



**norfolk coalition of disabled people**

**EQUALITY • DIGNITY • HUMAN RIGHTS**

**Norfolk Coalition of Disabled People**

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## **NCODP Response to DLA Consultation**

**Norfolk Coalition of Disabled People is a human-rights group controlled by disabled people and our member groups. Our members comprise nearly 50 local disability organisations (DPOs) led by disabled people, and over 500 disabled individuals and affiliates.**

We ensure the voice of Norfolk's disabled people is heard locally, regionally and nationally to promote social equality and dignity for all disabled people.

NCODP runs Disability Rights Norfolk which provides advice on a wide range of benefits including Disability Living Allowance (DLA), and Attendance Allowance (AA) to over 13,000 disabled people and their families each year. We provide Appeal representation and advocacy across a number of client groups. We also run a number of services to support the independence of disabled people, including support for direct payments and personal budgets to disabled people in Norfolk and Suffolk. .

NCODP is against the proposed cuts and rationing of DLA. We believe these proposals are a regressive measure which will disproportionately penalise disabled people, who rely on DLA to meet the increased costs of their disability. These increased costs do not revolve around provision of aids and adaptations alone. Raising the eligibility criteria for DLA will have a profoundly negative effect on disabled people's human rights to access the world as equal citizens.

You have asked what activities are most essential for everyday life. It is impossible to make a list, as it requires the subjective engagement of each individual, who would each have their own priorities. You say you want to create a benefit that is based on the social model of disability and furthers the personalisation agenda. There is no evidence of this in your proposals.

These changes can't be taken in isolation of the other changes being imposed by the Coalition Government which affect disabled people. The suspension or scrapping of the Independent Living Fund, changes to housing benefit, cuts in



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Access to Work and Supporting People budgets will have a cumulative effect on disabled people's income and ability to live equal and active lives. If you add to this the cuts being imposed on local Government social services departments then it adds up to an assault on disabled people which is neither fair nor proportionate.

Our independent research<sup>1</sup> shows that:

- Of Norfolk's 186,000 disabled people, 45,000 of working age on disability benefits will lose £526 per year, 8% of income each year.
- Of Norfolk County Council's proposed £136 million cuts in services over the next 3 years, £45 million will directly and exclusively effect disabled people, representing a loss of services valued at £476 per disabled person per year, or about 7% of their income.
- Disabled people will also be affected by other services cuts making the full impact even greater.
- The increase in VAT is expected to add £158 to the essential bills of the average household and will mean a loss of about 2% of income for the poorest 50% of disabled people.
- As a direct consequence of the above, the poorest 53% of disabled people in Norfolk, around 100,000 people and their families, will see **their living standards decline by a third over the next four years.**
- The conclusion is that the cumulative impact of the changes introduced by the Coalition Government together with the cuts proposed by Norfolk County Council will be discriminatory, disproportionately effecting the most vulnerable and poorest group in society – disabled people, their families and carers.

DLA is acknowledged to have one of the lowest levels of fraud of any benefit, and yet there are proposals for frequent assessments and reviews; again, this is a disproportionate response that penalises many disabled people completely unnecessarily. Your own research indicates the current serious anxiety about potential reviews, to the point that some recipients prefer to survive on lower income than to face the disruption they believe will be caused by trying to enter

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<sup>1</sup> <http://www.campaignagainstcuts.org.uk/documents/facts/impact-of-cut-on-disabled-people-in-norfolk-012011.pdf>



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work. This will not improve by requiring PIP recipients to have frequent medical assessments. No information is offered as to your estimates of relative savings between self-assessment and medical assessments, implying that the prime aim of assessments is to deny claimants, rather than to promote their independence.

We have grave concerns regarding the proposals for medical assessments, in particular in the capacity of the assessor to make a knowledgeable judgement of the claimant's situation based on a one-size-fits-all programme.

We believe that the continued professional, 'top down', medicalised approach will cost more not less money than if you engage upstream with DPOs to help you create appropriate and proportionate claim and assessment procedures.

If you wish to stop the increasing costs of this benefit, you would save far more public money if you invested in the independent advice services that are currently being decimated by cuts.

Instead of focusing on the figures that only 20% of DLA recipients work, why not look at the barriers to the other 80% who don't and learn from the experiences of the 20% who do?

Again your own research recommends much earlier information is given to people with new impairments to protect their work status, indicating more targeted and relevant information should be actively promoted. Good peer to peer information advice and advocacy could turn DLA into a tool for continuing employment and greater awareness among disabled people of routes to independence.

The focus should be on how DLA can promote active citizenship and opportunities for disabled people to live independent lives.

There is no comment in the consultation regarding how these proposed changes will affect Carer's Allowance. What is going to be the passporting criteria to this and other benefits or schemes that are essential for disabled people's independence?



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We are especially concerned about the assumed overlap between DLA mobility component and the duties of care providers to provide transport for disabled people living in residential care. Assumptions that Local Authorities will fill in the gaps are unreasonable. A great deal more research about the living conditions and expectations of those who are most vulnerable is needed before decisions can be made about altering the mobility component for this category.

Norfolk Coalition of Disabled People can bring unique expertise to the process of making DLA/PIP a more efficient means of improving the life chances for disabled people. To do so we need to fund adequate advisors, targeted within appropriate environments to ensure fairness and community acceptance of the merits of the scheme, while using our experiences during its implementation to highlight its weaknesses to Government. We urge you to consider these suggestions.

**Norfolk Coalition of Disabled People (NCODP)**

**February 2011**