**Consultation on Adult Disability Payment**

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Full name or organisation’s name

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**Consultation on Adult Disability Payment**

**Summary of RNIB Scotland Responses**

The Royal National Institute of Blind People (RNIB) Scotland supports children and adults with sight loss and helps them to live full and independent lives, campaigning for their rights.

Our key points in response to this consultation on Adult Disability Payment (ADP) can be summarised along the following two lines; the aspects which will mirror those of existing Personal Independence Payment (PIP) provision, and the proposed divergences from this benefit.

* The criteria and scoring which remain in line with PIP do not present cause for concern for blind and partially sighted people. This has not been a barrier and the existing matrix enables blind and partially sighted people to score sufficiently to access the support they are entitled to.
* Accurate application of this matrix depends upon the assessor having detailed knowledge of sight loss however, and this is something we would wish to see ensured for the incoming Adult Disability Payment.
* The introduction of Short-Term Assistance and payments being issued every four weeks in arrears is welcomed.
* We support ceasing in-person examinations in favour of consultations which take place according to the preference of the claimant and in a familiar location.
* Shifting the onus from claimants to provide evidence of their conditions through seeking as few pieces of existing public sector records as possible is broadly welcomed. We look forward to getting more information on how this will operate and the powers of claimants to ensure the evidence provided is accurate.
* We warmly welcome the proposal of indefinite awards for conditions which are highly unlikely to improve. We would appreciate a guarantee that indefinite and long-term awards made respectively via Disability Living Allowance (DLA) and PIP would be honoured when transferring to ADP.
* Proposed changes to the application process which will enable new claims to be made online, by paper form or in person would be significant and welcomed, and we look forward to more information on this and the ADP pilot scheme.

**Consultation questions**

**Part 1: Introductory and Interpretation (regulations 1 and 2)**

**Q 1: Do you agree the regulations reflect this policy intent?** YES

**Q 2: If you have any further comments please provide them here.**

**Definitions of 'Aid or Appliance'**

**We believe the definitions of 'aid or appliance' to sufficiently accommodate the equipment blind and partially sighted people use. This is important as scoring points for the use of an aid is often central to blind and partially sighted claimants securing an award.**

**It should be noted that for blind and partially sighted people that 'aid and appliance' is not limited to canes and assistance dogs, for instance. It also spans a range of items from IT to cooking aids, such as software packages for assistive technology and talking microwaves which incur a substantial additional cost in comparison to an individual without a visual impairment.**

**Proposed Pilot Scheme**

**RNIB Scotland welcomes Social Security Scotland's intention to run a pilot scheme and looks forward to the outcomes and feedback from this.**

**Part 2: Disability Assistance for Working Age People Overview (regulation 3)**

**Q 3: Do you agree the regulations reflect this policy intent?** YES

**Q 4: If you have any further comments please provide them here.**

RNIB Scotland understands that the administration and re-designing of social security by the Scottish Government is a considerable task. The devolution of disability benefits provides an opportunity to review the existing status quo on welfare provision.

Adopting Benefit Criteria

Overall, Personal Independence Payment (PIP) criteria cover the main areas of daily living and mobility needs for blind and partially sighted claimants. The descriptors allow for people with sight loss to score adequate points.

Blind and partially sighted people may have other medical conditions that mean they receive support through Disability Living Allowance (DLA) or PIP. Changes to the existing PIP criteria could cater more appropriately to their needs, and so we would welcome the Scottish Government's proposed review in 2023 (subject to re-election).

The activity under mobility is relevant to most of our clients as it assesses someone's ability to navigate. This specifically mentions visual impairment and guide dogs, which is welcomed. The descriptors within this activity allow for blind and partially sighted people to score sufficient points.

**Daily Living Component and Mobility Component (regulations 4 and 5)**

**Q 5: Do you agree the regulations reflect this policy intent?** YES

**Q 6: If you have any further comments please provide them here.**

Data-Sharing

The statement in the consultation document concerning the utilisation of existing public sector data where it is exists is broadly welcomed. This will shift the onus from blind and partially sighted people to evidence their eligibility against each individual aspect of support they need. RNIB Scotland would warmly welcome further information about this process, what level of public sector data will be available to Social Security Scotland, what role the individual will have in granting access to this, and the provision of assurances around data protection and information handling. Overall, we very much want to get clarity on how the data-sharing process will work and the point at which the claimant will give permission for data-sharing.

