



Evaluating the devolution of disability benefits



EQUALITY AND WELFARE

Contents

Contents	1
Evaluating the devolution of disability benefits	2
Role of policy impact evaluation	2
Comparisons with approach to evaluating low-income and early carer benefits ..	3
Key considerations in evaluating disability benefits.....	4
Disability benefits policy context.....	6
Framework for evaluating disability benefits	8
Evaluation framework.....	8
Thematic evaluation projects	9
Monitoring management information and high-level trends	10
Learning and further research	11
Evaluation tools	11
Bespoke evaluation projects.....	12
Prospective timescales	13
Annex A: Example logic model for low-income and early carer benefits evaluation	14

Evaluating the devolution of disability benefits

The devolved social security benefits represent an ambitious agenda for changing the benefit support that is made available to the people of Scotland. A previous [evaluation strategy](#) that focussed on our approach to evaluating the first tranche of devolved benefits was published in November 2019. This strategy builds on that work and outlines the approach to evaluating the policy impact of the devolution of disability benefits.

This strategy covers the three main types of Disability Assistance:

- Child Disability Payment, which will replace Disability Living Allowance for Children (DLA Child), is currently being piloted in three local authority areas and will be rolled out nationally in Autumn 2021 for new applications.
- Adult Disability Payment, which will replace Personal Independence Payment (PIP), will begin being piloted in Spring 2022, and will be rolled out nationally in Summer 2022 for new applications.
- Pension Age Disability Payment, which will replace Attendance Allowance in the future.

It also covers:

- The case transfer process of moving the disability benefits of Scottish clients currently administered by the Department for Work and Pensions to Social Security Scotland and onto the new equivalent forms of assistance.
- The Accessible Vehicles and Equipment Scheme, which replaces the UK Motability Scheme.
- Child Winter Heating Assistance, which is designed to help families of severely disabled children.

It does not cover:

- Severe Disablement Allowance - as it is a 'closed' benefit with no new applications. This benefit will be delivered by the Department for Work and Pensions for the foreseeable future.
- Employment-Injury Assistance - which will replace Industrial Injuries Disablement Benefit. The Scottish Government plans to undertake a consultation ahead of delivery which will inform detailed policy proposals.

Role of policy impact evaluation

Devolved benefits are being delivered in line with the Social Security Principles outlined in the [Social Security \(Scotland\) Act 2018](#). Our Charter¹ explains what the principles mean in practice and what people are entitled to expect from the Scottish

¹ [Social Security Scotland: Our Charter](#)

Government and Social Security Scotland, and has a Measurement Framework² that gathers information against these commitments.

Policy impact evaluation is the systematic assessment of a Government policy's design, implementation, and outcomes. In the context of social security, this involves understanding how a benefit is being implemented and what effects it has had, for whom and why.

Social security policy evaluations are one source of evidence that shows the contribution of benefits to delivering on the wider Social Security Principles and wider government objectives, particularly the effectiveness of policymaking processes, and whether social security has been an investment in people, helped to reduce poverty, and brought value for money.

The approach to providing disability benefits has been developed by listening to individuals who have a lived experience of the current social security system, and organisations representing disabled people or people with long-term health conditions. Policy impact evaluation projects will be developed with stakeholders and developed alongside the wider programme of engagement work by Social Security Scotland, which involves those with lived experience, in order to show whether the service has been designed with client needs in mind and delivered with dignity and respect.

Policy impact evaluation will also incorporate learning from other information sources and workstreams across the Scottish Government and Social Security Scotland to assess the effectiveness of benefit delivery from the policy view. This includes work underway to measure the take-up of Scottish social security benefits.

Comparisons with the approach to evaluating low-income and early carer benefits

Our published [evaluation strategy](#) outlined our evaluation approach for low-income and early carer benefits introduced up to 2020³. It charted how each individual benefit would be evaluated using a theory of change, which can be used to investigate net impacts by exploring the causal chains thought to bring about change by an intervention⁴.

Logic models (similar to that in Annex A) were used to identify how the benefit itself, and the way the benefit was delivered, could be expected to achieve the expected short- and medium-term policy outcomes by documenting the causal steps that lead from one outcome to the other. They were also used to assess the likely contribution to wider social security and long-term government objectives.

