

Draft Disability Assistance (Miscellaneous Amendment) (Scotland) Regulations 2023

Draft Equality Impact Assessment

EQUALITY IMPACT ASSESSMENT

Title of Policy	Disability Assistance (Miscellaneous Amendment) (Scotland) Regulations 2023
Summary of aims and desired outcomes of Policy	<p>These regulations make amendments to the principal regulations for Child Disability Payment, Adult Disability Payment and Carer's Allowance. They also make changes to the principal Adult Disability Payment transitional provisions.</p> <p>The main purpose of these amendments to the principal regulations is to smooth the journey for individuals moving from Child Disability Payment to Adult Disability Payment and to make some minor technical changes to improve clarity. They will deliver on our overall policy intent for disability assistance which is to improve outcomes for disabled people.</p>
Directorate: Division: Team	Social Security Directorate Social Security Policy Division Disability Benefits Policy Unit

Executive summary

The Social Security (Scotland) Act 2018 (the 2018 Act) sets out the broad framework for the delivery of social security in Scotland. Child Disability Payment was the first of three types of disability assistance to be introduced by the Scottish Government and launched nationally on 22 November 2021. It is available to children and young people from the ages of 3 months to 18 years old who have care and/or mobility needs as a result of a disability.

Adult Disability Payment was also introduced by the Scottish Government on 29 August 2022. This form of assistance provides disabled individuals with support for extra costs incurred as a result of disability. Both Child Disability Payment and Adult Disability Payment have been co-designed with stakeholders and disabled people to ensure that the values of dignity, fairness and respect are embedded throughout.

In addition to supporting new applications, Scottish Ministers have made provision for the transfer of responsibility for delivering disability benefits for individuals who receive Personal Independence Payment and Disability Living Allowance for Children from the Department for Work and Pensions to Social Security Scotland. They are also responsible for changing the disability benefits for these individuals from Personal Independence to Adult Disability Payment and Disability Living Allowance for Children to Child Disability Payment. We refer to this process as “case transfer”.

The Disability Assistance (Miscellaneous Amendment) (Scotland) Regulations 2023 make amendments to the following sets of principal Regulations for Child Disability Payment and Adult Disability Payment: the Disability Assistance for Children and Young People (Scotland) Regulations 2021; the Disability Assistance for Working Age People (Scotland) Regulations 2022; and the Disability Assistance for Working Age People (Transitional Provisions and Miscellaneous Amendment) (Scotland) Regulations 2022. These changes to the principal regulations are intended to smooth the transition for individuals moving between these benefits. In addition they include some minor technical amendments. They also make a small adjustment to the Social Security (Invalid Care Allowance) Regulations 1976 to clarify eligibility criteria for Carer’s Allowance.

The public sector equality duty is a legislative requirement which states that the Scottish Government must assess the impact of applying a proposed new or revised policy or practice on groups with protected characteristics. Policies should reflect that different people have different needs. Equality legislation covers the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.

This Equality Impact Assessment has identified potential impacts on disabled people in Scotland as a result of these amendments to the principal regulations for Child Disability Payment, Adult Disability Payment and Carer’s Allowance. It was found that, overall, these changes would have a positive impact on people in Scotland with protected characteristics. No specific areas of improvement have been identified during the process of this equality impact assessment however, if any areas of improvement are identified, we will endeavour to make changes to better meet the needs of people living in Scotland. We will also be continuing to monitor and evaluate the impact of these amendments through a comprehensive evaluation programme conducted by the Communities Analysis Division within the Scottish Government.

These changes build on the 2018 Act’s framework of a system that is underpinned by dignity, respect and a human rights based approach to delivering social security for the people of Scotland. This impact assessment is one of a package to accompany the regulations. The others are: Business and Regulatory Impact Assessment (BRIA); Island Community Impact Assessment (ICIA) Children’s Rights and Wellbeing Impact Assessment (CRWIA); and the Fairer Scotland Duty Assessment.

Background

Amending the principal regulations ensures that Child Disability Payment and Adult Disability Payment entitlement is aligned to our policy intent, which is to help improve outcomes for disabled people, by providing financial assistance to help meet the additional costs associated with care and mobility needs as a result of being disabled.

