected characteristics:

¹ Funeral Cost Plan - <https://www.gov.scot/publications/funeral-costs-plan/>

- **Age** – Young people aged 16 or 17 who are the nearest relative of the person who has died as they will be removed from the hierarchy for FEA, unless they explicitly request that they want to take responsibility for the funeral. In addition, where a child has died,² we will no longer make deductions where the child had assets in their own name. This will potentially increase the amount of the payment for these families and will streamline the application process for the death of a child, making this easier for families to complete. This is likely to positively impact people of working age who are already facing particularly difficult circumstances following the death of a child.
 - **Disability** – Applicants will receive support for reasonable additional transport costs incurred as a result of their disability to arrange or attend the funeral. People with a disability may be more likely to incur increased transport costs, for example if public transport is not accessible for them.
 - **Sexual Orientation** - The additional transparency provided by the use of the new nearest relative test is expected to have a positive impact as it clearly lists the closest relative as either their spouse; civil partner; or partner where they had been living together as if they were married or civil partner.
 - **Religion or Belief** – Processing FEA applications within 10 working days is expected to have a positive impact for faith groups that require funerals to take place within certain timescales, as they will receive the payment more quickly than at present, reducing the time between the funeral and when payment is received.
7. Some groups with protected characteristics may face difficulties in accessing or understanding their entitlements due to language or other communication barriers. Applications for FEA will be taken over the phone, online or on a paper form which will improve choice and access for these groups. We will ensure information and advice on FEA is as accessible as possible and reaches the full range of people who could benefit from this support in a range of formats.
 8. The Scottish Government's commitment to co-design the new social security system with the experts and people with personal experience of the current system has ensured that those with protected characteristics have had a direct impact on shaping the service.

Background

9. The Social Security (Scotland) Act 2018³ (the Act) was brought forward as a result of the changes to the devolution settlement enacted in the Scotland Act 2016.
10. Section 34 and Schedule 8 of the Act make provision for FEA and require that Scottish Ministers make regulations setting out provision of assistance to be given based on the eligibility entitlement of one or more of the seven primary eligibility criteria (i.e. location of the funeral; relationship with the deceased; value of the deceased's estate; residence and presence; financial circumstances; receipt of, or eligibility for, other types of State assistance; and application within specified period). The regulations also include provision for timescales for the processing of redeterminations and certain issues of processing relating to application dates.

² For this policy child includes people aged 17 and under.

³ Social Security (Scotland) Act 2018 - <http://www.legislation.gov.uk/asp/2018/9/contents/enacted>

11. The Funeral Expense Assistance (Scotland) Regulations 2019 provide detailed rules relating to this impact assessment. Further details will be set out in operational guidance.

Policy Aims

12. FEA will provide a one-off payment to support people on certain low income benefits or tax credits by providing a contribution towards the cost of a funeral. FEA is intended to help improve the outcomes for bereaved people by reducing the burden of debt they may face when paying for a funeral.

13. The FEA payment provides a contribution towards funeral costs:

- **Burial or Cremation costs.** This may also include the cost of any documents that are required to allow the burial and cremation to take place.
- **Certain travel costs;**

and
- **A flat rate payment for other expenses.** This may be used towards any other funeral expenses such as funeral director fees, a coffin, and flowers. The amount of other expenses will either be –
 - £700 for the majority of eligible applicants where the deceased had no funeral provision in place (this payment amount will apply for all FEA payments for child funerals); or
 - £120 to eligible applicants where the deceased had made provision for their funeral through a funeral plan.

14. This support plays a part of achieving the Scottish Government's National Outcomes and will specifically contribute towards the following:

- We tackle poverty by sharing opportunities, wealth and power more equally; and
- We respect, protect and fulfil human rights and live free from discrimination.

Forecast Expenditure and Take Up

15. The Scottish Fiscal Commission (SFC) is responsible for producing independent forecasts for devolved social security expenditure. For FEA, the SFC has published forecasts alongside the Budget on 12 December 2018⁴.