Accurate Descriptions of Condition(s)

The departure from in-assessment examinations is strongly welcomed as this has been a particular source of anxiety for claimants. In the past, crude eye tests have been conducted by assessors during assessments which is inappropriate and unlikely to accurately reflect the realities of a claimant's sight loss condition. Nor would this evidence the nuances between and within the considerable variety of sight loss conditions.

It is important that claimants should be able to direct assessors to accurate descriptions of their condition(s). Participants in our focus groups highlighted instances where evidence of sight loss provided by a general practitioner did not corroborate the severity of the claimant's condition, nor the opinion of their ophthalmologist.

Consideration should be given to the points on the relative weight of evidence cited in 'The PIP Assessment Guide - Part 1'[[1]](#footnote-1):

"When a third party provides evidence – for example, a carer or health professional – the assessor should evaluate the strength of the opinion being expressed. Their evaluation could include the level of expertise of the individual offering the opinion; their direct knowledge of the claimant’s health condition or impairment; and whether it is medically reasonable."

Beyond a medical description of an individual's sight loss condition, only the claimant can account for impact of sight loss on their day to day lives.

One focus group member said "When you submit your application, you're asked for evidence based on your disability, so your GP or consultant should provide that. When you're registered blind, your consultant should give you a description, because they know exactly what your condition is, but also your limitations. ... Especially if they're newly diagnosed, it [assessment] can be quite traumatic."

Automatic Entitlement

RNIB Scotland recognises that, for a variety of reasons (including stigma attached to the process), not everyone with a significant degree of sight loss is registered as blind or partially sighted.

We welcome the consideration by Social Security Scotland of automatic entitlement, and would like to extend an offer to support the development of a framework or to make suggestions as to which factors could be taken into account in identifying automatic entitlement for blind and partially sighted people.

**Determination of ability to carry out activities (regulation 6)**

**Scoring for daily living and mobility activities (regulations 7 and 8)**

**Scoring: further provision (regulation 9)**

**Q 7: Do you agree the regulations reflect this policy intent?** YES

**Q 8: If you have any further comments please provide them here.**

Determination of ability to carry out activities

Regulation 6 which relates to the reliability criteria is of huge importance when assessing blind and partially sighted claimants. We strongly support its continued use. The correct application of this criteria is what usually leads to points for our clients and it is ergo essential to the assessment of visual impairment within the daily living and mobility components.

The consideration of 'safely' when determining an individual's ability to carry out an activity was particularly welcomed by focus group participants. In its absence, blind and partially sighted people may be considered to “undertake an activity” which is really very challenging for them. For instance, participants stated, "There is no such thing as a familiar journey" and "Every day is an obstacle course", as, for example, obstacles such as A-boards can appear on pavements along familiar routes without warning.

Scoring for daily living and mobility activities

The scoring for daily living and mobility activities contained in regulations 7 and 8 provide the same threshold of 8 and 12 points for standard or enhanced rate respectively, in line with PIP. This transparency forclaimants is welcomed and can help in focusing on relevant activities and to identify need.

Scoring: further provision

One focus group participant expressed trepidation about the application of the 50% rule given the variability in environmental settings, such as the comparison between winter and summer light levels. Clarity of communication by assessors on judgements made according to this rule would be welcomed by blind and partially sighted claimants.

However, regulation 9 relating to the 50% rule does not often present issues for blind and partially sighted claimants. Recent case law has explored the application of this rule, and RNIB Scotland would encourage Social Security Scotland to evaluate these findings to ensure the rule is applied reasonably and fairly.

**The required period condition: daily living component and mobility component (regulation 10 and 11)**

**The relevant date (regulation 12)**

**The relevant date: after an interval (regulation 13)**

**Q 9: Do you agree the regulations reflect this policy intent?** YES

**Q 10: If you have any further comments please provide them here.**

These conditions mirror those currently operational under PIP and are reasonable. This transparency is welcomed.

