

**Response to the Department of Work and Pensions Personal Independence
Payment: assessment thresholds consultation
Date: 10th April 2012**

Introduction

This response has been produced by Maggie Paine, Hearing and Sight Centre General Manager, on behalf of our blind and partially sighted clients and volunteers.

We provide advice and support to over 5000 blind and partially sighted people per annum in Plymouth and surrounding areas.

Question 1. What do you think of the governments latest ideas about the daily living activities? Does the government need to make more changes to this?

Daily Living Activity 1 – Preparing food and drink

The detail provided in the consultation paper regarding preparing food does not include buying and selecting fresh food, mixing ingredients or following a recipe. In order to prepare a meal you need to have the correct ingredients and be able to put these together. Many blind and partially sighted people need help to buy and select fresh ingredients before they can even begin to prepare them.

For example a blind or partially sighted person may:

- need someone to go with them to the shops
- require someone to buy and deliver food on their behalf
- find selecting the fresh produce difficult; a carrot feels very much like a parsnip
- not be able to judge when fruit and vegetables are at their best

Consequently, people who require help to buy and select fresh ingredients need to be factored into descriptors for activity one.

Daily Living Activity 2 – Taking nutrition

Blind and partially sighted people may need some support, not included in the daily living activity two descriptor - taking nutrition. They may need help to find food on the table and need someone to explain what food is on the plate.

Daily Living Activity 3 – Managing Therapy or Monitoring a Health Condition

The description provided in the consultation paper about managing therapy is not clear if 'support' includes aids and adaptations that dispense drugs. Such aids are essential for partially sighted and blind people in the way they manage ongoing health conditions. Many blind and partially sighted people will require assistance in establishing, maintaining and evaluating these dispensing aids for them to work effectively.

Daily Living Activity 4 – Bathing and Grooming

The description outlining daily living activity 4 is not clear what constitutes 'specialist equipment'. A definition would be useful within the descriptor. Blind and partially sighted people use a wide range of specialist equipment for grooming themselves effectively for example equipment could include specialist mirrors for shaving, brushing hair or checking teeth

Daily Living Activity 5 – Managing Toilet Needs or incontinence

This descriptor is unclear on what constitutes help going to the toilet. Many blind and partially sighted people may be able to use the toilet themselves but may need help to find the toilet, sanitary bin, wash hand basin, soap and toilet paper. A clear definition of 'help' would be useful here and this definition should include finding the basic toilet facilities.

Daily Living Activity 6 – Dressing and Undressing

This descriptor should be extended to include needing help to tie shoe laces, support needed to identify when clothes are dirty or need ironing and support needed to colour match clothes appropriately.

Daily Living Activity 7 – Communicating

If you are blind and partially sighted it is not clear about how Braille and using audio disks is handled in daily living activity seven. It is also not clear about what assumptions will be made about text size, type face or needing coloured backgrounds when considering whether a person can read or not. Since written information is not readily available in different formats or Braille, people should not be classified as being able to read.

As well as this the communication descriptor has been written in a way that excludes visually impaired people that use glasses or contact lenses to access written information. What about people with some useful vision who need specialist glasses or lenses to access information.

Daily Living Activity 9 – Making Financial Decisions

The descriptor is not clear if requiring help identifying money type is classified within making simple financial decisions.

What activity is missing?

There is a massive gap in daily living activity pertaining to health and safety in the home.

Blind and partially sighted people have difficulty in recognising when cleaning is needed, for example when food had been dropped or liquids spilt. Ensuring that homes are clean reduces risk of infection and minimises potential for trips and falls. It is also vital in maintaining a good quality of life and wellbeing.

A daily living activity for health and safety in the home must also include the washing and ironing of clothes. Ironing clothes presents many blind and partially sighted people with the risk of being burned and having clean and ironed clothes reduces the risk of bacterial infections. Culturally, having clean and ironed clothes is important in successful social inclusion and full participation. Many blind and partially sighted people may need support with this, for example they may need someone to; select the correct colours and fabrics for the corresponding washing programme, iron clothes and identify when clothes require washing and ironing.

A health and safety daily living activity should also include activities such as gardening and decorating. These are essential social and cultural tasks which blind and partially sighted people need support with due to the risks they face using gardening tools, such as cutting equipment and ladders when decorating.

Question 2. What do you think of the governments ideas about the points allowed for daily living activities and the points you need to get this component.

