

# Disability Alliance Briefing B11

## Disability Benefit provision in the EC

This briefing contains a summary of the provisions for work incapacity and disability in 37 countries (not including the UK). Schemes which provide for work injury have not been included. The information is based on 'Social Security Programs throughout the World' <sup>1</sup> published by the US Social Security Administration (August 1999), plus information from Government websites for various countries and MISSOC – Social protection in the Member States of the European Union.

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<sup>1</sup> [www.ssa.gov/statistics/ssptw/readme.html](http://www.ssa.gov/statistics/ssptw/readme.html)

## **BELGIUM**

**Qualifying conditions:** Loss of  $\frac{2}{3}$  of earning capacity in usual occupation. 6 months of insurance, including 120 days of actual or credited work and insurance during last quarter.

**Level:** Equal to 65% of lost wages for employee with dependants; 40% if no dependants; 45% if no dependants but living with others with no income. Payable after 1 year of incapacity (1<sup>st</sup> year paid under sickness benefit). Minimum benefit.

For people who do not qualify for a contributory benefit there is the disability allowance. This benefit has three elements: income replacement, integration allowance and a care allowance for older people. Entitlement to the first two elements is based on an annual income tax declaration. If this has not been made, there is a more specific examination of resources.

## **DENMARK**

**Qualifying conditions:** Universal pensions: basic disability pension and universal disability supplement (both income tested) – payable at age 18-66 if working capacity reduced by at least 50% due to physical, mental and/or social reasons.

**Disablement supplement (no test):** Partial compensation of special expenses for physical or mental impairment in terms of lack of working capacity.

**Unemployment supplement (no test):** Partial compensation for total loss in earnings capacity due to 100% physical or mental impairment.

**Permanent total (maximum) disability pension:** 100% disabled due to physical or mental impairment. Payable through age 66, if initial claim for pension takes place at age 18-59.

**Permanent total (medium) disability pension:**  $\frac{2}{3}$  disabled due to physical or mental impairment, aged 18-59 (or, 100% disability if initial claim takes place aged 60-66).

Partial (early or low) disability pension: At least  $\frac{1}{2}$  disabled due to physical, mental or social reasons.

Disability allowance (no income test): Aged 18-66, ineligible for pension due to high earnings, but medically certified to have at least  $\frac{2}{3}$  diminution in work capacity and deafness resulting in serious communication problems.

Outside assistance allowance (no income test): Aged 18-66, requiring personal assistance by third party and in case of blindness or severe vision impairment.

Constant-attendance allowance (no income test): Aged 18-66, requiring constant surveillance or care by a third person.

Level: Set amount based on degree of disability.

## **FRANCE**

Qualifying conditions: Under age 60. Loss of at least  $\frac{2}{3}$  of earning capacity, in any occupation. Entry into insurance 12 months before incapacity and 800 hours of employment in last 12 months, including 200 hours in last 3 months.

Level: 50% of average earnings in highest paid 10 years if incapable of any professional activity, up to max.

Constant-attendance supplement: Maximum yearly amount.

Partial disability: 30% of average earnings in highest paid 10 years. Minimum and maximum amount.

There is a non-insurance non-means-tested disability benefit in France payable to people over 80% disabled. The claimant may also be eligible for an attendance allowance paid directly to a care provider, an allowance for social housing, and a card which allows the claimant exemption from the TV licence, some tax concessions and free transport.

Those people with disabilities who are not 80% disabled but who cannot work and who do not have a work history must apply for the French equivalent of Income Support.

## **GERMANY**

Qualifying conditions: General disability, incapacity for any gainful activity. Occupational disability, 50% reduction of earning capacity in usual occupation. Total of 60 months coverage and 36 months of contribution out of last 5 years.

Level: Pension factor for general disability, same as old-age benefits; for inability to perform previous employment, pension factor is 0.667. If disability occurs before age 60, the period up to age 55 is fully taken into account together with 1/3 of the period from age 55-60 up to maximum of 20 months.

Long-term care benefits: Payable in 3 stages: Substantial need for care for at least 1 daily procedure. Severe need for care with need for daily procedure 3 times per day. Critical need for care with need for round-the-clock care.

In addition, all 3 stages must have need for home health care. In 1999, to be eligible, the insured must have at least 4 years' and from year 2000 at least 5 years' coverage in a long-term care fund.

