

# Disability Living Allowance Reform

Equality Impact Assessment  
May 2012

# Reform of Disability Living Allowance

## Brief outline of the policy

1. Disability Living Allowance is a benefit that provides a cash contribution towards the extra costs of needs arising from an impairment or health condition. It is a tax free, non-means-tested and non-contributory benefit, and it is payable regardless of employment status. Although Disability Living Allowance is intended to contribute towards extra costs, measuring each individual's expenditure would be administratively complex and expensive. Entitlement and award levels are, therefore, based on proxies – care and mobility – as research at the time of Disability Living Allowance's introduction showed that they were the greatest sources of extra costs<sup>1</sup>. The decision about whether to award benefit is made on the basis of the severity of an individual's care and mobility needs as a proxy for their extra costs.
2. To apply for Disability Living Allowance, individuals currently complete a lengthy claim form which requests detailed information about the impact that their impairment or health condition has on their ability to manage their care themselves and/or get around. Disability Living Allowance awards can be decided on the basis of self-reporting of need, and although medical evidence is sought for certain awards, it is not mandatory or routinely provided. At present around half of all award decisions are made without any additional medical evidence<sup>2</sup>. The Decision Maker either awards or turns down the claim. Awards are currently payable at two mobility and three care rates leading to a possible eleven different combinations of payable rates of benefit. Awards can be made for any duration, but just over two-thirds of people currently on Disability Living Allowance have an indefinite award<sup>3</sup>. Awards are reviewed if an individual reports a change, but there is currently no process to systematically review all awards to ensure that they remain appropriate and accurate.
3. The current Disability Living Allowance legislation provides automatic entitlements to certain rates on the basis of specific conditions and impairments, or the treatment an individual is receiving. As a result, eligibility for Disability Living Allowance is sometimes based on medical condition rather than the impact of that condition, meaning that support is not always appropriately targeted.

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<sup>1</sup> Office of Population Censuses and Surveys, *The financial circumstances of disabled adults living in private households*, 1988.

<sup>2</sup> DWP ad hoc statistical note 'DLA Award Values and Evidence Use for New Claims in 2010, in Great Britain', 2011.

<sup>3</sup> DWP ad hoc statistical note 'Analysis of Disability Living Allowance: DLA Awards', 2011.

# Rationale for intervention

4. There are now 3.2 million people receiving Disability Living Allowance and forecast expenditure on the benefit for 2011/12 is £12.6 billion. In just nine years the numbers claiming Disability Living Allowance has risen from just under 2.5 million to 3.2 million – an increase of around a third<sup>4</sup>.
5. Despite the fact that an individual can receive Disability Living Allowance both in and out of work, it is widely perceived to be an out of work benefit and receiving Disability Living Allowance in itself appears to reduce the likelihood of being in employment, even after allowing for the impact of health conditions or impairments.<sup>5</sup>
6. The Government consulted on DLA reform from December 2010 to February 2011 on the proposal to replace DLA with Personal Independence Payment. The intention is that the new benefit will be introduced from April 2013, in a phased approach, starting with new claims, so that early lessons can be learnt on the implementation of the policy.<sup>6</sup> The Government continues to consult publicly on the detail of the assessment criteria and has opened a consultation on its plans for secondary legislation to underpin the Welfare Reform Act in March 2012.
7. Personal Independence Payment will not be extended to new or existing claims for children or those over 65 from 2013. Individuals already in receipt of Personal Independence Payment will continue to receive the benefit past the upper age limit of 65, provided they continue to meet the eligibility criteria. The experience of reassessing the working-age caseload will be used to inform any future decisions on the treatment of children and those over 65. The Government continues to publish policy briefing notes on the Department's website aimed at providing further information and clarity on its proposals. The proposed elements of the new benefit are:
  - A more accurate, objective and transparent assessment to deliver more consistent outcomes for individuals.
  - Two components, linked to the activities considered in the assessment. Eligibility for the mobility component will be based on the individual's ability to get around and the daily living component on their ability to carry out other key activities necessary to be able to participate in daily life.
  - Two rates for each component (four in total).
  - Eligibility based on a qualifying period of 3 months, with the expectation that the entitlement conditions will continue to be satisfied for a further 9 months.

