

Consultation Response

Personal Independence Payment: The PIP Mobility Moving Around Activity

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1. The National Association of Welfare Rights Advisers

The National Association of Welfare Rights Advisers was established in 1992 and represents advisers from local authorities, the voluntary sector, trade unions, solicitors and other organisations who provide legal advice on social security and tax credits. We strive to challenge, influence and improve welfare rights policy and legislation, as well as identifying and sharing good practice amongst our members.

NAWRA holds a number of conferences throughout the year across the UK, attended by members from all sectors of the industry. An integral part of these events are workshops that help to develop and lead good practice.

Our members have much experience in providing both front line legal advice on benefits and in providing training and information as well as policy support and development. As such NAWRA is able to bring much knowledge and insight to this consultation exercise.

The response has been put together from evidence collated through an email consultation with members. It is a representation of views from frontline advisers and their clients from across the UK.

2. The DWP Consultation Question

“The consultation question we are asking is:

- ***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”

3. The DWP preferred option

The DWP preferred option is to retain the current descriptors for Activity 12, the rationale being:

- A need to focus available resources on the most severely disabled
- The new descriptors are intended to have broadly the same as the second draft descriptors, but to address the consultation responses that the 2nd draft descriptors added potential confusion; a distinction was made there between those able to manage 50metres unaided and those needing to use an aid, appliance or wheelchair . What if the claimant had a need but did not have a wheelchair?
- The main change has been to remove references to use of an aid or wheelchair and replace that descriptor with new stand and move up to 20 metres descriptors.

PIP Activity 12 – Final Descriptors	PIP Activity 11: 2 nd draft descriptors
a. Can stand and then move more than 200 metres either aided or unaided (0)	a. Can move at least 200 metres either i. Unaided ii. Using an aid or appliance other than a wheelchair or motorised device (0)
b. Can stand and move unaided more than 50 metres but no more than 200metres either aided or unaided (4)	b. Can move at least 50 metres but not more than 200 metres either (4)
c. Can stand and then move unaided more than 20metres but less than 50 metres (8)	c. Can move up to 50 metres unaided but no further (8)
d. Can stand and then move using an aid or appliance more than 20 metres but no more than 50 metres (10)	d. Cannot move more than 50 metres either i. unaided.... (10)
e. Can stand and move more than 1 metre but no more than 20 metres either aided or unaided (12)	e. Cannot move up to 50 metres without using a wheelchair propelled by the individual (12)
f. Cannot either stand or move more than 1 metre (12)	f. Cannot move up to 50 metres without using a wheelchair propelled by the another person or a motorised device (15)
	g. Cannot i. Move around at all ;or ii. Transfer unaided from one seated position to another adjacent position (15)

- The change has been simplification by removal of the reference to aids appliances and wheelchairs and the removal of fine distinctions at the top between 12 point and 15 point descriptors.
- These might have been useful if the Department was serious about focussing more resources on the most disabled by creation of a top rate – however in the newspeak concentration of resources seems to mean leaving the most severely disabled at the same rates and cutting everyone else. No further resources but new relativities established.
- What has not changed is the division of those who are virtually unable to walk into those who continue getting a “higher rate” at descriptor e and above and those relegated to standard rate (at descriptors c and d)
- The rationale for the new 20 metre and 50 metre split is summarised by the DWP as:

“The benchmark of 20 metres was intended to allow us to distinguish between those who are effectively unable to get around due to reduced physical mobility – for example, people who are only able to move between rooms in their house but go no further – and those who have some, albeit limited, mobility.

We thought that these criteria could be applied consistently and would make it easy to differentiate between people who should be receiving the enhanced and standard rate. We considered that if we used distances in the assessment criteria which are close together, practical differentiation might become harder, leading to more inconsistent outcomes”

While the DWP have a clear preference for the current position they say they are:

"carrying out this consultation in a fully open-minded manner and will carefully examine all the evidence provided. If we consider that we need to make changes to the Moving around activity once we have analysed all the representations received, we will do so."

In reaching our decision we will consider how any potential changes might affect individuals and the numbers of people likely to receive the benefit.

We will also consider the potential impact of any changes on PIP and overall welfare expenditure and whether this is affordable and sustainable. We will publish a report summarising the responses received and how we reached our conclusions, once we have completed the consultation."