## **GREECE**

Qualifying conditions: Loss of 80% of normal earning capacity for 100% disability; at least 50% loss for partial disability. Worker must have 4,500 days of contribution or 1,500 days, including 600 days in 5 years preceding incapacity. For those not yet age 21, 300 days required in 5 years preceding disability, with this number gradually increased to 4,200 days by adding 120 work days for each year after age 21.

Level: Same as for old-age pension, including supplements. Pension begins after cash sickness benefits end.

Serious disability, loss of 80% of normal earning

capacity: full old-age pension.

Ordinary disability, loss of 67-79% of earning capacity: 75% of full old-age pension.

Partial disability, loss of 50-66% of earning capacity: 50% of full old-age pension. Minimum pension.

Social assistance in Greece is very limited. Until recently, the main form of social assistance protection was aimed at the coverage of emergency situations, such as earthquake victims or refugees.

Income maintenance measures for people with physical or mental disabilities are characterised by their diversity and complexity. There is no single categorical scheme for mentally and physically disabled people rather a series of different schemes for people in different categories.

Different levels of benefits apply to the different categories of disabled people. The categories are also subdivided and have different levels of benefit again. Criteria vary widely for the various categories and sub-categories, with the result that it is often claimed that there is discrimination between the different groups of disabled people.

## **IRELAND**

Qualifying conditions: Permanent incapacity for work, payable after 1 year's ordinary sickness benefit (or less than 1 year, if severe incapacity). 260 weeks of paid contribution with 48 weeks paid or credited in last tax year.

Blind person's pension (means tested): Residents with low vision and of limited means, aged 18 or older.

Disability allowance (means tested): Residents with limited means, aged 16-66, physically or mentally disabled, and substantially handicapped in undertaking suitable work.

Carer's allowance (means tested): Residents with limited means, aged 18 or older, living with and caring for disabled (or aged requiring constant

attendance) at home. Carer not otherwise employed and not receiving any other social welfare benefits.

Level: Set amounts.

## **ITALY**

Qualifying conditions: Total (more than two-thirds) and permanent inability to perform any work. 5 years of contributions, including at least 3 years in 5 years preceding application. Disability pensions are subject to an income test (3 times minimum pension).

[No work period or qualifying period required for sickness benefit – payable 6 months.]

Level: Same as old-age pension plus increment based on number of years until normal pension age. Benefit reduced 25% if beneficiary earns equivalent of 4-5 times the minimum annual social security pension; reduced 50% for earnings that exceed 5 times. Minimum pension.

Disability allowance: Loss of  $\frac{2}{3}$  working capacity. Contribution requirements same as for disability pension. Same as old-age pension. Payable for 3 year period. After 2 re-determinations of disability, the benefit becomes permanent.

There is no national system of social assistance in Italy. Instead there are particular national means-tested programmes for older and disabled people, coupled with local assistance schemes and church and voluntary relief schemes. Administration of almost all benefits is local and there are substantial regional variations. Italy relies on local authorities, the Church, voluntary bodies and 'grandmother welfare' to substitute for an official safety net.

## **LUXEMBOURG**

Qualifying conditions: Under age 65. Inability to perform former occupation or any similar occupation permitted to person's strength and aptitude. 12 months of coverage during the 3 years before onset of disability.

[No work period or qualifying period required for sickness benefit – payable 52 weeks.]

[No qualifying period if invalidity is caused by an injury of any kind or occupational disease (no indication if this would cover incapacity from birth – looks work related.)]

**Level:** Same as old-age pension. If disability occurs before age 55, pension is calculated to age 55 on imputed average earnings of the insured from age 25 to date of disability onset. Minimum pension if insured for 40 years.

Severe Disability Allowance was introduced in 1979 and is means-tested, intended for those over three years old who are disabled to the extent that they need constant help from another person. A means-tested benefit was introduced in 1989 for someone looking after a person aged over 65 who needs constant care.

## **NETHERLANDS**

**Qualifying conditions:** Loss of over 80% of earning capacity in current occupation for full pension, or 15% to 80% for partial pension under system for employed workers, or 25% to 80% for unemployed workers or resident persons disabled since childhood and students.

**Level:** For employed workers: Up to 70% of earnings for at least 80% disability and 14% to 50% of earnings for 15% to 80% disability.

Constant-attendance supplement: 30% of full pension.

