

SCOTTISH GOVERNMENT POSITION PAPER

SEQUENCING DELIVERY OF THE DISABILITY AND CARER BENEFITS

Introduction

This paper is one of a series providing an update on our position on various matters relating to the development of the devolved social security benefits in Scotland.

The purpose of this paper is to set out our rationale for the Scottish Government's decisions on how quickly we can deliver the disability and carer benefits, and the order in which new claims services for these benefits should be launched.

From the first tranche of benefits to the disability and carer benefits

Under the terms of the Scotland Act 2016, 11 benefits were devolved to the Scottish Government.

As at February 2019, our new agency Social Security Scotland is already making payments for the Carer's Allowance Supplement and the Best Start Grant pregnancy and baby payment. The agency will deliver a further four payments in 2019: the Best Start Grant nursery age and school payments; Funeral Expense Assistance; and a new Young Carer Grant.

These benefits are mainly in the form of one-off or lump sum payments and grants. We have already put in place much of the capability – processes, people and IT systems – needed for Social Security Scotland to administer them effectively.

Extensive planning is also underway for the agency to take over delivering the remaining devolved benefits from 2020 onwards – starting with the main disability and carer benefits.

The disability and carer benefits are more complex to deliver than the Wave 1 benefits:

- 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 or carer benefit is complex and will involve evidence gathering 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 DWP – meaning that DWP has already established who they are and that their application is genuine. For example, most people who get the Best Start Grant are eligible because they are already in receipt of an income

replacement benefit like Income Support, Universal Credit or income-based Jobseeker's Allowance. Some new applicants for the disability and carer benefits won't be getting any form of DWP support, meaning that Social Security Scotland will need to verify their identity.

- The agency will also need to be able to carry out face-to-face assessments, in line with our commitment to deliver assessments for Disability Assistance for Working Age People (which replaces Personal Independence Payment or PIP) in-house.

All this means that, while the processes and systems that we put in place for the Wave 1 benefits provide us with a good starting point, many elements that are unique to the disability and carer benefits will need to be built from scratch to support delivery of these benefits.

Pace of delivery

We want to introduce the devolved benefits in their Scottish form as quickly as we can – taking into account some key considerations:

- Ensuring a safe and secure transition
- Allowing sufficient time between benefit launches, and
- For each benefit, introducing a new claims service before we transfer existing claims from DWP to Social Security Scotland.

We explore these in more detail below.

Ensuring a safe and secure transition

We know from our work with people who have direct personal experience of the current DWP system that what matters to them most is getting paid the right amount, on time. Accordingly in planning delivery of the disability and carer benefits, we have prioritised ensuring that these benefits transition safely and securely from DWP to Social Security Scotland, so that people who rely on them continue to get their regular payments.

In doing so we have learned lessons, from our work to date on delivering benefits so far as well as from previous major changes to social security by the UK Government.

Our experience of delivering the first tranche of benefits shows that we need at least a year of detailed design, development and testing (including engagement with people who have lived experience of the current system through our Experience Panels, iterative design work with focus groups and testing the service with real clients) before we can be confident about launching new claims of a new benefit that is fit for purpose and works for people. This is in line with estimates from the Government Digital Service that complex new services take at least 12 months to deliver from the start of service design. We want to ensure our processes are simple and accessible so that we can encourage people to take up the financial support to which they are entitled.

Allowing sufficient time between benefit launches

We also know that we need a period of time (known as a “fire break”) between the launch of each new benefit to:

- embed processes and systems
- provide training to staff in Social Security Scotland
- respond to early user feedback
- address bugs and fixes
- ensure that people who are eligible to apply for the benefits understand the changes that are happening, and
- learn lessons to support the next benefit launch.

Since the disability and carer benefits are higher-risk and more complex than any we will have delivered before, we consider that we need to allow a minimum of 5 to 6 months between launches of the different benefits (compared to the firebreak of around three months that we are allowing between launches of the first tranche of benefits). This will allow us time to fix technical and operational issues which arise, make changes in response to feedback, and ensure Social Security Scotland staff can administer the benefit confidently.

Trying to compress this timeline significantly increases the risk of a failed benefit launch, which will put people’s payments at risk and could cause stress and anxiety, and does not meet our principle of protecting people and their payments.

