

Disability Alliance

R50: Response to the quinquennial Review of the Independent Living Fund

- 1) Disability Alliance (DA) welcomes the opportunity to contribute to the 2006 quinquennial review of the independent living fund (ILF). DA is a national registered charity with a principal aim of relieving poverty and improving the living standards of disabled people. Our eventual aim is to break the link between poverty and disability.
- 2) The Alliance is a membership organisation with over 350 members which range from small self-help groups to major national disability charities. We are controlled by disabled people who form a majority of our Board of Trustees.
- 3) DA are best known as the authors of the Disability Rights Handbook, an annual publication with a print-run of 30,000, but we also produce a wide range of guides to benefits and related subjects. We aim to provide information on social security benefits to disabled people, their families, carers and professional advisers. We also undertake research into the needs of disabled people, with a particular emphasis on income needs. We run a Tribunal Support Unit to assist other advisers with appeals against decisions on disability benefits.
- 4) Due to staffing changes, DA has been unable to give this important review the attention that it deserves, unfortunately. Thus, we have been unable to gauge members' opinions and gather evidence as we would like, although we did highlight the review via our website.
- 5) DA does, however, want to make some suggestions in respect of the future of the ILF.

What do you believe to be the strengths and weaknesses of the ILFs?

- 6) DA believes that an important strength of the ILF is the fact that entitlement is not subject to local authority financial pressures in respect of social care provision. This avoids the possibility of a “post-code lottery” situation arising, in terms of individuals with similar levels of care and support receiving variable levels of required services.
- 7) An obvious weakness, however, is how the national scale of the ILF appears somewhat paradoxical in light of government drives towards localism in terms of social care provision and individual budgeting, which is more in tune with local services and needs.
- 8) DA would, however, reiterate that applying a national standard of financial support for care services, based on local assessments, appears to be the fairest method of ensuring a more-or-less universal regime of entitlement to ILF, at least in the next few years.
- 9) We would also raise a weakness; ILF payments cease following a decision to reduce or remove a person’s Disability Living Allowance (DLA) high rate care component, for instance, when they renew their DLA claim. This measure appears unnecessarily punitive, considering the fact that approximately 50% of appeals against such DLA decisions are successful.
- 10) DA would like to see the continuation of ILF payments in these circumstances, pending the outcome of an appeal against the DLA decision. The number of recipients affected by the situation is relatively small, yet the effects on their care and support services can be dramatic, leading to disruptions and stress. For the ILF fund, the overall financial impact would be relatively minor, given the low numbers affected.

How do you see the ILFs relating to other ‘cash for care’ models (notably Direct Payments and Individual Budgets)?

- 11) As noted above, DA is aware of the moves towards an increasingly local approach to social care and support, and endorses the attempts to allow disabled people to have more control over what support they receive, as well as in how they receive it.
- 12) However, Direct Payments are made to a wider range of people than under the ILFs. Also, Direct Payments are essentially used as the locally assessed passport onto ILF assistance, which does to some degree help to achieve the local focus.
- 13) In terms of Individual Budgets, we feel that it is simply too soon into this programme to consider cutting or substantially changing the fundamental nature of the ILFs. There will undoubtedly be some element of duplication between ILFs, Direct Payments and Individual Budgets, but we would recommend a thorough evaluation of these three packages before making any major decisions.

Are current arrangements for delivering the ILFs best suited to its purpose within a changing policy context?

What changes, if any, do you believe are required in the way in which the ILFs operate?

- 14) Presently, and for the reasons stated above, it is our view that the ILF should continue largely as is at present. This would allow Direct Payments to continue to evolve at a local level, Individual Budgets to bed in, and for a comprehensive evaluation of all three approaches to be carried out over an appropriate length of time.
- 15) DA cannot comment in any more depth on the operation of the delivery of ILFs due to a lack of hard evidence. We have, however, been made aware of concerns over the amount of other social security benefits required to top-up ILF funds, of issues around administration and bank accounting procedures,

and with the cost of securing some local authority services seeming disproportionate in certain areas.

- 16) We would also raise the issue of the 65-year-old cut-off point for entitlement to ILF. There are many people older than this who require home care and support and who should be considered for inclusion within the scheme.
- 17) We trust that you will find out comments helpful in terms of this review and look forward to receiving details of the outcome in due course.

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Disability Alliance

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