16. FEA represents an additional investment by the Scottish Government in comparison to current DWP Funeral Expenses Payment (FEP). Based on SFC forecasts, it is estimated that around 4,400 people will receive an FEA payment during the first full year of operation. This will result in expenditure of over £6 million each year, around £2 million more than for FEP. Administration costs for FEA form part of wider financial planning for Social Security Scotland.

⁴ The Scottish Fiscal Commission Budget published 12 December 2018 - <http://www.fiscalcommission.scot/publications/scotlands-economic-and-fiscal-forecasts/scotlands-economic-and-fiscal-forecasts-december-2018/>

17. The SFC forecasts that the number of people who will be eligible for FEA will be around 40% higher than those eligible under FEP at present and initially expects that 53% of those eligible will receive an FEA payment (based on average take-up rates for FEP over the last three years).
18. Building on the Act's framework for a social security system that is founded on dignity, fairness and respect, Scottish Ministers are committed to supporting people to access their full entitlement. The Act requires Scottish Ministers to prepare a strategy to promote take up of the benefits it is administering, including FEA.

Who was involved in this EQIA?

19. The FEA & Funeral Poverty Reference Group⁵ was established in March 2016 to help gather evidence, bring a variety of informed perspectives and provide feedback on proposals for FEA. Membership includes funeral directors, local government, third sector welfare rights advisors, bereavement organisations, faith groups, groups representing older people, and others with an interest in funeral poverty. Involving a wide range of organisations and individuals with experience of the current system from the outset has developed a policy which draws on their wealth of knowledge and experience.
20. The consultation, A New Future for Social Security in Scotland, ran between 29 July and 30 October 2016⁶. The Funeral Payments section sought views on how individuals thought the new Scottish benefit could achieve improvements such as reaching more people and creating more predictable eligibility so that people can make better informed decisions when they are arranging a funeral. This section of the consultation received over 150 responses from both individuals and organisations. A summary of these responses can be seen in the independent analysis report, from page 179⁷.
21. The then Cabinet Secretary for Communities, Social Security and Equalities, Angela Constance MSP, also hosted three stakeholder round table events between 15 September and 5 October 2016; and the National Conference on Funeral Poverty on 16 November 2016. These events provided stakeholders the opportunity to feed into the early development of the policy discussions and were encouraged to contribute to the above consultation.
22. Consultation responses and the events, helped shape the initial proposals for FEA that were taken forward with the FEA & Funeral Poverty Reference Group. For example, in relation to simplifying the eligibility criteria around the applicant's relationship to the deceased.
23. Illustrative regulations for FEA were shared with the Social Security Committee and Delegated Powers and Law Reform Committee of the Scottish Parliament on 30 November 2017. They were also shared with a range of stakeholders to inform further development of the policy.

⁵ FEA & Funeral Poverty Reference Group - <https://www.gov.scot/groups/funeral-poverty-and-funeral-expense-assistance-reference-group/>

⁶ A New Future for Social Security, Consultation on Social Security in Scotland - https://consult.gov.scot/social-security/social-security-in-scotland/supporting_documents/Consultation%20on%20social%20security%20in%20Scotland%20%20full%20version.pdf

⁷ Analysis of Written Responses to the Consultation on Social Security in Scotland - <https://www2.gov.scot/Resource/0051/00514351.pdf>

