

# **DISABILITY ALLIANCE BRIEFING B12**

## **DISABILITY BENEFITS IN EC AND OTHER COUNTRIES - SUMMARY**

Disability benefits have been compared in 14 EC countries:

Belgium	Denmark	France	Germany
Greece	Ireland	Italy	Luxembourg
Netherlands	Portugal	Spain	Austria
Finland	Sweden		

12 possible future EU countries

Cyprus	Czech Republic	Estonia	Hungary
Poland	Slovenia	Bulgaria	Latvia
Lithuania	Malta	Romania	Slovak Rep

and 11 other OECD countries:

Australia	Canada	Iceland	Japan
Korea (South)	Mexico	New Zealand	Norway
Switzerland	Turkey	United States	

Only disability/incapacity benefits were considered but where there was no entitlement without a contribution record, entitlement to sickness benefit was checked.

The majority of countries pay a pension because of loss of earning capacity, from total inability to work through 2/3 loss of capacity – the most common yard stick – to 50% loss. There is a mix of non-means and means-testing. In many cases there was also a minimum contribution record required.

There are two main methods whereby people without a contribution record qualify for benefit, however, the main source of care may not always be the state. In some countries it is difficult to see how a person too disabled to work would ever qualify.

The first of the methods of qualifying for benefit is through 'derived rights'. In some countries, it is not necessary for the actual claimant to have been a member of a social security scheme to receive a benefit. It is possible that a

working person (often but not always a parent) is the member of the scheme, and the family of this person then 'derive' rights from this membership.

The second possibility is that claimants who do not qualify for payments under a social insurance scheme are living on benefits from a social assistance scheme, where qualification is dependant upon a means-test. In many countries, this will be a family means-test rather than one based on the individual's income.

In some southern European countries, the benefit schemes are not fully developed and the family is still the main source of support for disabled people. In former communist countries, it is still common to find that care for people with disabilities is provided by institutions.

There does not appear to be any help for disabled people without a contribution record in Cyprus, the Czech Republic, Romania, the Slovak Republic, Mexico or Turkey. It is also very limited in a number of other countries. In Italy any provision is via the local authority, the Church, voluntary bodies or the family. Provision in Greece is both limited and fragmented. If a person is less than 80% disabled in France they will have to rely on the French equivalent of income support. In Switzerland payment is only available after claims against close relatives have been exhausted and the level of payment is determined following an analysis of the claimant's budget.

Some countries also pay an outside assistance allowance (Denmark) or a constant attendance allowance or carers allowance (Denmark/Ireland/Romania/Slovenia/Australia). It is not always clear from the limited information available to whom the allowance is paid.

Australia pays a non means-tested mobility allowance for people age over 16 who cannot use public transport without substantial assistance. Some help is given in France for people who are at least 80% disabled, in Spain there is a mobility subsidy, in Hungary support is given following a means test of the family and Norway appears to provide adapted cars.

Denmark also pays a disablement supplement that is intended as a partial compensation of special expenses for physical or mental impairment, but this is also in terms of lack of working capacity.

Finland is the only country among those looked at where a disabled person's allowance is paid based on the harmful effects of illness or injury, the need for assistance, and for additional expenses caused by illness or disability, rather than because of loss of earning capacity. Although other countries do pay

towards the need for somebody to be in attendance.

The Norwegian Ministry of Foreign Affairs web page states 'Social security also provides dysfunctional persons with support for medical expenses, practical help and care at home, the acquisition of mobility and other aids, and if necessary even a specially equipped car'. In addition the web site states that people with congenital disabilities or who have been disabled from an early age, also qualify for disability benefits.

New Zealand offers, in addition to invalid benefit, accommodation supplement, advances for maintenance and repairs to the home, training incentive allowance, transition to work allowance, disability allowance and special needs grants.

The information is based on the publication "Social Security Programs Throughout the World" published by the USA Social Security Administration in August 1999. Reference was also made to MISSOC - Social protection in the Member States of the European Union and various web sites.

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Disability Alliance  
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