Changes to the Child Disability Payment and Adult Disability Payment Regulations which relate to the Child Disability Payment to Adult Disability Payment journey

The Scottish Government recognises the vital importance of supporting young people who are transitioning between different forms of social security assistance. We have listened to disabled people and people with long-term health conditions with experience of the social security system who told us that transitioning between child and adult services can be challenging.

We have already taken a number of actions to ensure that this process is less burdensome and more seamless than under the UK system, such as extending eligibility to 18 for those individuals in receipt of Child Disability Payment before the age of 16 to ensure continuity for young people at what we have been told is a difficult transition period for them. We have also provided individuals with the choice to make an application in many different ways including by post, online, by phone and with face-to-face support from our Local Delivery team.

We consider that the amendments we are making to the principal regulations for Child Disability Payment and Adult Disability Payment will have a positive impact on individuals with protected characteristics as they intend to smooth the journey of those individuals transitioning from Child Disability Payment to Adult Disability Payment.

One way we are doing this is by amending the Adult Disability Payment Regulations to enable the payment cycles of people moving from Child Disability Payment to Adult Disability Payment to be maintained. This will ensure that young people who are transitioning from Child Disability Payment to Adult Disability Payment will receive their Adult Disability Payment on the same date that their Child Disability Payment was previously paid.

The move to align the payment cycles of people moving from Child Disability Payment to Adult Disability Payment will offer advantages for smooth processing. It will avoid the need for Child Disability Payment to end with a smaller payment covering part of a payment cycle, and therefore offers an administrative advantage.

At the moment, this group of young people are entitled to Adult Disability Payment from the date that a determination of entitlement for Adult Disability Payment is made, meaning that they receive their Adult Disability Payment later than those who were not in receipt of Child Disability Payment before becoming entitled to Adult Disability Payment. We are altering the start date of entitlement

for Adult Disability Payment so that it begins on the day after the individual's next Child Disability Payment payment cycle ends, following the determination. Consequently, we are making a small amendment to the Child Disability Payment Regulations to bring entitlement to an end when someone has received a determination that they will be entitled to Adult Disability Payment.

Importantly, this change does not negatively impact on the overall amount a person will receive. This change will therefore directly benefit disabled young people moving from Child Disability Payment to Adult Disability Payment as it will provide them with financial continuity and ease their transition from one form of assistance to another.

There is provision in the Child Disability Payment Regulations to extend entitlement to Child Disability Payment to age 19 for those transferring from Disability Living Allowance to Child Disability Payment and those who have made a cross border move to Scotland from elsewhere in the United Kingdom who were also included in the case transfer process. This was included to provide case transfer individuals, approaching 18 at the time of transfer, sufficient time to make their Adult Disability Payment application before their Child Disability Payment comes to an end. We are now at a place in the case transfer process where all young people over age 16 have now transferred to Child Disability Payment and are receiving the appropriate communications about making an application for Adult Disability Payment. This means it is now appropriate to narrow this provision. As such, we are amending this provision to apply only to those who turn 18 on or before 31st December 2023. This will ensure that this policy has the desired impact which is to protect those young people transitioning from Child Disability Payment to Adult Disability Payment as they approach 18. It also means that going forwards, regardless of whether an individual was originally in receipt of Disability Living Allowance or not, the same rules, regarding entitlement to Child Disability Payment over the age of 18, apply.

We have set out in more detail in our 'key findings' section the positive impact that these changes will have on individuals with protected characteristics of age and disability.

Other Amendments to the Child Disability Payment, Adult Disability Payment and Adult Disability Payment Transitional Provisions Regulations

These amendments also include a set of minor technical amendments to the Child Disability Payment, Adult Disability Payment and Adult Disability Payment transitional provisions Regulations. As such, we do not consider that they will have a significant impact on groups of people or communities but we have noted any potential impacts that have arisen as part of this impact assessment.

We are amending the Child Disability Payment and Adult Disability Payment Regulations to make explicit that the care/daily living component of Adult Disability Payment/Child Disability Payment is restricted to individuals for whom the United Kingdom is the correct state for paying these components. We are aware that the residence criteria is more likely to impact individuals who

regularly move between Scotland and the rest of the UK but there is insufficient data available to determine the level of this potential impact.

