

Response ID ANON-P7EB-DTXQ-F

Submitted to Consultation on Funeral Expense Assistance Regulations
Submitted on 2018-08-22 20:03:07

General Questions on the regulations

1 Do you think that the draft regulations (Annex A) are likely to meet the policy intent set out in this document?

Not Answered

If no, please explain.:

2 Can you identify any potential unintended consequences of the regulations?

Not Answered

If yes, please explain.:

3 Can you identify any gaps in the regulations?

Yes

If yes, please explain.:

We have concerns about the actual financial assistance to be provided. Whilst an increase to the flat rate payment in order to protect against inflation is most welcome, there remains a question mark over the value of the basic flat rate payment.

It is highly questionable whether this provides for a satisfactorily dignified funeral.

It is of vital importance that the calculation of the payment is reviewed regularly.

It would be prudent to include provision for those who are not in receipt of benefits, for example, those in work, and who are in receipt of a low wage.

Voluntary groups in the Catholic Church have experience of these people and they are often worse off than those on benefits.

Measuring poverty in terms of receipt of benefits could exclude the working poor and increase poverty.

FEA regulations

4 Is the application window for FEA clear?

Yes

If no, please explain.:

The improvement to ten days for determination of eligibility is most welcome but there is still a period of considerable uncertainty at a most vulnerable and difficult time. The determination period should be reviewed regularly with a view to reducing it further.

5 We have proposed that the applicant must usually have the nearest relationship to the person who has died, and in exceptional family circumstances, such as estrangement, that they explain to Social Security Scotland why they should be considered to be the appropriate person who will take financial responsibility for the funeral.

Not Answered

If no, please explain.:

6 We have proposed that applicants must be habitually resident in Scotland, and the person who has died must be ordinarily resident in the UK to qualify.

Not Answered

If no, please explain.:

7 We propose that qualification by being in receipt of UC should be an award of more than £0 in the month before or the month in which the application is made.

Not Answered

If no please explain.:

8 Is the qualifying benefit / tax credit eligibility clear?

Not Answered

If no please explain.:

9 We have proposed to continue with the presumption that where there is a bill outstanding and the applicant consents, the payment will be made directly to the funeral director. Where the bill has already been paid, the payment will be made to the applicant.

Not Answered

If no, please explain.:

10 We have proposed not to make deductions from the payment award where there are assets in the name of the child who has died.

Not Answered

If no, please explain.:

Request for a re-determination

11 We have proposed that requests for an FEA re-determination should be made within 31 calendar days of receipt of notification of the original determination.

Not Answered

If no, please explain.:

12 We have proposed that an FEA re-determination should be processed within 15 working days of receipt of a request.

Not Answered

If no, please explain.:

Impact assessments

13 Do you have any additional evidence or impacts which are not covered in the EQIA or CRWIA?

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Partial Business and Regulatory Impact Assessment (BRIA)

14 Do you have any additional evidence or impacts which are not covered in the draft BRIA?

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About you

What is your name?

Name:

Anthony Horan

What is your email address?

Email:

ahoran@rcpolitics.org

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Catholic Parliamentary Office of the Bishops' Conference of Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly dissatisfied

Please enter comments here.:

Whilst the consultation is accessible to organisations who might work in this area it was found to be inaccessible to lay people. We had hoped to draw views from the people most affected by the provisions but they found the consultation too complex and confusing, a complaint we often hear from members of the public who would like to participate in government consultations.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: