

Consultation on aids and appliances and the daily living component of Personal Independence Payment: Response from Citizens Advice Scotland
January 2016



Citizens Advice Scotland (CAS), our 61 member Citizen Advice Bureaux (CAB), the Citizen Advice consumer helpline, and the Extra Help Unit, form Scotland's largest independent advice network. Advice provided by our service is free, independent, confidential, impartial and available to everyone. Our self-help website Adviceguide provides information on rights and helps people solve their problems.

In 2014/15 the Citizens Advice Service network helped over 323,000 clients in Scotland alone and dealt with over one million advice issues. With support from the network clients had financial gains of over £124 million and the Scottish zone of our self-help website Adviceguide received approximately 5.4 million unique page views.

Issues relating to benefits and tax credits are the most common area of advice provided by citizens advice bureaux in Scotland, with 220,000 new issues in 2014/15, representing 37% of their work. Scotland's CAB service is at the frontline of changes to the social security system, including the roll-out of Personal Independence Payment.

Summary

- **Citizens Advice Scotland (CAS) does not agree that any change should be made to the way aids and appliances are currently taken into account when determining entitlement to the daily living component of Personal Independence Payment (PIP). We are concerned that the proposed changes would remove crucial support for disabled people in Scotland.**
- **We do not believe that such a significant change should be made to the PIP eligibility criteria when the benefit is still in its infancy and the roll-out of PIP is still ongoing. At this stage the focus should be on addressing issues with the current PIP assessment process, which have caused significant distress for many disabled people in Scotland. Further, it is inappropriate for such policy changes to be made when powers over PIP are due to be devolved to Scotland.**
- **The small sample of cases referred to in the Consultation Paper is insufficient evidence of a problem with the current approach to aids and appliances.**

Response to consultation

Question 1: What are your views on the current system and its advantages and disadvantages compared to options one, two, three, four and five?

PIP is a crucial benefit for many people with disabilities and long term health conditions. It is an 'extra costs' benefit, in that it is intended to provide support in recognition of the fact that people incur additional costs as a result of their disability or health condition.

In September 2015, CAS gathered the views of over 200 bureau advisers and clients on the purpose of disability benefits, and how eligibility should be assessed.¹ The majority of advisers and clients emphasised that the additional financial support provided through PIP was crucial to enabling disabled people to participate in society and to live independently.

“Without such financial support, there would be greater likelihood that people with health conditions would become more isolated from/within their communities – accordingly, such benefits also help to address barriers in society”.

“This additional money is essential and can keep an individual just above the poverty line due to additional costs with heating, clothing, mobility and diets that can come with having a health issue”.

Aids and appliances were one of the key extra costs identified by advisers and clients.

The Consultation Paper suggests that there is a problem with the current approach to aids and appliances in that people who are eligible for PIP on the basis of their need for aids and appliances often in fact incur no or low additional costs. However, this analysis is based on a small sample of cases, as well as 'anecdotal' evidence during the first independent review of PIP.² It does not reflect our experience of the extra costs incurred by disabled people. Those who use aids and appliances may have a range of other additional costs including extra heating or paying for support with shopping and cleaning.

Further, entitlement to PIP is not determined by the *actual* costs incurred by an individual. The eligibility criteria, including the use of aids and appliances, are intended to be **proxies** of the additional costs that a disabled person may incur. When PIP is awarded it is not intended, for example, to cover the actual costs incurred by a person to purchase aids or appliances; it is intended more broadly to meet the extra costs of disability. The analysis in the Consultation Paper seems to

¹ *Designing a social security system for Scotland: Disability and carers' benefits* (CAS, December 2015) <http://www.cas.org.uk/publications/designing-social-security-system-scotland-disability-and-carers-benefit>

² *An independent review of the Personal Independence Payment assessment* (December 2014) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/387981/pip-assessment-first-independent-review.pdf

suggest that the benefit should be awarded to cover actual costs – for example, by having a discretionary award depending on the aids and appliances to be purchased.

CAS believes that **no change should be made** to the current approach to aids and appliances when determining eligibility to PIP. **We do not support any of the options set out in the Consultation Paper.**

CAS supports the UK Government's commitment "*to supporting disabled people to exercise choice and control and lead independent lives*"³. However, our evidence shows that, despite this policy intention, the introduction of PIP has caused significant problems for some of the most vulnerable people in Scotland. The UK Government's focus should be on addressing these problems with the current system, instead of introducing changes to the eligibility criteria for PIP which would further reduce the support available to disabled people.

PIP is one of the fastest rising issues for bureaux in Scotland. In 2014/15, bureaux dealt with 30,000 new issues relating to PIP; an increase of 90% on the previous year. The most significant issue for clients has been considerable delays in the assessment process. Bureaux have also seen other issues such as clients being required to travel long distances for an assessment, and difficulties in completing the 'How your disability affects you' (PIP2) form within the time limit (one month).

These problems have caused considerable distress for many sick and disabled people in Scotland, often leaving them facing hardship and unable to meet basic living costs. When surveyed in August 2014, nine out of ten advisers thought that the PIP assessment process was causing additional stress and anxiety for clients; nearly four in five advisers said they had seen clients' health worsening as a result of the process.

We also do not think that the UK Government should be taking any policy or funding decisions (outside operational matters) on any benefit, including PIP, which is due to be devolved to the Scottish Parliament., without full agreement from the Scottish Government.

³ *Consultation on Disability Living Allowance Reform* (December 2010)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/181633/dla-reform-consultation.pdf page 5, para 1