The Child Disability Payment and Adult Disability Payment Regulations are also being amended to make provision to state that, where a Determination Without Application is made on an individual's entitlement to Adult Disability Payment when Scottish Ministers become aware that the individual has died, their entitlement will end on the day the person dies. This has always been the policy intention but this additional clarification ensures this is put beyond doubt. We are also clarifying Regulation 34(b) of the Child Disability Payment Regulations by inserting the word 'Payment' after 'Child Disability' as this is currently missing.

The Adult Disability Payment and Adult Disability Payment transitional provisions Regulations are being amended to clarify who changes are reported to before the transfer determination. Further amendments to the Adult Disability Payment transitional provisions Regulations clarify when and how changes that occur after the point of transfer should affect a person's award.

These are technical amendments and we do not foresee any significant impact on groups or communities other than to clarify these provisions in terms of the Regulations.

Amendment to the Social Security (Invalid Care Allowance) Regulations 1976

We are making amendments to the Social Security (Invalid Care Allowance) Regulations 1976 to reflect the current legal position for carers to be able to receive Carer's Allowance when abroad and caring for someone who is in receipt of Child Disability Payment or Adult Disability Payment. We consider that this will have a positive impact for disabled people given that it will ensure that carers abroad who are caring for a disabled person in receipt of Child Disability Payment or Adult Disability Payment receive the assistance they are entitled to.

We are amending the list at Regulation 9(2)(b) of the 1976 Regulations to include the care component of Child Disability Payment at the middle or highest rate and the daily living component of Adult Disability Payment at the standard or enhanced rate.

This will ensure carers providing care to someone in receipt of Child Disability Payment or Adult Disability Payment are treated consistently with those providing care to someone in receipt of Attendance Allowance, Disability Living Allowance or Personal Independence Payment.

Who was involved in this EQIA?

In July 2016 the Scottish Government launched a public consultation to support the development of a framework that would become the Social Security (Scotland) Bill. This received more than 200 responses to questions relating to

disability benefits with an even split between organisational and individual responses. In particular comments were invited on a partial Equality Impact Assessment which represented the Scottish Government's work on the impact of social security policy on people with protected characteristics prior to the consultation.

There were 521 formal written responses submitted, of which 241 were from organisations and 280 from individual respondents. Of the 241 organisational responses, 81 were received from stakeholder groups relating to children/young people, equalities and human rights, disability and long term conditions, and carers. The independent analysis of the responses along with the Scottish Government response were published on 22 May 2017¹.

The Scottish Government has set up Social Security Experience Panels with over 2,400 people across Scotland registered as panel members when the Panels opened in 2017. The Panels involve people with lived experience of the benefits that have been introduced in Scotland.

Two surveys regarding the case transfer process were sent out to Experience Panel members in January and February 2019. 404 and 559 responses were received respectively. A series of individual and group interviews were also conducted. Results from both surveys and the interviews were published in 2019.² These surveys confirmed that of most importance to panel members was that they continue to receive the correct payment at the correct time. The changes we are making in relation to smoothing the journey for individuals moving from Child Disability Payment to Adult Disability Payment mean that the payment cycles for these children and young people will be maintained and they will receive their Adult Disability Payment on the same date their Child Disability Payment was previously paid.

The Consultation on Disability Assistance built on the work on the Experience Panels and was published on 5 March 2019. In line with the principles of dignity, fairness and respect, the Scottish Government sought the views of the people of Scotland on the three proposed disability assistance benefits. The consultation closed on 28 May 2019, having received 262 replies, of which 74 were from stakeholder organisations and 188 were from individuals. The consultation helped to inform the development of the principal regulations for Child Disability Payment and Adult Disability Payment, taking into account the views of people with a lived experience of social security.

