# Inclusion London Response to the Health and Disability Benefits Green Paper Consultation

## About Inclusion London

Inclusion London is a Deaf and Disabled people’s organization that works to promote equality and inclusion of Deaf and Disabled people. We support over 70 DDPOs in London and through those organisations our reach extends to 70,000 Disabled people.

## Sources of Information

Inclusion London conducted two focus groups for the specific purpose of responding to this inquiry. Both were undertaken with our member organisations who provide advocacy and advice to Disabled people regarding benefits.

We also have regular direct engagement with Disabled people across London, who’s experiences have contributed to this response.

## Introduction

Inclusion London welcomes the opportunity to respond to this consultation on the future of Health and Disability benefits and the willingness of the Department of Work and Pensions to make changes. However, any changes that are proposed and enacted must work for those who are claiming those benefits now, and those that will be claiming in the future.

Inclusion London believes that any changes to the way our social security system works should bring it in line with the UN Convention on the Rights of Disabled People (UN CRPD), particularly Article 28, adequate standard of living and social protection[[1]](#footnote-2). This is especially the case as in many places the Green Paper mentions affordability, and so, it is important that none of the changes that may be enacted lead of a regression of the right to an adequate standard of living. A just and fair welfare benefits system must recognise that some people are not able to work and it must provide adequate financial support for them

Inclusion London would also like to express our concern with the misuse of the term independent living throughout the Green Paper. Independent living, as defined by the UNCRPD is the equal right of Disabled people to live in the community with choices equal to others with the support needed to do so[[2]](#footnote-3). Welfare benefits are one of the types of support that feed into whether someone can live independently. The concentration exclusively on employment in relation to independent living is therefore concerning to us, especially in the context of the UN Committee on the Rights of Disabled People finding that their had been “grave or systemic violation” of the rights afforded to Disabled people in the Convention, including in relation to Article 28 and Article 29[[3]](#footnote-4).

Additionally, Inclusion London is concerned with how the Green Paper has mixed operational changes with potentially major policy changes. Many of the operational changes discussed in the Green Paper, such as those relating to reasonable adjustments, are already underway or should have been implemented a long time ago.

## Improving support

Key Points:

* The current system is over-complicated, and the information about how to apply for benefits is inaccessible, with £16 billion in means-tested benefits remaining unclaimed each year[[4]](#footnote-5).
* There should be better signposting to information, advice and advocacy services for claimants, however, it must be noted that due to cuts to the advice sector, it can be difficult, especially for Disabled people with access needs, to find good and accessible advice[[5]](#footnote-6).
* The DWP must improve the quality of and the number of staff manning their phone lines, so that people are not waiting for long periods of time to get their call answered.
* The benefits system must be made accessible in the first place so that more people can more easily engage with it, and are not forced to reply on help from family or friends, which in many cases is not appropriate or available.
* Inclusion London welcomes the DWP making commitments to making their services more accessible, however, this should have happened already as the DWP is subject to the anticipatory duty requirements in the Equality Act 2010.
* There must be clear and accessible reasonable adjustments policy which must be widely publicised. The policy should not only set out existing adjustments the DWP can provide but set out the process of requesting and receiving adjustments in individual cases.
* The must be an effective system of monitoring how well reasonable adjustments are implemented. Individual communication needs of claimants known to the DWP must be identified and systems put on place to meet those needs during all contact with the DWP or other organisations acting on its behalf.
* Advocacy must be fully funded, be independent of the DWP and be rights-based. This would be best placed within local Disabled People’s Organisations whose workforce are people with lived experience of the process and are a trusted source of information, advice, and support.
* Inclusion London believes that the DWP must reinstate the 50m rule with regards to mobility as a starting point to meet more Disabled people’s mobility needs.

### Reasonable adjustments

Whilst it is good that the DWP continues to look into and invest in ways to make their services more accessible for Disabled people, the fact of the matter is that there should have always been those provisions put in place as a legal duty under the Equality Act. For example, Universal Credit and PIP are new benefits systems for which have been designed after the Equality Act was in force. Reasonable adjustments include things such as different ways to apply for benefits, communicate with the DWP, complete forms etc. We welcome the introduction to online forms, which would make the process easier for some people, however it is shocking that it has taken so many years to do this. The duty in the Equality Act is anticipatory so everything must be done to ensure people can engage with the system effectively in a variety of ways.