The challenge from the DWP to disability organisation at a recent meeting of the Disability Benefits Consortium was that if alternative propositions were to make headway, they would need to be evidence based, practical and affordable – either within current budgets or if an exceptional case could be made for additional resources for a modified PIP.

4. Other DWP measures of severe mobility restriction

4.1. Disability Living Allowance

The lessons from DLA Higher Mobility may be particularly instructive. Here was a part of the DLA scheme where the attempt to apply an objective and medicalised test – effectively a PIP descriptor approach – has been at its strongest. Unfortunately the lessons appear to be that setting a fixed distance was – and remains highly problematic.

To qualify for DLA Higher Mobility a claimant has to be either unable to walk at all or virtually unable to walk as regards the distance over, speed at, length of time for or the manner in which s/he can make progress without severe discomfort"

Case law rulings emphasised that: *"virtually unable to walk embraces those who, while still technically capable of walking, are still unable to do so to any appreciable extent or practically unable to walk"* R (M)1/78.

Furthermore *"The base point is total inability to walk which is extended to take in people who can technically walk, but only to an insignificant extent"* R(M)1/91.

- Historically the Social Security Commissioners and higher Courts were reluctant to lay down a prescribed distance, especially as this was only one of the factors.
- In R(M) 5/86) - accepted that someone who could only walk 50 yards should qualify
- However in CM 47/86 - Not wrong to disallow someone who could not walk 50 yards." What constitutes an inability to walk is a matter of fact... so long as the decision is not perverse, then it is not for Commissioners to interfere"

However eventually the Commissioners gave some more detailed guidance in CDLA/608/94

- It was seen as impossible to set a fixed distance as *“so much depends on physical circumstances and physical state of each claimant”*.
- **However**, *“in the absence of any special indications from the other three factors (speed, time and manner) if a claimant is unable to cover 25-30 yards without severe discomfort his ability to walk is not appreciable or significant*
- However *“if he can walk more than 80 or 100 yards he is unlikely to be unable to walk”*
- For distances in between, DATs should bear in mind CM/379/89: *“In such a case - 60 or 70 yards without severe discomfort - there would have to be some other factor such as extreme slowness or difficulty of the manner”*

The point of this for PIP purposes then is that the combined wisdom and experience over years of application to real cases is that:

- The right distance for defining the very limited walking ability under consideration will vary considerably on a case by case basis
- But that if pushed in the absence of other factors, a rough “rule of thumb” was established at around the 50m mark, above which awards could be made but only in the presence of other limiting factors

4.2. Employment and Support Allowance

ESA is the template for PIP in both process and broad design although the purpose of the benefit is very different and it aims to measure “limited capability for work” rather than limitations with daily living and mobility tasks”

Mobility is an area where the two closely meet. ESA Functional Area 1: Mobilising is not so different from PIP Activity 12: Moving around, but the point scoring milestones are very different.

A level of difficulty that would put someone in the most severe category of mobility impairment and enhanced benefit under ESA might be insufficient for anything other than PIP standard rate, notwithstanding that the claimant is to all intents and purposes “virtually unable to walk

For ease of comparison, the PIP ordering has been reversed so that it follows the ESA pattern of most severe difficulty at the top.

PIP Mobility - Activity 12: Moving Around	ESA – Functional Area 1: Mobilising
f. Cannot either stand or move more than 1 metre (12)	
e. Can stand and move more than 1 metre but no more than 20 metres either aided or unaided (12)	a. Cannot: i. Mobilize more than 50m without stopping due to significant discomfort or exhaustion ii. Repeatedly mobilize 50m within a reasonable time scale (15)
d. Can stand and then move using an aid or appliance more than 20 metres but no more than 50 metres (10)	b. Cannot mount or descend 2 steps without a handrail unaided (9)
c. Can stand and then move unaided more than 20metres but less than 50 metres (8)	c. As a) but cannot mobilise more than 100metre (9)
b. Can stand and move unaided more than 50 metres but no more than 200metres either aided or unaided (4)	d. As a) but cannot mobilise more 200metres (6)
a. Can stand and then move more than 200 metres either aided or unaided (0)	e. None of the above apply (0)

Both ESA and PIP tests are tests are points based continuums to determine eligibility for a 2 tier benefit in and follow a similar assessment procedure, assessed by a mixture of self assessment and Health Professional report and other evidence.

