

**Family Carer Support Service response to:
Consultation on the PIP assessment *Moving around* activity – June 2013**

Hft's Family Carer Support Service (FCSS) provides information and support to family carers of people with a learning disability anywhere in England.

We do this by responding to individuals who request help by telephone, email and letters; through participative workshop courses so groups of relatives acquire skills and knowledge they need to understand and engage effectively in processes affecting their relative and themselves; the production of resources specifically tailored to the support roles family carers play throughout phases and aspects of their relative's life; and by working in partnership with others to help raise the profile of family carers, their needs and contributions, in research, health and social care, as well as mainstream, initiatives.

This response to the **Consultation on the PIP assessment *Moving around* activity** is based on responses from family carers across the country and discussions with colleagues who support family carers.

Before answering the consultation question, we must comment on paragraph 3.5 of the Consultation document and Appendix B. Paragraph 3.5 and Appendix B describe how the Department for Work and Pensions (DWP) will reach its decision about what changes are made, indeed whether any changes are made at all to the *Moving around* activity, and 'likely mobility component caseloads'.

We understand the reasons for the Government targeting the enhanced rate of the PIP *Moving around* activity "on those with the greatest barriers to mobility" and we agree with this. However, we are a growing population with access to advancing healthcare, with an increased survival rate and people are living longer. This has inevitably increased the number of people living with significant disabilities. Of course, this will result in an increased expenditure of the disability welfare benefits bill. To deny people who need the extra support to access the basics in life, purely due to the increased population of people with disabilities is extremely unjust.

We are fully aware of the economic climate and support the Government in seeking ways to improve this country's financial situation, however, it is clearly discriminatory to decide who receives (or, in this case, doesn't receive) a welfare benefit based on expenditure, or on numbers of people claiming a particular welfare benefit.

What are your views on the *Moving around* activity within the current PIP assessment criteria?

We would like to know what you think about the *Moving around* activity assessment criteria set out in the current Regulations, including the current thresholds of 20 and 50 metres. As part of this we would like to know what you think the impact of the current criteria will be and whether you think we need to make any changes to them or assess physical mobility in a different way altogether.

PIP is a benefit “to help with some of the extra costs caused by long-term ill-health or a disability” (www.gov.uk/pip/overview), “for those who face the greatest barriers to participating in everyday life” and “the role of the benefit [is] in preventing circumstances worsening and therefore reducing individual reliance on state support” (Personal Independence Payment: second draft of assessment criteria – An explanatory note to support the second draft of the assessment regulations, DWP, November 2011). The DWP’s change to the *Moving around* activity from 50 metres to 20 metres to receive the enhanced rate of the Mobility component completely undermines the stated intention of the welfare benefit.

20 metres is a short distance, which for most people means they cannot reach their nearest local shop, bus stop, and in some cases, cannot even reach the end of the path in front of their house. We are concerned that the DWP is not aware of the real meaning of using 20 metres as a threshold to receive the enhanced rate of the *Moving around* component.

The distance from the entrance to the House of Commons to the Speaker’s chair:



It is perhaps helpful to consider what kind of impact only being able to move this distance could have on a person.

People who can move further than 20 metres but no further than 50 metres face difficult challenges in their lives on a daily basis, in working and in interacting with the wider community. The change to the *Moving around* activity simply does not reflect this.

50 metres is widely used as a benchmark for accessibility for people with significant disabilities. Department for Transport (DfT) guidance recommends that “seating should be provided on pedestrian routes at intervals of no more than 50 metres” and “parking spaces for Blue Badge holders should preferably be provided within 50

metres of the facilities they serve” (Inclusive Mobility, DfT, 2002). The introduction of a 20 metre limit is at odds with accepted standards.

People who can move 20 metres but cannot move further than 50 metres experience a significant barrier to participate in daily activities – particularly outside their home. ‘Transport for Everyone: an action plan to improve accessibility for all’ (DfT, December 2012) noted that “disabled people in particular rely on public transport to access jobs, services, facilities, family and friends”.

Accessing public transport for the majority of this group is difficult; the distance to a bus stop or train station is often too far, and a large proportion of the vehicles are not accessible for people with disabilities. This is recognised in ‘Transport for Everyone: an action plan to improve accessibility for all’ (DfT, December 2012) which shows that only 65%, 61% and 41% of buses, taxis and trains are fully accessible. The action plan aims to make transport accessible for everyone between now and 2020. If someone’s disability support is reduced and they are no longer able to pay for taxis or for their Motability vehicle, how are they going to get around until public transport is “accessible for everyone” in 2020?

