



DBC PIP Provider Pledges Report Executive Summary

Who we are

The Disability Benefits Consortium (DBC) is a national coalition of over 60 different charities and other organisations committed to working towards a fair benefits system (a full list of current members is included in the report).

Using our combined knowledge, experience and direct contact with disabled individuals and carers, we seek to ensure Government policy reflects and meets the needs of all disabled people.

Introduction

The DBC has serious concerns about the policy design behind the new Personal Independence Payment (PIP) assessment. However, we also recognise that the way in which the assessments are delivered will have a significant impact on both the experience of claimants and the accuracy of the outcome they receive.

Based on our experience of the Work Capability Assessment (WCA) and our direct experience of working with disabled people, we formulated a set of ten pledges that we felt the PIP providers would need to meet in order to deliver an assessment that is as fair and effective as it can be.

We have asked the two appointed providers, Atos and Capita, to explain how they will meet these pledges. We will use their responses to call for changes at an early stage, where we believe one provider has presented a better proposal than the other, and to hold the providers to account and call for improvements to their services in the long term.

This executive summary introduces the pledges, briefly details how the providers plan to meet them, and outlines the key differences between the two approaches. We then set out a number of recommendations highlighting how each of the providers and the DWP can improve the process to make it better meet the needs of disabled people.

Key issues

Following our engagement work with them to produce this report we have identified the following top five recommendations relating to the two assessment providers:

1. **Home visits and scheduling of appointments** - Atos should follow the lead of Capita and give claimants a choice of a home visit or a centre based assessment, and a choice of possible dates and times rather than requiring them to request a change to a slot that is provided to them. It is also vital to monitor whether Capita's approach is carried out effectively in practice.
2. **Matching claimants with the right assessors** – Atos should look to match assessors with specific expertise to claimants with relevant conditions. Capita have said that they will do this but only “where possible”. It is therefore important to monitor whether this actually happens in practice.

3. **Additional evidence** – Both providers should remind claimants, in all standard communications, of the importance of providing additional evidence if they have not already done so. Extra efforts should be made to seek additional evidence in cases where claimants are vulnerable, have difficulties self-reporting their condition (such as claimants with cognitive, intellectual or mental impairments), or where claimant's conditions fluctuate.
4. **Assessor accountability** - There should be a clear DWP and provider mechanism for ensuring that assessors are held to account if their recommendation was inappropriate due to a poor assessment, insufficient attention paid to additional evidence, or failure to collect additional evidence.
5. **Assessor training** – Both providers should work with representative organisations to develop training for assessors on a wide range of conditions and the impact of multiple and complex conditions.

The Pledges

1. We will make sure that a full range of communications methods are available, that our staff are trained in how to use them, and that individuals only have to tell us once what their accessibility and/or communications requirements are.

Both providers are committed in principle to ensuring that communications preferences are catered for, that staff are trained to use the available methods, and that claimants should only have to express their preferences once.

2. We will proactively gather all relevant written evidence, and will only call claimants in for a face to face assessment when a decision cannot be reached on the basis of written evidence.

Both providers recognise that the onus is on them rather than the DWP to collect additional evidence when it is not provided and where it is considered to be "necessary". However, it is far from clear what circumstances will constitute a situation where the providers are expected to collect evidence and both providers have said that this will be largely dictated by DWP guidance.

3. As far as we are able, we will only recommend reasonable prognoses for claimants to try and ensure that (from our perspective) claimants do not undergo reassessments at inappropriate frequencies.

The positions of both providers on this pledge are the same. The providers will make a prognosis at the end of each assessment which will play a significant role in deciding what the length of PIP award will be, and hence when someone will be reassessed. This prognosis will be largely based on DWP guidance.

4. We will ensure that the assessment venue is accessible and appropriate for a full range of disabled people, that claimants are informed of their right to a home visit (in some circumstances) and aware they can bring a friend, family member, or advocate to their assessment.

Both providers commit to providing accessible locations with ground floor access and informing claimants that they can bring an advocate or family member. However, there is a stark difference in their overall approaches to this pledge. While Capita are proactively offering claimants a choice about the date, time and location of their assessment, and place greater emphasis on home visits, Atos state there is no 'right' to a home visit, and will be proposing assessment dates and times, to which claimants will need to proactively request a change. Atos say that home visits will only be offered to specific

claimants in specific circumstances (as decided by DWP guidance). Others who request home visits will only be 'considered'.

5. We will train our assessors to understand a wide range of impairments and conditions, and to recognize the impact of multiple and complex conditions. Where possible we will match claimants with assessors who have the most expertise.

There is another stark difference in the responses of the providers to this pledge. Atos have stated that the DWP does not believe that matching assessors by expertise with claimants is necessary, so they will not do it. In contrast, Capita have said that they will put a system in place to try and match the most appropriate assessor available to the claimant, depending on their conditions and needs.

6. We will hold assessors to account for their recommendations, will have an accessible complaints procedure in place, and will seek claimant feedback to monitor performance.

Both providers state that they will audit assessors to ensure that they are performing to a sufficient standard, are putting a complaints procedure in place, and designing customer satisfaction forms.

7. Our assessors will conduct interviews in a sensitive and culturally appropriate manner, and will explore *how* individuals complete activities.

Both providers say they will conduct assessments in a sensitive and respectful way – their performance will need to be monitored as the assessment is introduced. Capita have also said they will try to match assessors on religious and cultural grounds where possible – Atos have not committed to doing this.