24. Between 17 May and 23 August 2018 we undertook a 14 week consultation⁸ on the draft regulations for FEA. The consultation summarised the findings of impacts assessments to that point and sought views on any further impacts. There were 41 separate responses (of which 12 said they had no additional evidence for the EQIA; a further 13 gave no response; and 16 did provide further information for the EQIA)⁹. An independent consultation report¹⁰ has been published summarising responses. A detailed response to the consultation report by the Scottish Government has been published alongside the FEA regulations¹¹.
25. In addition, a consultation event was organised with the Scottish Ethnic Minority Older People Forum, attended by 85 people from different faith, cultural and ethnic backgrounds. The event provided an opportunity to ensure the views of ethnic minority older people of different faiths were heard within the FEA process as policy and delivery was being developed.
26. The Social Security Committee took evidence on the draft FEA regulations on 21 June 2018, during the consultation period. The Committee drew the attention of the then Minister for Social Security to the points made by stakeholders¹².
27. To ensure that people with direct personal experience of the current benefits system could help us decide how benefits are delivered in Scotland's new social security system, the Scottish Government set up Experience Panels. We have received, and are continuing to take views, from Experience Panel members on their lived experience, the design of the application form, and on the service that will deliver FEA. A summary of the initial research findings and user research for FEA will be published in spring in 2019.
28. Meetings also took place with individual organisations, such as Scottish Women's Aid, Young Scot, Stonewall and Families Outside, to understand better the interests of the particular groups they represent as part of the EQIA process.
29. We are continuing to develop the business processes which will allow people to access and receive FEA. We are continually testing and evolving designs with individuals to make the application process as user-friendly as possible. People from groups who share protected characteristics have been included in this process including people with disabilities such as visual impairments; people who are Black, Asian & Minority Ethnic (BAME); and individuals who have a lack, or perceived lack, of digital skills. We will use this and future research as we continue to develop the process to deliver FEA.
30. After we start to make payments, we will continue to take on board feedback from service users in order to enhance our IT systems and ensure Social Security Scotland staff have what they need to provide a high level of service. This will all contribute to ensuring the service we provide has dignity, fairness and respect at its heart.

⁸ Consultation on Funeral Expense Assistance Regulations - https://consult.gov.scot/social-security/funeral-expense-assistance/supporting_documents/00535472.pdf

⁹ Published responses to the FEA consultation - https://consult.gov.scot/social-security/funeral-expense-assistance/consultation/published_select_respondent

¹⁰ Funeral Expense Assistance Regulations: consultation analysis - <https://www.gov.scot/publications/funeral-expense-assistance-regulations-analysis-consultation-responses/>

¹¹ Scottish Government Response to the FEA Consultation – <http://www.gov.scot/ISBN/9781787814738>

¹² Social Security Committee Convener's letter to the Minister for Social Security - http://www.parliament.scot/S5_Social_Security/General%20Documents/20180626_ConvToMin_FuneralExpenseAssistance.pdf

KEY FINDINGS

31. The widening of eligibility for FEA by around 40% compared to FEP will have a positive impact for people of all protected characteristics, meaning more of them will receive help with funeral costs. The improved transparency of the new nearest relative test will ensure that we will reach more people with this benefit and will allow us to streamline the application process. We have also committed to a 10 working day processing time for completed applications and to increasing the flat rate part of the payment annually to take account of inflation. Overall, these changes will help reduce the financial pressures faced by bereaved people, which we expect will have a positive impact on their experience of grief, on longer term mental health and family relationships.
32. Ensuring that our communication services are accessible to the people we need to reach by providing information in plain English in a range of ways that explains what people are entitled to expect from us in advance of application; and what they need to do in order to claim support will make things easier for people at a time when they may struggle to take in information.
33. As well as these overarching benefits, there is also evidence that FEA will have particular impacts for the following groups.

Age

34. FEA will have a positive impact for young people aged 16 or 17 who are the nearest relative of the person who has died as they will be removed from the hierarchy for FEA, unless they explicitly request that they want to take responsibility for the funeral. We have made this policy change as during our research with previous FEP applicants we have heard of cases where 16 or 17 year olds have been expected to take responsibility for a funeral as they were working (in one case on a zero hours contract), even though they would be unlikely to be able to enter into a contract with a funeral director until they are 18 years old. These young people will be at the start of their career or still in education, are more likely to struggle to pay for a funeral and are less likely to be prepared emotionally to arrange a funeral. Removing these young people from the hierarchy will potentially allow other family members to receive an FEA payment.
35. During our engagement with stakeholder organisations, we have heard of cases where deductions have been made from a FEP payment as the child had a Child Trust Fund. Where a child has died,¹³ we will no longer make deductions where the child had assets in their own name. This will potentially increase the amount of the payment for these families and will streamline the application process for the death of a child, making this easier for families to complete. This is likely to positively impact people of working age who are already facing particularly difficult circumstances following the death of a child.
36. The Annual Social Fund Report¹⁴ by DWP noted that over one in three (34%) of successful FEP applications were made to pensioners in 2016-2017. In addition, between 2016-2041, pensionable age population in Scotland will increase by 25%¹⁵.