² [Social Security Charter: measurement framework](#).

³ These benefits included: Universal Credit Scottish choices, Carer's Allowance Supplement, Best Start Grant, Funeral Support Payment, Young Carer Grant, and Job Start Payment.

⁴ UK Government (2020) [The Magenta Book](#)

The policy evaluations planned under this framework were started around 12 months after benefit launch, and made use of a range of data sources including Social Security Scotland data and bespoke commissioned research with applicants, clients and other key stakeholders. The findings from the evaluations published to date are available on the Scottish Government website⁵.

Though the theory of change approach, and relevant data sources, will be used as part of the evaluation approach to disability benefits, there are some fundamental differences in the way that disability benefits will be delivered that means the evaluation approach will have to be adapted.

Key considerations in evaluating disability benefits

Disability benefits are more complex to deliver than the first tranche of benefits for a number of reasons outlined below:

- They involve regular payments to individuals, who will have an ongoing relationship with Social Security Scotland.
- People's circumstances may well change during that relationship, requiring adjustments to their payments.
- Whereas establishing people's eligibility for the first tranche of benefits is relatively straightforward, to establish whether someone is eligible for a disability benefit is complex and will involve gathering supporting information and more sophisticated decision making.
- For the majority of the first tranche of benefits, people who are receiving them are usually getting them because they are already entitled to another benefit administered by the Department for Work and Pensions (DWP) - meaning that DWP has already established who they are. Some new applicants for disability benefits will not be getting any form of DWP support, meaning that Social Security Scotland will need to verify their identity.
- Social Security Scotland will also need to be able to deliver client consultations for Adult Disability Payment.
- As disability benefits are currently administered by DWP, the majority of those who will be receiving the new forms of assistance in the first few years will be clients whose awards have transferred from DWP rather than those who have made a new application directly to Social Security Scotland.
- The different forms of Disability Assistance are being launched in a phased way - with Child Disability Payment the first to pilot.

The initial priority is ensuring that clients transition safely and securely from DWP to Social Security Scotland, and continue to get the right payments at the right time. The new applications service will be launched before starting to transfer the disability benefits of existing Scottish clients from DWP to Social Security Scotland.

⁵ [Social security policy research and evaluation: publications](#)

Given the priority of safe and secure transition, it is intended that eligibility criteria, rates and components of all forms of Disability Assistance will initially remain largely the same as the current equivalent UK disability benefits until after transition is complete⁶. This means that policy changes have largely been focussed on the way that entitlement and awards are assessed, the way that the benefit is delivered and the way that benefit delivery is experienced by applicants and recipients.

As a result, the main focus of initial evaluation activity will be assessing the impact of these policy changes on clients and client outcomes, rather than assessing the impact of disability benefits generally. Therefore, it is not designed to look at questions of adequacy of payments, for example. However, where relevant, evaluation research will give an opportunity for clients to recount their experience of disability benefits generally, and the impact of disability benefits on their quality of life specifically. Disability Assistance, like all devolved benefits, is regarded as a human right by the Scottish Government. We are committed to ensuring that those who interact with the social security system are treated with fairness, dignity and respect and those who are entitled to social security are able to access it. Within this, the intention is to develop a 'person-centred approach', which treats clients as individuals, taking into account their personal circumstances and needs when making decisions on entitlement and awards⁷. However, this will have to be delivered alongside the need to ensure that the benefit is delivered consistently and that people in comparable positions are treated similarly.

The larger levels of government investment; the complex nature of disability benefits delivery generally, and the client journey specifically; the case transfer process; the initial focus on changes to decision-making processes and benefit delivery; and the phased launch of the different forms of Disability Assistance, mean that the evaluation approach for disability benefits will also be more complex compared to the first wave of devolved benefits.

⁶ Disability benefits will be raised annually by at least the rate of inflation.

⁷ The Scottish Government's plans for a new approach to gathering information and making decisions when a client applies for a disability benefit can be accessed [here](#).