For unemployed workers: Up to 70% of earnings for at least 80% disability and 14% to 50% of earnings for 25% to 80% disability.

For resident persons disabled since childhood and students: Up to 70% of minimum wage for at least

80% disability and payments of 14% to 50% of minimum wage for 25% to 80% disability.

## **PORTUGAL**

Qualifying conditions: Loss of  $\frac{2}{3}$  of earning capacity. 60 months of contribution.

Social pension – 18 or over with no coverage under any contributory social security programme.

Level: 2% of average annual earnings during highest 10 of last 15 years times years of insurance. Minimum monthly pension: 30% of average earnings or a minimum fixed amount depending on the number of contributions, whichever is higher. Maximum monthly pension: 80% of average earnings. Fixed amount constant-attendance allowance.

## **SPAIN**

Qualifying conditions: Loss of normal earning capacity. If under 26, contributed for  $\frac{1}{2}$  the time between age 16 and date of disability; over age 26, contributed for  $\frac{1}{4}$  the time from age 20 to date of disability, with at least 5 years of contributions and with at least  $\frac{1}{5}$  of the required contributions in last 10 years.

Level: For permanent total disability for all work, 100% of benefit up to maximum earnings for contribution purposes.

Constant-attendance supplement: 50% of pension.

For permanent total (occupational) disability (reduction of 100% of capacity to work in own trade or profession), 55% of benefit base, plus 20% if age 55 or over.

For permanent partial disability (33% reduction of capacity to work in own trade or profession), lump sum equal to 24 monthly payments of 75% of benefit base.

Periodical non-contributory disability benefits are awarded for persons suffering from predictably permanent deficiencies, of a physical or mental nature, whether congenital or not, which annul or modify their physical, mental or sensorial capacity. There is also a mobility subsidy.

## **AUSTRIA**

Qualifying conditions: Loss of 50% of normal earning capacity and 60 months of contribution in the last 10 years or 180 months of contributions in total.

Level: 1.83% of average earnings in best 15 years for each of first 30 insurance years, plus 1.675% for each insurance year from 31-45. Maximum pension, 80% of average covered earnings. Additional supplement of 1.83% of earnings for each year of disability which occurred before age 56, up to maximum of 60% of earnings. Child's supplement for each child under age 18 (27 if student, no limit if disabled.)

Care Benefit: Persons in need of personal care may be entitled to a monthly benefit depending on amount of care needed.

## **FINLAND**

Qualifying conditions: Universal pension (income-tested) – permanent incapacity for suitable work, aged under 65. Same as old-age pension. Full pension if resident of Finland, 80% of time after age 16 and before disability or disabled before 21 while resident of Finland.

Early disability pension: Payable age 58-64, unable to work due to mental or physical exhaustion.

Disabled person's allowance: Aged 16-64 who are not pensioners. Amount depends on harmful effects of illness or injury, the need for assistance, and for additional expenses caused by illness or disability.

Level: Earnings-related disability pension: 1.5% of wage for each year of service up to onset of disability. For projected service (time between onset of disability and retirement age 65), 1.5% to age 50, 1.2% from age 50 to 60, and 0.8% from age 60 to 65. Maximum: 60% of pensionable earnings (including

universal disability pension). Partial pension,  $\frac{1}{2}$  of full pension (if loss of capacity is between 40-59%).

Rehabilitation benefit (for treatable disability): Same as full or partial-disability benefit, plus 33% increment for periods of active vocational rehabilitation arranged for the applicant by the employer.

Child care allowance: Children under 16 with disability or long-term illness.

## SWEDEN

### Old system

Qualifying conditions: Both universal and earnings-related pensions-disability pension may be granted as a full pension,  $\frac{3}{4}$ ,  $\frac{1}{2}$  or  $\frac{1}{4}$  of a pension, respectively. Resident in Sweden, or credited with pension points, for at least 3 years. A full pension requires 40 years' residency during ages 16-64 inclusive, or 30 years with pension points. The pension is reduced by  $\frac{1}{40}$  or  $\frac{1}{30}$ , respectively, for each year residency or pension points falls short.

### New system

Both universal and earnings-related disability pension may be granted as a full pension.  $\frac{3}{4}$ ,  $\frac{1}{2}$  or  $\frac{1}{4}$  of pension.

