*<https://consult.gov.scot/social-security/social-security-mainstreaming-equality/consultation/subpage.2019-11-01.2973552795/>*

*Outcome 1 - Social Security Scotland will deliver a seamless service that is inclusive and where our clients are able to access the support they need.*

**1. Do you feel this outcome meets the needs of protected groups?**

Yes.

While we have said this outcome will meet the needs of protected groups we believe there could be greater clarity on what the outcome is designed to achieve – for example, if it is to access the entitlement or simply support to apply for it. We believe it is important the provision of the new service will be based on an inclusive, human rights-based approach. However, consideration should be given as to how this outcome will be achieved for all protected groups. Currently, many people with visual impairment are facing unfair and unnecessary barriers to accessing support. Too often this is because assessors do not understand the impact of their sight loss and the appropriate expertise and information on visual impairment is not being deployed to ensure reasonable decisions on awards are made. This emphasises the need for a person-centred approach based on a reasonable understanding on how a person’s life is affected by their condition.

**If you answered No, can you please outline how the outcome could be improved to meet their needs?**

**2. Do you feel that the supporting activities stated will help achieve the stated outcome?**

Yes, we believe they will help achieve the stated outcome but further actions will be required.

The commitment to inclusive communication is crucial. This should include audio and braille formats. Online accessibility will be crucial for first contact with the service for many people with visual impairment, while for others a user-friendly telephone service where people are quickly put through to a member of staff will be of particular importance.

We are pleased that Social Security Scotland will engage with equality groups to inform decisions on the physical environment for Social Security Scotland locations. It is vital that people with visual impairment are consulted in this process. We believe further actions are required too. Accessibility in and around locations where assessments are to take place must be fully considered. Not only venues for assessment need to be accessible for people with visual impairment and mobility problems, but surrounding infrastructure too. Difficulties in negotiating poorly maintained and cluttered pavements are frequently highlighted to us by people with visual impairment. It is also vital that before people are required to attend an assessment they are asked what additional assistance and guidance they will need on their arrival at the venue so they can attend the appointment. Giving people with visual impairment the chance to visit an office so they can acquaint themselves with the environment prior to an appointment would also be beneficial. Access for people living rural and remote communities will also need to be given particular consideration.

Applying for entitlement to social security should not be a demotivating and disempowering experience, which it is for too many disabled people currently. We have made the case that assessors need to be able to access expert advice on visual impairment and visual impairment awareness training, so we don’t continue the current situation where many people with visual impairment are turned down for PIP only to win their case on appeal. In the last three years, around 40% of blind and partially sighted people in Scotland had their applications for PIP rejected, but 16% of those decisions were overturned after an appeal. This is inefficient for the system and damaging for people with visual impairment.

We hope the new approach and culture which has been set out for Social Security Scotland will tackle current flaws in the system which discriminate against disabled people and that progress will be effectively measured through the Equality Impact Assessment process. To that end it will be important to monitor the impact on different protected characteristics, and within that different disabilities.

**If you answered No, what types of activity are missing that we could do to make an impact on delivery of this outcome?**

**3. Do you feel that the measures of success stated will help Social Security Scotland measure the progress of this outcome?**

Yes.

It is welcome that success will be measured in part by client experience data feedback from representative groups – these must include people with a wide range of disabilities, including those with visual impairment. No two conditions are the same and no two people have identical experiences.

**If you answered No, what are your concerns, and can you identify any further measures we should use?**

*Outcome 2 - Social Security Scotland will have a culture built on inclusivity where differences are supported, our people feel valued and they have opportunities to reach their full potential.*

**4. Do you feel this outcome meets the needs of protected groups?**

Yes.

**If you answered No, can you please outline how the outcome could be improved to meet their needs?**

We support the outcome and believe a focus on inclusion within the workforce is crucial. However, we believe it should be clear in the outcome that this approach is also being taken in the expectation that it will benefit people with protected characteristics making applications through the system. We believe that overall the outcomes could benefit from being more externally focussed.

**5. Do you feel that the supporting activities stated will help achieve the stated outcome?**

Yes. The emphasis on staff training and awareness is crucial, so it is welcome to see a strong commitment to this in training and development, and specific awareness weeks. We believe these activities should include visual impairment awareness training along with broader sensory impairment awareness initiatives. Along with other organisations Royal Blind can provide training resources on visual impairment.

We welcome initiatives such as the appointment of mental health first-aiders. Too often the emotional impact of sight loss is not recognised and people are not offered support.

**If you answered No, what types of activity are missing that we could do to make an impact on delivery of this outcome?**

**6. Do you feel that the measures of success stated will help Social Security Scotland measure the progress of this outcome?**

Yes, but more information would be welcome on how success will be identified and reported on. In particular, we would like further information on how self-declaration (eg. HR data on protected characteristics) will provide a robust process for identifying the number of disabled people employed within Social Security Scotland.

**If you answered No, what are your concerns, and can you identify any further measures we should use?**

*Outcome 3 - Social Security Scotland will be an employer of choice and through our recruitment process we will look to build a workforce that is representative of the population of Scotland.*

**7. Do you feel this outcome meets the needs of protected groups?**

Yes.