¹³ For this policy child includes people aged 17 and under.

¹⁴ Annual Report by the Secretary of State for Work and Pensions on the Social Fund 2016-17 -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/630382/social-fund-annual-report-2016-2017.pdf

37. We have sought to understand the needs of older people throughout the development of the FEA by having the Scottish Older People's Assembly (SOPA) and Scottish Pensioners Forum as members of our reference group. We have also looked to engage directly with groups of older people at events such as a SOPA workshop on 23 April 2018 and Scottish Ethnic Minority Older People Forum Event on 25 July 2018. In response to FEA consultation Age Scotland, Golden Charter, National Association of Funeral Directors (NAFD), and Society Of Allied And Independent Funeral Directors (SAIF) also highlighted specific issues for this grouping. Particularly, on the issue of accessible travel (which is picked up within the disability section); and the need to consider any additional communication support for this group to take account of particular accessibility needs.
38. It has been clear from our engagement that many people currently find accessing the information on welfare and other income which they are entitled to confusing and difficult. We will work with a range of stakeholders and partners who interact with people either in providing welfare advice, or other support functions at the point of bereavement, to promote take up of FEA and any other benefits which they might be eligible for in line with our commitment to income maximisation, and will ensure that the needs of older people are taken into account as part of this.

Disability

39. The 2016-17 Annual Social Fund Report by DWP noted that approx. 8.7% of successful FEP applications were made to disabled people in 2016-2017. In 2013/14, according to DWP data, 30% of families with a disabled person are in poverty in the UK¹⁶.
40. We have heard that it is important for disabled people to have their needs taken into account when accessing social security. In order to make the system accessible for people with a range of needs and preferences and to maximise take up, there will be multiple application channels for FEA, including a new online application channel. We are considering accessibility throughout the FEA development process by including users with a range of disabilities in all aspects of research and design and adhering to internationally recognised digital accessibility standards all with a view towards ensuring as inclusive and positive a service experience as possible. Our user research team are liaising with Scottish Council for Voluntary Organisations (SCVO) to recruit participants with a range of disabilities, including visual impairment, so that we are better equipped for usability testing during the next phases of FEA service design.
41. It has also been suggested that disabled people may incur additional transport costs when arranging a funeral and could be disadvantaged in the support provided through FEA. Transport costs for all applicants arranging or attending a funeral are based on the reasonable actual costs incurred. This means that disabled people will also receive support for reasonable additional transport costs incurred as a result of their disability to arrange or attend the funeral, for example if they need to use a particular method of transport for accessibility reasons. This is expected to have a positive impact for disabled people.

Gender

¹⁵ NRS population projection 2017 - <https://www.nrscotland.gov.uk/news/2017/SCOTLANDS-POPULATION-IS-PROJECTED-TO-INCREASE-AND-TO-AGE>

¹⁶ Disability and poverty information from Joseph Rowntree Foundation - <https://www.jrf.org.uk/mpse-2015/disability-and-poverty>

42. DWP currently do not report the gender breakdown of FEP applications, as such there is limited evidence to identify benefit recipients by gender. However, the Annual Social Fund Report noted that approx. 2.4% of successful FEP applications were made to lone parents in 2016-2017, and we expect it is more likely that many of these people will be women living in poverty. In addition, women are expected to live longer than men¹⁷, and in 2014-17 single female pensioners (18%) were more likely to be in poverty after housing costs than single male pensioners (11%)¹⁸.
43. Social Security Scotland will not require information on gender in order to assess eligibility for FEA applicants, but will record of gender data for monitoring & evaluation (M&E) purposes where applicants consent to this. This will generate more evidence to see whether women are disproportionately impacted by funeral poverty and allow for more targeted interventions and approaches to be considered, if appropriate, in the future.

