

**Personal Independent Payments
Second Draft Consultation
Response from Carers' Resource**

Q1 – What are your views on the latest draft Daily Living activities?

They adequately cover a range of daily activities and appreciate that whilst some activities may fit within more than one category (eg toilet needs & grooming/bathing) it is important not to double count. The categories in themselves are a great improvement on existing DLA questions and carers were pleased with the wording.

Q2 – What are your views on the weightings and entitlement thresholds for the Daily Living activities?

Carers were concerned that the weightings given to some of the descriptors which require 'prompting' were too low. Carers often find the task of prompting the most difficult part of their role – it can be time consuming and draining. They felt that activity 8 (Engaging Socially) needed further explanation – the difference between descriptors b & c seemed fairly arbitrary. The phrase 'overwhelming psychological distress' in descriptor d refers to enduring mental health problems – it was suggested that this should read 'severe and enduring'.

Q3 – What are your views on the latest draft Mobility activities?

Carers felt that the descriptors for Moving around were measurable and therefore easier to follow. However, for Planning & following a journey the descriptors seem less clear. For example in activity 10, the difference between descriptors b and c(i) seem to be biased against people with mental health issues. The difference seemed to be that someone who needs prompting to go out at all (eg. because of depression/anxiety) will score lower than someone who cannot cope with unfamiliar journeys. The latter descriptor attracts enough points on its own to be awarded standard rate mobility.

Q4 – What are your views on the weightings and entitlement thresholds for the Mobility activities?

Carers were pleased to see that either of the mobility activities alone can give either standard or enhanced awards. They felt that this was a vast improvement on the DLA mobility component because it could also take into account a combination of both activities. However, the main concern was that many people will now be excluded from benefit as the cut off points seem to have been set lower. There was also a worry about its effect on Mobility schemes.

Q5 – What are your views on how the regulations work regarding benefit entitlement?

The draft regulations set out how the assessment determines the extent to which the claimant is limited in carrying out daily/mobility activities and the level of benefit which then applies. Carers felt that this was straightforward.

Q6 – What are your views on how we are dealing with fluctuating conditions?

Carers were pleased to see that 'days' rather than 'time' was being used as the measure, as they felt that this was more straightforward for them to understand.

Q7 – What are your views on the definitions of 'safely', 'timely', 'repeatedly' and 'in a timely' manner?

Carers were concerned that some of the definitions contain subjective explanations – eg. What might be considered 'reasonable' may be open to interpretation and will require case law to be established.

They felt that these definitions should appear as a general provision included in the Regulations.

Q8 – What are your views on the definitions in the regulations?

The definitions seem satisfactory.

Q9 – Do you have any other comments on the draft regulations?

Carers were concerned that there was no relevance placed on night-time care, other than an acknowledgement that daily activities can mean at any time of day or night. It is good that it is possible to be assessed as severely limited without regular night time care. However, for carers, night time needs are highly relevant. Needs which arise in the night time are generally those which can not be catered for easily without either an informal carer being available or considerable financial expenditure.

Carers expressed concern that the documentation did not address how PIP would affect Carers' Allowance. How will the eligibility for Carers' Allowance be determined in the proposals for PIP? There is concern from carers that the documentation to be mailed to eligible claimants next year, will be too complicated for some carers to understand. Carers have enough to do day to day without having an added stress of worrying about submitting another claim. This could have a significant effect on those families in receipt of DLA and CA and effectively mean carers have not just one but two benefits to re-claim

In terms of the policy briefing on young people and the discussions around when to introduce the benefit, carers of young people aged between 14-19 were worried about the additional pressures it would incur on them. They felt that it was already a period of enormous change, socially, emotionally and practically speaking for young people of this age, incorporating a huge level of assessment and paperwork. To add to this daily stress through the introduction of a process with as yet uncertain outcomes was a cause for great concern and worry.