### Level:

Universal disability pension: 90% of reduced current base amount, multiplied by the accrued number of fortieths or thirtieths, to a single pensioner, or 72.5% to a married pensioner.

Supplements: 111.5% of reduced base amount with accruals, if ineligible for earnings-related pension; constant-attendance supplement, up to 65% of base amount.

Partial disability:  $\frac{3}{4}$ ,  $\frac{1}{2}$ , or  $\frac{1}{4}$  of a full pension.

Earnings-related disability pension: Computed same as old-age pension except credit given for years up to age 65 if certain prior coverage requirements are met.

Partial disability:  $\frac{3}{4}$ ,  $\frac{1}{2}$ , or  $\frac{1}{4}$  of a full pension.

## **POSSIBLE FUTURE EU COUNTRIES**

### **CYPRUS**

**Qualifying conditions:** Permanent incapacity for work. Contributions paid for at least 3 years and earnings in lower band are 156 times weekly basic earnings, and weekly average earnings since 1964 or age 16 are 25% of basic earnings, plus paid or credited contributions in previous year must correspond to at least 20 times weekly basic earnings.

**Level:** Basic pension same as old-age pension, including dependants' supplements.  
Supplementary pension: For each year of contribution, the total weekly average credited earnings projected to age 63 on the basis of average earnings during the 5 years preceding disability, multiplied by 1.5%.

### **CZECH REPUBLIC**

**Qualifying conditions:** Total disability (66% loss of earning capacity), or partial disability (33% loss of earning capacity), 5 years of insurance in last 10 years (up to 4 years if under age 28).

**Level:** For total disability, basic amount plus earnings-related portion. Percentage amount is calculated from the calculation base (1.5% of the calculation base for every year of insurance), and the number of years of insurance. Minimum pension: same as for old-age pension.  
Partial disability: Basic amount plus earnings-related portion, 0.75% of the calculation base for every year of insurance.

### **ESTONIA**

**Qualifying conditions:** Full or partial permanent or long-term disability for work regardless of pensionable length of service.

**Level:** In three categories, depending on the degree of disability. Benefit categories are 295%, 250% and 195% of national pension rate.

Disabled child under 16: 200% of national pension (210% if entitled to survivor pension, 255% if orphan).

## HUNGARY

**Qualifying conditions:** 67% loss of working capacity and improvement not expected within one year. Either not working or whose income significantly less than prior to onset of disability.

**Level:** For total disability, 51% of average net earnings since 1 January 1988 if less than two years of coverage, increasing by steps to 63% for 25 years coverage. Thereafter, equal to old-age pension plus 5%.

The following non-contributory schemes also exist for disabled people in Hungary:

**Personal annuity for blind persons:** for those blind people who still live in a family.

**Invalidity annuity:** for disabled people above 18 years of age who lost their capacity for work before 25 years of age.

**Transport support for physically disabled persons:** for seriously disabled persons (as certified by medical experts) whose family income per capita is equal to or below 250% of Current Minimum Old-Age Pension.

**Special Family Support:** for disabled people under 20 years of age living in the family.

## POLAND

**Qualifying conditions:** Total disability (incapacity for any work) or partial disability (greatly impaired earning capacity or total incapacity for usual work). 5 years of employment during last 10 years (1-4 years if under age 30); disability occurred during the course of employment or within 18 months of cessation of work.

**Level:** In case of total disability the benefit is calculated in the same way as old-age pension.

Constant-attention supplement: Set amount.

Partial disability pension: 75% of the amount of total disability pension.

Poland has no social assistance scheme and membership of the social protection scheme is based on contributions. Disabled people who are not members of the new privately provided scheme will have to rely on family help, or may be in institutions.

#### **SLOVENIA**

Qualifying conditions: Incapacity for all work (total disability) or greatly reduced capacity for regular or equivalent work (partial disability). Coverage for at least  $\frac{1}{3}$  of years after age 20 ( $\frac{1}{4}$  if under age 30).

Level: Minimum: Same as old-age pension, except that pensions of workers under age 63 (men) or 58 (women) increased by 10% to 20% of pension according to years of coverage. If disability before age 63 (men) or 58 (women) and less than 20 years of insurance; coverage, minimum pension is 45% (men) or 55% (women).  
Constant-attendance allowance provided where necessary.  
Partial disability: 80% of earnings, or until suitable employment is found.

