

Ekklesia's response to the DWP's consultation on the PIP 'moving around' criteria

Introduction: Ekklesia is an independent beliefs and values think-tank, founded in 2001, strongly rooted in the Christian tradition but working collaboratively with people of other faith and people of good faith with no religious belief. We work collaboratively with disabled people and researchers working on disability issues, and we have monitored the issues covered by this consultation closely.

We disagree with the 20 metre benchmark distance proposed by HM government, for the following eight core reasons:

1. Because the majority of wheelchair users can walk a little, the use of 20 metres as the benchmark distance risks disabled people with significant mobility difficulties (those who can walk 20 metres but not 50 metres) losing essential adapted cars or specially converted wheelchair accessible vehicles supplied via the Motability scheme.
2. 20 metres is not a practical level of mobility and does not enable disabled people to achieve any significant independent activity outside their homes.
3. Disabled people with significant walking difficulties who fail to qualify for the enhanced mobility component, and therefore the Motability scheme, will lose their independent mobility. The result of this will be social isolation and the risk of accumulating costly health problems.
4. The impact of this loss will be unacceptable and discriminatory, imposing significant impairment disadvantages on disabled people.
5. Other costs in the public sector, notably in social care services, will result from depriving disabled people of support for independent mobility, not least due to the need for additional support to make essential journeys.
6. Resources spent on other services will not compensate disabled people for their loss of independent mobility.
7. A 50 metre benchmark distance is widely used as a measure of significant mobility impairment in relation to other disability benefits, the blue (disabled) parking badge and in official guidance on creating an accessible built environment, including the location of disabled parking spaces in relation to public and commercial buildings. It makes no sense not to follow through with the PIP 'moving around' criteria set according to the same benchmark.
8. In November 2011, we note that the DWP considered the ability to walk 50 metres as necessary to the achievement of a basic level of independence. There is no evidence that this is not still the case, and disabled people with motability issues overwhelmingly support this assessment.

Related assessment issues:

The use of aids and appliances can indicate the nature and severity of a claimant's walking difficulty. There is a good argument for their consideration, but the assessment should not penalise people for using them.

DWP guidelines make clear that physical mobility should be assessed in relation to moving around outdoors. The expectation here may be that those who qualify for the enhanced PIP rate will be those who, in practice, are restricted to walking indoors. This should not be assumed to be the case.

Cost implications

Statistics and measurements from Motability, along with research undertaken by Oxford Economics (*The Economic and Social Impact of the Motability Car Scheme*) provide evidence for the deleterious impact of the government's proposed mobility criteria for PIP on the wider economy, including expenditure on other public or third sector services – for example in relation to other transport requirements and access to work costs, as well as social care and health.

Projection questions

We note that the DWP's own projections (Appendix B of the consultation document) show that by the time PIP has been fully implemented, 428,000 fewer claimants are expected to qualify for the enhanced mobility component than currently qualify for the higher rate mobility component under PIP. However, it has been pointed out that this is a 'net' figure; it is expected that around 200,000 people with difficulties planning and following a journey (who were previously only able to claim the lower rate mobility component of DLA) will qualify for the enhanced mobility component, so the net figures hide the true number of current DLA claimants who may lose the higher rate mobility component, likely to be around 600,000.

Conclusion

PIP is intended to support disabled people's participation in society. We support that aim. It is clear that in terms of personal, social and economic impact, adopting the 20-metre benchmark will act against involvement and inclusion. It will deny many thousands of disabled people with significant mobility difficulties the ability independently to negotiate everyday journeys. These include travelling to work, taking children to school, shopping, accessing GP services, attending hospital appointments, seeing friends and responding to invitations of hospitality. A 50-metre benchmark would allow and assist these vital activities.

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