

Independent Age submission to the Work and Pensions Committee Inquiry on health assessments for benefits

January 2022

1. About Independent Age

Independent Age is a national charity. We offer free and impartial advice and information, as well as providing connection services to improve wellbeing and reduce loneliness of people in later life. In addition to this, we use the knowledge and understanding gained from our frontline services to campaign on issues that affect older people, like poverty, health and care.

This submission corresponds to questions 1, 5, 10 and 12a in the Committee's call for evidence, and we have answered in relation to Attendance Allowance specifically. We have set out insight and recommendations in relation to the assessment of Attendance Allowance across the following areas:

- The demand for advice and information on this benefit
- Awareness of the benefit and confusion about who it is for
- Difficulty filling out the claims form for Attendance Allowance, including understanding about the level of detail required
- Availability of support to fill out the claims form, including face to face appointments
- Available formats for submitting the claims form, including digital platforms

In response to question 6 about relying on clinical input for judgements:

- We do not think it would be practical or desirable for decisions about entitlement for Attendance Allowance to be taken on clinician input alone.
- Attendance Allowance relates to every-day activities and clinicians alone would be very unlikely to have a level of knowledge about the individual's home circumstances and life required to be able to inform this decision.

This response builds on oral evidence provided to the committee by Independent Age's Head of Policy and Influencing, Morgan Vine, on 12 January 2022. For more information about this response, contact Anna Davies, Policy Manager anna.davies@independentage.org

2. Independent Age's insight on Attendance Allowance¹

Attendance Allowance is an important benefit to the older people we support at Independent Age

- Independent Age runs a national telephone helpline which provides free information and advice for older people and their families on care and support, money and benefits, housing and health and mobility.
- Enquiries relating to Attendance Allowance made up nearly a quarter - around 22% - of the benefits-related enquiries we received between January - December 2021.

- Our web page on Attendance Allowance was the top page for user traffic in 2021 on the independentage.org site.
- Our factsheet on Attendance Allowance was also the most frequently downloaded of all our factsheets in 2021. There is clearly demand for resources to better understand this benefit.
- Independent Age does not currently undertake case-work with people who call our helpline. Where someone needs additional support to fill out the form for an Attendance Allowance claim we will signpost to other organisations rather than offer this service ourselves. For this reason we have also consulted with an organisation that provides specialist support to make Attendance Allowance claims, Age UK Bromley and Greenwich and used their comments to inform this submission.

There is low awareness of the benefit and confusion about what it entails

- Enquiries that Independent Age receives in relation to Attendance Allowance are fairly evenly split between:
 - those asking about the benefit and what claiming entails, and
 - our advisers needing to make people aware of the existence of the benefit and the fact that someone could be eligible.
- We are aware there is a lack of understanding or awareness about this benefit. We frequently hear it being confused with Carer's Allowance, or people thinking it relates to a carer as one doing the 'attending'.
- People may also assume it relates only to their mobility, because it is compared with Disability Living Allowance (DLA) and Personal Independence Payments (PIP). There is not a good level of understanding that Attendance Allowance is about care needs overall.

The form is long and difficult for people to fill out, particularly if they are doing so on their own

- Many people that we speak to through the Independent Age helpline and advice service tell us that they struggle to fill out the Attendance Allowance claim form due to the length (nearly 30 pages) and detail required.
- For individuals with care and support needs and who may be struggling with day-to-day activities, a form of this length and nature can feel like a major undertaking that requires a lot of energy.
- We are also aware that it can be emotionally difficult for people to spend time detailing all of the things that they struggle to do, rather than being able to focus on what they can achieve. We understand why this information is needed in order to assess a claim, but it is clear some people will need more support to help them with what can be an emotionally draining process.
- Filling out the form in enough detail may require including very personal information e.g. disclosing that you regularly do not make it to the toilet in time. People understandably may worry about writing this down and wonder how secure the information is. A more thorough understanding of how the information on the paper-based form will be protected could help alleviate people's concerns.
- When people have been used to coping with disabilities, they may not identify help with an activity as a 'need'. For example, if you have been used

to getting by with just one bath a week, do you think of it as a 'need' to have one every day?