In each case a claimant can only perform the activity at that descriptor level if they can do so: repeatedly, reliably, safely and in a reasonable time.

Yet the outcomes are totally different – so get an enhanced rate under PIP Mobility 12f or 12 e but in many or most cases falls to 12d or 12 c and get the standard rate.

5. Mobility in other Government policy areas

The 50 metre yardstick runs through a number of other policies:

- The Department for Transport's Inclusive Mobility guidance referenced in the Buildings Regulations states:
- Seating should be provided on pedestrian routes at intervals of no more than 50 metres
- Disability Parking bays should be within 50 metres of the facilities they serve
- The Blue Badge Scheme : the previous “passporting to a blue badge from an award of DLA Higher Mobility has been supplemented with a provision for all those scoring 8 or more points under PIP. That is of course if the current descriptors leave them with the means to obtain a vehicle!

6. Is there a case for a 20 metre group?

The DWP's challenge to the disability and advice sector is to come up with an evidence based alternative. Yet the DWP offers no evidence as to any real difference in mobility costs between two groups of people both whom would be regarded as unable to walk to any appreciable extent and as having limited capability for work related activity.

The only evidence base is that in trials of the PIP Assessment, Health Professionals felt reasonably confident that they could make a diagnostic distinction. It may work as a practical diagnostic tool, but there is no evidence for the dramatic policy change.

The key question for any evidence based policy change to justify a hard choice to significantly cut support for some 600,000 people is whether there is any real difference in the effective additional costs for Mobility between two groups of people who are "virtually unable to walk"

No such research has been carried out by the DWP, and it would seem unlikely that much difference would emerge. Anyone who is virtually unable to walk – be it 20m or 50m – is going to be someone who struggles to do much more than get into a car at one end and out the other.

The DWP itself acknowledges that *"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..."*

In the experience of NAWRA members, **both** groups would be likely to need:

- access to a reliable car to mobilize independently or to otherwise spend a similar sum in taxis, petrol money for lifts.
- Neither subset of the virtually unable to walk group are likely to be able to cope with public transport where sufficient is available. Most bus stops would be over 50 metres from a claimant's home.
- The majority of wheelchair users may be virtually rather than unable to walk and many will be caught by the 20 metre rule and lose their only means to independence and participation in society.

The DWP case for a 20 metre limit would seem to be essentially that

1. It seems practically possible to make a distinction within a group that the DWP accept all have walking abilities below the minimum level to promote independence, regardless of the absence of any evidence base for any effective difference in mobility costs
2. By so doing the DWP is able to deliver a savings target which has even less evidence base, by removing Higher Mobility from some 600,000 claimants

This thinking represents the triumph of a minimalist, essentialist, narrow medical model of disability over a joined up, broader health related social model of disability that reflects cost effective personalised support aimed at promoting independence and effective participation in society.

7. How many will be affected?

The DWP's own impact assessment shows the likely effects. To be fair the switch from 50 metres but only using an aid or appliance to 20 metres doesn't seem to make a great deal of difference.

The big impact is that the 50 metre level scores only 8 or 10 points. Under the 2nd draft descriptors it was only those who could demonstrate a need to use an aid, appliance or wheelchair within 50 metres who could get the 12 points needed for PIP Mobility at the enhanced rate.

This then is not an argument about how many angels can dance on the head of a pin, even if the case for 20 metres has a touch of Jesuitical casuistry about it. It will make a real difference:

At the end of the transfer process from DLA to PIP – as at May 2018 -, the DWP tell us that the comparative numbers are as follows:

Scenario	DLA Higher/ PIP Enhanced M	DLA Lower/ PIP Standard
Without the cuts	1,030,000 DLA Higher	929,000 DLA Lower
PIP with 2 nd draft descriptors	652,000 PIP Enhanced	590,000 PIP Standard
PIP with current descriptors	602,000 PIP Enhanced	634,000 PIP Standard

The difference then of the switch is to add some 50,000 on to the 378, 000, previously set to lose their DLA Higher Mobility bringing the total up to 428,000.

The difference between the two PIP scenarios also indicates what the DWP anticipate happening to people losing their DLA Higher Mobility. A further 50,000 reduction in PIP Enhanced Rate will lead to a 44,000 increase in PIP Standard rate, with the remaining 6,000 presumably getting no PIP Mobility at all.

