

## **Disability and Carers Benefits Expert Advisory Group:**

To: Shirley-Anne Somerville, Cabinet Secretary for Social Security and Older People  
By e-mail

27th Sept 2019

Dear Shirley-Anne,

### **LONG-TERM PRIORITIES FOR THE DISABILITY AND CARERS BENEFITS EXPERT ADVISORY GROUP (DACBEAG)-DIGITAL PORTAL DEVELOPMENT**

I am writing in relation to the request in your letter of 31 July, for members of the advisory group to feed into development of the digital portal.

I am writing to update and inform you that, five members of the group attended a meeting within the Scottish Government on the 14<sup>th</sup> August. The topic of the meeting was a DACYP Digital Portal presentation, along with some information on; the Application Process, Evidence Gathering, Decision Making and Staff Training. I have enclosed the list of attendees in the annex.

We continue to be in contact with your officials, and look forward to engaging with them moving forward. I have attached in the annex our recent correspondence to officials for your reference.

Your sincerely,

Jim McCormick  
Chair

## **Disability and Carers Benefits Expert Advisory Group:**

To: Alison Byrne, Deputy Director, Social Security Programme Delivery Support  
By e-mail

27th Sept 2019

Dear Alison,

### **DIGITAL PORTAL DEVELOPMENT MEETING**

I am writing to thank you for organising and inviting us to the Digital Portal Presentation along with information on; the Application Process, Evidence Gathering, Decision Making and Staff Training on the 14<sup>th</sup> August.

The meeting covered these topics in a fast-paced way. Our understanding is that this element of programme development is highly dynamic in terms of identifying and addressing potential problems and improvements needed with the system. We were challenged within this context with where feedback from our group members would be most helpful for this dynamic and changing process. With this in mind, we discussed our initial reflections at our recent group meeting (29th August) and have outlined some of our thoughts below.

We were pleased to hear about progress being made with user testing and user engagement in relation to the application forms and process. We welcome the ongoing involvement of the people affected by the system, in designing it.

One of the overriding themes of the meeting, was the approach of building a system with enough time for it to be fully tested, whilst still allowing it to be able to adapt to policy requirements, and to be improved over time. We recognise the need for large-scale testing, well ahead of the first applications for DACYP being made next year. However, we would also note that policy goals, and the regulations to deliver them, need to be clarified before the effectiveness of the digital portal can be assessed with complete confidence against them. Whilst we were pleased to hear about the close relationship between policy and programme and to have a clearer understanding of the relationship between Policy and Social Security Scotland, however, the group still felt that programme development needs to follow and adapt to policy objectives. If eligibility, or assessment criteria, for example, were to change in the future, beyond Wave 2 delivery, it is important that the system has the capability to adapt. In principle, it is possible that technical, or other capacity constraints, could, in this context, influence the scope of policy. While there is nothing to suggest this will happen in practice, as this is the first on-line disability assistance application portal, the group is keen to ensure that the interaction between policy and programme development is clear and effective.

We were pleased to hear that the IT system will be updated consistently in line with user feedback but we are keen to know more about the process being developed to respond to a large volume of responses, both problems and suggestions for improvement.

We were also interested to see a commitment to gathering enough information for accurate and robust decision making whilst challenging any expectation by applicants coming from the legacy benefits system that they should present “bags full of paperwork”. We welcomed the emphasis on robust self-assessment, and self-directed additional information being gathered to “top up” evidence, where needed to fill gaps. Evaluation of how well this balance is being struck should be seen as an early priority and it was agreed that this is largely about an empowering culture where decisions makers feel confident taking decisions based on the balance of probability in light of evidence.

There was some discussion at the meeting about scanning medicine labels into the online application form. This is potentially progressive in terms of technology, but for the Group this raised questions regarding any reliance on this form of evidence: such as the applicability for people with fluctuating conditions, or those who are not taking medication (with say undiagnosed or untreatable conditions, or where side-effects are felt to be intolerable). We were assured that guidance will be developed on how decision-makers should take evidence of medication into account appropriately. We would welcome clarity on how such guidance is to be developed and tested, but we are also keen to see clear guidance for applicants, to minimise the sense that more evidence of medication is needed to strengthen an application.

We welcome the decision to fix the date of claim early on during the online process, even if the individual doesn't have a national insurance number.

However, in terms of the online form, questions about residency and nationality come before the initial claim section can be completed. In most cases, this is straight forward, but in some cases, this could be a complex decision. It should be clear, that the date of claim is fixed at the point these questions are answered, regardless of the answers given. So, if the answers to these questions suggest the individual won't be entitled, then a claim should be taken and a determination made - which can then be challenged, rather than a claim being excluded. We were unsure if the date of the claim would be set in a similar way for individuals applying in other ways such as on the phone or in writing.

We were also unsure if the application portal will be available in a format which allows audio conversion for those who may need it. We warmly welcome the introduction of an online portal for disability assistance, but are mindful of the need to ensure there is a fully inclusive and accessible format for communications from the start.

Finally, we very much welcomed the commitment to staff training and scenario based learning to embed the principles outlined in the Act and the Charter. We strongly recommend drawing on the expertise and lived experience of organisations led by people affected directly by these benefits as one way of developing the desired culture.

We are pleased to have had this opportunity to view the digital portal in development and to engage with officials on related aspects of building the new system of disability assistance.

I look forward to your response and we would be pleased to discuss this further with officials.

Your sincerely,

Jim McCormick  
Chair

Digital Portal Meeting  
Victoria Quay, Edinburgh  
14<sup>th</sup> August, 12 noon until 2.30 pm

Attendees:

**Dr Jim McCormick:** Chair of DACBEAG, Associate Director for Scotland, Joseph Rowntree Foundation

**Tressa Burke:** Deputy Chair of DACBEAG, Chief Executive Officer, Glasgow Disability Alliance

**Fiona Collie:** Policy and Public Affairs Manager

**Ed Pybus:** Welfare Rights Worker -Disabled Children and Families, Child Poverty Action Group, Carers Scotland

**Andrew Strong:** Assistant Director (Policy and Communications), the ALLIANCE

**Victoria Miller:** Secretary to DACBEAG

**Angela Keane:** Service Manager, Programme Management and Delivery, Disability and Carers Benefits

**Carolyn Armstrong:** Product Owner PIP, Programme Management and Delivery, Disability and Carers Benefits

**David Martin:** Product Owner - Attendance Allowance, Disability and Carers Benefits

**Lesley Moorhouse:** Policy Officer, Disability Benefits Policy Unit

**JP Liddle:** Policy Delivery, Disability and Carers Benefits

**Craig Higgins:** Product Owner, Disability and Carers Benefits:

**Matt Creaney:** Learning & Development Manager, Learning and Development

**Josh Mouldey:** Product Owner, Disability and Carers Benefit

**Ellen Ferrington Michaelis:** Programme Coordinator - Programme Briefing, Events and Parliament