Introducing a new claims service before we transfer existing claims

For each benefit, we will need to launch our new claims service before we can start to transfer existing claims. There are several reasons for doing so:

- Practically speaking, we cannot transfer existing cases to the new benefit systems until they have been built.
- Research with people who receive benefits has indicated that many find making a new claim the aspect of the existing system that is most stressful (this is especially the case with PIP). We can therefore make the greatest improvements most quickly by focusing on reforming the new claims process.
- Taking the benefits in this staged way will allow us robustly to test and check the data and records we receive from DWP for each benefit, and be certain that this is complete and contains the information we need to begin administration and delivery by Social Security Scotland.
- In the meantime, people already entitled to these benefits will continue to receive their regular payments, administered by DWP under agency agreements, in keeping with our principle of a safe and secure transfer.

More details on our plans for transferring existing claims are set out in our position paper.

The order in which we will deliver new claims for the disability and carer benefits

Taking into account these key considerations, the next step is to consider the order in which we deliver our new claims service for the disability and carer benefits.

We believe that the most sensible approach is to deliver new claims for the main disability benefits, in increasing order of complexity and size of caseload, and then to deliver Carer's Allowance in its Scottish form. We will work to the following timetable:

- summer 2020 – Disability Assistance for Children and Young People (replacing Child Disability Living Allowance)
- winter 2020 – Disability Assistance for Older People (replacing Attendance Allowance)
- early 2021 – Disability Assistance for Working Age People (replacing Personal Independence Allowance)
- end of 2021 – Scottish Carer's Allowance

We have decided on this sequence for a number of reasons.

The service pattern for the three disability benefits has similarities in what is required to support an application and the case management role for a member of staff in Social Security Scotland.

That means we can incrementally build the disability systems for Disability Assistance for Children and Young People, Older People then Working Age People in succession, reusing common elements as each benefit goes live. Essentially you get to the Working Age system via the systems for Children and Young People and then Older People. These three benefits are inextricably linked. Launching them in sequence significantly reduces the risk of a failed launch of our PIP replacement – the most complex form of Disability Assistance – and thereby protects people and their payments.

In contrast, applications for Carer's Allowance depend on the cared for person being in receipt of a disability benefit (including the disability benefits that we are delivering as Scottish Disability Assistance). We will therefore be able to provide a clearer and more sensible service to people applying for Scottish Carer's Allowance when we already have processes in place for managing new claims for the disability benefits.

Some of the characteristics of Carer's Allowance as a benefit also mean that it is sensible to take additional time over its delivery. Unlike Disability Assistance, Carer's Allowance is an income replacement benefit. It impacts on tax and other benefits, and requires case managers to have access to a wider and more complex range of detailed information about other support that an applicant is getting than is needed for Disability Assistance.

Carer's Allowance also has the greatest number of interactions with DWP and Her Majesty's Revenue and Customs (HMRC) of all the devolved benefits, which means

that the data sharing arrangements we will have to agree with the UK Government are particularly complex.

Finally, there are a large number of entitlements and concessions, some of them substantial, and many of them reserved to the UK Government, that a person can access currently by claiming Carer's Allowance. These could include a carer premium, carer addition or carer element, worth around £36 per week, as well as National Insurance credits. A claim for Carer's Allowance can also have an impact on the benefits of the cared for person. Making sure that people still get this passported support when they claim Scottish Carer's Allowance is vital for the quality of life of the carers it supports. This will require us to build a large number of information feeds to DWP and other organisations as we design the new claims system – adding to the time that we will need to deliver Carer's Allowance securely and safely ensuring payments are protected. Based on current plans, we believe that doing so by late 2021 is an ambitious but realistic target.

More details on our plans for Scottish Carer's Allowance are set out in our position paper.

After the disability and carer benefits

For each of the disability and carer benefits, once we have launched our new claims service, we will begin transferring existing claims from DWP to Social Security Scotland. We expect to have completed our transfer programme by the end of 2024, with the majority of cases transferred over by the end of 2023, subject to DWP agreeing to match our pace on transfer.

In addition, we will deliver on our plans for the remaining devolved benefits. These are set out in our position papers

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