However, reasonable adjustments also must work for individuals. The DWP should publicise its reasonable adjustments policy which should, besides a standard list of options available, clearly describe the process of requesting and getting adjustments to meet individual needs. As well as having a standard list of adjustments that Disabled people can request (e.g., communications in different formats, phone or video rather than in person assessments) adjustments should also be available based on the individual needs of the Disabled person. For example, we have had reports that DWP assessors do not have an understanding of trauma – in one case we have heard of a woman who had been sexually abused having her hearing assessed by a male assessor approaching her from behind. This was incredibly traumatic for the woman in question. In this instance, it would have been appropriate, as a reasonable adjustment, to change the assessment. It should also be possible to request a female assessor as a reasonable adjustment for these reasons. We also know of cases where people requested very minor adjustments for their assessments, such as dimmed lighting, or some extra time for the assessment and the assessment providers did not confirm those would be in place.

Transparency and willingness to learn is also incredibly important when we talk about reasonable adjustments. As far as we understand it, when challenged under the Equality Act the DWP tends to settle individual cases, imposing non-disclosure agreements on individuals. It is important that the DWP is open about its mistakes and takes those complaints/legal action as an opportunity to learn and improve service rather than silence individuals.

### Advocacy

It is essential that people claiming benefits get advocacy support to navigate the system.

Advocacy must be:

* Independent;
* Fully funded;
* Accessible;
* Rights based;
* Available at all stages, including challenging decisions.

Official advocacy must not undermine or put barriers for less formal advocacy.

The green paper suggests that advocacy must be value for money. Value for money must be seen in terms of outcomes achieved for individuals, not in terms of the number of people assisted or the number of sessions provided. Lessons must be learnt from Mental Health advocacy or the Care Act advocacy where budgetary considerations lead to suppression of referrals and often poor quality.

Access to independent advocacy is imperative. However, it is important that this is not delivered by the DWP but independent of the government. This would be best placed within local Disabled People’s Organisations whose workforce are people with lived experience of the process and are a trusted source of information, advice, and support; helping people to say what matters to them. Funding DPOs to deliver rights based advocacy to support disabled people to navigate the benefits system would support thousands of us per year and improve outcomes and increase employment opportunities for disabled people.

It is important to proactively ask people about the difficulties they might have applying for benefits or challenging decisions and proactively encourage people to contact the DWP if they have any difficulties. Currently people are pushed to use help of their informal networks, this does not work for everyone.

It should also be possible for third sector organisations to refer people for advocacy, when they believe a person meets the test.

It is also vital that the DWP makes it easier for advice and advocacy organisations to act on behalf of individuals they support. For example, implied consent rules in Universal Credit must be restored. Many Deaf and Disabled people are disadvantaged by this rule. Currently advisers and advocates waste a lot of time waiting on the phone for the DWP’s helplines. The DWP should establish quick and easy channels for those professionals to get in touch.

### Mobility

The tightening of eligibility around the mobility component of PIP from 50m to 20m excluded many Disabled people who need support getting around. For some, it resulted in the loss of their Motability vehicles and their independence.

We believe, as a starting point, that the reinstatement of the 50m rule would go some way in the right direction to meet more Disabled people’s mobility needs. The 20 metres rule has resulted in thousands of disabled people losing their Motability cars. We would suggest that access to Motability scheme is reviewed to ensure that it can support more disabled people and remove barriers to our mobility and independence. We believe that the DWP should provide support for people to save for expensive aids without the accumulated savings impacting their means-tested benefits.

## Employment Support

Key Points:

* Inclusion London is deeply concerned about the proposed mixing of health and work benefits.
* The DWP should immediately abolish sanctions and conditionality for Disabled people.
* The Low Capacity for Work component in Universal Credit should be restored, and the support group and higher rate of benefits for people in that ESA group should be retained.
* Employment support should be voluntary, and accessed at the discretion of each claimant.
* Employment support should focus on removing barriers and discrimination, and should be designed and delivered in co-production with Deaf and Disabled People’s Organisations.
* Access to Work must be reformed so that it is easy for users to navigate and apply for, and so that users are not having to pay for support out of pocket. It must be better advertised to both Disabled people and employers.
* There must be more requirements and monitoring of organisations signed up to Disability Confident, and all employers must be currently employing Disabled people if they wish to achieve a higher level of certification.