Residence and presence conditions (regulation 14)
Absence from the United Kingdom (regulation 15)
Absence from the United Kingdom including medical treatment (regulations 16)
Absence from the United Kingdom in special cases (regulation 17)
Serving members of Her Majesty’s forces and their family members – further provision (regulation 18)

**Persons habitually resident in the United Kingdom (regulation 19)
Persons habitually resident in outside of the UK (regulation 20)
Refugees (regulation 21)**

**Q 11: Do you agree the regulations reflect this policy intent? YES/NO/DON’T KNOW**

**Q 12: If you have any further comments please provide them here.**

Age Criteria (regulation 22)
Persons of pensionable age: exceptions (regulation 23)
Adult disability payment after an interval and after reaching the relevant age (regulation 24)

**Determination of an award after the person has reached the relevant age (regulation 25)**

**Q 13: Do you agree the regulations reflect this policy intent? YES/NO/DON’T KNOW**

**Q 14: If you have any further comments please provide them here.**

Terminal Illness (regulation 26)

**Q 15: Do you agree the regulations reflect this policy intent? YES/NO/DON’T KNOW**

**Q 16: If you have any further comments please provide them here.**

Care home residents (regulation 27)

**Hospital in-patients (regulation 28)**

**Exceptions: care homes and hospitals (regulation 29)**

**Legal Detention (regulation 30)**

**Periods of residence (regulation 31)**

**Payment of Adult Disability Payment between two periods of residence (regulation 32)**

**Q 17: Do you agree the regulations reflect this policy intent? YES/NO/DON’T KNOW**

**Q 18: If you have any further comments please provide them here.**

**Rate of Adult Disability Payment and Making Payments (regulation 33)**

**Making Payments (regulation 34)**

**When an application is treated as made and beginning of entitlement to assistance (regulation 35)**

**Time of Payment (regulation 36)**

**Continuing Eligibility (regulation 37)**

**Q 19: Do you agree the regulations reflect this policy intent?** YES

**Q 20: If you have any further comments please provide them here.**

**Making and Timing of Payments**

**Payments being made every four weeks and being paid in arrears gives blind and partially sighted people certainty in their income and support and is preferential to a weekly payment. This method enables forward planning and removes the anxiety about weekly payments which can be halted at short notice and with immediate effect.**

When an Application is Treated as Made and Beginning of Entitlement to Assistance

**Regarding '**When an application is treated as made and beginning of entitlement to assistance (regulation 35)', RNIB Scotland has found delay in processing PIP claims to be a major problem area, often adding financial anxiety and uncertainty to the trauma of dealing with sight loss. We have also noted that once a client has received notification of their award, they appear to be more reluctant to challenge a decision or ask for it to be looked at again. When asked why this is, clients state that "the whole process has been so stressful that they simply can't face going through any more assessment or uncertainty".

RNIB Scotland is also aware that currently requesting information/application details in alternative formats can add six weeks to an application procedure. This should not be the case.

The current timescale for PIP applications is around 16 weeks. Decisions on Attendance Allowance (AA) are much quicker - within three to four weeks. We recommend an eight-week timescale, and ergowelcome the timescale outlined in regulation 35.

Continuing Eligibility

**The ability for individuals to be granted continuing eligibility through regulation 37 is very welcome. Blind and partially sighted people in receipt of social security have been required to attend regular re-assessments although improvement of their sight loss condition is highly unlikely. Requiring these individuals to navigate a complicated system and repeatedly prove their eligibility causes extreme anxiety and distress. RNIB Scotland would welcome further information about how decisions of continuing eligibility will be made. We would appreciate further detail on what a 'light touch' review will involve. Additionally, where an award would be reduced following a 'light touch' review, the justification for this should be made expressly clear by Social Security Scotland.**

**Indefinite Awards**

We note that indefinite PIP awards have not been made. However, individuals have received long-term awards that they may believe to be indefinite although DWP retains the prerogative to re-assess PIP at any time.

The proposal of indefinite awards was received overwhelmingly positively by focus group participants. For blind and partially sighted people who are either registered blind or whose conditions are degenerative and highly unlikely to improve, indefinite awards would mean "everyone knows where they are". This would eliminate the considerable concern that claimants would be subject to repeated assessments and potentially have their entitlement unfairly reduced.

Blind and partially sighted focus group participants particularly emphasised that indefinite and long-term awards already granted respectively through DLA or PIP should be honoured when transferring to ADP. Explicit confirmation of this would be welcomed from Social Security Scotland.

**Part 11: Qualifications and Experience Necessary to Carry out Assessments (regulation 38)**

**Q 21: Do you agree the regulations reflect this policy intent? NO**

Whilst welcoming the principle of the general qualifications required to conduct ADP assessments, we are concerned that this does not include knowledge of sight loss. The ramifications of assessors not having knowledge of sight loss and the consequent adverse effects on claimants are outlined in detail in our response to question 22 below.