Disability benefits policy context

The following table outlines some key changes relevant to all forms of Disability Assistance. Some of the policy changes are dependent upon further legislation, which will be subject to approval by the Scottish Parliament. Full details on each of the proposed policy changes are available in the relevant policy position papers on the Scottish Government [website](#).

Policy	Detail
Entitlement	Social Security Scotland will make decisions about entitlement based on the applicant's account of their circumstances and ask the client who can provide the most relevant supporting information. Face-to-face assessments will be replaced by client consultations. They will only be used when it is the only practicable way to make a decision.
Award duration	All awards for Disability Assistance will be ongoing. However, clients will be given an award review date as part of their initial award decision which will be used to determine continuing entitlement to the component rates of each form of Disability Assistance. Long-term review periods will be available for people whose disability or condition is unlikely to change, with a minimum of five years and a maximum of ten years between reviews. Work is underway to establish parameters that could be put in place for the provision of indefinite awards for certain clients whose needs are very unlikely to change.
Light-touch reviews	In the case of review, additional information will only be gathered when needed to make an informed decision on whether the impact of a client's condition or disability has changed sufficiently to warrant a change in award rate.
Terminal illness	A new approach to terminal illness will be introduced which allows medical professionals to use their clinical judgement to determine entitlement. This decision will be based on guidance prepared by the Chief Medical Officer and is a change from the time-limited definition currently in use by the UK Government. Social Security Scotland will automatically award the maximum rate of Disability Assistance to clients with a terminal illness and there will be no review of awards made under these rules.
Case Transfer	Initial awards of Disability Assistance for clients whose cases are transferred will be based on information collected by the DWP, not a new application to Social Security Scotland. These awards will be paid at the same rates and on the same dates as the benefit the client received before their case was transferred.

Other proposed changes have been made to particular elements of the individual disability benefits including:

Policy	Detail
Eligibility for Child Disability Payment	Eligibility will be extended for Child Disability Payment from 16 years to 18 years-old for those already in receipt of assistance before turning 16.
Client consultations for Adult Disability Payment	Unnecessary routine face-to-face assessments will end. If there is no other way to make a decision, person-centered client consultations will be held, focusing on fairness, standards and quality. Clients will have a choice of communication channels including online, telephone and face-to-face consultations. Clients will be able to select a date, time and place that is convenient for them, with home visits available. Consultations will be audio-recorded as standard with copies made available to the client and tribunal, should a client appeal their decision.

New policies have also been proposed, including:

Policy	Detail
Accessible Vehicles and Equipment Scheme	The Accessible Vehicles and Equipment Scheme will provide a service similar to the current Motability scheme, and will be available to those receiving the highest mobility rate of Child Disability Payment or Adult Disability Payment. A range of cars, wheelchair-accessible vehicles, scooters and powered wheelchairs will be available to those eligible at affordable leasing terms, with a range of adaptations at little or no cost.
Child Winter Heating Assistance	A new payment was introduced in 2020 to help families of severely disabled children to heat their homes.

Framework for evaluating disability benefits

We have established that the initial changes to Disability Assistance are focussed on the way the benefit is delivered, the way that entitlement and awards are decided, and the way that benefit delivery is experienced by applicants and recipients.

Some of the impacts of the way that the benefit is delivered, such as whether benefit recipients feel they have been treated with dignity and respect, will be examined through process evaluation and the activities of Social Security Scotland in gathering information on the experiences of applicants, clients and staff.

The questions for policy evaluation, then, are:

- What are the implications of these changes for the clients themselves?
- How do we capture and assess the intended changes?
- How are they related to individual client outcomes?
- How do we identify the contribution to wider social security and government objectives?

Evaluation framework

Given that many of the changes are process orientated, overlap and cut across the individual disability benefits, we have decided to use a thematic approach to evaluation rather than a benefit-by-benefit approach (Figure 1).

It will be possible to identify lessons relevant to individual benefits through management information, and by categorising experiences gathered in qualitative research by the relevant benefit ⁸.

