

Personal Independence Payments Consultation

We would like to take this opportunity to respond to the proposals to introduce Personal Independence Payments from April 2013. This is in response to the DWP request for views during the formal consultation period

Here at AmicusHorizon (Housing Association) we manage over 28,000 homes across London, Sussex and Kent. We offer housing solutions from general needs to supported housing for vulnerable people and older adults. As a housing provider, we're dedicated to improving the quality of life of our residents.

We felt it was important to involve residents rather than just respond as an organisation. We organised a number of focus groups with residents across all three regions and have collated their views on the proposed changes. Many of those who attended have a physical disability or mental health condition, and most receive DLA in it's current form

Overall the change to a transparent points based system received a positive reaction as it was felt that would be consistent with the approach taken within other benefits such as Employment & Support Allowance.

However there is concern, by most but not all, at dropping the lower rate care component currently in payment within DLA.

There were also many comments regarding the points allocated for individual activities which we've included below

Activity 1 – Preparing food and drink

The assessment criteria looks at whether the person can make a simple meal with fresh ingredients, it was therefore felt that some consideration should be given to how the claimant got the fresh ingredients.

You go on to say that cooking food means cooking or heating at above waist height, this was consider unfair as it does not take into consideration the ability to bend and remove items from an oven.

Our residents also felt that there should be a higher point allocation if person needs prompting to either prepare or cook a simple meal and therefore the points should be allocated differently, B 1 point, C 2 points and D 3 points.

There was some feeling that preparing food should be separate from preparing drink as these tasks are completely different. Strong feeling that if person is unable to cook or prepare a meal at all then this should be allocated 12 points

Overall the group believed that more importance should be placed on the scoring of Activity 1 Preparing food and drink than for example Activity 6 dressing and undressing, as being unable to prepare food or drink could be life threatening, unlike Activity 6.

Activity 2 – Taking Nutrition

Item C should have a higher score allocated as using a tube or something similar requires a higher level of help than having your food cut up as in point B that also scores 2 points.

Item F has been allocated 10 points but it was felt that similarly this should also score 12 points as this could be life threatening.

Activity 3 – Managing Therapy or monitoring a health condition

We would like some clarity on category B which you state that supervision, prompting or assistance to manage medication or monitor a health condition is 1 point however we do not feel this reflects the serious consequences of not taking medication which again could be life threatening.

Is medication considered as therapy for points C to F, otherwise the maximum points you can receive for help with medication is 1 point?

We also feel that the maximum points allocated to category F should be 12 as being unable to undertake such therapy could be life threatening.

Activity 4 – Bathing & Grooming

Overall there was concern that having the ability to wash the lower body is not taken into account when assessing a person for this activity, clarification is required of what is meant by torso as our understanding is that this is waist and above?

Clearer explanation of what is meant by bathing as many people thought this did not include showering and related specifically to taking a bath?

Category C needs prompting to groom should be 2 points as if you weren't being prompted to groom you would require assistance to groom which scores 2 points.

Category E needs supervision or prompting to bathe should be 4 points as if you weren't being prompted to bathe you would require assistance to bathe which scores 4 points.

Activity 5 – Managing toilet needs or incontinence

There was a concern regarding no award of points for soiling yourself, if you are then able to change clothes etc, but would be awarded points if you wore pads or used an aid or an appliance. It was felt that there are additional cost of replacing/ washing soiled clothing which would not be addressed.

Category C needs prompting to manage toilet needs should be 4 points as if you weren't prompted you would therefore require assistance to manage your toilet needs which does score 4 points.

Activity 6 – Dressing & Undressing

Category C should be allocated the same points as category E as if you require prompting with dressing/undressing and didn't receive it you would require physical assistance.

Category D should be allocated the same points as category E as it was felt that there should be no difference between lower and upper body.

Also noted in activity 6 there is a provision for the ability to take on or off sock or shoes, which relate to the feet however in activity 4 bathing and grooming has no provision for cleaning/ grooming of feet/toes?

Activity 7 - Communication

Residents found that the outline of the qualifying criteria was confusing and should be clearer and requires further clarification.

Also concerns were raised on where Braille and/or large print fit into the criteria.

Residents believe that category E should be allocated 6 points as this would take a specialist such as a signer to relay the information whereas category D could be a family member or friend.

Could not understand why prompting communication does not seem to score any points as prompting on other categories does?

Activity 8 – Engaging socially

Categories B & C should be allocated the same points as if you require prompting to engage you could require support to engage if not prompted

Activity 9 – Making financial decisions

Category D should score higher than 6 as the ability to not make any financial decisions at all would have a huge impact on that persons life, for example it could lead to them being made homeless as they were not able to pay rent or leave them open to financial abuse i.e. loan sharks.

Activity 10 – Planning and following a journey

Concerns were raised around the wording of a journey to an unfamiliar destination, as some people might be able to make a journey to somewhere, but might be unable to make a return journey without assistance or guidance.

Concerns were also raised regarding the large difference in the points allocated between C and E, there was recognition that there should be a points difference but not understood why this would be almost double. Also why is category E 15 points when the maximum required is 12 points for the enhanced rate?

Activity 11 – Moving Around

Category D awards 10 points but was felt that this should qualify someone for the enhanced rate and should therefore be allocated 12 points.

Also unsure why category F & G were allocated 15 points when the maximum required for the enhanced rate is 12 points.

There was a related query raised on the mobility elements and how this relates to the motability scheme, will this require the standard or enhanced rate?

Summary

It is felt by our residents and our Welfare Benefit Officers that too much emphasis is placed on the requirement for physical help against any requirement needed because of a mental health issue, such as being prompted to complete a task or supervision required to complete a task.