**Q 22: If you have any further comments please provide them here.**

Qualifications and Experience Necessary to Carry out Assessments

**RNIB Scotland welcomes the regulation that assessments which will involve consideration of the individual's mental health will be conducted by someone with relevant experience and expertise in that area.**

**Research by RNIB found that the PIP application process caused blind and partially sighted people considerable distress and hardship. Many claims wrongly led to a nil award or lower than the claimant's statutory entitlement, with assessors often lacking an understanding of sight loss and its impact on people's daily lives**[[2]](#footnote-2)**.**

Our statistics confirm that over 96% of cases supported by RNIB win at appeal, compared to the 66% - 76% general success rate at appeal for all disabled people. Our high success rate at appeal overtly demonstrates that blind and partially sighted people are not being assessed adequately first time around, and the UK Government is unnecessarily spending tens of thousands of pounds of taxpayer’s money challenging claims where entitlement should be straight forward.

**From our experience as an organisation of supporting clients through the appeals process and tribunals, we would wish to see evidence of learning from PIP appeals embedded in Social Security Scotland. We believe this would serve as a valuable and significant learning tool not just for claimants and supporting organisations such as RNIB Scotland, but also assessors.**

**The requirement that ADP assessors should have at least two years of experience working in health care or social care services is broadly welcomed, but RNIB Scotland would strongly encourage Social Security Scotland to ensure all assessors receive detailed training on sight loss and its impact so blind and partially sighted people can be understood, supported and respected. The provision of training so assessors are fully equipped to understand the difficulties blind and partially sighted people face could reduce the number of wrongly refused claims and re-determination appeals.**

**The overriding concern of our focus group participants was that claimants must be assessed by someone who had knowledge of sight loss. While they acknowledged that it would be challenging to employ assessors which specialise in each condition, past negative experiences underlined the importance of claimants being considered by those who understand sight loss.**

**Crucially, with an ageing population and growing rates of diabetes in Scotland, cases of sight loss are expected to increase considerably in the future. Currently around 178,000 people in Scotland live with a significant degree of sight loss, and this is predicted to rise by 20% by 2030[[3]](#footnote-3). This underlines the current and projected scale of sight loss in Scotland, and the need for assessors to understand eye conditions within a system intended to treat all claimants with dignity and respect.**

**It was suggested by focus group participants that many blind and partially sighted people experience challenges with their mental health. This has been particularly the case since the emergence of COVID-19, and the considerable feeling of isolation many blind and partially sighted people already felt prior to the introduction of restrictions. Whilst knowledge and experience of supporting people with mental health conditions features in the draft regulations, it is important that all assessors have sensitivity towards the mental health of blind and partially sighted people who may not present with a diagnosed mental health condition.**

**Under the current system, PIP assessors have access to a range of impairment specific case studies. These case studies are intended to guide assessors as to where potential points could be scored for particular disabilities. However, the visual impairment case studies did not adequately capture all the relevant points, so in practice did not aid accurate decision-making. If drafted accurately and used in the right way, this is a tool that could support the quality of assessor's decisions, and we would recommend that impairment specific case studies are used as part of assessors training and guidance along with evidence of learning from PIP appeals. This is something we as an organisation would be happy to support and facilitate.**

**To illustrate some of the issues PIP has presented for blind and partially sighted claimants, we have provided three case studies:**

**Case study 1**

One individual applied for PIP after being in receipt of the lowest rate of care for DLA when their needs changed.

On applying for PIP, they were awarded four points which they felt did not accurately reflect their needs. Due to this, they approached RNIB for support with a mandatory reconsideration.

As part of this process, her Certificate of Visual Impairment, prescription, and a letter from Blindcraft which confirmed the termination of her employment on medical grounds, were submitted in evidence. The mandatory reconsideration awarded the claimant 24 points, leading to an award of the enhanced rate for both components of PIP. In addition, this award was granted for five years, in recognition of how highly unlikely their condition was to improve.

**This demonstrates the value of evidence in considering a claimant's needs. Greater reliance on evidence rather than assessment would have avoided the need for a mandatory reconsideration, and the cost and considerable distress this process imposes upon the claimant.**

**Case study 2**

An individual who applied for PIP after becoming registered severely sight impaired (SSI) due to the sudden and rapid onset of sight loss had their claim refused. Following an assessment, they scored only two points.