The Scottish Government has also undertaken ongoing consultation with stakeholders through our independent Disability and Carers Benefits Expert Advisory Group (DACBEAG). DACBEAG is chaired by Dr Jim McCormick and comprises individuals with significant practical experience of the UK social security system, from a range of professional backgrounds. It is independent

¹ <https://www.gov.scot/publications/analysis-written-responses-consultation-social-security-scotland/>

² See <https://www.gov.scot/publications/social-security-experience-panels-case-transfer-survey-findings/> and <https://www.gov.scot/publications/social-security-experience-panels-designing-case-transfer-process-main-report/>

of the Scottish Government. The Group's role is to advise Scottish Ministers on specific policy options for disability assistance and carers benefits due to be delivered in Scotland. DACBEAG's advice helped to inform the development of Adult Disability Payment policy and the principal regulations that we are amending and considering the impact of these amendments on individuals with protected characteristics.

The Ill Health and Disability Benefits Stakeholder Reference Group was set up in March 2016 to inform and influence the development of policy options relating to devolved Disability Assistance. This group has advised on the potential impact of policy decisions as well as stakeholder engagement. They mostly advise on the impact of policy decisions on disabled people and the social security system as a whole.

On 21 December 2020, the Scottish Government launched a public consultation on its proposals for the delivery of Adult Disability Payment and on drafts of the accompanying impact assessments. The consultation ran until 15 March 2021 and received 127 responses from individuals and stakeholder organisations. The consultation wanted to gather views to ensure that the proposals were aligned with the principles of dignity, fairness and respect. These amendments are also intended to align with these principles and the overall policy intent which is to improve outcomes for disabled people and part of ensuring this is by considering the impacts of these proposals on individuals with protected characteristics.

Overall these consultations and advice from stakeholder groups helped to inform the principal regulations for Child Disability Payment and Adult Disability Payment which we are amending as part of these regulations. We are doing this to ensure that the journey of individuals moving between these forms of assistance is as smooth as possible. As part of the development of these amendments we have considered the current impact of these regulations on the Child Disability Payment to Adult Disability Payment journey and the potential impacts of the amendments we propose to smooth this transition which are detailed below in the 'key findings' section.

The scope of the EQIA

This Equality Impact Assessment gives consideration to the impact of the introduction of these amendments on disabled people who have one or more protected characteristics.

Data Sources

A variety of sources were used in compiling this EQIA, including:

- Scottish Health Survey 2021³
- Social Security Experience Panel findings⁴
- Responses to our Consultation on Disability Assistance in Scotland⁵
- Scotland's Census 2011⁶
- DWP Stat Xplore
- Child Disability Payment Statistics – February 2023⁷
- Adult Disability Payment Statistics – December 2022⁸

Key findings

This Equality Impact Assessment has found that the introduction of these amendments to the principal regulations for Child Disability Payment, Adult Disability Payment, Adult Disability Payment transitional provisions, and Carer's Allowance will have a positive impact on the people of Scotland, including individuals who fall under the following protected characteristics.

Age

The Scottish Health Survey 2021 provides an accurate estimate of the number of disabled children and young people in Scotland. Within the 0-15 age group, 21% of children have a longstanding illness⁹. For young people aged 16-24, 26% of young people have a longstanding illness.

In 2021, there were just over 900,000 children aged 15 and below in Scotland and about 225,000 young people aged between 16 and 19¹⁰. In November 2021, prior to the wholesale start of case transfer from Disability Living Allowance for children to Child Disability Payment, there were just under 44,000 children entitled to Disability Living Allowance in Scotland. Of these, there were around 3,900 were aged between 0-5, just over 19,000 were aged between 5-10, and almost 21,000 individuals were between the ages of 11-15¹¹.

³ [Scottish Health Survey 2021: supplementary tables - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/scottish-health-survey-2021-supplementary-tables/)

⁴ <https://www.gov.scot/publications/social-security-experience-panels-disability-living-allowance-dla-children-visual-summary/>

⁵ <https://www.gov.scot/publications/consultation-disability-assistance-scotland-analysis-responses/pages/3/>

⁶ <https://www.nrscotland.gov.uk/statistics-and-data/census>

⁷ [Child Disability Payment: high level statistics to 31 December 2022 - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/child-disability-payment-high-level-statistics-to-31-december-2022/)

⁸ [Adult Disability Payment Official Statistics \(socialsecurity.gov.scot\)](https://socialsecurity.gov.scot/publications/adult-disability-payment-official-statistics/)