### Access to Work

Inclusion London believes that Access to Work is one of the best ways to support Disabled people into work, and remain in work, when it works well. This is especially true for self-employed Disabled people and those who work for organisations who would not be able to afford to fund all types of support and equipment that a Disabled person may require. However, there are also many issues that exist within the current Access to Work system that must be solved if it is to be truly effective.

Access to Work must be further streamlined and the bureaucracy removed from the process. Often it takes Disabled people weeks or even months to receive the equipment and support they need, affecting their ability to do their jobs. In one case, it took a Disabled worker six months to get a package of support confirmed and she has been getting support from Access To Work since 1992.

Inclusion London research found that only 15% of users found Access to Work easy to apply for or use, and described it as “jumping through hoops”. Once agreed, packages of support sometimes last 3 years, which is useful for both the employee and employer. However, the renewal process can involve revisiting information ATW already has (e.g. being asked for the same medical information time and time again)[[6]](#footnote-7).

The practice of having to claim back support worker costs through a paper based and system that frequently results in lost paperwork means that support workers are not paid in a timely manner and users are left out of pocket – which would particularly disadvantage people who do not have the money to pay upfront such as young workers who are in their first job. This process must be simplified and a digital option must be offered, not just as a reasonable adjustment. The same applies to Fares to Work claims and Fares in Work claims. These are also paper-based systems and this provides a barrier for many recipients of Access To Work support, so they have to use valuable Support Worker hours to complete the claim forms. During lockdown the DWP allowed some elements of the process claims to be digitized but Disabled people who were shielding still couldn’t complete some elements of the claims process, which remained inaccessible. When Disabled staff experience these problems on an ongoing basis, it disadvantages them in the workplace.

There are also issues with the advertisement and promotion of the Access to Work scheme to both Disabled people and employers. This results in people not knowing they are eligible for support. All employers should be provided with information about the scheme in order so they can inform employees. Disabled People's Organisations should also be funded to provide advice on employment rights to both Disabled people and employers, including to provide support to apply to Access to Work.

### Disability Confident

Our experience of the Disability Confident scheme is that it doesn’t translate into numbers of Disabled people getting permanent paid work. Where is the data to show this scheme is making a significant difference to the number of Disabled people that are employed by these organisations?

All employers should be required to report on the number of Disabled people they employ - a TUC report confirms many employers do not collect this information and that many Disabled people do not declare they are Disabled or have a long term health condition because they do not feel confident their employer will be supportive[[7]](#footnote-8). In order to reduce this fear senior management teams need to undertake Employment Rights training and create an inclusive and diverse workplace in which every employee feels valued. They should also support the establishment of Disabled Workers Groups and be responsive to issues that Disabled staff raise collectively.

Furthermore, there should be more specific requirements and monitoring of Disability Confident and the employers which are signed up to the scheme, which should be made publicly available. The Work and Pensions Committee recently recommended that the DWP should establish an independent body to carry out objective external assessments of Disability Confident employers at levels 2 and 3 to monitor whether they are fulfilling their obligations[[8]](#footnote-9). At the moment, employers can be awarded a Disability Confident accreditation without employing a single Disabled person – this must change so that Disability Confident employers must show meaningful changes to their recruitment, progression and other workplace practices and be employing Disabled people before being rewarded a higher level of accreditation[[9]](#footnote-10).

### Staying in Work

Rather than targeting individual Disabled people before their Work Capability Assessment, the government should be funding independent monitoring bodies such as the EHRC, to ensure that Disabled people’s rights in the workplace are enforced and to avoid job losses due to disability discrimination. Additionally, the Department should increase the speed at which they carry out Work Capability Assessments, rather than approaching claimants before they have been carried out.

Furthermore, the government must legislate to strengthen protections against disability discrimination in the workplace, for example, mandatory reporting of the disability pay gap and the formulation of action plans by employers if recruitment, retention and progression gaps are identified. As a necessary part of this, Occupational Health must also be reformed to start operating from a social model perspective and to give good advice to employers and employees about reasonable adjustments and schemes such as Access to Work.

There also needs to be more investment in inclusive education, particularly in further education, apprenticeship and training schemes, to ensure that Disabled people have equitable access to training and skills that they need to get jobs and advance in the workplace. Very often these schemes are not fully accessible – for example, they may have inaccessible, online application processes and not provide additional access support. Many of these mainstream opportunities are not accessible for people with learning difficulties.