The weighting are set too high across both daily living activity and mobility components of the benefit. To ensure that those who need support get it

Standard rate should be 6-8, and

Enhanced rate should be 9 and over

Question 3. What do you think of the governments latest ideas about the mobility activities? Does the government need to make more changes to this?

Moving around activity –

This activity has been designed so it relates to an individual's physical ability to move around - despite cross party recognition of the impact of sight loss in this activity just two years ago.

Mobility Activity 10, planning and following a journey.

Generally descriptors used across the mobility descriptors are complicated and difficult to understand. Descriptors talk about needing someone to be with you to stop something bad happening or needing someone with you to encourage or remind you to follow a planned journey. It also talks about needing someone with you because you are not aware of dangers. It would be useful to use language such as 'guide' a term which blind and partially sighted people are used to talking about.

The descriptor doesn't talk about people having difficulties walking in public places. Blind and partially sighted people experience massive environmental barriers which make travelling around impossible. Environments are unpredictable and can change moment to moment. They are also cluttered, poorly maintained and badly designed, this could include: negotiating things like: wheelie bins, construction works and materials, broken paving slabs, raised flower beds, bollards, uneven curbs, advertising boards, small children and animals. Consequently, walking in public spaces need to be included in mobility activity 10.

This activity descriptor also talks about people who use guide dogs as an example of someone who has difficulty following and planning a journey. This descriptor should also include people who use long canes, because their needs are just the same. The government need to recognise that many people who are blind and partially sighted do not use guide dogs. This may be for a number of reasons:

- Home not suitable to house a dog
- Blind and partially sighted person not liking dogs
- Blind and partially sighted person being allergic to animals
- Blind and partially sighted person not being able to cope with caring for an animal

The descriptor also talks about people managing and negotiating a familiar and unfamiliar journey. The government should be clear what constitutes a familiar journey. For blind and partially sighted people a familiar journey needs to be simple and short with minimum opportunity for disruption, obstacles or change. In reality the barriers that both journeys present blind and partially sighted people are the same and the descriptor should just talk about journeys regardless of whether they are familiar or not.

These proposals around mobility appear to exclude many people with severe visual Impairment from enhanced mobility rate of PIP. Is this conscious decision by DWP to reverse recent legislation that corrected the long standing anomaly that excluded blind and partially people from the higher rate of DLA.

Question 4. What do you think of the governments ideas about the points allowed for mobility activities and the points you need to get this component?

Once again thresholds appear to be set very high to ensure that people who need help with mobility get it

Standard rate should be 6-8, and

Enhanced rate should be 9 and over

Question 5. What are your views on how the regulations work regarding benefit entitlement?

It is not clear in the regulation what criteria qualify for what benefits,

Question 6. What do you think of the governments ideas for dealing with health conditions that are sometimes a little better and sometimes a little worse? Does the government need to make more changes to this?

Generally, people may find it difficult to evaluate their condition across a whole year, whilst some may require a year to adequately reflect fluctuations in conditions. The government may find it useful to allow people some flexibility in regards to the time frame they use to describe their fluctuating condition, for example some people may be better at describing fluctuations across a period of a week or throughout a day. In the case of blind and partially sighted people most conditions only deteriorate.

Question 7. What do you think of the governments ideas about the meanings of the following words - 'safely', 'timely', 'repeatedly' 'reliably' and 'in a timely' manner? Does the government need to make more changes to this? Should the meanings be in the regulations?

There should be some clarity in the definition of 'safely' what constitutes harm. Is the government referring to both physical and psychological harm?

There should also be some more clarity on reliably would someone spilling their food be classified as not eating reliably?

The definitions of these terms should be included in the regulations and also be included as part of the descriptors for both daily living and mobility activities.

Q 8. What are your views on the definitions in the regulations.

Communication difficulties should include reading Braille and if people require large text, preferred fonts, coloured text backgrounds, audio and other assistive technology.

Dress appropriately should include someone needing help to identifying when cloths need washing and ironing

Q 9. Do you have any other comments?

The case studies with visual impairments have been chosen to focus on adaptation and change, both in the condition and in how the person deals with it over time. The case studies assume that need for support will be reduced as time passes and that most people will 'adapt' or get equipment or reasonable adjustments. In reality, regardless of the length of time a person has lived with sight loss or the adjustments they receive the difficulties and barriers remain.