#### **BULGARIA**

Qualifying conditions: Permanent or long incapacity for work incurred no later than 2 years after work termination; 5 years of service, or 3 years if age 20-25; none if under 20 and insured.

Social pension (income-tested) – totally disabled and aged over 16 – set amount.

Level: Total disability, 55% of average earnings during last 12 months.

Supplement for total disability (and old-age pensioners) requiring constant attendance: 75% of social pension.

Partial disability: incapacity for usual but not all work, 55%, 40% or 25% of earnings, depending upon degree of disability.

Increment of 5% of pension if 10-15 years of service, 10% if 15-20 years, or 15% if over 20 years coverage (50 and 20 for women).

Minimum disability pension for ordinary illness, depending on degree of disability: 1<sup>st</sup>, 2<sup>nd</sup> or 3<sup>rd</sup> degree, 140%, 130% or 115% of social pension respectively.

## **LATVIA**

Qualifying conditions: 3 years of insurance.

Covers people in receipt of sickness benefit for which there is no qualifying period.

Level:

Pension is granted according to three categories of disability.

Category I: 0.45 times average wage in 3 consecutive of last 5 years, plus average wage times ratio of years actually contributed to total possible number of years between age 15 and retirement. Minimum of 1.6 times the minimum state social security allowance.

Category II: 0.4 times average wage in 3 consecutive of last 5 years, plus average wage times ratio of years actually contributed to total possible number of years between age 15 and retirement. Minimum of 1.4 times the minimum state social security allowance.

Category III: Minimum state social security allowance.

## **LITHUANIA**

Qualifying conditions: Disability involving either permanent or prolonged incapacity for work, from 1 to 30 years of contributions (men) or from 1 to 28 years (women), depending on age.

[Covers permanent resident with no minimum qualifying condition for sickness and medical

benefits.]

Level: Varies according to degree of disability.  
Total disability: 100% of old-age pension.  
Constant attendance allowance: 50% of basic old age pension.  
Partial disability: 50% of old age pension.

## **MALTA**

Qualifying conditions: Total permanent incapacity for suitable full-time or regular part-time work. 250 weeks of paid contributions as employee or self-employed, with annual average of 50 weeks paid or credited.  
Reduced pension if 20-49 weeks.

Also means-tested (whole family) non-contributory benefits

- Blindness pension: over 14 and unable to perform any work for which eye sight is essential
- Handicapped pension: over 16
- Carers' pension: Single or widowed citizen full-time care of bedridden or wheelchair bound near relative.
- sickness assistance: Suffering from a chronic disease or condition that requires a special diet.<sup>2</sup>

Level: Benefits vary, depending on whether a service pension is payable and whether the person is married and supporting his wife.

The constitution of Malta states: (1) Every citizen incapable of work and unprovided with the resources necessary for subsistence is entitled to maintenance and social assistance.

(2) Workers are entitled to reasonable insurance on a contributory basis for their requirements in case of accident, illness, disability, old-age and involuntary unemployment.

(3) Disabled persons and persons incapable of work are entitled to education and vocational training.

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<sup>2</sup> Official website of Maltese Government.

How this translates into actual benefit entitlement, or even if it does, isn't clear.

## **ROMANIA**

Qualifying conditions: Incapacity for all work (total disability) or for regular work (partial disability). 1-22 years (men) or 1-17 years (women) of employment, according to age when disabled.

Constant-attendance supplement: Total disability requiring constant attention.

Partially disabled may work half-time.

Level: 49% to 70% of reference earnings depending on length of employment.

Constant-attendance supplement: Set amount for total disability pension only.

Partial disability: 85% or 60% of total disability pension depending on degree of disability.

Reduced pension if at least half of qualifying period completed.

There is no social assistance scheme and no non-contributory disability benefits.

## **SLOVAK REPUBLIC**

Qualifying conditions: Total disability (disabled for all work), or partial disability ( $\frac{1}{3}$  loss of earning capacity). 5 years of employment in last 10 years (1-4 years if under age 28).

Level: 50% of average earnings during highest 5 of last 10 years, plus 1% of earnings per year of employment between 26 and 42 years. Minimum pension. Higher rates for unhealthy and arduous occupations.

Constant-attendance supplement: according to degree of disability.

Reduced pension: 2% of earnings times years of actual and credited employment.

Dependants' supplements: for wife aged 65 or disabled.