Disabled People’s Organisations (DPOs) should be funded to provide personalized support to individual Disabled people who want to work. There also needs to be a recognition and an acceptance that some Disabled people cannot work. However, in many cases it is the employers who need to change, not Disabled people themselves.

There also needs to be an acknowledgement that factors beyond a Disabled person’s control (e.g. lack of appropriate social care, inaccessible transport and an employer’s refusal to make reasonable adjustments) are what stops many Disabled people from seeking employment.

Employment support should be approached from the perspective of the social model of disability, understanding that the Disabled person should not be forced into an inaccessible workplace, but that workplaces should change to accommodate Disabled people. This could be achieved by providing work coaches with rights-based disability equality training which many DPOs can provide.

Also, employment support should take account of an individual’s skillset and aspirations, leading to appropriate employment which matches the values and skillsets of the Disabled person. The system must be completely redesigned so that Disabled people are supported into an appropriate employment, and employers are supported to make suitable changes to their workplaces to ensure they are inclusive. Work coaches should be having these conversations with employers on a regular basis.

### Conditionality and sanctions

We are deeply disappointed about that the Green Paper does not consider an option of abolishing sanctions and conditionality at least in relation to Disabled people. Inclusion London believes that leaving decisions around sanctions to individual job coaches is wrong – even if they are not being applied, their existence still creates a climate of distrust and intimidation, and puts undue pressure on claimants.

Disabled people who are using employment support are incredibly detrimentally affected by sanctions and conditionality. This is despite wide ranging evidence from a variety of organisations that sanctions do not work, and are actively harmful and counterproductive for Disabled people[[10]](#footnote-11). This includes the Work and Pensions committee, who said: “No evidence the Committee received was “more compelling than that against the imposition of conditionality and sanctions on people with a disability or health condition. It does not work. Worse, it is harmful and counterproductive.[[11]](#footnote-12)”

Sanctions cause many Disabled people severe mental distress that has had harmful results, in many cases leading to the death of the person. The BBC has identified at least 82 Disabled people who have died after alleged DWP activity, including sanctions[[12]](#footnote-13). This clearly demonstrates a need to abolish sanctions for Disabled claimants, and that the use of Prevention of Future Death reports alone are not adequate to prevent more loss of life.

Sanctions and conditionality must be abolished for Disabled people if the DWP wants them to have any confidence in the idea that they can take up employment support or do some work-related activity without the risk of losing some or all of their benefits.

### Good Personalised Employment Support

Many Disabled People’s Organisations have employment advice and support services which advise Disabled people of their rights in their workplace and support them with applying to Access to Work. They should be funded to provide this support throughout an individual’s journey in finding, retaining and progressing in work.

Inclusion London runs the “Making it Work” employment project, in partnership with local DPOs, colleges and employers around London[[13]](#footnote-14). Rather than forcing Disabled people to adapt to inaccessible and un-inclusive workplaces, Inclusion London and local DPOs work with employers to teach them about the social model and inclusive employment practices to create supported internships for young Disabled people. Some DPOs also provide Follow-On support services which provide personalised support to:

* find out what jobs would suit each client best
* find the right employers and opportunities
* approach employers the client would like to work for
* ask for reasonable adjustments when the client applies for jobs
* prepare for every stage of the recruitment process (including job applications, interviews and work trials)

When the client is in work, DPOs continue to provide personalised support (where needed) to:

* communicate the client’s access needs to his or her employer
* apply for Access to Work funding to pay for any equipment or a job coach
* ask for reasonable adjustments
* help the client with the induction process
* undertake any training that the client may need to do

Some DPOs also provide a Job Coach service and a Mentoring service. Job Coaches can support Disabled people to learn the tasks that they need to do in the workplace and create aids to help them with their tasks. A Mentor will check in on how clients are doing. Clients can also go to their Mentors if they need some help or if they need to discuss something about their jobs.

DPOs also support employers in different ways:

* They offer them training and guidance on how to support Disabled staff in the best way possible
* They support employers to make their recruitment processes accessible to Disabled people
* They support employers to make their workplaces and jobs more accessible for Disabled people.

The DWP should co-produce similar schemes across the country with Disabled People’s Organisations to be rolled out on a local level to best understand and cater to local needs.