Pregnancy & Maternity

44. The current FEP is available to help parents with funeral costs of a baby stillborn after 24 weeks of pregnancy. This will also be the case for FEA. As we develop the application process for FEA we will look to engage with organisations and individuals with experience of stillbirth in order to ensure that our language is appropriate, as we would not wish to cause any additional distress for these applicants due to the way questions are asked during the application process. Work on this has already been undertaken while developing the Best Start Grant and we will build on this existing engagement.
45. It had been suggested that we widen FEA eligibility to include provision for pre-24 week pregnancy loss. We have engaged with other parts of the Scottish Government, members of our reference group and with NHS Information Services on this matter. While families can choose to make their own arrangements at present, we heard that some families may decide to take up the support from the NHS because of concerns about the cost in making their own arrangements. There is limited data available in this area as there are currently no procedures for recording why families decide to take up the support available from the NHS or make their own arrangements. In addition, many providers of funeral services (including private sector providers) already deliver their services either free or at a reduced rate in these circumstances, but there is no central record of this provision. Having considered this matter further, the Scottish Government has decided not to widen eligibility further to include this group.

Gender Reassignment & Sexual Orientation

46. FEA will be payable to the nearest family member or friend of long standing of the deceased who is responsible for paying for the funeral regardless of gender or sexual orientation.
47. Stonewall has welcomed the use of the new nearest relative test in the family hierarchy as it recognises the deceased's immediately closest relative as either their spouse; civil partner; or partner of the deceased where they had been living together as if they were married or civil partner. The transparency of this new hierarchy was also welcomed as it would help inform people of their entitlement based on their position within the hierarchy.

¹⁷ Scotland's Population 2016 - The Registrar General's Annual Review of Demographic Trends -

<https://www.nrscotland.gov.uk/statistics-and-data/statistics/stats-at-a-glance/registrars-general-annual-review/2016>

¹⁸ Poverty and Income Inequality in Scotland 2014-17 - <https://www.gov.scot/publications/poverty-income-inequality-scotland-2014-17/>

48. Some concerns were raised about the term ‘friend of long standing’ because that relationship is considered to be the most distant from the deceased, (after all family members), and that may affect older people within this group who are estranged from their family due to their sexuality. Discussions with stakeholders to date suggest that the impact to this group is likely to be limited as policy and service design testing have included how Social Security Scotland will manage complex cases including circumstances that involve estrangement, and multiple applications being received for the same funeral. We will continue to work with stakeholders to ensure that these questions are asked in a sensitive manner.
49. In addition, service design work has been carried out to look at inclusive forms of address and how those who have had their gender reassigned are recorded, whether we need to collect this information and, if so, how the system will manage this.

Race

50. DWP currently do not report on the ethnic minority breakdown of applications. As such there is currently limited evidence to identify FEP benefit recipients by ethnicity. However, evidence of wider population in Scotland by ethnicity is available via the latest census data¹⁹.
51. Engagement with stakeholders has highlighted concerns, including from COSLA, and Golden Charter, about the eligibility for FEA for people who are subject to the asylum process and wider groups with no recourse to public funds. In Scotland in 2017 there were around 10,125 asylum seekers in receipt of Home Office support²⁰.
52. Immigration policy is reserved to the UK Government. Immigration law determines that some individuals (e.g. asylum seekers) have no recourse to public funds. Because immigration is reserved to the UK Government, Scottish Ministers have no option but to ensure eligibility is aligned to UK legislation. This will particularly affect asylum seekers and other people with no recourse to public funds, who may have a range of protected characteristics, as these groups will be excluded from receiving social security benefits (including FEA) by reserved immigration law. Some people in this position can however apply to the Home Office or local authorities if they require assistance, though this is often narrower in scope and less generous than access to social security.
53. In addition, while we could make FEA payments to persons who are subject to the asylum process and wider groups with no recourse to public funds, the person who receives this benefit would then be in breach of their immigration status leading to potentially severe consequences.
54. At the consultation event that was organised with the Scottish Ethnic Minority Older People Forum (attended by 85 people from different faith, cultural and ethnic backgrounds) some concerns were raised about the language used for FEA, in particular the need to use plain English and make any information (and the application) as accessible as possible for those people who have English as a second language, as well as considering providing information in other languages and formats. This is being taken forward through our service design process and communications plan.