Partial disability: 50% of total disability pension. To receive pension, individual does not qualify for old-age pension, or is not disabled due to industrial injury.

There is no general social assistance scheme.

## **OTHER OECD COUNTRIES**

### **AUSTRALIA**

Qualifying conditions: Social security (means tested unless blind): Age 16 to 65 (men), 16 to 61 (women). Minimum 20% impairment level and an inability to work 30 hours a week at full wages, or be retrained for such work for at least the next 2 years, due to a physical, intellectual or psychiatric impairment or permanent blindness. Resident and physically present in country.

Wife pension (means-tested) paid when both disability pensioner and wife are over 21 (unless there are children).

Carer payment (means-tested): Paid to provider of constant care at home for a social security or veteran's income support recipient who has a physical, intellectual or psychiatric disability (including a profoundly disabled child); or for 2 or more disabled children.

Mobility allowance (not means-tested): Paid to disabled person age 16 or more who cannot use public transport without substantial assistance.

Level: Set amounts.

### **CANADA**

Qualifying conditions: No universal pension. Earnings –related pension: Severe and prolonged incapacity for any gainful activity. Contributions in 4 of the last 6 years. (Quebec only, half the years in which contributions could have been made, but at least 2 years of contribution.)

**Level:** Payment of earnings-related pension at basic amount plus 75% of retirement pension with maximum amount.

Each of Canada's ten provinces and two territories designs, administers and delivers its own social assistance programme to persons with insufficient income. Entitlement is based on a needs test, which takes into account the assets and income of an applicant's household and its basic needs. A person with a disability, who has a substantial physical or mental impairment that is continuous or recurrent and expected to last one year or more, may be eligible for income support. The disability has to result in a substantial restriction in his/her ability to attend to personal care, function in the community, or function in the workplace.

## **ICELAND**

**Qualifying conditions:** Universal pension, age 16-66. Three years' residency in Iceland before submitting application, and 75% reduction in working capacity; full pension, 40 years' residency.

Occupational pension, at least 50% reduction in working capacity, 24 months of contributions and a reduced income.

**Level:** Income-regulated basic pension. Income-tested supplementary allowance. For couple, if both are disabled, 90% each of single rate. Supplement for children. Other means-tested allowances such as for housing and medicine.  
Partial pension payable for 50% to 84% disability.

## **JAPAN**

**Qualifying conditions:** For Class I, total disability requiring constant attendance: for Class II, disability severely restricting ability in daily living.  
Contributions paid or credited during 2/3 of period between age 20 and disability onset.

**Level:** National pension programme paid according Class I or II. Dependents supplement.  
Employees' pension insurance: Class I, 125% of old-age pension plus additional amounts for dependants; Class II, 100% with a minimum benefit. Lump-sum

grant: 200% of old-age pension payable with minimum. Dependants supplement.

### **KOREA (SOUTH)**

Qualifying conditions: Disabled as result of disease or injury occurred during the insured period, and has paid contributions over 2/3 of the insured period, plus period as recipient of disability pension.

Level: For total disability, same as old-age pension. For partial disability, benefits reduced by up to 40% depending on degree of incapacity to work.

### **MEXICO**

Qualifying conditions: 50% reduction in customary earning capacity. 150 weeks of contribution. May continue to work in different job.

Level: Old system: Same as old-age pension.  
New system: 35% of average earnings in the last 500 weeks of contribution plus family allowances equal to 15% of pension.

Someone who is working appears to have to support his/her dependants from their wages.

### **NEW ZEALAND**

Qualifying conditions: Invalid benefit: Permanent and severe restriction in capacity for work, or total blindness. Residence during last 10 years; income-tested. Personal earnings of totally blind person are exempt. Must be over 16 years of age.

Level: Set amounts. Additional payments for dependant children.  
Other assistance available (some needs-tested) such as accommodation supplement, advances for maintenance and repairs to the home, training incentive allowance, transition to work allowance, disability allowance, special needs grants.

### **NORWAY**

**Qualifying conditions:** Both universal and earnings related pensions; earning capacity permanently reduced 50% or more, aged 16-66. Universal disability pension: 3 years' coverage immediately preceding claim (1 year in some instances). Payable abroad under special conditions.  
Earnings-related disability pension: 3 years' earnings above base amount; payable abroad.

