

## **LSB Regulation of special bodies/non-commercial bodies – LawWorks response**

LawWorks was founded in London in 1997 as the Solicitors Pro Bono Group and is a registered charity (number 1064274). The organisation was formed in response to the need to provide free legal advice to vulnerable people on low incomes, who cannot access legal aid and are unable to pay for legal advice and who suffer as a result of ignorance of their legal rights. It does this through operating a range of free legal advice projects through which member law firms and in-house legal teams volunteer their services. LawWorks screens applications for help to assess the legal issues on which people apply for help, checks entitlement to legal aid and to other sources of free legal advice, checks the incomes and outgoings of people seeking help and matches people with volunteer solicitors who have the appropriate skills.

To reach people most in need of help, LawWorks provides a number of legal advice projects. These include over 130 legal advice clinics providing face-to-face advice; in-depth advice for individuals; LawWorks for Community Groups providing legal advice to small not-for-profit organisations; mediation for legal disputes and advice by email for clients of advice agencies.

The outcomes achieved by free legal advice include helping people on low incomes to remain housed, obtaining repairs for tenants, protecting against loss of employment, obtaining redress for discrimination and prevention of problems further escalating. Legal advice is provided in all areas of social welfare law. LawWorks does not provide assistance in criminal matters. Traditionally, it has not operated significantly in family or immigration law but, in light of the changing economic and legislative environment, the charity is starting to focus more attention on these areas.

The LawWorks Clinics project provides consultancy and advice in order to establish and support free legal advice sessions staffed by volunteer lawyers and law students. We help set up and support partnerships between member firms and teams of in-house counsel, law schools and third sector organisations (Law Centres, Citizens Advice Bureaux and community centres) to address unmet legal need in local communities. The Project supports a network of over 130 clinics across England and Wales which deliver approximately 35,000 pieces of advice each year. LawWorks works very closely with these non-profit organisations and so the effects of the action taken in light of this consultation will be felt across the work that we do. These not-for-profit sources of legal advice are a highly valuable addition to the community as their dedication is the interests of the client, rather than commercial interests.

The legal advice clinics we support are normally held on a weekday evening with the legal advice being provided by volunteer lawyers and supervised law students. The clinics are generally operated on a drop-in model where clients turn up on the night and are seen on a first-come, first-served basis or by pre-arranged appointment. The volunteers generally attend sessions on a regular basis specified by a rota. As these clinics are operated by volunteers there is no dedicated permanent member of staff involved directly in the clinic, thus any imposition of regulations which would require a permanent staff or a significant time investment could cause significant resourcing difficulties for these clinics.

The legal advice clinics generally give “one-off” advice on a range of areas of law. The most common areas of law covered by LawWorks clinics are:

| Consumer | Debt | Employment | Family | Housing | Welfare | Immigration |
|----------|------|------------|--------|---------|---------|-------------|
| 10%      | 9%   | 27%        | 12%    | 21%     | 2%      | 5%          |

One very successful legal advice clinic is operated in a local library in the West Midlands and was started in response to feedback received from library users. The clinic operates as a partnership between four law firms and the library, and is supported by local law schools. The four firms operate a rota service each week for the advice with the law students and library staff assisting in the administration of the clinic. For clinic models similar to this, which are run by a number of law firms themselves, any changes to regulation would be less burdensome as the firms are already regulated for the legal services they provide and are more likely to have the resources between them to take on the administration associated with regulation. However, clinics like this are unfortunately the minority.

In contrast to this, one clinic which is run by a university in Yorkshire is only able to operate due to the goodwill of lawyers at a local firm. The clinic is run at the university and law students interview the client and produce a letter of advice under the supervision of a local solicitor. The university already does not have the resources to dedicate a full-time member of staff to the clinic, and therefore any regulatory rules which impose the requirement of a permanent member of staff would pose a threat to the existence of the clinic, and result in the loss of a local community resource.

LawWorks is particularly concerned by the impact licensing and the new regulatory framework will have on law schools who host legal advice clinics. There are more than fifty clinics which are part of the LawWorks clinics network which are currently hosted at a law school. Law school clinics are a vital resource for both the students and the local community. They offer the students the opportunity to practice their legal skills in a controlled and carefully supervised environment. They instil in those students the ethical values which should be inherent in all lawyers, encouraging them to continue to support clinics and wider pro bono projects beyond law school throughout their career. The introduction of these licensing rules will have a significant impact on these clinics as the law clinic is only a small part of the law school and the University as a whole, thus burdensome rules pose a real threat to their very existence.