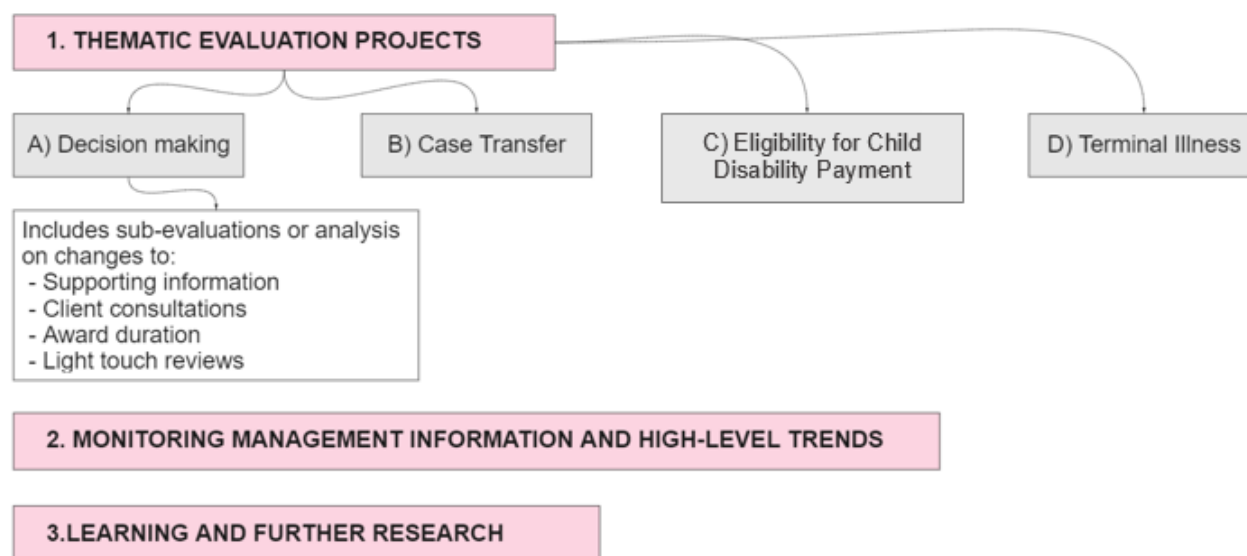
Two new policies (the Accessible Vehicles and Equipment Scheme and Child Winter Heating Assistance) will sit outside of this evaluation framework but will be evaluated as bespoke evaluation projects.

Our evaluation approach has three main strands, which will be outlined in further detail below:

1. Thematic evaluation projects
2. Monitoring management information and high-level trends
3. Learning and further research

⁸ It is important to note here that we have committed to a substantial, independent review of Adult Disability Payment after launch which will be dealt with separately to the evaluation activity outlined in this document.

Figure 1: Disability Benefits Evaluation Framework



Thematic evaluation projects

Thematic evaluation projects will be commissioned to examine the impact of key policy changes on the delivery of disability benefits and how this has been experienced by the client.

Initially there will be four core evaluation projects, looking at the following areas of significant policy change across Disability Assistance:

- Decision making
- Case Transfer
- Terminal Illness
- Eligibility for Child Disability Payment

Decision making encompasses a host of different policy changes, and so assessing the impacts of those changes, and decision making generally, will be much more complicated relative to some of the other projects. Therefore, it is likely to consist of various 'sub-evaluations' or 'sub-projects' which seek to explore the impact of particular changes to the decision-making process.

These sub-projects may explore:

- The use of supporting information in assessing entitlement
- The use of client consultations in assessing entitlement
- Decisions on award type, level and duration
- The use of light-touch reviews

Given the cross-cutting importance of decision making across the different forms of Disability Assistance we also intend to conduct a 'sub-evaluation' focussed on decision making itself which will incorporate each of the processes above as well as other aspects of the decision making process. However, it is important that research is timetabled at the most productive point. Too early will fail to take account of the experience of enough clients, across the different forms of Disability Assistance, or the relevant stages in benefit implementation. Too late will mean that the research results may not feed into improvement work or the future development of disability benefits at the appropriate point.