Many employment support providers lack insight into the social model of disability and therefore do not think about the changes that employers need to make to be more inclusive. Inclusion London’s experience of working with DPOs which provide employment support is that DPOs have ‘lived experience’ of disability and therefore understand the barriers which many Disabled people face to sustaining paid work and progressing. DPOs understand the different types of support that Disabled people can access through Access to Work. DPOs need to be adequately funded to provide this support, although it must be emphasised that it should be voluntary on the part of the Disabled claimant, and they should not be subject to sanctions and conditionality.

One of the problems DPOs face is that commissioning practices (of e.g. local authorities) exclude small organisations. Minimum turnover requirements of applicants and minimum size of contracts mean that small DPOs, although very effective at serving local Disabled people, cannot compete against large service providers (e.g. traditional disability charities). There needs to be more flexibility so that DPOs can access sources of public funding.

Our experience is that many Disabled people seeking paid employment also need support in other aspects of their life (e.g. financial and benefits advice, social care advice, general wellbeing etc.). This is why DPOs are well positioned to provide this holistic support that many Disabled people across need.

DPOs have experience of work coaches who simply don’t understand the barriers that Disabled people experience getting up each morning, getting ready for work and travelling to work. Also, unless Disabled people are sufficiently paid, they will not be able to accept certain jobs because they aren’t financially viable, particularly given the additional daily living costs that they incur.

There should be a range of options available for Disabled people to voluntarily access employment support. This could include in-person, digital or a hybrid mix of support depending on their circumstances and what is most accessible for them.

We are very much opposed to DWP services being present in healthcare settings. This is because of the mental distress that is caused to claimants that is caused by sanctions, conditionality and the Department as a whole, as demonstrated in multiple academic and non-academic research reports. We believe it is deeply inappropriate and harmful for the DWP to be present in spaces which people are accessing in order to get support for their mental distress and other impairments and health conditions[[14]](#footnote-15)[[15]](#footnote-16)[[16]](#footnote-17).

## Improving Current Services

Key Points:

* Assessments must be redesigned so they are based on the social model, respect Disabled people’s dignity and start from a position of trusting what Disabled people say about their own impairments and needs.
* PIP and WCA descriptors should be changed – many people with additional disability-related costs do not get PIP so criteria must be adapted to ensure that more people are eligible.
* Disabled people with lifelong conditions that will not improve should not be subject to reassessments.
* The DWP must be clearer on the type of medical evidence they are looking for, and Disabled people should not have to pay for said evidence.
* A range of types of evidence from different professionals should be allowed, particularly for those people who do not have evidence from their GPs. This could include social workers, OTs and educational professionals.
* Inclusion London welcomes the recording of assessments.

### Assessments

With both PIP and Work Capability Assessments, the format of assessments should be at the discretion of the Disabled person having the assessment, with the choice of assessment having no impact on the results of the assessment. Regardless of format, support should be made available so that the assessment is accessible to the Disabled person, and they are able to fully participate – e.g. BSL users should be provided with a BSL interpreter in an in-person assessment or over video call. Furthermore, Inclusion London believes that all assessments, regardless of format, should be record and a copy provided to both the assessor and the Disabled people.

If PIP and Work Capability Assessments have to continue taking place, Disabled people should be assured that their assessor has some knowledge or expertise in their impairments. Many cases have occurred where Disabled people have been assessed by someone completely inexperienced in their type of impairment – for example, people who experience mental distress being assessed by OTs or physiotherapists.

With regard to the PIP descriptors, Disabled people feel that they do not relate to their needs, and are generally an affront to their dignity and privacy. This points to a wider issue with PIP assessments on the whole in that they are conducted from an individual medical of disability – this needs to change so they run in line with the social model and promote independent living. Any changes to criteria within the current system should make it easier for Disabled people to claim PIP, as there are many people who have additional disability related costs who currently cannot claim. Inclusion London has also been told by some of its member organisations who provide advice and advocacy on benefits that they have seen assessors who do not understand the criteria that they have to use to judge the level of benefits that someone could receive, this has led to Disabled people needing to go to tribunal to appeal decisions, and those decisions often being overturned. This creates more stress and work for both the Disabled person, the DPO supporting them and the DWP.

With reassessments, the DWP must recognise that for many people, their impairments will not improve, and will likely worsen over time. There should not be repeat assessments for those people. Reassessments should be triggered by the Disabled person in the event that their impairments or health conditions change, rather than by the DWP.