⁹ [Scottish Health Survey 2021: supplementary tables - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/scottish-health-survey-2021-supplementary-tables/)

¹⁰ [Mid-2021 Population Estimates Scotland | National Records of Scotland \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/statistics-and-data/population-estimates-scotland/)

¹¹ DWP Stat Xplore

Across the period 26 July 2021 to 31 December 2022, 42% of the part 1 applications were made for children aged 5-10, whilst 31% were in the 11 – 15 age group and 26% in the 0-4 age group.¹²

We know that many disabled young people transition between child and adult services at age 16. We have already established Child Disability Payment and Adult Disability Payment in a way that helps ensure that young people aged 16-18 will not have a gap, or lose their entitlement to Child Disability Payment whilst waiting for their Adult Disability Payment application to be processed. This has a positive impact on disabled young people by reducing the anxiety and challenges at this difficult time for them and their families. It also helps mitigate any further drop in household income at a time when other child benefits and respite care may stop.

Individuals in receipt of Child Disability Payment can make an application for Adult Disability Payment any time between the age of 16 and 18 and will become entitled to Adult Disability Payment from the date that a determination is made on their Adult Disability Payment application. We are therefore amending the Adult Disability Payment Regulations to enable the payment cycles of individuals moving from Child Disability Payment to Adult Disability Payment to be maintained, meaning that they will receive their Adult Disability Payment on the same date their Child Disability Payment was previously paid.

We believe that this will have a positive impact on individuals as it will ensure a more straightforward journey for those individuals moving from Child Disability Payment to Adult Disability Payment at an already challenging point for many young people.

Furthermore, there is currently provision within the Child Disability Payment Regulations to provide Child Disability Payment recipients with enough time to make an application for Adult Disability Payment where their award has transferred from Disability Living Allowance for Children. This also applies where they have made a cross border move to Scotland and were due to turn 18 immediately after Adult Disability Payment launched nationally. Without this provision, some individuals would only have hours to submit their Adult Disability Payment application before their Child Disability Payment would end.

The Regulations entitle all Child Disability Payment recipients whose award has transferred from Disability Living Allowance to stay on Child Disability Payment until the age of 19. However we are now at a point in the case transfer process where we know all Disability Living Allowance recipients over age 16 have been transferred, are receiving appropriate communications about making an application for Adult Disability Payment and have adequate time to submit their Adult Disability Payment application. Accordingly, we are amending the Child Disability Payment Regulations to limit the extension of

¹² [Child Disability Payment: high level statistics to 31 December 2022 - gov.scot \(www.gov.scot\)](https://www.gov.scot/child-disability-payment-high-level-statistics-to-31-december-2022)

entitlement to 19 to those individuals who turn 18 on or before 31st December 2023.

We consider that this change will have a positive impact as it will ensure that the group of case transferees approaching 18 who we intended to protect continue to be protected. It also means that, following these amendments, all young people who are aged 18 after 31 December 2023, regardless of whether an individual was originally in receipt of Disability Living Allowance or not, will be subject to the same rules regarding receipt of Child Disability Payment over the age of 18.

Disability

As of 31 December 2022, it is estimated that 54,375 children and young people were in receipt of Child Disability Payment. Of this total, 13,005 were new applicants and 41,370 were people who had their award transferred to Child Disability Payment.¹³

As of the 31 October 2022, 3,470 people were in receipt of Adult Disability Payment. Of this total, 3,135 people were new applicants and 335 were people who had their award transferred from the Department for Work and Pensions' Personal Independence Payment.¹⁴

As described in the 'background' section above, we believe that the changes we are making to ensure a smooth transition for individuals moving between Child Disability Payment and Adult Disability Payment will have a positive impact on disabled people in Scotland.

By maintaining the payment cycles of persons moving between these forms of disability assistance, we are ensuring that they do not have any gap in payment which will protect their passported benefits. It will also reduce disruption to their direct debits, bills and other payments.

Furthermore we are making changes to the principal Regulations for Carer's Allowance to ensure that carers who are caring for a disabled person abroad who is in receipt of Child Disability Payment or Adult Disability Payment continue to receive Carer's Allowance.