We also envisage similar difficulties for some advice agencies and other charities that host and organise clinics, but do not provide any legal advice themselves and do not have a solicitor on staff. These clinics are an essential source of legal advice for many members of the local community and their existence is a necessary part of the greater community strategy for increasing access to justice for local residents. If the regulations imposed on these organisations are too onerous, it is a serious possibility that many of the clinics they run will be forced to discontinue.

Issues will also arise in clinics which are primarily driven by individual volunteers, without the support of law firms, law schools or charities. An example of this is a clinic based in the south of London – 20-30 volunteers attend a community centre one night each week and assist over 60

individuals, with a variety of problems from council tax disputes to employment problems. It has been a feature of the local community for decades, and serves as a provider of last resort for individuals who aren't able to access legal aid or afford a solicitor. They do not have a permanent member of staff, are reliant entirely on volunteers, and have a budget of less than £1500 per year which is primarily spent on stationery, photocopying costs and legal resources. We are very concerned that services such as these, providing access to justice for those most in need, will be unable to continue if burdensome, complex or expensive regulations governing special bodies are implemented.

### **Partner Organisations involved in Clinics**

Clinics are normally a partnership of multiple organisations. Of the clinics that LawWorks' works with, this breaks down as:

| Law School involvement | Citizens Advice Bureau involvement | Law Centre involvement | Other charity / agency involvement |
|------------------------|------------------------------------|------------------------|------------------------------------|
| 61%                    | 7%                                 | 14%                    | 31%                                |

#### **1) To what extent do you think the current non-LSA regulatory frameworks provide fully adequate protection for consumers?**

Non-commercial legal advice providers are placed under scrutiny from a number of sources, with both the individuals giving the advice and the providers themselves having to follow regulatory guidelines. The vulnerability of the consumer is often an important consideration for non-commercial providers and therefore the combination of regulatory rules and guidance at individual and organisational level offers adequate protection.

Many legal advice clinics take place at Law Centres, CABx and law schools. In addition to the rules set by the Law Centres Federation, Citizens Advice and the law schools themselves, LawWorks provides guidance on best practice for clinics. LawWorks does this by providing handbooks to clinics and developing models which can be easily replicated. These encourage high standards throughout the LawWorks clinics network which, combined with the regulatory rules set by umbrella bodies such as the Law Centres Federation, Citizens Advice or AdviceUK, provide comprehensive protection for consumers.

#### **2) Do you agree with the LSB's assessment of the gaps in the current frameworks?**

Although there are gaps in the current framework, it is important that the regulatory framework imposed on special bodies properly balances the effectiveness of the service offered by these organisations with the protection of consumers. There are already various parties regulating the advice given by non-commercial advice providers which offers adequate protection for consumers whilst enabling providers to continue offering their service.

#### **3) What are the key risks to consumers seeking advice from non-commercial advice providers?**

The key risks to consumers seeking advice from non-commercial advice providers are those which are symptomatic of all non-profit organisations and charities. There are the normal risks associated with non-commercial bodies such as unstable funding resources and sustainability;

however these are inevitable risks inherent to non-commercial organisations and therefore often cannot be reduced without jeopardising the future of the service in the community.

Many of the non-commercial advice providers are currently facing challenges relating to funding, in part due to cuts in government spending. These non-commercial advice providers deliver a fundamental service to their communities, a service which will only become increasingly necessary in light of government cuts, and therefore should not be further penalised for their current financial challenges. Consumers who use the services offered by these providers do so as a last resort and would go elsewhere to seek this advice if this was an option. The priority is facilitating these services by ensuring that the regulatory framework is not too onerous on the provider, improving access to justice for those local people who soon will have nowhere else to go.

There have been some examples where non-commercial advice providers who have found themselves in financial difficulty have been able to secure funding from a combination of sources in order to stay in operation. A couple of years ago, at the height of the recession, the government, commercial organisations and charitable organisations came together to save advice providers who were struggling to stay afloat. We, and other organisations, also have on-going restructuring projects which aim to ensure that non-for-profit agencies are on a sustainable footing going forward.