Religion or Belief

¹⁹ 2011 Census: Release 2A - <https://www.scotlandscensus.gov.uk/statistical-bulletins>

²⁰ [Immigration Statistics 2017 excel data](#) - the Home Office

55. DWP currently does not report on the religion or belief breakdown of applications. As such there is currently limited evidence to identify FEP recipients by religion or belief. Although, again evidence of wider population by religion or belief is available via the latest census data.
56. We have sought to understand the varied funeral requirements of religious and belief communities. We found that some faiths must arrange a funeral within 24 hours of the person dying; for some faiths the person who has died must be buried, while for other faiths the person must be cremated. These different funeral requirements will mean that average funeral costs will vary amongst faith groups and can have cost implications on the person responsible for paying for the funeral. For example, we asked all local authorities about different charges for faith burials and cremations. Those that responded confirmed they will accommodate faith requests without extra charges. However, funeral directors or local authorities may include additional charges for example for funerals at the weekend, which might be more likely to include faith funerals that are carried out within 24 hours.
57. FEA will provide flexibility for the funeral choices made by the person receiving the payment by paying the reasonable costs incurred for either burial or cremation fees (depending on which is chosen). It is important to have this flexibility as burial is usually more expensive than cremation and we would not want faith groups that must have a burial to be disadvantaged by FEA. The flat rate contribution of either £700 or £120 will not be tied to any particular funeral items in order to recognise the different expenses needs for different faith groups. Further information will be set out in guidance about how Social Security Scotland will calculate reasonable costs.
58. In addition, the consultation event with the Scottish Ethnic Minority Older People Forum highlighted that Muslim women can have different roles during the funeral period, and different grieving period which may affect their accessibility to apply for FEA. Having considered this further, we think that having a 6 month window after the funeral will provide enough time for an FEA applicant to be submitted by this group.
59. Our commitment to processing all applications within 10 working days will have a positive impact for faith groups that have particular timescale requirements for a funeral as we expect that they will receive the payment more quickly than at present.

CONCLUSION

60. This EQIA process has identified that the FEA has potential to have positive impacts for those who share protected characteristics.
61. We understand groups who share protected characteristics may face difficulties in accessing or understanding their entitlements due to language or other communication barriers. We will ensure information and advice on FEA is as accessible as possible and reaches the full range of people who could benefit from this support, through services used by bereaved persons, and in a range of formats.
62. We will ensure there is clear guidance for both decision makers and applicants, and for effective promotion of the FEA at all stages to maximise uptake. Widespread training and awareness raising of the FEA will also be required among partner agencies; advice and advocacy services; and service delivery providers. This will help ensure that appropriate signposting is provided, and that applicants can access the necessary information and be suitably supported throughout the process.

MONITORING & REVIEW

63. The Social Security (Scotland) Act 2018 places a duty on the Scottish Ministers to report annually to the Scottish Parliament on the performance of the Scottish social security system during the previous financial year, including in relation to protected characteristics. Equalities data will be gathered from applicants, where they consent to provide this.

AUTHORISATION

64. I confirm that the impact of the Funeral Expense Assistance has been sufficiently assessed against the needs of the equality duty:

Ann McVie Deputy Director Social Security Policy Division	Date this version was authorised: 14 December 2018
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