Non working spouses, the unemployed, students and others without wages are excepted from social security tax, but they still qualify for social security benefits. People with congenital disabilities or who have been disabled from an early age, also qualify for disability benefits<sup>3</sup>.

**Level:** Universal disability pension: Up to 100% of base amount if totally disabled. 40 years of coverage for full pension; computed as if covered through 66<sup>th</sup> year if certain coverage conditions are met.  
Partial disability, reduced pension in proportion to loss of earning capacity.  
Minimum 50% of projected old-age benefit.  
Income-tested supplements: 50% of pension for spouse aged 60 or over; 30% of base amount for each child under 18; up to 61.55% of base amount if ineligible for earnings related pension.  
Constant-attendance supplement.

## **SWITZERLAND**

**Qualifying conditions:** Full pension if at least 66.6% disabled. Half pension, if at least 50% disabled; partial pension, at least 40% disabled in social cases. To receive full a pension, contributions must be made in all years from age 21.  
Minimum: one year of contributions.

**Level:** Full pension, half or quarter pension depending on degree of disability. Partial pension: Percentage of full pension according to relationship between the insured's years of contributions and those of their age group.

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<sup>3</sup> Internet – ODIN Ministry of Foreign Affairs.

Dependant supplement: Wife, 30% of pension. Child under age 18 (25 if student), 40% of pension.

Special pension for Swiss nationals who do not meet the requirements of minimum duration of contribution.

Mandatory occupational pension: 7.2% of funds that would be accumulated to retirement age. Full pension if 2/3 disabled; half pension if 50% disabled.

Social assistance plays only a minor role in the overall social security system, in which most needs for social protection are met through insurance-based provision. Social assistance is also regarded as a subsidiary payment in the sense that claims against close relatives must be exhausted before it may be awarded. Anyone in need, defined by law as anyone who cannot subsist at an adequate level by their own means, is entitled to claim social assistance, subject to the principle of subsidiarity.

Benefit is payable following an analysis of the claimant's budget. This means that a social worker estimates a person's needs using model expenditure budgets, but taking account of the individual's circumstances. There are no set limits in law for duration of entitlement but the normal expectation is that social assistance is a temporary benefit, except for older and disabled people.

## **TURKEY**

Qualifying conditions: Loss of 2/3 of working capacity. Must have been entitled to old-age pension, or had 5 years of coverage with an average contribution of 180 days per year, or, 1,800 days of contribution.

Level: Disability pension to be calculated during last 5 years. 70% of average indexed earnings. Social support supplement payable at flat rate.  
Constant-attendance allowance supplement: Pension increased to 80%.  
Minimum and maximum pensions.

There is no social assistance scheme and the social protection scheme requires contributions. It is probable that a disabled person who was not a member of the scheme and had no contributions would have to rely on their family for help.

## UNITED STATES

**Qualifying conditions:** Inability to engage in substantial gainful activity due to impairment expected to last at least one year or result in death. Insured: 1 quarter of coverage for each year since age 21, up to year disability began; maximum, 40 quarters of coverage. Also 20 quarters of coverage in the 10 year period before disability began.

More liberal requirements for young and blind.

### Level:

Based on covered earnings averaged over period after 1950 (or age 21, if later) and indexed for past wage inflation, up to onset of disability, excluding up to 5 years with the lowest earnings.

No minimum benefit for workers becoming disabled after 1981. A maximum amount for workers becoming disabled in 1999.

Dependants allowance: 50% of worker's pension paid to wife or husband (or divorced spouse, if marriage lasted 10 years) at age 65 (reduced if 62-64) or to wife or husband of any age caring for a child under age 16 or disabled; to each child (or dependant grandchild) under age 18 or age 18-19 and attending elementary or secondary school full time (no age limit if disabled before age 22).

Maximum family pension ranges from 100% to 150% of worker's basic pension.

Means-tested allowance payable to needy disabled and blind under SSI programme.

**Supplemental Security Income:** Is a means-tested, federally administered income assistance programme for older, needy people (age 65 and over) and blind and disabled people.

Alongside having limited income and resources, a person must satisfy the programme criteria for age, blindness or disability. The disability condition involves being unable to engage in any substantial gainful activity by reason of a medically-determined physical or mental impairment which is either expected to result in death or has lasted, or can be expected to last, for a continuous period of at least one year. A child of any age under 18 who has an impairment of comparable severity to that of an adult may be considered disabled.

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Disability Alliance – July 2000