Also, Disabled people have to constantly repeat information about their impairments despite having provided extensive medical evidence, sometimes over years, to the DWP. Assessors should read that information and not have the Disabled person repeat information that has already been provided.

Decision making would be improved if the DWP started with the position that the person applying for benefits is telling the truth, and they were not so preoccupied with catching people out. Assessments, and benefits as a whole, must take a rights based approach, encompassing all the pillars of independent living, rather than just concentrating on getting people back into the workplace.

### Medical Evidence

There should be a variety of evidence that should contribute to making PIP and WCA decisions, recognising that not all Disabled people will have frequent contact with medical professionals. This could include older documents from when they are first diagnosed with having a certain impairment, and OT and social services records as well as medical evidence. Many Disabled people do not have frequent contact with their GP, particularly if their impairment is relatively stable and unlikely to change. Additionally, the cost of obtaining medical records and evidence can be a huge barrier to Disabled people accessing benefits, so it should be made free to ask for medical evidence for benefit assessments.

The descriptors in PIP and WCA are not fit for purpose. As well as being highly intrusive and an affront to people’s dignity, they also do not line up with the type of medical evidence that individuals are generally able to get, and do not conform with the questioning that they often experience in PIP and WCA assessments. Whether or not the descriptors do change, our members told us that it would be useful to send descriptors to medical professionals and other bodies that can provide evidence so they can tailor evidence accordingly.

With regards to sending in evidence, our members have told us that just having a mailing address to post evidence to poses difficulties for their service users. As well as access issues stemming from having to physically post evidence, the DWP does not provide a postcode, so it cannot be sent on recorded delivery. This means there is no way to know or prove that evidence has been received, and no way to track it in the event that potentially important and private information is lost. Furthermore, they have expressed to us that it would be useful to have an email address that evidence, as well as other queries, could be sent to. As well as generally improving the accessibility of DWP services, this would also be a way of ensuring a trail of evidence if it is needed.

## Ways to Improve the Benefits System

Key Points:

* Inclusion London does not support the proposed merger of health and disability benefits, as these two benefits are designed to do two different things.
* Inclusion London believes there should be no further cuts to benefits, and that all benefits should be uplifted and caps removed.
* Inclusion London believes that many of the forms of practical support that is listed by the DWP in its Green Paper should already be supplied to Disabled people via social services, the NHS or other statutory bodies. The government must better fund DPO advice and information services so that Disabled people are better able to access these services.
* Inclusion London believes that there needs to be a whole system reform of social security, based on the principles suggested by the Commission on Social Security[[17]](#footnote-18).

### Simplifying the Benefits System

There should be no merge of PIP and Universal Credit/ESA, as discussed in the Health and Disability Benefits Green Paper. These benefits are designed to do different things, and some Disabled people who require PIP are in employment, which could affect their eligibility and financial position. Instead there should be better communication between the different teams in the DWP, so people applying for multiple benefits do not have to duplicate the evidence they submit. The bureaucracy in applying for benefits should be reduced in general, so there is less red tape to navigate for claimants, regardless of how many benefits they are applying for.

Furthermore, Deaf and Disabled People’s Organisations should be fully funded to support Disabled people throughout the entire process of applying for benefits, including support with appealing decisions and providing advocacy, if needed. This will ensure Disabled people are made aware of all the features of benefits that may be useful to them.

However, any moves to “simplify” or “streamline” the benefits system must not involve further cutting the rates of benefits that people receive, or tightening eligibility criteria. Without even considering the previous cuts to benefits, the removal of the £20 uplift to Universal Credit alone has had dire consequences for claimants up and down the country, with the JRF estimating it will push 700,000 more people into poverty[[18]](#footnote-19).

### Practical Support

The Green Paper also makes reference to the possibility of using benefits to pay for aids and adaptations that Disabled people need to live independently. This extra support should already be able to be accessed by Disabled people via the NHS, social services or schemes such as the Disabled Facilities Grant. If Disabled people are not able to access these statutory services in order to access the practical support they need, this is a dire indictment of the lack of funding and resulting ever tightening eligibility criteria that denies people access to services they need to live independently. The government must urgently invest extra funding into these services.

The DWP and local jobcentres and work coaches should have a list of local and national services that they can signpost people to if they are in need of practical support such as advocacy, social care or other services. This should include local Deaf and Disabled People’s Organisations who should be fully funded to provide advice, information and advocacy on a range of issues, including benefits.