RNIB supported this claimant through the mandatory reconsideration process and submitted additional evidence including their Certificate of Visual Impairment. RNIB advisors identified a total of 23 points for daily living and 16 points for mobility that the individual would be entitled to, due to their sight loss and issues with mobility compounded by another condition.

The reconsideration process saw the claimant awarded 7 points for daily living and 10 points for mobility, which led to an award of solely the standard rate for mobility.

RNIB supported this claimant to appeal this decision and provided representation. As a result of this appeal, the customer was awarded enhanced rates of both daily living and mobility for ten years.

**This case study demonstrates that often assessors do not possess an adequate understanding of sight loss which can lead to inaccurate and insufficient awards under PIP. This is demonstrated by the high rate of awards which are overturned at reconsideration or appeals stage which RNIB is involved in. This time-intensive and costly process unnecessarily can cause extreme distress to claimants.**

**Case study 3**

An individual who became registered partially sighted applied for PIP after transitioning from full-time employment to part-time alongside volunteering.

Their initial application took place over the phone, during which they were advised a paper application form would be posted to them to complete. When they stated they would have significant difficulty completing the form due to their sight loss and would prefer an electronic version, the person on the telephone said this wasn't an option and that the claimant would need to ask for help from a friend, family member or organisation to complete.

Four weeks later the paper form arrived. The claimant filled this out to the best of their ability and written from memory, aware that this would likely be difficult to read.

Alternative formats of the application process must be made available. People who are blind or partially sighted should not be required to share personal and confidential health information with a third party simply to access the support they are statutorily entitled to.

The claimant later received a letter informing them of their assessment date and details of what to expect on the day. This communication was not accessible to the claimant, worsened by some text being printed over grey backgrounds reducing contrast and clarity.

This appointment was scheduled for 9am in central Glasgow, necessitating the claimant to navigate Glasgow Central Station, Scotland's busiest train station and 11th busiest in the UK overall[[4]](#footnote-4), at peak travel time. However, as the claimant arrived at the busy train station, they received a call cancelling their assessment thirty minutes before it was due to start. The claimant, concerned they could be penalised for not presenting for their appointment, despite it being cancelled, navigated to the assessment office and was rescheduled for the following week, again at 9am, necessitating another challenging journey during rush hour.

Days later the claimant received a letter confirming the details of their rescheduled assessment but written in a hostile tone - inferring that the reschedule had been due to the claimant missing or changing their appointment, rather than the reality which was the reverse. This letter threatened termination of their claim if they failed to attend for a second time.

In the appointment, the assessor had evidence provided by the claimant's Consultant Ophthalmologist. It was apparent the assessor had no knowledge of sight loss; the claimant had to explain in simpler terms than those provided by the ophthalmologist details of their sight loss condition and the effect this has on their daily life. The claimant was also asked to explain the difference between blindness and partial sight.

In explaining their condition, the claimant produced scans from their recent ophthalmologist appointment to help demonstrate this to the advisor. This led to a discussion about assistive technology and the apps and strategies the claimant uses to access information, control their central heating remotely, and so on. While the claimant felt the assessor was polite and interested, despite seeming to have no knowledge of sight loss, they were concerned on leaving that they had perhaps led the assessor to believe they were more independent than they really are.

**This feeling has been echoed by other claimants affected by sight loss; that to ensure the realities and challenges of their daily lives with sight loss are fully understood by an assessor they need to be negative. RNIB Scotland does not believe it is appropriate to assess a claimant solely based on how they present in an assessment, and that decision-making should be based on the evidence provided. The process would also be significantly improved if assessors have a greater understanding of sight loss and understand the specialist evidence provided, and do not have to rely on the claimant to fill gaps in their own knowledge.**

**As we have stated elsewhere in this response, communications are an issue of equalities and we would strongly urge Social Security Scotland to ensure a range of application and communication channels are available to claimants according to their preference.**