- When assessing an application, DWP decision makers will be considering whether an activity can be done safely, reliably and in a timely manner. It would be helpful for the notes to be explicit about this. It may be possible for you to have a shower, but the key thing to note is the time it takes, whether you can do this safely and whether you can only do this on a 'good' day. A lack of understanding of this point means people submitting the form on their own are less likely to make a successful claim.

It can be hard to know exactly what level of detail people need to include in order to make a successful claim

- The accompanying notes on the Attendance Allowance form do include some useful definitions and examples. However, since people struggle to know how much detail to go into, it would be helpful to have some fully worked up examples of responses to questions, showing how many sentences can be included. There are resources online that give these sorts of fully worked examples (for example Citizen Advice's very helpful guidance on Attendance Allowance) but not everyone will be able to access these resources, especially if they are not comfortable using the internet.
- People may wrongly assume that by listing a condition, they will be approved automatically for Attendance Allowance. They may assume people understand what this condition means in practice and the impact it has on them day to day. The form and notes should do more to clarify that assessments are based on reports of difficulties with day-to-day activities, not in response to listing a particular condition.
- It may be necessary to repeat points in answer to different questions. The form and notes should make clear the repetition is fine and may be necessary to fully explain all the impacts of a disability.

Support with filling in the Attendance Allowance form is important and likely to lead to a successful claim, but we are concerned there is not enough of this support to meet demand, particularly face to face forms of support.

- Face to face claim support is particularly valuable in relation to Attendance Allowance. When meeting face to face it is possible for someone to observe the older person's movements and any issues like breathlessness first-hand, even if the older person says they are coping. This observation gives a lot of insight about how they may cope at home and highlights the issues that should be included in the claimant's response.
- However, the shift towards digital only support, accelerated by the pandemic, has reduced the amount of face-to-face support available to help Attendance Allowance claimants. When volunteers have been unable to give in-person support, this will have impacted their ability to get a true picture of how the person is likely to be coping at home.
- The Charity Digital Skills Report 2021 found that 83% of charities have adapted their services, pivoting to remote service delivery.² While this can be hugely beneficial in many areas, digitally excluded service users are potentially even more isolated. Over half (52%) of the charities surveyed for

the report were worried about excluding some people or groups and 27% said they need more support around digital inclusion.

- Volunteer-led support can be especially appropriate for Attendance Allowance claims where there is value in having the time to talk to someone at length – volunteers are often able to give this the time it needs. Volunteers can also often spend time with the person after the form has been completed, ensuring their wellbeing is at a good level having just had to think through and document all the tasks they cannot do.
- Independent Age's advice team have observed that the focus of support for Attendance Allowance claims currently seems to be on self-help tools, such as leaflets, guides, etc., to assist people. But, for many of the older people we speak to, this won't be enough; they will need support from another person working alongside them in order to make a successful claim.

In terms of formats for submitting the Attendance Allowance form, choice is key

- Currently, the Attendance Allowance form can be downloaded but there isn't an option to email a submission. Some older people who are online are more comfortable with email than digital platforms so we think this should be an option. For those with access to email, this option would also limit the number of people who have to re-complete the claim form due to the original being lost in the system, and provide evidence of when the form was submitted.
- We understand DWP are considering a digital platform for Attendance Allowance. This will be welcome for many digitally literate claimants but it is essential that a paper-based option for Attendance Allowance is maintained so people have choices of how to apply.

3. Summary of recommendations from Independent Age in relation to assessments for Attendance Allowance

- The Department for Work and Pensions (DWP) should review the guidance and notes that accompany the Attendance Allowance form. They should include some fully worked up examples so that claimants understand the level of detail that should be included in their responses.
- The notes must also make clear that repetition is acceptable and may in some cases be necessary.
- DWP should provide an option for emailing a completed form.
- DWP must maintain a paper-based option whatever decisions are made around a digital platform.
- Some older people who would qualify for Attendance Allowance will only be able to make a successful claim if they get support to fill out the form. DWP should offer financial support to organisations who help people with Attendance Allowance claims to increase the availability of this support, particularly that which is offered in person.