One risk which could be minimised is the impact on the consumer in the event of a service being forced to close. It is important that the impact of a non-profit advice provider closing is properly mitigated and there are proper methods for transferring cases between providers. This is something which licensing authorities should encourage as a safeguard for consumers.

#### **4) What are your views on the proposed timetable for ending the transitional protection?**

LawWorks are in agreement with the other bodies affected by the introduction of the new regulatory framework that ending the transitional protection in April 2013 would be inappropriate. In order for non-commercial providers to continue to offer the services they do, something which will become increasingly more challenging in the future, the rules governing special bodies and the licensing rules should be completely transparent.

April 2014 seems like a sensible and realistic deadline for ending the transitional period providing that the regulatory framework is properly in place by this date. It is vitally important that the transitional period only comes to an end when a sophisticated and well-developed regulatory framework is in place. On the other hand, it is imperative that the transitional period does not come to an end before all rules are determined as an indefinite extension would result in a lack of clarity and would make it difficult for non-commercial providers to understand the implications of these rules on their organisation.

Another important factor the LSB must take into account when considering when to recommend that the transitional period should end is the impact of including all general legal advice within the definition of reserved legal activity. This would have a wide-reaching impact across non-commercial legal advice providers and could limit many of the services offered.

If there is a realistic chance that all general legal advice becomes a “reserved legal activity” the LSB must ensure that there is adequate time for non-commercial providers, who may not have had to be licensed under the previous definition, to address the implications of these changes.

Special bodies are particularly vulnerable at the present time and many organisations which would fall under this type of ABS do not have the resources to keep changing to adapt to new regulatory guidelines. Therefore, to protect the existence of these providers any decisions made by the LSB must be long term.

**5) Should we delay the decision of whether to end the transitional protection for special bodies/non-commercial bodies until we have reached a view on the regulation of general legal advice?**

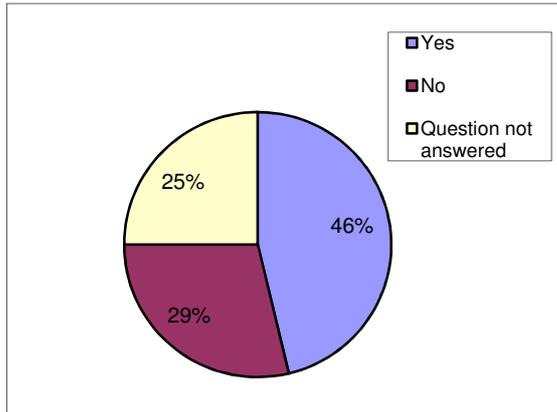
It is extremely important that the transitional protection for special bodies/non-commercial bodies continues until there is a definite decision on the regulation of general legal advice, if a decision in favour of including general advice under the definition of reserved legal activity is a realistic possibility.

Many organisations which fall under the definition of “special body” are finding themselves in very difficult times, something which frequent changes to regulation will only aggravate. Therefore, it is vitally important that the LSB properly evaluates whether there is a realistic likelihood that a decision will be made in favour of including all general legal advice under the definition of reserved legal activity before plans are made to end the transitional period. If the LSB reaches the conclusion that there is a real possibility that general advice will become a reserved activity, the LSB should assess whether all necessary changes to the regulatory framework can be properly implemented by April 2014, and if not, set a new date as soon as possible.

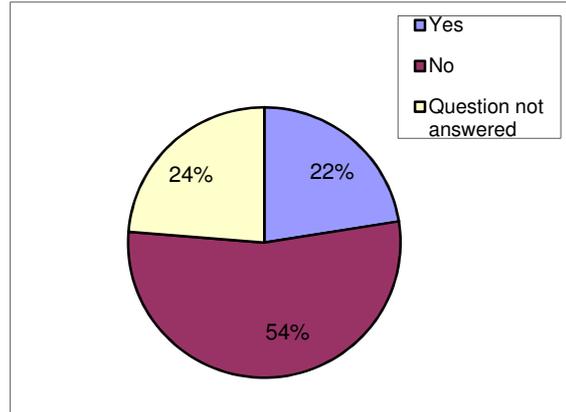
The LSB must take into account the detrimental impact on non-commercial organisations of indefinitely extending the transitional period. As aforementioned, this will ensure that non-commercial providers are able to properly understand the impact of new regulatory guidelines on their organisation and are able to allocate resources accordingly. If compliance with the rules is too time consuming for these organisations, it is likely that we will see a cut in the services offered which reflects this. Evidence of this can already be seen throughout the country at many law schools who are re-evaluating the services they offer to try to avoid burdensome regulatory rules. This will ultimately result in the loss of an invaluable resource to the local community which will become increasingly distressing for those local residents who rely on it.