Some carers abroad can apply for Carer's Allowance where their absence is temporary and has not lasted a continuous period beyond 4 weeks. This also applies where the absence is to care for a severely disabled person who is temporarily absent from the Common Travel Area (CTA).

We have identified a gap in the amendments which were made to the principal regulations for Carer's Allowance as a consequence of the introduction of Child Disability Payment and Adult Disability Payment,

¹³ [Child Disability Payment: high level statistics to 31 December 2022 - gov.scot \(www.gov.scot\)](https://www.gov.scot)

¹⁴ [Adult Disability Payment Official Statistics \(socialsecurity.gov.scot\)](https://socialsecurity.gov.scot)

specifically that these were not added to the list of qualifying benefits in these circumstances. We are therefore amending these Regulations to include references to Child Disability Payment and Adult Disability Payment in the relevant criteria.

We believe that this will have a positive impact on disabled individuals and those caring for disabled people as it will ensure that carers who are caring for someone in receipt of Child Disability Payment or Adult Disability Payment while abroad are able to receive Carer's Allowance ensuring that they are treated consistently with those caring for someone in receipt of Attendance Allowance, Disability Living Allowance or Personal Independence Payment.

Marriage and civil partnership

Although the Scottish Government does not require assessment against this protected characteristic unless the policy or practice relates to work, for example Human Resource policies and practices, we have considered this and not identified any particular barriers resulting from our policy approach which may affect people with the protected characteristic of marriage or civil partnership.

Pregnancy and maternity

There is not sufficient data available to assess the impact of these amendments in terms of pregnancy and maternity but we haven't identified any impact on people with this protected characteristic. It could be argued that ensuring continuity and minimising disruption relating to payment dates will particularly benefit people with dependents as they may have additional bills, direct debits or scheduled payments.

Race

There is not sufficient data available to assess the impact of these amendments on individuals because of their race but we haven't identified any impact on people with this protected characteristic.

Religion and belief

There is not sufficient data available to assess the impact of these amendments on individuals because of their religion and belief but we haven't identified any impact on people with this protected characteristic.

Sex

There is not sufficient data to determine the full impact of these amendments on individuals because of their sex, however we are aware that a larger percentage of carers in Scotland are female than male so we consider that the amendment that we are making to the principal regulations for Carer's Allowance may impact positively on more women than men.

Sexual orientation and gender reassignment

There is not sufficient data available to assess the impact of these amendments on people who have the protected characteristic of sexual orientation and gender reassignment however we do not foresee any impact on this protected group. However, when engaging with young people in the LGBTI+ community, we were told that 17-18 was the most common age to 'come out', including leaving the family home and that this was a period of extreme stress and difficulty for many young people emotionally and financially. It could be argued that smoothing the Child Disability Payment to Adult Disability Payment journey for young people and maintaining their payment cycles will provide further financial stability at this time.

Recommendations and Conclusion

This Equality Impact Assessment process has identified that, overall, the introduction of these amendments to the principal sets of Regulations for Child Disability Payment, Adult Disability Payment and Carer's Allowance, has the potential to have a positive impact for people in Scotland with protected characteristics.

The potential positive impacts identified include:

- Providing young people transitioning from Child Disability Payment to Adult Disability Payment with financial continuity by maintaining their payment cycles meaning they receive their Adult Disability Payment on the same date their Child Disability Payment was previously paid.
- Reducing the risk of gaps in payment for young people moving between Child Disability Payment and Adult Disability Payment, protecting their passported benefits.
- Ensuring that all young people who turn 18 after 31 December 2023 are subject to the same rules regarding receipt of Child Disability Payment after 18 while continuing to protect the cohort of case transferees turning 18 on or before this date
- Ensuring that carers of individuals in receipt of Child Disability Payment or Adult Disability Payment can receive Carer's Allowance while abroad to ensure they are treated equally to those caring for someone in receipt of Attendance Allowance, Disability Living Allowance or Personal Independence Payment.

We believe that these positive impacts will help to develop better outcomes for disabled individuals, particularly those young people transitioning from Child Disability Payment to Adult Disability Payment, by further smoothing the process and providing them with financial continuity.

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