8. Our assessors will conduct face to face assessments collaboratively with claimants, and make every reasonable effort to ensure that written reports are as transparent as they can be. Where appropriate, assessors will be open with claimants about observational evidence being recorded, and provide them with an opportunity to correct inaccuracies as early as possible.

Both providers say they will carry out the assessment in a collaborative way and Capita have said that they will look to tell claimants what is being recorded about them. We are concerned that, although Capita have offered to audio record assessments and have costed this into their bid, the DWP is not willing to allow them to do this. Both providers state that claimants can request a copy of the report from the DWP but Capita have said that they would be happy to allow the claimant to take a copy of their report straight away if the DWP allowed them to do this.

9. We will set up procedures to proactively gather feedback on the assessment process from disabled people and their representative organisations, and will be open with the findings from these.

Both providers have now set up formal engagement groups to gather feedback from representative organisations. We will need to monitor how effective this engagement is in shaping the future direction of the provider approaches.

10. Guidance for assessors will be regularly updated and developed using input from relevant experts, disabled people and their representative organisations.

Both providers state that guidance and training will be developed in consultation with experts and representative groups, and that ultimately the DWP have to sign off on any training or guidance materials.

Conclusions and recommendations

The exercise of asking both Atos and Capita to respond to the pledges has helped the DBC to establish what the differences will be between the two providers, what the rationales for these differences are, and what factors are controlled by the DWP. This will be invaluable in our efforts to ensure that the assessment process is as fair and effective as possible for the people we represent.

Our overall impression has been that the policy design from the DWP, and many of the assumptions it makes, risks leading to the mistakes of the WCA being repeated. We are clear that the ultimate responsibility for the design and quality of the assessment lies with the DWP. However, we also believe that the providers have a responsibility to ensure that their service is as good as possible. With this in mind, we would like to make the following recommendations:

For the providers and the DWP:

- There should be a clear DWP and provider mechanism for ensuring that assessors are held to account if their recommendation was inappropriate due to a poor assessment, insufficient attention paid to additional evidence, or failure to collect additional evidence. The DWP should apply contractual penalties to providers in all relevant circumstances.
- Audio recording should be available for all assessments and the DWP should evaluate what impact it has on the quality and accuracy of assessments.
- The DWP and the providers should ensure that disabled people, representative organisations and relevant experts should be fully involved in the development of guidance for PIP assessors.

For the providers:

- Providers should work with representative organisations to ensure that they are offering sufficient range and quality of communications methods.
- Providers should remind claimants, in all standard communications, of the importance of providing additional evidence if they have not already done so.
- Extra efforts should be made to seek additional evidence in cases where claimants are vulnerable, have difficulties self-reporting their condition (such as claimants with cognitive, intellectual or mental impairments), or where claimant's conditions fluctuate.
- Providers should work with representative organisations to develop training for assessors on a wide range of conditions and the impact of multiple and complex conditions.
- Atos should follow the lead of Capita and give claimants a choice of a home visit or a centre based assessment, and a choice of possible dates and times rather than requiring them to request a change to a slot that is provided to them.
- Atos, where possible, should look to match assessors with specific expertise to claimants with relevant conditions. At the very least, the DWP and Atos should properly examine what impact such an approach would have and how this compares to the current Atos proposal for using condition specific champions.
- Unless the information could be harmful to the claimant, assessors should inform them of all observational information that is being recorded and describe how they will record the information that has been provided by the claimant.

For the DWP:

- The DWP should effectively monitor the performance of providers in terms of whether they are meeting the communications preferences of claimants and whether claimants are satisfied with the communication support they have received.
- There should be more flexibility about how soon an assessment needs to take place if the provider is waiting for additional evidence which is expected to be important in recommending eligibility for the benefit.
- Working with health and social care professionals and representative groups, the DWP should develop a standard form for collecting additional evidence that is available to both providers and claimants.
- The DWP should consult with representative groups about the guidance for providers on deciding prognosis and the ultimate decision about reassessment frequency should take account of the impact that the assessment process has on claimants.
- All claimants should be provided with a copy of the assessor's report as soon as possible after their assessment and have the opportunity to flag up anything in the report that they believe to be inaccurate.
- The DWP should make clear how they will monitor and compare the performance of the two providers.

What we want MPs to do

MPs have a key role to play in trying to ensure that their constituents with disabilities or long-term illnesses are being fairly assessed for PIP. There are a number of actions we are asking them to take:

- Contact the Minister responsible for PIP, Esther McVey, to support the recommendations made in this report and encourage the DWP to respond quickly to issues arising in the delivery of the PIP assessments.
- Ask the DWP to provide a local contact for the assessment provider in their area so that they can find out more about how the assessment will be delivered for their constituents.
- Flag up any issues that are arising with their constituents being assessed for PIP with the assessment provider and the DWP.

For more information

If you would like more detail around the DBC's work with the providers and the DWP, you can read our original report (<http://goo.gl/ZoeTj>) (please note that this report was produced at the start of 2013 and some issues may have progressed since). You can also read the DWP's official response to issues raised in the report (<http://goo.gl/JtcCi>).

If you would like any further information please contact one of the Co-Chairs of the DBC: Tom Pollard (t.pollard@mind.org.uk/020 8215 2275) or Claire Nurden (cnurden@mssociety.org.uk/020 8438 0970).