Case Transfer is also complex and evaluation activity will likely overlap with that of other thematic projects (such as the eligibility change for Child Disability Payment and decision making). This, as well as the ongoing nature of the case transfer process, means that evaluation activity will be phased. We will need to ensure that projects are planned and timetabled carefully to allow for relevant learning to be incorporated into the transfer process in the shorter term, but also allow for interaction with parallel projects that may have longer timescales, and for an overall picture of the full Case Transfer process to emerge.

The scope of these specific evaluation projects, as well as the methods used and timescales involved, will depend on particular circumstances, such as the aims, objectives and research questions governing the project. However, it is intended that these individual thematic evaluation projects (and sub-projects) will follow a theory-of-change approach which will allow us to identify the relationships between what we intended to achieve by the individual policy changes, and what the outcomes have been.

They may also be able to assess the likely contribution of policy changes to high-level trends, or wider social security outcomes and government outcomes. However, given that these longer-term outcomes take time to determine and are affected by a range of factors, it is often difficult to measure and attribute change to specific policy changes. That said, we can reasonably expect that if success against short- and medium-term policy outcomes has been achieved, then this could contribute (to some extent) to better outcomes in the future.

Monitoring management information and high-level trends

We will monitor management information from Social Security Scotland in order to identify patterns and trends across and within the individual benefit caseloads. This may include analysis on caseload, conditions, awards, and expenditure, and can be compared to other data sources and evidence to assess the degree to which the patterns and trends we expected to see are occurring or not. We can also look at equalities data collected in applications to explore issues raised in impact assessments completed at initial policy development phases, picking up human rights elements and issues of intersectionality where relevant. Analysis of management information will also be a key component of the individual evaluation projects outlined above.

We will also look at existing data sources, such as population-level surveys, which can track wider, long-term outcomes across society and how these are distributed depending on how people report disability.

Learning and further research

Monitoring and evaluation activity is part of the ongoing cycle of policy development.

As the evaluation work outlined above is completed, we will learn more about the way the benefit has been implemented, and what the impacts have been, and can identify shortcomings and unintended consequences. The implications of these findings will be considered by the Scottish Government and can set the groundwork for policy improvement and/or further policy development, which may necessitate further data monitoring, evidence gathering and research as appropriate.

Evaluation tools

With any evaluation activity there is a trade-off between investment in data collection (time and money) and the depth of insight (quality of findings).

It is intended that each evaluation project, and sub-project, makes use of a range of relevant methods and data sources in order to build up the picture of effectiveness. Though the exact approach of the thematic evaluation projects are still to be defined, it is expected that a combination of the following sources of data will be utilised:

- **Management Information** which can provide immediate information on effectiveness of delivery and client outcomes.
- **Social Security Scotland research activity** which will include data collected for the purposes of gathering client and staff insights and socio-economic characteristics. This includes a Client Survey of all applicants who have reached a decision, the annual People Survey of staff, and programmes of ad-hoc research projects.
- **Survey data** which can measure long-term outcomes across society. In themselves they are not likely to be sufficient to disentangle the overall impact of disability benefits from other factors. However, it may be that additional questions can be added to population surveys to tailor them to policy-specific questions subject to space.
- **Commissioned research** can fill gaps in management and survey data, deploying tools such as qualitative research, which can explore user experience and outcomes. It may be that surveys are also deployed which use representative samples of benefit clients and explore their experiences in detail allowing for comparison across groups of clients - though there are also financial costs and trade-offs to consider. Where relevant, commissioned research will also give an opportunity for clients to recount their experience of disability benefits generally, and the impact of disability benefits on their quality of life specifically.

Whether qualitative or quantitative in nature, commissioned research will allow us to engage with individuals who have a lived experience of Disability Assistance, and organisations representing disabled people or people with long-term health conditions, in order to assess the effectiveness of the social security by involving the people who access it.

In addition, the following approach will be scoped in order to assess the usefulness and viability in answering specific research questions and/or tracking the impact of disability benefits on wider outcomes, such as employment.