**If you answered No, can you please outline how the outcome could be improved to meet their needs?**

**8. Do you feel that the supporting activities stated will help achieve the stated outcome?**

Yes. We welcome the priority given in this document to inclusive and accessible recruitment processes. Equality outcomes for staff must be developed not only from the point of interview but from the point of recruitment, and inclusive communications should also mean job adverts being made available in accessible formats and targeted at forums and locations which give disabled people the best chance of being aware of job opportunities. Reasonable adjustment processes are not only important for those in work but also for job interviews, which must be accessible for people with visual impairment. We are aware of instances in the public sector where this has not been the case, for example in not making appropriate IT support available for interviews.

To create more equality of opportunity in employment for disabled people in Scotland, we need to see a culture where employers are prepared to recognise the contribution in the workplace which can be made by disabled people. Two thirds of people with visual impairment of working age are not in paid employment. As an employer of disabled people with Disability Confident accreditation, we know from experience the great value of the contribution disabled people make to the workplace when provided with the opportunity. We believe Social Security Scotland should lead the way in putting this approach into practice. We therefore welcome the commitment to targeted workshops and roadshows with under-represented groups and to research experiences with the recruitment process.

**If you answered No, what types of activity are missing that we could do to make an impact on delivery of this outcome?**

**9. Do you feel that the measures of success stated will help Social Security Scotland measure the progress of this outcome?**

Yes. Further measures could also be helpful, for example identifying the number of disabled people who are invited to interview and the percentage who are successful in their application. If any particular problems are identified in recruitment processes, including in relation to specific disabilities, actions which are taken to address these should be recorded and information on this made available.

**If you answered No, what are your concerns, and can you identify any further measures we should use?**

*Outcome 4 - Social Security Scotland uses the equality data (evidence) collected from clients, our people and other sources to respond to feedback and continually improve the service provided to all clients.*

**10. Do you feel this outcome meets the needs of protected groups?**

Yes. It is welcome that this links to the strategic objectives of promoting equality and tackling poverty are stated outcomes. It is important to recognise that these are inter-connected. Blind and partially sighted people are at disproportionate risk of experiencing poverty.

**If you answered No, can you please outline how the outcome could be improved to meet their needs?**

**11. Do you feel that the supporting activities stated will help achieve the stated outcome?**

These supporting activities will help achieve the stated outcome, but we believe there is the potential for additional steps to be taken. For example, this could include a specific evaluation what impact the role of specialist advisor has on the level of support provided to disabled people, and how the role has contributed to application processes being fairer for disabled people and people living with long term conditions. We welcome the activities set out for staff but feel there could also be more outward-facing engagement to achieve the outcomes. For example, analysis of information on experiences of people applying for support from Social Security Scotland could be undertaken in partnership with disabled people’s groups and third sector organisations.

**If you answered No, what types of activity are missing that we could do to make an impact on delivery of this outcome?**

**12. Do you feel that the measures of success stated will help Social Security Scotland measure the progress of this outcome?**

Yes.

**If you answered No, what are your concerns, and can you identify any further measures we should use?**

*Outcome 5 - Social Security Scotland’s service is delivered through having established partnerships with relevant public sector, third sector and community bodies providing clients person centred advice no matter their circumstances.*

**13. Do you feel this outcome meets the needs of protected groups?**

Yes. However, this outcome will not on its own “eliminate discrimination” as set out in the general duty, but can only do so as one of a much broader range of measures. Ultimately, the level of resources made available for the provision of entitlements provision will have a huge role in determining how successful the new system is in addressing the significant income inequality which is experienced by too many disabled people in Scotland.

**If you answered No, can you please outline how the outcome could be improved to meet their needs?**

**14. Do you feel that the supporting activities stated will help achieve the stated outcome?**

Yes, and we feel effective signposting and referral from and to Social Security Scotland will be of particular importance.

**If you answered No, what types of activity are missing that we could do to make an impact on delivery of this outcome?**

**15. Do you feel that the measures of success stated will help Social Security Scotland measure the progress of this outcome?**

**If you answered No, what are your concerns, and can you identify any further measures we should use?**

*General Questions*

**16. Do the outcomes stated target the areas of most relevance for Social Security Scotland?**

Yes.

**If you answered No, what further outcomes would you suggest and why?**

**17. Are there any specific inequalities that you would wish to highlight that are relevant to the delivery of social security benefits? Any information or evidence you can provide or signpost us to will be greatly appreciated.**

Income inequality for people with visual impairment is of particular concern to Royal Blind. Two thirds of working-age people who are registered as blind or partially sighted in Scotland are not in paid employment. Three out of four blind or partially sighted older people live in poverty or less than half the mean national income [(Scottish Vision Strategy 2013 to 2018)](https://www.rnib.org.uk/sites/default/files/Scot_Vision_Strategy_refresh.pdf). 39 per cent of blind and partially sighted people of working age say they have some or great difficulty in making ends meet. [(My Voice, 2015)](https://www.rnib.org.uk/sites/default/files/My%20Voice%20UK%20Report-FINAL_0.PDF) .

**18. Do you have any other comments or suggestions on our approach to equality?**

It is welcome that the outcomes highlight the need to promote equality and tackling poverty. We believe consideration should also be given to including the promotion of inclusion as an important principle for disabled people in these objectives.