**6) Do you have any comments on the Impact Assessment? In particular do you have any information about the likely costs and benefits of the changes set out in this document and/or information about the diversity of the workforce or consumers that use special bodies/non-commercial organisations?**

Through the LawWorks Students Project, LawWorks has been able to collate data from universities and postgraduate law schools on the amount of funding they allocate for pro bono projects on an annual basis.



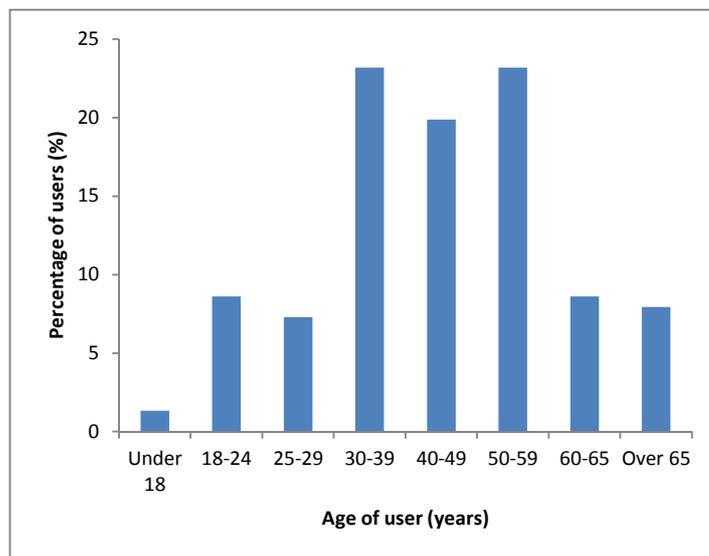
Percentage of law schools who allocate funding to pro bono projects



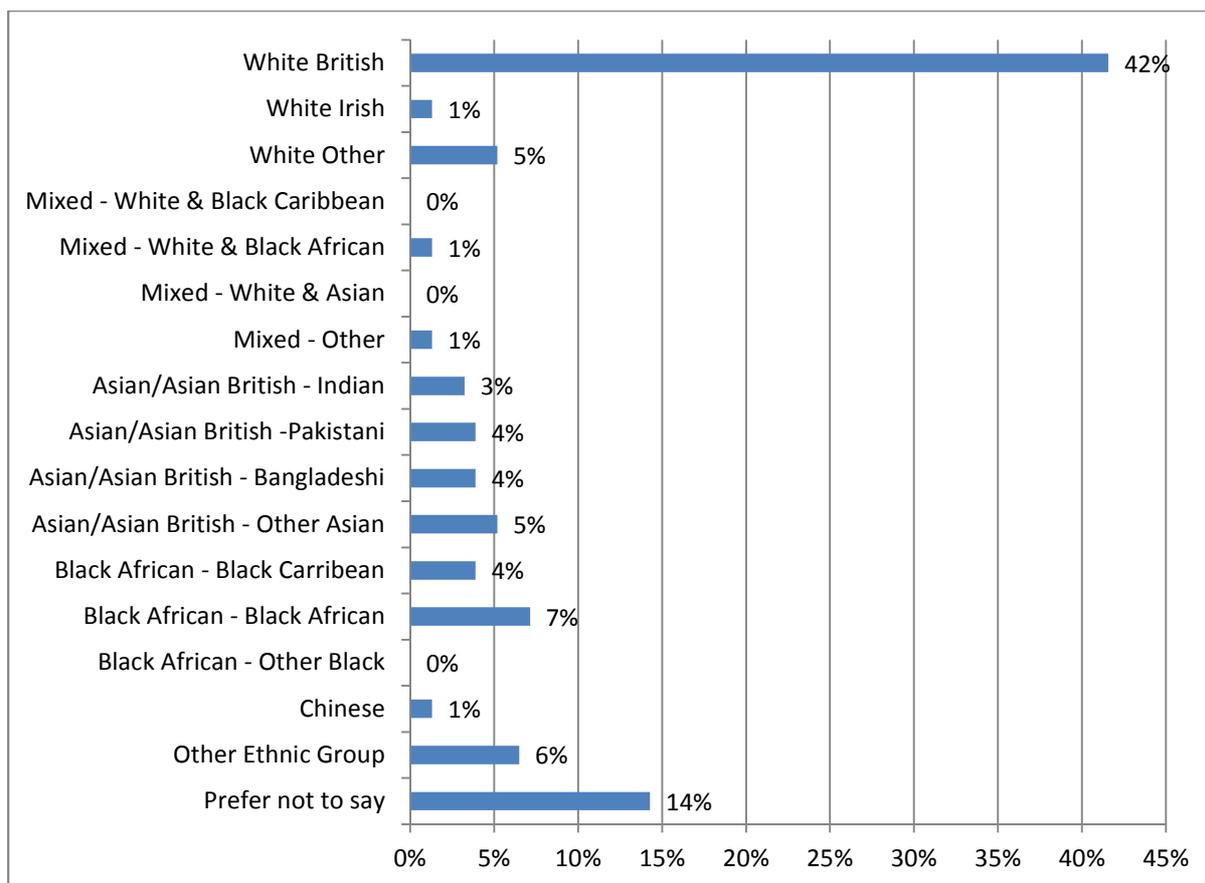
Percentage of law schools who receive any external funding for pro bono projects

