

Consultation response from the Royal London Society for Blind People

Personal Independence Payment: Completing the Detailed Design

Thank you for this opportunity to review the detailed proposals published in March 2012

Introduction

RLSB exists to help blind and partially sighted people live life without limits. With a history spanning more than 170 years, RLSB has become an expert in helping people achieve their goals in life and in that time we've helped thousands of people across London and the South East.

Our service users are adamant that they're not 'disabled' just because they can't see everything. They're ambitious, determined and want the same things as everyone else. RLSB provides a range of services designed to help blind and partially sighted people achieve their aspirations in respect of personal development, formal education, participation in sports and creative pursuits.

Our comments

1. The time scale for phasing in PIP (from April 2013) and for carrying out re-assessments of those currently on DLA (starting in Oct 2013) seems extremely optimistic. We hope that there will be opportunities for learning during the process and responding to legitimate concerns raised by disabled people.
2. We welcome the fact that DWP is providing the consultation document in accessible formats.
3. Can you re-assure us that as the changes are introduced, people with a visual impairment will be identified and automatically offered alternative formats?
4. Many blind and partially sighted people depend on friends or charity workers to read their mail during occasional visits. As a result, they may only attend to their written correspondence at intervals, for example, every 2 weeks. If information is not provided in their preferred format, they are likely to miss the very tight deadlines for making a PIP application (see below).
5. DWP expects new and existing claimants with a 'new' condition that affects their need for support to make a new claim

and satisfy the 3 month qualifying period and the 9 month prospective test. But 'new condition' is not defined. We should be grateful for clarification and reassurance that, for example, someone who has Age Related Macular Degeneration (AMD) in one eye and then, subsequently, the other eye, will not be regarded as having a 'new' condition.

6. Young people aged from 16 will be eligible for PIP, but will need to demonstrate that they can manage their own affairs. It is not clear from the guidance what this means. Could you tell us how assessors will determine whether or not a young person over the age of 16 can 'manage their own affairs' ?

7. The time scales for making an application are very short. As it stands, anyone on DLA will have a 4 week period in which to register their intention of making a PIP application, following the initial contact by DWP. If nothing is heard, DLA will be suspended and potential claimants will be given another 4 week period to make an application. If nothing is heard DLA will be terminated. We regard these intervals as unreasonable for blind and partially sighted people who are likely to have difficulty in both reading correspondence and making an application. We would urge DWP to extend both intervals from 4 to 6 weeks.

8. The proposals suggest that the final recommendation will be made by the Decision Maker based on his or her interpretation of the written evidence submitted by the assessor. Para 5.18 refers to an appeal process.

We should be grateful for clarification of the appeal process and the measures that will ensure its independence.

9. We should be grateful for clarification regarding the criteria that DWP will use to identify those 'needing additional support in the claiming process' (Para 5.12) and the type of support that will be available.

10. We should like further information regarding the qualifications, experience, training and monitoring of assessors, and in particular, how they will be prepared to engage with blind and partially sighted people.

11. Since all claims will require face-to-face meetings, could you inform us of the arrangements for helping blind and partially sighted people travel safely to the chosen venue?

12. Could you let us know how long applicants should expect to wait for a decision, following the interview?

13. Could you confirm that DWP will regularly disclose (anonymised) information on decisions made by the assessors and decision makers, for example, how often decision makers follow, or overturn, the recommendations of assessors; the number of applications approved, compared to those that are turned down.

I should be grateful if you could send me confirmation that you have received this response to your consultation.

Regards

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RLSB

Life Without Limits for Blind Young People

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