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<sup>4</sup> Work and Pensions Longitudinal Study, May 2011. Further details on the growth of the DLA caseload are available in the DWP ad hoc statistical note 'Disability Living Allowance: Growth in the number of claimants 2002/03 to 2010/11, 2011.

<sup>5</sup> Disability Living Allowance and work: Exploratory research and evidence review, DWP Research Report No. 648

<sup>6</sup> For more details please see: <http://www.dwp.gov.uk/docs/pip-briefing-high-level-reassessment.pdf>

- Moving away from automatic entitlement based on certain conditions to assessments based on individuals' circumstances and the impact of an individual's health condition or impairment.
  - The facility to regularly review all awards.
  - Maintenance of provisions to fast track claims for people who are terminally ill.
8. The Government's intention is that both levels of the daily living component of Personal Independence Payment will be a gateway for receipt of Carer's Allowance. Carers make a valuable contribution and the Government's intention is that those with caring responsibilities will continue to receive the support they need.
  9. It is also the Government's intention to retain the current arrangements on income-related benefits, where certain rates of DLA entitle the recipient to additional amounts of benefit, known as 'premia'. The proposal is that these arrangements would remain in place for working age benefits until the introduction of Universal Credit<sup>7</sup>.

## Policy Objective

10. The new benefit will ensure that support is focussed on those with the greatest barriers and that expenditure is sustainable. The reforms will create a new more active and enabling benefit that supports disabled people to overcome the barriers they face to leading full and independent lives.
11. The assessment for Personal Independence Payment has been designed to assess more accurately, objectively and transparently those people who would benefit most from additional support, taking fair account of the impact of all impairment types.

## Consultation and involvement

12. The Government recently closed a consultation on the detail of the Personal Independence Payment assessment criteria. The Department for Work and Pensions is now considering the responses to this consultation. A consultation on plans for secondary legislation to underpin the Welfare Reform Act opened in March 2012. Responses to both consultations will be published later in the year.

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<sup>7</sup> Details of which benefits will be part of Universal Credit and how the benefit will be structured can be found in 'Universal Credit: welfare that works', Cm 7957, November 2010.

# Impact of Disability Living Allowance reform

## Gender

### Background and Statistics

13. Overall the number of men and women receiving Disability Living Allowance is almost equal. There are currently 1.6 million men and nearly 1.6 million women in receipt of the benefit.

**Table 1: Disability Living Allowance recipients by gender**

Benefit	Men	Women	Proportion Men	Proportion Women
<b>Disability Living Allowance</b>	1,603,000	1,600,000	50.1%	49.9%
<b>Total</b>	3,203,000		100%	

Source: Work and Pensions Longitudinal Study May 2011. Note: Figures may not add due to rounding. Numbers have been rounded to the nearest 1000.

14. The proportion of men and women expected to be entitled to Personal Independence Payment is estimated to be roughly equal, with 46% male and 54% female. Although this is slightly different from the current DLA caseload, the differences are not statistically significant<sup>8</sup>.

15. The proportion of men and women currently on DLA receiving each rate combination is also broadly similar, although there are some differences. For example, 18.5% of men receive middle rate care and lower rate mobility compared to just over 12.5% of women.

**Table 2: Disability Living Allowance rate combinations by gender**

Rate combination	Men	Women	Total
<b>Higher Care and Higher Mobility</b>	229,000 14.3%	290,000 18.1%	520,000 16.2%
<b>Higher Care and Lower Mobility</b>	114,000 7.1%	76,000 4.8%	190,000 5.9%
<b>Higher rate Care only</b>	25,000 1.5%	20,000 1.3%	45,000 1.4%
<b>Middle Care and Higher Mobility</b>	214,000	254,000	468,000

<sup>8</sup> For further details of the modelling, please see: <http://www.dwp.gov.uk/docs/pip-assessment-thresholds-and-consultation.pdf>, pp. 9-11.

