

## **Response by Libraries Advice & Information (Welfare Rights team) to The Personal Independence Payments :assessment thresholds Consultation Document**

The Stockport Welfare Rights teams, part of Stockport Libraries, Advice and Information, is a well-established and major provider of advice and advocacy in Stockport.

We work in close co-operation with Advice Officers who are based in a network of Stockport Direct Local Centres, and the Debt Advice Service.

The Welfare Rights team specialises in benefit problems. We provide representation at Social Security Appeal tribunals and have a contract from Community Legal Services to provide services for welfare benefits and debt advice. .

We also work to the CLS Quality Mark at Specialist level for Welfare Rights advice. Both the Advice Officers and the Home Visiting Team assist clients in the completion of claim packs and review applications, and the Welfare Rights team represent appellants at appeal hearings.

### **Question 1: What are your views on the latest draft Daily Living Activities?**

*Activity 1 Preparing food and drink:* we felt that it was helpful to have separated preparing food from the act of buying it, which is now presumably covered under *activity 9 Making financial decisions* as in terms of cognitive skills they are different. Preparing food unaided could be achieved by learning and rehearsing a repertoire of recipes whereas to make financial decisions may require help on each occasion. In activity 1 we are not entirely clear about where *prompting* ends and *supervision* begins, if a person needs to be prompted several times during the preparation of a single meal when does this reach the threshold for supervision?

*Activity 3 Managing therapy and monitoring a health condition:* we felt that in each of the descriptors c, d, e and f the words *or monitor a health condition* should be inserted immediately following *to manage therapy*. We had in mind here the supervision required to prevent the risk of self –harm in people with mental health problems who lack insight into their condition.

*Activity 7 Communicating and Activity 8 Engaging Socially:* we felt it was an improvement that these activities were now separated, but were disappointed that *social support* is limited to *a person trained or experienced ...* as the provision of such a person is often restricted, by financial constraints, only to those who are socially isolated. Additionally many people who need social support to engage socially prefer to access this from a family member.

**Question 2: What are your views on the weighting and entitlement threshold for the Daily Living Activities?**

*Activity 4 Managing toilet needs and incontinence:* we felt that this activity should have been accorded higher weighting given its relative urgency compared to *Bathing and grooming*. It seems counter-intuitive that *needs assistance to bathe* and *needs assistance to manage toilet needs* have the same weighting.

**Question 3: what are your views on the latest draft Mobility activities?**

*Activity 2 Moving around:* we felt that descriptor 2d should be more restrictive as to what constituted *an aid or appliance* to differentiate between those who use a walking stick merely for balance and those who only partially weight bear or whose gait is extremely unstable.

**Question 4: what are your views on the weightings and entitlement thresholds for the Mobility Activities?**

*Activity 1 Planning and following a journey:* we felt that descriptor 1d should attract the same score as activity 1e.

*Activity 2 Moving Around:* taking into account the caveat outlined in our answer to Question 3 we felt that descriptors 2d and 2e should both attract a score of 12 points. There is no advantage to a score of 10 over a score of 8 unless 10 is to be the threshold for access to the **Motability** scheme. Retaining the differential in scoring between descriptors 2d and 2e fails to take account of the reasons why people with effectively the same limitations in their mobility may opt to use a frame or crutches over propelling themselves in a wheelchair. To effectively propel a manual wheelchair requires the ability to lean forward with the upper body at an acute angle to the thighs, this is not possible for those with restricted movement of the lower back or hips.

**Question5:** we have no comments.

**Question 6:what are your views on how we are dealing with fluctuating conditions?**

We liked the fact that there were clear definitions of the periods, but were concerned whether it would be difficult to uncover such fine detail in the assessment process.

We liked the proposal of a twelve month assessment period.

**Question 7 : what are your view on the definitions of “safely” “timely” “repeatedly” and “in a timely Manner”?**

We were happy with the definitions and felt that they should be included within the regulations as a general provision.

**Question 8: what are your views on the definitions in the regulations?**

We felt that they were admirably precise. We would suggest the following changes:

**Dressing and undressing:** add *or any footwear prescribed by a podiatrist or other medical professional*. This would then include the fastening of a calliper, and of shoes fitted with a raise, which require a secure fastening at, or just below, the ankle joint to prevent their additional weight causing them to drop while walking.

**Toilet needs:** add *coping with menstruation*.

**Question 9:**

We have no comments.