Although the consultation is only around Activity 12, impacts cannot be seen in isolation. The numbers losing out will be greater as, in a very welcome side of PIP, some 200,000 claimants with more severe difficulties under Activity 11 Planning and Following a Journey will be able to access a "higher" rate of benefit for the first time. This though means that the numbers previously on DLA Higher Mobility seeing a reduction will be closer to 600,000 with around 70,000 losing all PIP Mobility and 530,000 getting PIP Standard Rate.

The DWP projections are based on trials running a shadow PIP assessment for 1,000 DLA claimants; all volunteers whose benefit was not affected by the assessment but which gave the DWP a broad brush understanding of the impact of the changes.

However, while the DWP may be happy with the likely outcomes, NAWRA members find it hard to see how the stated cuts are actually achieved if the assessments fully take into account the ability of the claimant to perform activities reliably: i.e. safely, repeatedly to an appropriate standard and within a reasonable time. The concern is that in the "big bang" of a new benefit the DWP are hoping to push back the boundaries of reasonableness established in case law and return to a minimalist, essentialist, medical model of disability.

Those with effective representation may win through at appeals; those without may feel intimidated into accepting the new "unreasonableness" until the DWP's new power is tested.

8. Lower Mobility changes

It should be remembered that DLA Higher Mobility has been the subject of particular DWP attention concerning the robustness and evidence base of awards. Unlike other components, no award of DLA Higher Mobility without clear medical evidence or an EMP medical report commissioned by the Department. This may be why the attrition rate for those found not even to meet the 50 metre criteria is relatively low at 12%.

There has been less focus on the cuts for current recipients of DLA Lower Mobility in all of this. On the face of it the descriptors look less controversial and similar to those for the current test with the welcome addition of 12 point descriptors to cover two groups: those able to access DLA Higher Mobility by other routes (blindness, severe mental impairment) and those with more severe restrictions (e.g. difficulty planning and following a journey in even familiar routes).

However, the numbers suggest otherwise. With a likely new cohort of some 380,000 new PIP standard rate claimants among those virtually unable to walk, one might expect a similar increase in total numbers compared with DLA Lower Mobility. But rather than a 380,000 increase, the DWP are forecasting a 295,000 decrease. In other words some 675,000 current DLA Lower Mobility claims must lose their benefit to make the numbers add up.

NAWRA members are concerned at the significant targeting of those with mental health problems, where the decisions appear to be based on impatience and poor understanding. This is already one of the biggest problem areas in the troubled Work Capability Assessment. It would seem that the creation of an unnecessary and lower scoring – overwhelming psychological distress descriptors is the main structural vehicle for cutting DLA Lower Mobility Awards. Current DLA Lower Mobility claimants with mental health issues are likely to continue to have difficulties planning and following a journey in unfamiliar places, but by applying a separate discriminatory test they will be sidelined away from 8 points at 11c towards 4 points at 11b. Or in the more severe difficulties away from 12 points 11f, towards 10 points at 11e.

The Government are picking on a group even less able to defend themselves and in a perhaps more hidden manner yet the effects on vulnerable people are likely to be just as devastating.

9. Impact on individual claimants:

The ability for people to get around independently is vital for their participation in society. The support offered by DLA Mobility is a vital armoury in the Government's arsenal if they wish to tackle equality issues and promote social inclusion, cohesion and moves from welfare to work.

In monetary terms the drop from 'higher to lower' rates means a loss of 34.00 a week or 1,600 a year. However, even if a claimant is able to find other support or re-prioritises form elsewhere in their budget to support their additional Mobility costs, they will crucially no longer be able to access the Motability scheme which many see as the only way to access a reliable, trouble free, safe and adapted vehicle.

The drop for the similar numbers of DLA Lower Mobility claims in the PIP sights are 21.00 a week or 1,100 a year.