	13.4%	15.9%	14.6%
<b>Middle Care and Lower Mobility</b>	296,000 18.5%	199,000 12.5%	495,000 15.5%
<b>Middle rate Care only</b>	67,000 4.2%	49,000 3.0%	116,000 3.6%
<b>Lower Care and Higher Mobility</b>	186,000 11.6%	236,000 14.8%	422,000 13.2%
<b>Lower Care and Lower Mobility</b>	111,000 6.9%	107,000 6.7%	218,000 6.8%
<b>Lower Care only</b>	116,000 7.2%	140,000 8.7%	255,000 8.2%
<b>Higher Mobility only</b>	198,000 12.4%	173,000 10.8%	372,000 11.6%
<b>Lower rate Mobility only</b>	47,000 3.0%	55,000 3.4%	102,000 3.2%
<b>Total</b>	<b>1,603,000</b>	<b>1,600,000</b>	<b>3,203,000</b>

Source: Work and Pensions Longitudinal Study, May 2011. Note: Figures have been rounded to the nearest 1000. Percentages have been rounded to one decimal place.

16. As explained in the impact assessment accompanying this document, the introduction of Personal Independence Payment will also have an effect on those receiving disability premia in the income-related benefits. Where possible, data on the premia has been analysed by gender. The profile mirrors the pattern on DLA, with almost equal numbers of males and females.<sup>9</sup>

17. The introduction of Personal Independence Payment will also have an impact on those in receipt of Carer's Allowance, as outlined in the impact assessment published alongside this document. Overall, around two-thirds of those currently entitled to Carer's Allowance are female, with the remainder male. Almost three-quarters of those in receipt of Carer's Allowance payments<sup>10</sup> are female.

<sup>9</sup> Analysis from the Work and Pensions Longitudinal Study, May 2011. It has not been possible to include disability premia available in Employment and Support Allowance in this analysis as this information is not recorded on administrative datasets.

<sup>10</sup> The overlapping benefits rule results in many individuals having an entitlement to claim Carer's Allowance but not to receive any payment of the benefit. However, some of these individuals will benefit from the Carer's Premium in income-related benefits.

**Table 3: Carer's Allowance caseload by entitlement and receipt of payment by gender**

<b>Benefit</b>	<b>Men</b>	<b>Women</b>	<b>Total</b>
<b>Carer's Allowance (entitled only)</b>	186,000 41%	265,000 59%	<b>451,000</b> <b>44%</b>
<b>Carer's Allowance (in payment)</b>	156,000 27%	414,000 73%	<b>569,000</b> <b>56%</b>
<b>Total</b>			<b>1,020,000</b>

Source: Work and Pensions Longitudinal Study, May 2011. Note: Figures have been rounded to the nearest 1000. Percentages have been rounded to one whole number.

18. When Carer's Allowance claims specifically linked to DLA recipients 16-64 are examined, the proportion of females entitled to the benefit is 64%. When those entitled and those receiving payments are considered separately, the proportion of females remains broadly similar.

**Table 4: Carer's Allowance caseload by entitlement and receipt of payment for claims linked to a 16-64 DLA claim by gender**

<b>Benefit</b>	<b>Men</b>	<b>Women</b>	<b>Total</b>
<b>Carer's Allowance (entitled only)</b>	36,000 38%	58,000 62%	94,000
<b>Carer's Allowance (in payment)</b>	90,000 35%	169,000 65%	259,000
<b>Total</b>	<b>353,000</b>		

Source: Disability and Carer's Database, May 2011. Note: Figures have been rounded to the nearest 1000. Percentages have been rounded to the nearest whole number.

### **Risk of negative impact**

19. At this stage, no potential adverse impacts on either gender have been identified on those receiving Disability Living Allowance. As the numbers of men and women in receipt of Disability Living Allowance is almost equal there is no reason to suggest that either men or women are more likely to be affected by the new benefit – either directly or indirectly.

20. However, the picture is less clear cut in relation to the knock-on effects of DLA reform on those receiving Carer's Allowance Payments. Although we have not

been able to specifically model gender effects, the descriptive analysis shows that females are more likely to be entitled to Carer's Allowance and more likely to be receiving a payment. Our impact analysis concludes that the overall Carer's Allowance caseload will remain similar after the introduction of Personal Independence Payment, the evidence suggests that those who may be affected are more likely to be female.

