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Shirley Anne Sommerville
Cabinet Secretary for Social Justice
Scottish Government
St Andrews House
Regent Road
Edinburgh
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DATE

Dear Cabinet Secretary

Re: The Independent Review of Adult Disability Payment

I am writing to you on behalf of the MS Society, the MS community and the undersigned, organisations and people, who are part of the wider community of disabled people in relation to the Independent Review of Adult Disability Payment (ADP).

Scottish Government's Approach

It is important that we take time to commend the Scottish Government on adopting a different approach to Social Security and disability assistance benefits than the one that has been demonstrated by the UK Department of Work and Pensions (DWP). The Government's commitment to deliver a more person-centred approach is one that we have supported throughout the process of Social Security Scotland (SSS) developing and delivering the Scottish Benefits system. We particularly welcomed the introduction of the values of Dignity, Fairness and Respect that underpin this approach. In a similar vein we were also very encouraged by the Scottish Government's insistence that welfare is an investment in society.

While we understand that the complexities of transferring cases and payments from the DWP to Social Security Scotland, and the need for Personal Independence Payment and ADP to remain very similar benefits, limited the Scottish Government's scope for introducing wholesale changes to its new disability assistance benefit, it is our view that this was a missed opportunity.

Adult Disability Payment

As you know, Personal Independence Payment was introduced by the UK Government as a disability assistance benefit to replace the Disability Living Allowance. The purpose of both DLA and PIP, and subsequently ADP, was to help disabled people of working age manage the extra costs of their disability. It is widely acknowledged that the main reason for introducing PIP as the means to deliver disability



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assistance payments was to reduce the welfare spend. The MS Society found that since PIP replaced DLA in 2013, one in three people with MS moving over to this benefit had their support downgraded.

In 2022, the Scottish Government launched ADP across Scotland, replacing PIP, having consulted on the new benefit over late 2020 and early 2021. At the time of its launch, Adult Disability Payment was fundamentally the same benefit as PIP, adopting the same eligibility criteria that had been introduced to reduce welfare spend. The MS Society found that since PIP replaced DLA in 2013, one in three people with MS moving over to this benefit had their support downgraded. By retaining the same criteria that were responsible for a third of claimants living with MS, the Scottish Government missed an opportunity to introduce a disability assistance benefit that was truly an investment in society.

We do, however, acknowledge the positive changes made to the application and decision-making process for ADP, which, people report, is much improved on the PIP system.

Independent Review of ADP

The Independent Review was commissioned by the Scottish Government to ensure that ADP was meeting the needs of disabled people now and in the future. The final report was published in July of this year following 18 months of engagement with disabled people, third sector organisations, Social Security Scotland, UK and Scottish Government(s) and wider stakeholders in the field of Social Security. During these discussions the needs of disabled people were at the heart of the review and the vision that was laid out for the review was “...to ensure that the ADP system is fair, transparent, and supportive, empowering those it serves to live with dignity and respect.” It is our view that the review has embodied this approach and the 58 recommendations that are made within it would go a long way to seeing this ambition realised.

Further to this Edel Harris also writes in the report:

I sincerely hope that my findings and recommendations will help to:

- a) build on great foundations
- b) improve the overall client experience
- c) improve the systems and processes adopted by Social Security Scotland to, at all times, ensure accessibility, transparency, timely communications, timely decision-making, and ease of use
- d) ensure a modern and more realistic approach to determining eligibility based on the principles enshrined in the UN Convention on Human Rights.

We fully support this position and urge the Scottish Government to implement all the recommendations from the report as quickly as possible. Only in doing so will the values of Dignity, Fairness and Respect be at the heart of Adult Disability Payment. Further to this to be in a position to invest in society, as is the stated intention of the Scottish welfare system, we need to abandon the PIP eligibility criteria and move to a more person-centred holistic approach to assessing need. This will ensure that disabled people receive the support they need to live as independently as possible.



Yours sincerely

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On Behalf of the Following Organisations

Karen Cockburn	Charity Director	Nerve Tumours UK
Rachel Edwards	Chief Executive Officer	Epilepsy Connections
Kripen Dhrona	Chief Executive	British Polio Fellowship
Iain McWhirter	Chief Executive Officer	Revive MS Support
Genevieve Harrison	Chief Executive Officer	Compass Therapy Centre
Pamela Binny	Volunteer	ME Action
Lucy Taylor	Chief Executive Officer	MS Trust
Paula Gribben	Head of Therapy	Scottish Head Injury Forum
Billy Watson	Chief Executive	SAMH
James Jopling	Director	Parkinson's UK Scotland
Alice Struthers	Programme Director	Neurological Alliance of Scotland
Rich Collins	Chief Executive	Inflammatory Neuropathies UK
Andy Barrick	Chief Executive	Multiple Systems Atrophy Trust
Mary Troup	Trustee	Orthostatic Tremor UK Support Group
Sara Redmond	Chief Development Officer	Health and Social Care Alliance Scotland (the ALLIANCE)
Rob McDowall	Chair	Welfare Scotland

Further individual signatures are attached as a separate file.