

Sight Support

With regards to your consultation of Personal Independence Payments, please find below our recommendations. Sight Support is the local association for the blind, delivering services to blind and partially sighted people across South East Wales. Services include Rehabilitation Services, Counselling, advice on specialist aids and equipment, the teaching of Braille, support work, social clubs and telephone befrienders, and benefits advice.

Daily Living Activities

1 Preparing food and drink

We recommend difficulty reading food labelling (such as best before date and cooking instructions) be taken into account when assessing this descriptor.

b. We would recommend this descriptor (currently *Needs to use an aid or appliance to either prepare or cook a simple meal*) is extended to those who need to use an aid to prepare a hot drink independently.

g. We would recommend descriptor 1g (currently *Cannot prepare and cook food and drink at all*) is extended to those who (while able to prepare simple, uncooked food) are unable to make a hot drink by themselves.

3 Managing therapy or monitoring a health condition

b. *Needs supervision, prompting or assistance to manage medication or monitor a health condition.* We recommend that descriptors b-d are amalgamated, all scoring 4 points in order to accurately reflect the risk to the claimant should medication be untaken due to lack of supervision, and the likely interruption to a carer's day due to frequency of help needed throughout the day. For visually impaired people, difficulties with this task include difficulty identifying medication (which tablet do I take now?), reading instructions, and problems with dropping tablets (and not being able to see to pick them up and take them).

4 Bathing and grooming

We recommend that difficulties with the tasks of nail cutting, shaving and applying make up be included in this descriptor. Being able to perform these tasks are essential for maintaining dignity. Assistance with nail cutting and shaving also helps maintain claimant safety. We recommend that supervision needed to check these tasks of bathing and grooming have been performed correctly is included in these descriptors in order to maintain dignity and safety.

5. Maintaining toilet needs or incontinence

d. We recommend that assistance needed to locate the toilet, and ensure there is toilet roll and soap to wash hands be included in this descriptor.

6 Dressing and undressing

c. We recommend the need for prompting to change dirty or stained clothing be included in this descriptor.

d and e. We would recommend that equal scoring (4 points) be given to assistance needed to dress or undress the lower and upper body. It makes no sense in terms of independence for someone who is unable to put their underwear on unaided to score fewer points than someone who needs assistance to put on their cardigan.

7. Communicating

We would recommend a font size to be specified in these descriptors, and would suggest 20 point print as reasonable. Some people with visual impairments are only able to read extremely large font eg 180 point print, or one word to a page of a magnifier. The size of the font required makes their access to printed material not reasonably practical. We would suggest separating these people out from those who are able to read large print material enough to follow a letter or article.

We would also recommend that wearers of specialist spectacles due to visual impairment be counted as using an aid or appliance, rather than as an ordinary spectacle wearer.

8. Engaging socially

c. *Needs social support to engage socially* We recommend DWP reconsiders who can score points under activity eight so it's not restricted to people with cognitive impairments.

9. Making financial decisions

We recommend the inclusion of a further descriptor: '*Needs to use an aid to make financial decisions*' to encompass the difficulty people have making financial decisions eg regarding internet banking without the use of specialist (and expensive) magnification and screen reading software (given that a broader and more competitive range of products is usually available online than on the high street).

c. Needs prompting to make simple financial decisions We recommend this descriptor be extended to include the difficulty a person with sight loss has being aware of signage and small print which impacts on their ability to make good financial decisions. For example, a blind or partially sighted person is unable to read signage indicating goods are on special offer, small print such as on a receipt to make sure they have been charged correctly, or read the screen or keypad to access a cash machine to check bank balance, transactions or withdraw cash and would need accompanying on a shopping or banking trip for appropriate assistance.

NB: We also endorse RNIB's recommendation that there be an additional descriptor relating to *Maintaining a safe home environment*. People who experience sight loss are at additional risk of falls and other injuries from dropped and/or broken items. People with low levels of functioning vision are unable to see if their crockery and kitchen surfaces are clean, leaving them at high risk of infection. Strong and specialist lighting is also essential to many people living with sight loss, and the ability to ensure lights are fitted and working correctly (eg have a functioning bulb and plug) are essential to maintaining maximum independence in the other descriptor areas. We endorse the descriptors and point allocation that RNIB have suggested.

Mobility Activities

Following a journey

c and d. We recommend the descriptor on following a journey to an unfamiliar destination includes not only "supervision, prompting or a support dog" but an orientation aid too. We concur with RNIB's recommendation that the focus on familiar and unfamiliar destinations is altered to focus on familiar and unfamiliar journeys or routes instead to reflect the nature of the difficulty that visually impaired people have on mobilising out of doors. It is also worth reiterating that barriers to outdoor mobility do not usually decrease with the length of time someone has been living with sight loss – crossing a busy road (whether it is in a familiar or unfamiliar area), for example, will always be dangerous for someone with very restricted functioning vision, even when using a guide dog.

Also worth noting is that people with a visual impairment often rely on taxis and lifts from friends and relatives to mobilise out of doors, and therefore are not mobilising independently, rather relying on other peoples' eyes to locate route, entrances to buildings, get them to the correct side of the road etc. We would suggest adding to the descriptor of following a journey 'by public transport or walking', so as to correctly reflect how independent the claimant would be without the financial assistance of PIP or DLA (to pay for taxis or petrol for relatives giving lifts).

NB We strongly recommend retaining entitlement to the higher (enhanced) rate of the Mobility Activities component based on level of visual acuity and ability to orientate oneself out of doors. While we agree that there are some grounds for redrafting disability benefit to make it more fitting for the changing nature of disability, disability equipment and support that has evolved over the past twenty years, MPs of all parties only sought to bring parity of entitlement of a severely sight impaired person to that of a wheelchair user in 2009 (with those changes taking effect April 2011), and we do not see any good reason to withdraw this entitlement now. People with such low functioning vision as to not be able to orientate themselves out of doors face the same level of barriers, and expense when working around those barriers, as those who use a wheelchair.

Please do not hesitate to contact us should you wish to discuss these recommendations further.

Yours faithfully,

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(Normal working hours: Tuesday - Friday 9.30am - 4.30pm)

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