### Gender reassignment

21. No data is collected on the gender reassignment of Disability Living Allowance recipients. However, we believe that there are no grounds to suggest this policy will adversely affect Disability Living Allowance or Carer's Allowance recipients based on gender reassignment.

### Conclusion

22. As the proportion of men and women receiving Disability Living Allowance is almost equal, there is no reason to suggest that either group is more likely to be affected. However, any indirect impacts on those receiving Carer's Allowance are likely to affect more women than men.

### Disability

23. The definition of disability for the purposes of equality impact assessment is contained in the Equality Act 2010, and was previously that defined by the Disability Discrimination Act (DDA)<sup>11</sup>. The vast majority of people receiving Disability Living Allowance are likely to be covered by the Equality Act definition. The Family Resources Survey suggests that over 90% of adult Disability Living Allowance recipients are DDA disabled. However, this is likely to be an underestimate as it only includes those with a current disability, and is subject to measurement error. Considering all recipients of Disability Living Allowance is therefore likely to provide a better proxy of those defined as disabled under the Equality Act definition.

24. In general Disability Living Allowance is not paid on the basis of a particular disability or health condition, but according to the impact of a disability. The table below shows the main medical condition of Disability Living Allowance recipients, with arthritis and mental health conditions being the two most common. Information on secondary conditions<sup>11</sup> is not recorded for all recipients but will form part of the assessment.

**Table 5: Disability Living Allowance recipients by medical condition**

Main disabling condition	All DLA
AIDS	0%
Arthritis	18%

<sup>11</sup> The lag in survey data availability means that the Equality Act 2010 was not in force when the Family Resource Survey data was collected for 2009/10. This analysis therefore uses the DDA definition of disability.



<b>Back Ailments</b>	<b>5%</b>
<b>Blindness</b>	<b>2%</b>
<b>Chest disease</b>	<b>3%</b>
<b>Deafness</b>	<b>1%</b>
<b>Diabetes Mellitus</b>	<b>2%</b>
<b>Epilepsy</b>	<b>2%</b>
<b>Frailty</b>	<b>0%</b>
<b>Heart Disease</b>	<b>4%</b>
<b>Learning Difficulty</b>	<b>12%</b>
<b>Malignant Disease</b>	<b>2%</b>
<b>Mental Health Causes</b>	<b>14%</b>
<b>Multiple Sclerosis</b>	<b>2%</b>
<b>Muscle/Joint/Bone Disease</b>	<b>6%</b>
<b>Parkinson's Disease</b>	<b>1%</b>
<b>Renal Disorders</b>	<b>1%</b>
<b>Skin Disease</b>	<b>0%</b>
<b>Stroke Related</b>	<b>3%</b>
<b>Other/Transfer from AA</b>	<b>23%</b>

Source: Work and Pensions Longitudinal Study May 2011 Notes: All figures rounded to the nearest percent. Some recipients of DLA who transferred from the AA system may not have been allocated a specific disabling condition code.

25. 30% of those identified in survey data as receiving Carer's Allowance classify themselves as DDA disabled<sup>12</sup>. Analysis of the overlap between those Carer's Allowance claims and DLA claims shows that around 20% of those entitled to Carer's Allowance are also in receipt of DLA<sup>13</sup>. This means that in addition to the knock-on effects of the reform of DLA on carers, some carers will themselves experience the direct effects of the move to Personal Independence Payment.

### **Risk of negative impact**

26. Replacing Disability Living Allowance with a new benefit that is focussed on supporting those individuals with the greatest barriers to participation provides an opportunity to promote equality of opportunity for disabled people least likely to

<sup>12</sup> Family Resources Survey 2009/10. This compares to 1 in 6 of the population more generally.

<sup>13</sup> Disability and Carer's Database, May 2011. Only cases linked to a DLA claim where the claimant was aged 16-64 were considered. Around half of those who are entitled to the benefit are in receipt of a payment.

live full and active lives. However, as the benefit becomes better targeted on those with the greatest needs it is likely that some disabled people, who may have self-assessed as needing support, but who have lesser barriers to participation, will receive reduced support.