- **Data linkage** with DWP, Her Majesty's Revenue and Customs (HMRC) or NHS data could help track longer-term outcomes for clients, including comparable outcomes for those on existing benefits. There are significant issues to resolve with regard to ethics, data protection and security as well as ensuring ongoing resourcing. Permissions and agreement to share data with partner organisations would also have to be secured. However, there are potential benefits of being able to track long-term outcomes, and allow for detailed analysis by different groups.

Bespoke evaluation projects

The Accessible Vehicles and Equipment Scheme and Child Winter Heating Assistance will be evaluated as bespoke evaluation projects, because of the difference in scope comparative to the other policies included in this strategy.

These two policies are designed for a discrete purpose, and are forms of passported assistance, determined through entitlement to disability benefits. Unlike the other policies included in this framework, they are not linked directly to the delivery of the three main types of Disability Assistance, and clients will have limited interaction with Social Security Scotland when accessing these forms of assistance.

Though the scope of these evaluation projects is still to be defined, it is intended that these projects also use a theory of change to identify the chain of intended impacts, and make use of the relevant evaluation tools outlined above, though they are likely to be smaller in scale.

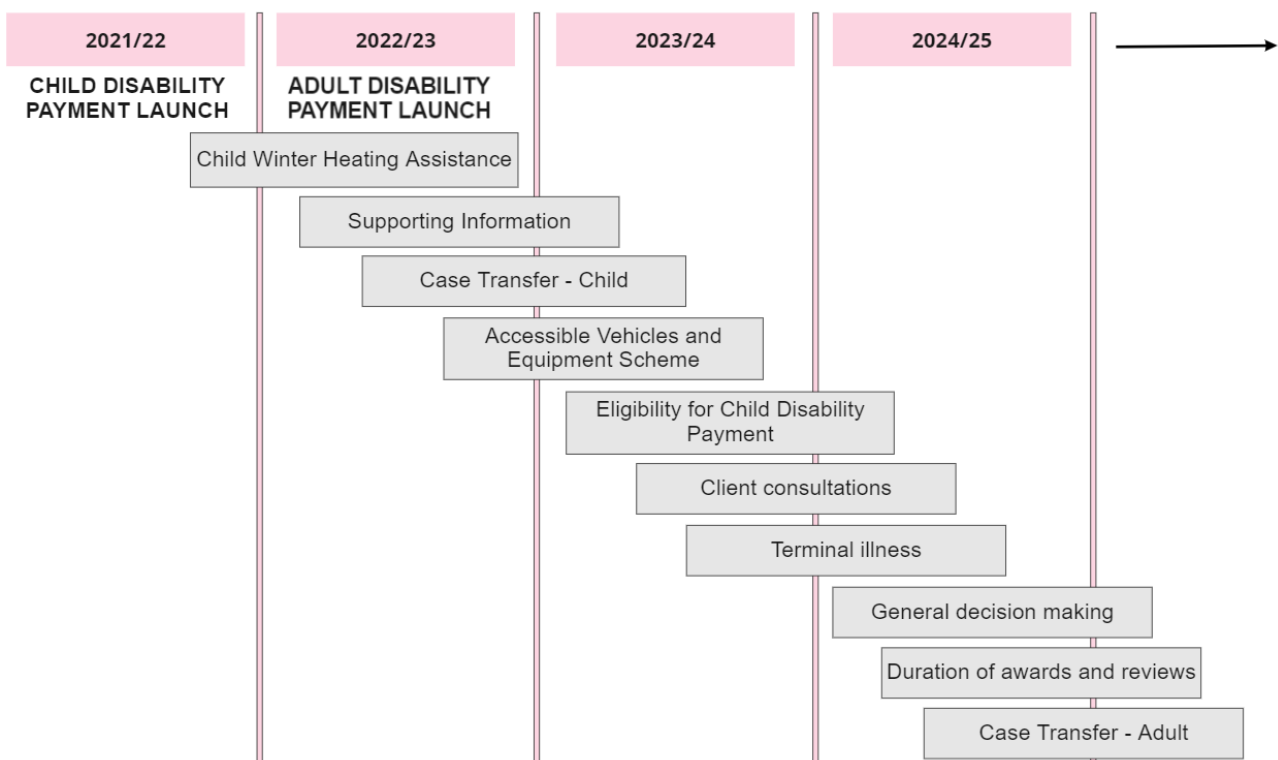
Prospective timescales

Child Disability Payment launched in pilot form from July 2021, with full national launch for new applications scheduled from Autumn 2021. This will be followed by the introduction of Adult Disability Payment with a pilot in Spring 2022 and full national launch for new applications by Summer 2022. The timeline below shows the phasing for the different activities involved in policy evaluation using the approach outlined, though not the size, scope or length of them.