NAWRA members are concerned that the people they support and advise will experience:

- Increased isolation and confinement to their own homes – whether due to reduced income or the “cliff edge” effect of loss of access to Motability
- Severe restrictions on their ability to participate in society: whether this be :
 - Socially to access the support and companionship of their peers and support network
 - the significant voluntary efforts that disabled people contribute to whatever is left of the big society
 - the ability to access opportunities for training and employment opportunities to make a reality of Government ambitions to encourage moves from welfare to work.
- Negative Impacts on their health – isolation and confinement has been shown to impact on both physical and mental health. Initially people will suffer quietly in their own homes but in some cases, the extra support needs will require additional support from social and health services.
- Difficulties accessing NHS therapeutic activity – whether physio/occupational therapies and groups to promote physical activity or mental health support and activity groups as a core part of treatment.
- An increased impact in rural / suburban areas where public transport may be less realistic an option and distances and expenses considerably greater. A Motability car may be the only realistic option to promote independence.
- A potentially more severe impact on the poorest of those affected – claimants on means tested benefits face a potentially double whammy in that a loss of a PIP award as a result of these changes may result in an additional cut to their means tested benefits. The effect will be less pronounced than for reductions in the switch from DLA Care to PIP Daily Living. However, the solution is not to abandon vital disability additions in means tested benefits altogether, as is planned under Universal Credit!

10. Impacts on other areas of Government spending

A sustained and significant attack on support for personal independence and mobility is also likely to impact elsewhere in Government expenditure:

- Worsening situations for individuals may reach a point where social , health and support services have to intervene to a greater degree or earlier than if the change had not been made
- Making life more difficult for individuals – increasing isolation and poverty - will impact overall on their health and need for care. The Government may be banking on an inability to access that care, but over time modest support needs may develop into acute and expensive interventions

11. An alternative solution

The DWP asks for practical, evidence based alternative ways to allocate PIP resources. Yet there is no evidence base to support the Department's preferred option, save that it can be done and will deliver significant cuts.

A fit for purpose Activity 12 should offer a range of descriptors to related to different levels of mobility difficulty that can act as effective proxies for levels of support towards additional Mobility costs. Clearly more research needs to be done but there are likely to be three groups:

1. Those unable to walk to any appreciable extent. As the DWP states *"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..."* and who would be allocated to the Support Group under ESA
2. Those with a slightly greater level of mobility but still substantially impaired where PIP can offer a standard rate support in a way which DLA could not
3. Those with some significant impairment where an award might not be justified on its own but where the difficulties might be considered in combination with difficulties from Activity 11 – part of the group covered by the current descriptor 12 b

11.1 A consistent approach until research is done

NAWRA would suggest that more research needs to be done to set an evidence based dividing line between these three broad groups or to better define them. However the current Activity 12 is neither fit for purpose nor consistent with other Government approaches within social security policy or elsewhere.

Until the DWP can obtain the evidence base we would suggest that some reform is urgently needed for now. What seems very clear though is that the separation off of a group at 20 metres, simply because trials suggest that it can be done is not acceptable. It is likely that the broadly the additional costs of Mobility for a group below *"the distance than an individual is required to be able to walk in order to achieve a basic level of independence..."* are likely to be similar.

We would suggest then that until the work can be done to derive evidence based policy, PIP should adopt an approach that is more consistent with other definitions of moving around that will remain in the system – DLA Higher Mobility – that remains for claimants outside of working age and ESA.

Accordingly we would suggest :

- Merging descriptors 12 c,d and e into one descriptor scoring 12 points for those who have been seen over many years as unable to walk to any appreciable extent, below a level of basic independence and eligible for the ESA Support Component
- Splitting 12 b into two at with a distinction between:
 - One descriptor offering lower level support for those with substantial mobility restrictions, but who are not quite virtually unable to walk – perhaps in a range of 50 to 150 metres - , carrying 8 points and offering lower Standard Mobility support
 - a remaining group with some substantial difficulties as covered by the original 12 b , but not enough in itself enough to justify an award. However the 4 points allows these difficulties t be taken into account alongside other difficulties under Activity 11, allowing the possibility of an award based on the combined Mobility difficulties.