27. Where these individuals have a carer in receipt of Carer’s Allowance, this will also result in some loss of benefit due to the knock-on effects of reform. This would appear to be more likely to have an effect on disabled people, as carers are more likely to be disabled than the population in general.

**Opportunity to promote equality**

28. Disabled people are best able to help identify the support they most likely need, therefore disabled people have been involved throughout the consultation process. The Department for Work and Pensions is now considering the responses to its consultation on the draft assessment criteria and is continuing to consult on the regulations underpinning its policy proposals.

29. Replacing Disability Living Allowance with a new benefit provides an opportunity to improve understanding of the benefit and communicate that support is available both in and out of work. This may remove a barrier to working for some disabled people, promoting equality of opportunity.

**Conclusion**

30. The new benefit will be fairer, and may help to improve understanding that support is available both in and out of work. More regular reviews and a more objective, rather than self, assessment may mean reduced support for some people who have lesser or reduced barriers to participation. This is entirely consistent with the policy but it is possible that this group are more likely to be adversely affected. The knock-on effects of the policy affect disabled people as many of those who identify as disabled are also carers.

**Ethnicity**

**Background and statistics**

31. Administrative data on ethnicity is not held for Disability Living Allowance or Carer’s Allowance as it is not collected when a benefit claim is submitted. However, data from the Family Resources Survey suggests that people from ethnic minority backgrounds are slightly less likely to receive Disability Living Allowance than people from white backgrounds.

**Table 6: Proportion of DLA recipients by ethnicity**

<b>Ethnicity</b>	<b>16-64 DLA recipients</b>	<b>All UK adults</b>
White	93%	91%
Mixed	1%	1%
Indian	2%	2%
Pakistani and Bangladeshi	1%	2%

Black or Black British	2%	2%
Other ethnic groups (inc. Chinese and Other Asian)	1%	2%

Source: Family Resources Survey 2007-2008, 2008–2009 and 2009-2010. Note: Percentages have been rounded to nearest percentage point. A three year average has been used due to small sample sizes.

32. The position for Carer’s Allowance recipients is similar to DLA recipients as 7% are from ethnic minority groups and 93% are from a white background. The sample size on Carer’s Allowance is small and it is not possible to provide any further breakdowns on different ethnic groups<sup>14</sup>.

33. It is not possible to extract specific information on those receiving disability premia from survey data and therefore no ethnicity data on this subset of DLA recipients is available.

### **Risk of negative impact**

34. There is no evidence to suggest that the policy would be more likely to affect any particular ethnic minority group.

### **Conclusion**

35. A slightly higher proportion of people from a white background receive Disability Living Allowance and Carer’s Allowance, which suggests this group may be more likely to be affected.

## **Age**

### **Background and statistics**

36. Personal Independence Payment will be introduced for working-age people aged 16-64 from April 2013. Individuals in receipt of Personal Independence Payment will continue to be entitled beyond age 65 as long as they continue to satisfy the eligibility criteria. This age-limit will increase in line with the changes to State Pension age.

37. Personal Independence Payment will not apply to children when it is introduced in 2013. The Government recognises that the needs of children can be different from those of adults and is committed to learning from the experience of implementing the new benefit for individuals of working age before extending it to children.

38. Over half of Disability Living Allowance recipients are aged 16-64 and around a quarter are 65 or over. This reflects the fact that applications for Disability Living Allowance can be made up to and including a person’s 65th birthday. People are able to continue receiving Disability Living Allowance after they reach 65, so long as their application was made before they reach this age. This means that the proportion of recipients aged 65 or over has been growing over time.

<sup>14</sup> Family Resources Survey 2007/08-2009/10.

**Table 7: Disability Living Allowance recipients by age**

Age	Number of recipients	Percentage of recipients
<b>Children (under 16)</b>	335,000	10%
<b>Working Age (16-64)</b>	2,010,000	67%
<b>Pensioner (65 or over)</b>	857,000	27%
<b>Total</b>	<b>3,203,000</b>	<b>100%</b>

Source: Work and Pensions Longitudinal Study, May 2011 Note: Percentages may not sum due to rounding.