Many people with physical disabilities need to use alternative transport, either relying on friends and family carers to drive them to places, paying for taxis, or using their own, personally adapted Motability vehicle, paid for with their Disability Living Allowance. This involves extra cost, which people will be unable to pay if their disability benefit is reduced. The DfT acknowledges this situation on page 13 of ‘Transport for Everyone’; “The private car will continue to play an important role providing disabled people with independence, where other forms of transport are not accessible or available”.

Many people who currently receive the higher rate of the mobility component of DLA use their payments to pay towards their Motability vehicle which is adapted to be used only by the owner. Loss of a specially adapted vehicle will have a harsh impact on individuals, who are no longer be able to get around as they used to, increasing the risk of isolation of the person. Isolation can lead to physical and mental health problems, which are likely to lead the person to access other sources of support, producing a further financial cost to the Government. Individuals may struggle to attend important health appointments, they may no longer be able to go to work, resulting in a new claim for out of work benefits, a loss of National Insurance and Tax payments to the Government, and more importantly than any financial figure, a loss of independence for that person.

People who currently use a Disabled Person’s Parking Permit may also lose their automatic entitlement to the Blue Badge; whether they are a car driver or not, this will have major consequences for many who need to park close to building entrances and urgently park for reasons of their disability.

The wording in the *Moving around* activity is concerning. It is contradictory, and it also suggests that the DWP is now only targeting the enhanced rate of the *Moving*

around component at those who cannot leave their house. The activity states: “This activity should be judged in relation to a type of surface normally expected out of doors such as pavements and roads on the flat and includes the considerations of kerbs”. This is followed by “20 metres is considered to be the distance that a claimant is required to be able to walk in order to achieve a basic level of independence in the home such as the ability to move between rooms”. Which is it?

Restricting the distance from 50 metres to 20 metres strongly suggests that those who qualify for the enhanced rate of PIP *Moving around* activity will mainly be people who cannot leave their house. While it is important that the benefit targets those with highest need, it is also essential that people who can move a little further than their front door also qualify, as they too have significant barriers (both physically and financially) to participation in society.

People who are able to leave their house but move no more than 50 metres also face significant barriers. You acknowledge this in the *Moving around* activity by stating “50 metres is considered to be the distance that an individual is required to be able to walk in order to achieve a basic level of independence such as the ability to get from a car park to the supermarket”.

For somebody who struggles to get from a car park to the entrance of a supermarket (ignoring the fact they will then need to find a way to get around the supermarket to do their shopping), the difference between £21 and £55.25 (£34.25) per week will have a huge impact. This could be the difference between getting out of the house once a week to do their food shopping, to only being able to go twice a month. It could be the difference between getting to work, or having to resign from their employment. It could be the difference between choosing whether the physiotherapy appointment or the appointment with the consultant is more important. It could be the difference between someone deciding an appointment is more important than eating for a few days. It could be a difference of not being able to drive to work or hospital appointments, if they lose their Motability car.

We welcome the intentions in ‘Fulfilling Potential: Making It Happen’ (DWP, 2013), however, the change of criteria for the *Moving around* activity undermines them – in particular that of: “reforming welfare and removing the barriers to work to promote independence and reduce the risk of dependency” and “making sure that disabled people can play a full role in society...by removing barriers to participation in public life”. The proposals under consideration regrettably seem to demonstrate a risk identified by DWP. The Equality Impact Assessment (EIA) for DLA reform in 2012 stated under the heading ‘Opportunity to promote equality’ that “replacing Disability Living Allowance with a new benefit.... may remove a barrier to working for some disabled people, promoting equality of opportunity” (Disability Living Allowance Reform: Equality Impact Assessment, DWP, May 2012). The distance change for the *Moving around* activity will do exactly the opposite.

People who do not receive the financial support they need to live independently are highly likely to require support from other services, such as the NHS, social services, and out of work benefits such as Employment and Support Allowance. The reduction of support through disability benefits will result in the complete opposite of the intentions of 'Fulfilling Potential' and the statement in the EIA for DLA in 2012.

In summary, we object to the change of the *Moving around* activity criteria, on the grounds that it:

- is discriminatory at an individual level
- is unlikely to produce savings
- contradicts the 2012 Equality Impact Assessment for Disability Living Allowance Reform
- is out of synchrony with other established standards and policies
- confuses issues related to mobility inside and outside living spaces
- goes against the flow of recent aspirational Government documents pertaining to connected communities