### Principles Benefit System Reform Should be Based On

Inclusion London agrees with the principles put forward by the user-led Commission on Social Security, and believes it is essential that the DWP work with Deaf and Disabled People and our organisations to create a fairer social security system for the people that need to use it.

The principles regarding disability benefits are as follows:

“Commission on Social Security Principles for Disability Benefits

● Replace PIP with a new personalised payment to cover the extra costs of disability

● Co-produced by people with lived experience

● Assessments in line with the social model of disability

● Recognise people are experts on how their impairment affects them ● Savings, etc. to be ignored when working out Disability Benefit

● Disability benefit to be dealt with by a new government department completely separate from those ‘helping people get back to work’

● Social care to be free instead of taken from an individual’s disability benefit

● The rate of benefit has to be much higher and more realistic than it is now[[19]](#footnote-20)”

## For Further Information

Contact Inclusion London’s Policy and Parliamentary Officer, Rachel O’Brien, at Rachel.obrien@inclusionlondon.org.uk

1. https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-28-adequate-standard-of-living-and-social-protection.html [↑](#footnote-ref-2)
2. https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-19-living-independently-and-being-included-in-the-community.html [↑](#footnote-ref-3)
3. https://tbinternet.ohchr.org/\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2f15%2f4&Lang=en [↑](#footnote-ref-4)
4. https://www.entitledto.co.uk/blog/2020/february/16-billion-remains-unclaimed-in-means-tested-benefits-each-year/ [↑](#footnote-ref-5)
5. <https://asauk.org.uk/wp-content/uploads/2020/07/Advising-Londoners-Report-30072020-1.pdf> [↑](#footnote-ref-6)
6. https://www.inclusionlondon.org.uk/campaigns-and-policy/campaigning-networks/stopchanges2accesstowork/barriers-work-deaf-disabled-employees-losing-due-changes-governments-access-work-programme/ [↑](#footnote-ref-7)
7. https://www.tuc.org.uk/sites/default/files/DHIWsurveyreportEng.pdf [↑](#footnote-ref-8)
8. https://publications.parliament.uk/pa/cm5802/cmselect/cmworpen/189/18907.htm [↑](#footnote-ref-9)
9. https://publications.parliament.uk/pa/cm5802/cmselect/cmworpen/189/18907.htm [↑](#footnote-ref-10)
10. [Stop Benefit Sanctions now | Inclusion London](https://www.inclusionlondon.org.uk/campaigns-and-policy/facts-and-information/welfare-reform/stop-benefit-sanctions-now/) [↑](#footnote-ref-11)
11. <https://publications.parliament.uk/pa/cm201719/cmselect/cmworpen/955/95502.htm> [↑](#footnote-ref-12)
12. https://www.disabilityrightsuk.org/news/2021/may/82-benefit-claimants-have-died-after-some-alleged-dwp-activity-such-termination [↑](#footnote-ref-13)
13. https://www.inclusionlondon.org.uk/training-and-support/partnership-working/employment-consortium/making-it-work-employment-and-skills-consortium/#:~:text=What%20is%20Making%20it%20Work,by%20the%20City%20Bridge%20Trust. [↑](#footnote-ref-14)
14. https://www.theguardian.com/society/2015/jun/26/mental-health-protest-clinic-jobcentre-streatham [↑](#footnote-ref-15)
15. https://mh.bmj.com/content/41/1/40.full [↑](#footnote-ref-16)
16. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/415177/IPS\_in\_IAPT\_Report.pdf [↑](#footnote-ref-17)
17. https://www.commissiononsocialsecurity.org/draft-proposals [↑](#footnote-ref-18)
18. https://www.jrf.org.uk/report/autumn-budget-why-we-must-keep-20-social-security-lifeline?utm\_medium=email&utm\_campaign=JRF%20weekly%20round-up%20wc%207%20Sept%202020&utm\_content=JRF%20weekly%20round-up%20wc%207%20Sept%202020+Version+A+CID\_aeddecd1a62afe84d6181106615b0377&utm\_source=Email%20marketing%20software&utm\_term=Our%20new%20analysis [↑](#footnote-ref-19)
19. https://www.commissiononsocialsecurity.org/draft-proposals [↑](#footnote-ref-20)