39. There are some differences between the different age groups in the benefit rate combinations received. For example, children are more likely to receive lower and nil rates of mobility and less likely to receive higher rate mobility, This reflects current rules which permits payment of the higher rate mobility component from three years of age and the lower rate mobility component from five years of age.

**Table 8: Disability Living Allowance recipients by age and benefit rate combination**

Rate combination	Children	Working Age	Pensioners	Total
<b>Higher Care and Higher Mobility</b>	42,000 12.5%	299,000 14.9%	178,000 20.8%	<b>520,000</b> <b>16.2%</b>
<b>Higher Care and Lower Mobility</b>	52,000 15.6%	123,000 6.1%	14,000 1.7%	<b>190,000</b> <b>5.9%</b>
<b>Higher Care only</b>	28,000 8.4%	7,000 0.4%	10,000 1.2%	<b>45,000</b> <b>1.4%</b>
<b>Middle Care and Higher Mobility</b>	16,000 4.9%	271,000 13.5%	181,000 21.2%	<b>468,000</b> <b>14.6%</b>
<b>Middle Care and Lower Mobility</b>	113,000 33.6%	348,000 17.3%	34,000 4.0%	<b>495,000</b> <b>15.5%</b>
<b>Middle Care only</b>	58,000 17.4%	42,000 2.1%	15,000 1.7%	<b>116,000</b> <b>3.6%</b>
<b>Lower Care and Higher</b>	1,000 0.4%	272,000 13.5%	149,000 17.3%	<b>422,000</b> <b>13.2%</b>

<b>Mobility</b>				
<b>Lower Care and Lower Mobility</b>	5,000 1.4%	192,000 9.5%	21,000 2.5%	<b>218,000</b> <b>6.8%</b>
<b>Lower Care only</b>	14,000 4.1%	189,000 9.4%	53,000 6.2%	<b>255,000</b> <b>8.0%</b>
<b>Higher Mobility only</b>	2,000 0.6%	185,000 9.2%	184,000 21.5%	<b>372,000</b> <b>11.6%</b>
<b>Lower Mobility only</b>	4,000 1.2%	81,000 4.0%	17,000 2.0%	<b>102,000</b> <b>3.2%</b>
<b>Total</b>	<b>335,000</b> <b>100%</b>	<b>2,010,000</b> <b>100%</b>	<b>857,000</b> <b>100%</b>	<b>3,203,000</b> <b>100%</b>

Source: Work and Pensions Longitudinal Study May 2011. Figures have been rounded to the nearest 1000. Percentages and caseloads may not sum due to rounding.

40. The DLA age breakdown for those aged 60-64 has also been compared to the age breakdown for those in receipt of disability premia in the income-related benefits. It is very similar, suggesting that there should be no additional impact for these groups on the grounds of age, over and above the general effect of the introduction of Personal Independence Payment for those aged 60-64.

41. The age profile of those with Carer's Allowance in payment is unsurprisingly dominated by adults over the age of 35 and under the age of 65, with three-quarters of those receiving payments falling into this age range. There are two main reasons for this: 1) the most common caring relationship outside institutions is children caring for their parents<sup>15</sup>; 2) due to overlapping benefit rules, most of those receiving Carer's Allowance payments are under State Pension Age<sup>16</sup>.

**Table 9: Carer's Allowance in payment by age**

<b>Age band</b>	<b>Number</b>	<b>Proportion</b>
<b>Under 35</b>	116,009	20.3%
<b>35-64</b>	436,000	76.7%
<b>65 and over</b>	17,000	3.0%
<b>Total</b>	<b>569,000</b>	<b>100%</b>

<sup>15</sup> See table 5.2 in the 2009/10 Family Resources Survey publication, available at [http://statistics.dwp.gov.uk/asd/frs/2009\\_10/chapter5.pdf](http://statistics.dwp.gov.uk/asd/frs/2009_10/chapter5.pdf).

<sup>16</sup> There is a marked difference in the age profile for Carer's Allowance when entitled only cases are compared to those with payments in place. The majority of entitled only cases are in those over 65 as one cannot be in receipt of State Pension and Carer's Allowance.