It also gives an indicative timetable of when evaluation activity may begin, though not report. This timetable allows for the staged launch of the individual benefits and the need to take account of the experience of enough clients, across the different forms of disability benefits. However, it may change as data availability and other feasibility issues become clearer over the course of implementation and beyond.

During 2021-22 the main focus will be to define the size, scope and research questions for each individual thematic evaluation project, and assess the potential methods and data sources available, which may also impact on the evaluation timetable below.

Figure 2: Provisional phasing of evaluation activity



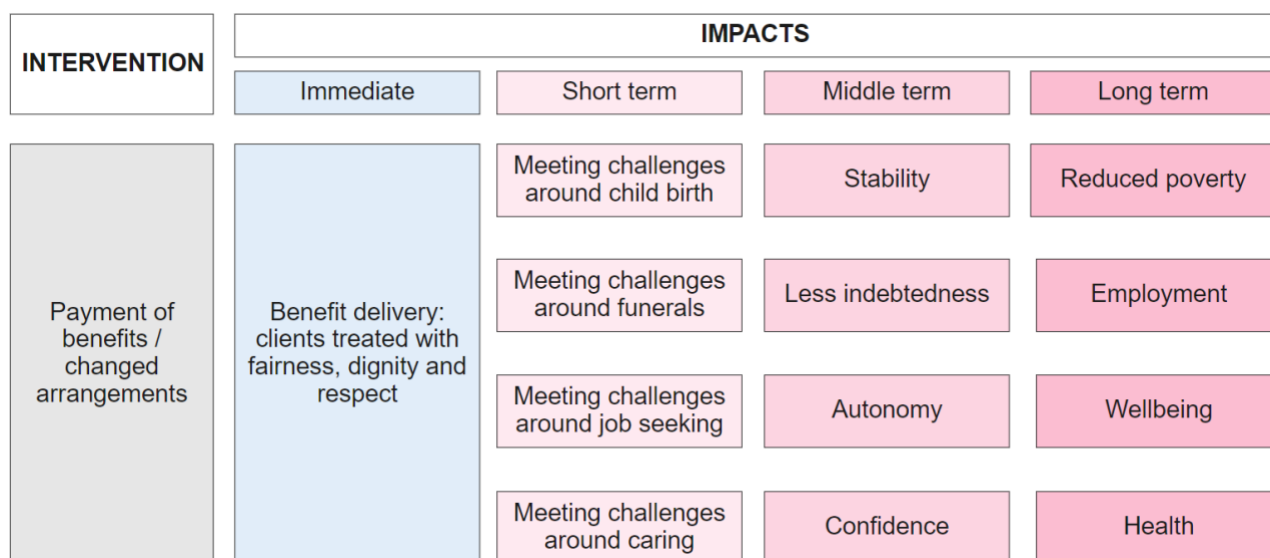
Annex A: Example logic model for low-income and early carer benefits evaluation

The evaluation approach for low-income and early carer benefits introduced up to 2020 used a theory of change approach. This can be used to investigate net impacts by exploring the causal chains thought to bring about change by an intervention.

Logic models were used to identify how the benefit itself, and the way the benefit was delivered, could be expected to achieve the expected short- and medium-term policy outcomes by documenting the causal steps that lead from one outcome to the other. They were also used to assess the likely contribution to wider social security and long-term government objectives.

Below is an example of a logic model relevant to low-income and early carer benefits evaluation. Evaluation projects of policies associated with disability benefits will also follow a theory of change approach which will allow us to identify the relationships between what we intended to achieve by the individual and combined policy changes, and what the outcomes have been.

Figure 3: Example Logic model for low-income and early carer benefits evaluation





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