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Registered Charity No. 294922

National Association of Deafened People

20th February 2012

PIP Assessment Development Team
2nd floor, area B
Caxton House, Tothill Street
LONDON SW1H 9NA

Dear Sirs,

PIP Assessment Thresholds and Consultation

The National Association of Deafened People welcomes the opportunity to contribute to your ongoing review of the new Personal Independence Payments scheme, as outlined in your January 2012 consultation document. The Association aims to reflect the views and experiences of people – predominantly adults - who have lost their hearing post-lingually. Taking your consultation questions in turn:

Q1 – What are your views on the latest draft Daily Living activities?

We welcome the inclusion of the new activities, especially those for Communicating and Social Engagement. One of the defining characteristics of *homo sapiens* is the ability of the species to communicate and thence build social networks, so disabilities which impede these activities have a huge impact on quality of life.

We are less confident that the proposed definitions of these characteristics adequately reflect the difficulties experienced by deaf people. To seek to distinguish between “understanding complex verbal information” and “understanding basic verbal information” is of little relevance: if you can’t hear what is being said to you, you aren’t going to follow it, regardless of its complexity. We are also unclear as to the significance of the references in these descriptors to “individuals who require a sign language interpreter”. The great majority of deaf people don’t use sign language, and need access to services such as Speech to Text and Lipspeakers if they are to communicate effectively. We would welcome confirmation that your guidance on the application of these descriptors will ensure that needs of this type are taken into account. [Or that the wording of the descriptors will be broadened.]

[Continued overleaf]

We are not comfortable that the descriptors for Activity 8 reflect the problems facing deaf people. There is no doubt that large numbers of hearing impaired people lead lives of considerable social isolation and deprivation as a consequence of their deafness, but we aren't confident that people in this situation would score any points under the proposed descriptors.

Q2 – What are your views on the weightings and entitlement thresholds for the Daily Living activities?

As discussed above we are not confident that the descriptors for Communicating and Social Engagement adequately reflect the experiences of deaf people in an overwhelmingly hearing world, consequently we suspect that the proposed weightings and entitlement thresholds would result in very few deaf people qualifying for payment. Presumably this was not your intention?

Q3 – What are your views on the latest draft Mobility activities?

Many people with hearing problems also experience either Menieres disease or some form of vertigo, both of which can interfere with their ability to make journeys unaided, but often on a transient basis. It is not clear how people with these conditions would be assessed, and thence whether they would receive any support under the proposed weightings and entitlement thresholds.

It is also not uncommon for deaf people to arrive at the wrong destination on a journey, because their bus/train has been diverted or re-routed, and they have not been able to hear announcements to this effect. For this reason some of our members only feel safe when travelling in conjunction with a hearing companion. How would this need be picked up under your criteria?

Q4 – What are your views on the weightings and entitlement thresholds for the Mobility activities?

See comments under Q3 above.

Q5 – What are your views on how the regulations work regarding benefit entitlement?

We are not qualified to comment on the technical drafting of the Regulations. However our experience has been that deaf people making claims under the existing Regulations see a wide range of outcomes, which often reflect the self confidence of the applicant and his/her ability to communicate effectively with the assessor. It is therefore important that the Regulations require that the assessment process be conducted in a way which explicitly recognises the communication difficulties of the applicant.

[Continued overleaf]

Q6 – What are your views on how we are dealing with fluctuating conditions?

See comments under Q3 above. With a condition such as Menieres disease it is impossible to predict whether the patient will be suffering an acute episode on a day when he/she needs to travel, so travel assistance will often have to be booked in advance for a trip on which the patient actually has one of his/her “good” days.

Q7 – What are your views on the definitions of ‘safely’, ‘timely’, ‘repeatedly’ and ‘in a timely manner’?

No comment offered.

Q8 – What are your views on the definitions in the regulations?

No comment offered.

Q9 – Do you have any other comments on the draft regulations?

See comments under Q5 above regarding the environment in which assessments are conducted.

We will of course be happy to provide any further information you require on these points.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'P. N Tomlinson', written in a cursive style.

Paul N Tomlinson
Honorary Secretary