Source: Work and Pensions Longitudinal Study May 2011. Figures have been rounded to the nearest 1000. Percentages may not sum due to rounding.

### **Risk of negative impact**

42. The proposed policy change initially focuses on working age recipients (16-64) and so they are more likely to be affected. As regards the knock-on effects of the policy, those in receipt of Carer's Allowance, aged 35-64 are particularly likely to be affected by the introduction of Personal Independence Payment.

### **Conclusion**

43. This reform to DLA specifically focuses on those aged 16-64. More information on how the needs of children aged 16 moving from DLA to Personal Independence Payment will be met is available in our consultation on the detailed design of Personal Independence Payment: [www.dwp.gov.uk/consultations/2012/pip-detailed-design.shtml](http://www.dwp.gov.uk/consultations/2012/pip-detailed-design.shtml). The effects on carers as a result of the introduction of the new policy reflect the demographic profile of this group.

## **Additional Equality Assessments**

### **Sexual orientation**

44. The Department does not hold information on its administrative systems on the sexual orientation of claimants. Based on our knowledge of the policy design and of the customer group, the Government does not envisage an adverse impact on these grounds.

### **Religion / Belief**

45. The Department does not hold information on its administrative systems on the religion or beliefs of claimants. Based on our knowledge of the policy design and of the customer group, the Government does not envisage an adverse impact on these grounds.

### **Marriage and civil partnerships**

46. The Department does not hold information on its administrative systems for DLA on the civil partnership status of claimants. Based on our knowledge of the policy design and of the customer group, the Government does not envisage an adverse impact on these grounds.

### **Pregnancy and maternity**

47. The Department only holds information on pregnancy and maternity on its administrative systems where it is the primary reason for incapacity. It cannot therefore be used to accurately assess the equality impacts. Based on our knowledge of the policy design and of the customer group, the Government does not envisage an adverse impact on these grounds.

## Gender Reassignment

48. The Department does not hold information on its administrative systems for DLA on transgender persons. The Government does not envisage an adverse impact on these grounds.

## Monitoring and evaluation

49. The material in this Equality Impact Assessment covers the equality groups currently covered by equality legislation, i.e. age, disability, gender, transgender, ethnicity, religion, sexual orientation, pregnancy/maternity, marriage and civil partnerships. The Department for Work and Pensions is committed to monitoring the impacts of its policies and we will use evidence from a number of sources on the experiences and outcomes of the protected groups.

a. We will use administrative datasets, including the Department for Work and Pension's Work and Pensions Longitudinal Study (WPLS), to monitor trends in the benefit caseloads for the protected groups and in the level and distribution of benefit entitlements. The administrative data will provide robust material for age and gender although not, as a rule, for the other protected groups. Where it is practical we will endeavour to incorporate information for the other protected groups.

b. We will use survey data, such as the Family Resources Survey (FRS), to assess trends in the incomes of the protected groups and in their employment outcomes. The FRS will collect information on age, disability, gender, ethnicity, sexual orientation, religion, marriage and civil partnerships.

c. We will use qualitative research and feedback from stakeholder groups to assess whether there are unintended consequences for the protected groups, and whether the policy is likely to result in adverse consequences for particular groups.

d. We will utilise feedback from Departmental employee networks and internal management information. For example we will monitor the level of complaints in order to assess the broader impact of the policy.

e. We will draw on broader DWP research where appropriate, as well as any research commissioned specifically as part of the evaluation of the measure.

50. As part of our actions in the context of the data requirements under the Equality Act, we are looking across DWP activities to identify and address further gaps in data provision wherever reasonable.

## Next steps

51. This document follows Royal Assent of the Welfare Reform Bill. A consultation has been launched on the detail of Personal Independence Payment and invites

comment on the equality impacts of the policy. The consultation is available at:  
[www.dwp.gov.uk/consultations/2012/pip-detailed-design.shtml](http://www.dwp.gov.uk/consultations/2012/pip-detailed-design.shtml)

## Contact details

52. To comment on the equality impacts of Personal Independence Payment please contact: [pip.feedback@dwp.gsi.gov.uk](mailto:pip.feedback@dwp.gsi.gov.uk)