**Consideration of entitlement after specified period (regulation 39)**

**Other situations requiring a determination without an application (regulation 40)**

**Determination following official error – underpayments (regulation 41)**

**Determination following error – overpayments (regulation 42)**

**When changes in entitlement take effect (regulation 43)**

**Q 23: Do you agree the regulations reflect this policy intent? YES/NO/DON’T KNOW**

**Q 24: If you have any further comments please provide them here.**

**Periods in respect of a re-determination request (regulation 44)**

**Q 25: Do you agree the regulations reflect this policy intent?** YES

**Q 26: If you have any further comments please provide them here.**

Periods in Respect of a Re-Determination Request

**We welcome the extension of the time limit for individuals to request a re-determination where they feel their granted entitlement is incorrect. This will allow blind and partially sighted people flexibility and less time pressure on receiving the result of an application and assessment that they believe to be inappropriate. We hope that having the more generous time limit available will lead to less anxiety about submitting a request in time.**

**The proposed introduction of 'Short-Term Assistance' is strongly welcomed, to ensure individuals will continue to receive their previous payment amount until the outcome of a re-determination has concluded. This will remove the penalising effect of requesting a re-determination or appeal when an individual believes their award to be inappropriate.**

In addition, the position should be maintained where there is at least one tribunal wing member with a knowledge of disability. In-person hearings should be available on request.

**Part 14: Provision of vehicles (regulation 45)**

**Q 27: Do you agree the regulations reflect this policy intent? YES/NO/DON’T KNOW**

**Q 28: If you have any further comments please provide them here.**

Liability for assistance given in error (regulation 46)
Determination to effect a deduction decision (regulation 47)

**Q 29: Do you agree the regulations reflect this policy intent? YES/NO/DON’T KNOW**

**Q 30: If you have any further comments please provide them here.**

**Schedule 1 – Adult Disability Assistance Determination**

**Q 31: If you have any comments Schedule 1 please provide them here.**

**Schedule 2 – Members of Her Majesty’s Forces: Excluded Persons**

**Q 32: If you have any comments on Schedule 2 please provide them here.**

**Q 33: If you have any comments about the proposed review of Adult Disability Payment please provide them here.**

**Q 34: If you have any comments about the impact assessments please provide them here.**

**Q 35: If there is anything else you would like to tell us about the regulations, impact assessments or Adult Disability Payment in general, please do so here.**

Application Process

The proposed changes to the application process, that it should be possible to apply for ADP online, by paper application or face to face is strongly welcomed as a departure from the prevalence of 'digital by default'. Historically, RNIB Scotland has advocated for communications to be tailored to the preferences of the recipient, and successfully lobbied for an amendment to this effect to be embedded in Scottish social security legislation. Further information on how the application process and communications will be offered would be welcome, as this is a source of anxiety for many.

RNIB Scotland would underline that communication is an equalities issue. Simply applying for benefits and getting communications can be a real problem for blind and partially sighted people. RNIB Scotland focus groups emphasised the costs of accessing technology. The high costs of accessible technology for blind and partially sighted people must be taken into account.

Consultation Settings

Additionally, the ability for in-person consultations to take place at the client's home or at a local partnership location, depending on the preference of the individual, is also welcome. Attending an assessment at an unfamiliar location has been highlighted by blind and partially sighted people as being particularly stressful. However, as one focus group participant raised, even attending an appointment in a known place can cause considerable difficulty, for instance, if it involves navigating train stations during peak travel times. Travelling during peak times is challenging for blind and partially sighted people and can unnecessarily add to a likely heightened sense of distress ahead of an assessment. We would welcome more convenient locations, but there should also be flexibility and reasonable adjustments made on both location and timing, as well as other aspects of appointments.

Concluding Comments

Overall, RNIB Scotland broadly supports the changes proposed by the Scottish Government to this replacement for PIP. RNIB Scotland would encourage the Scottish Government to consult with disabled people and the organisations that represent them at initial and significant junctures such as the re-design of the application process. As an organisation we would be happy to support and facilitate the involvement of blind and partially sighted people in these processes.

1. <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918328/pip-assessment-guide-part-1-assessment-process.pdf> [↑](#footnote-ref-1)
2. <https://www.rnib.org.uk/campaigning-current-campaigns-employment-and-welfare/pip-campaign> [↑](#footnote-ref-2)
3. <https://www.rnib.org.uk/professionals/knowledge-and-research-hub/key-information-and-statistics/sight-loss-data-tool> [↑](#footnote-ref-3)
4. <https://dataportal.orr.gov.uk/media/1906/station-usage-2019-20-statistical-release.pdf> [↑](#footnote-ref-4)