- For simplicity and consistency – again subject to a later review – PIP Activity 12 could simply be replaced by the descriptors in ESA Functional Area 1; Mobilising. We suggest this with great caution – in general the benefits are there to measure totally different things and the benefits perform two very different roles in the social security system. We have criticised Universal Credit, for example for failing to understand this difference between benefits for “sickness” and benefits for “disability” We would similarly stress the dangers in using evidence from one benefit for the other and welcome the Ministerial commitment to discontinue this practice.
- However, for this particular activity – and this activity alone – ESA and PIP are measuring the same thing even if one is concerned with the impact on work capability and the other the additional Mobility costs these same difficulties generate. There could be merit in consistency and clarity by using the same categories of Mobility difficulty. Essentially then the descriptors in PIP Activity 12 could be replaced by those in ESA Functional Area 1 – with the order reversed for consistency with the rest of PIP. Thus
 - the current ESA 1a which encompasses those virtually unable to walk and places them in the Support Component could attract a score of 12 points under PIP
 - the current ESA 1b and 1c which give 9 points and a long way towards the limited capability for work criteria could attract a lesser level of PIP support with 8 points and standard rate
 - the current 1d which gives 6 points which may combine with other difficulties under the WCA could be ascribed 4 PIP points allowing the possibility of an award if combined with a descriptor from a reformed Activity 11
- Activity 11 also needs some work the current 11b seems to only allow one group the possibility of combined scores – namely those with mental health issues. There needs to be a broader more generic descriptor for lower level Activity 11 difficulties. Indeed we are not clear as to the purpose of the separate descriptors at 11b and 11e, as those experiencing overwhelming psychological distress are likely to have difficulties with the mainstream test of planning and following a journey. Unless there is – as we fear from the projections – a discriminatory intent to sideline those with mental health issues onto these lower scoring descriptors and either off Mobility altogether or onto standard rate when Enhanced rate should apply.

11.2. Reliably assessing reliability

There is a surficial attraction to distinguishing levels of difficulty by distance, but lessons are there from the history of DLA Higher Mobility, that they are by no means the only factor. Just because there are numbers which generate further numbers, does not make the test any more objective.

Nevertheless history has shown that distance seems particularly compelling and this can provide a practical distinction provided it is not pushed into the absurdities of the 20 metre level, when touch is lost with the reality of the disabling effect of the limitation.

However, great care must be taken to ensure that severe discomfort and reliability are properly taken into account to allow the appropriate choice of descriptor for individuals whose mobility difficulties cannot be defined by distance alone. The failure to do so lies behind most appeals and why the Department loses so many of them. It will be surely better for all if PIP can strive to get it right first time.

11.3 . An alternative within budget?

NAWRA recognises that a fit for purpose Activity 12 is unlikely to generate the projected savings . The existence of an appropriate rate for those nearer the edge of Higher RATE Mobility, may make it possible to be slightly tighter, but our proposals are not likely to come within the pre existing budget assumption of a 20% cut overall and a 30% cut aimed at those with disabilities of “working age”

NAWRA has in past submissions rejected the case for cuts in this area. There is even less evidence based policy for the cuts than for the distinction between 20 metres and 50 metres. A target was set to cut DLA on the back of a proverbial envelope along with the assertion that DLA is or was somehow “out of control:

- The DWP’s own preliminary research on DLA take up rates suggested that it was highly likely that DLA was significantly ***under claimed***
- DLA began before the roll out of Community Care from 1993 onwards - which brought with it significant cost savings through the closure of old fashioned and expensive institutions. Despite some real shortcomings and early failures , Community Care this offered the potential at least– when properly co-ordinated and resourced - for far more creative, imaginative and cost effective supported living within the community.
- This was also a period in which society began to see people with disabilities as having a role to play in society and a contribution to make, rather than being shut away behind closed doors, whether of institutions or private care. Equalities has moved from a concern of the left to a mainstream consensus, but which PIP is in danger of rowing back from
- DLA plays a crucial role in promoting independence: it offers real support to individuals and provides the resources for informal support networks, participation, engagement and supported living schemes.
- It has the potential to be a real enabling benefit to help bridge the gap from welfare to work for those recipients for whom this is a realistic option. There was room for improvement in this area, although the Government seem to be rowing hard in the opposite direction in the treatment of disabled workers under Universal Credit.
- The existence of DLA is vital for social and health services to balance their books

12. A gentle plea for rational policy making

It may be that a sensible evidence based mobility continuum could allow some tighter focus at the top perhaps assisted by the presence of a standard rate at an appropriate level. However that level is unlikely to be at 20metres or by any other means of sub dividing a group that has the most severe limitations and who all are “virtually unable to walk”

Our suggestions may be the basis of a more fit for purpose Personal Independence Payment. Sensible evidence based research may need to be commissioned to work out the most appropriate gradations within both Activities 11 and 12.

Finally we would suggest that if the Department wishes to remain with its preferred option it should abandon the name Personal Independence Payment, as the current position seems to promote the precise opposite.