Some of the law schools who took part in the LawWorks Students project survey indicated that they do allocate funds for pro bono projects; however this funding can vary from offering reimbursements for travel and refreshments to staffing costs. Of the law schools who answered the question, 68% said that they committed less than £10,000 per annum to student pro bono activities. These funds are often distributed across a number of projects, with a legal advice clinic only being a small part of a wider student pro bono initiative. Therefore, in reality, the funding allocated for legal advice clinics hosted by law schools is limited and thus any changes to the regulatory framework could cause significant issues for law school clinics. Taking this into account, any fees imposed on special bodies as part of the licensing requirements should be kept to an absolute minimum so that organisations are able to allocate resources to account for this extra financial burden. When taking into account the limited funding committed to student pro bono activities, these clinics would struggle to allocate resources to implement necessary licensing rules. This inevitably would have a knock-on effect on the service offered by the legal advice clinic hosted by the University, potentially threatening the clinics very existence.

LawWorks also has the benefit of knowledge gained from the legal advice clinics which are part of the LawWorks clinics network about the users of these advice providers.



Age distribution of users of LawWorks legal advice clinics



*Ethnicity of users of LawWorks legal advice clinics*

Similarly to the LSB's findings, the majority of LawWorks clinics are located in London (approximately 50%). The data we have suggests that women are more likely to use the service offered by non-commercial legal advice providers (60%) than men (40%). Our data shows that the majority of users of legal advice clinics are aged between 30 and 60 years of age and a high percentage of consumers are from a white ethnicity. A number of consumers of LawWorks legal advice clinics have a disability (13%) and the majority of these users have a physical disability (60%).

Full results from our annual survey can be found in appendix 1.

**7) What are your views on allowing special bodies/non-commercial organisations to charge for advice? What do you think are the key risks that regulators should take into account if these bodies can charge?**

None of the legal advice clinics which are part of the LawWorks clinics network would want to charge for their services as their primary purposes are to facilitate lawyers giving free legal advice to those people who cannot afford it and, in the case of law school clinics, for educational purposes.

If these bodies are able to charge for services, there should be a proper process in place for the organisations to deal with these clients separately. We acknowledge that some non-commercial providers may need to charge for their services to enable them to continue providing legal advice to

those who need it. If charging enables providers to sustain their service then the processes should be as simple as possible to enable those organisations to charge clients if necessary.

### **8) What are your views on our proposed approach to allowing a full range of business structures?**

Making regulation as flexible and accessible as possible will enable more non-commercial providers to survive, despite the difficult circumstances they currently find themselves in. Allowing a full range of business structures will help facilitate this.

In the case of clinics run by law schools, there is often a difference between the purpose of the clinic and the aims of the University as a whole. The primary purpose of the University is education, whereas the clinic is often for the benefit of the local community. The clinic is only a very minor part of the University and therefore the regulation of the provider should be reflective of this.

Likewise, in the case of general advice centres, for example domestic violence support projects, and similar charities the regulation of the entire organisation would be inappropriate. The main aim of the organisation is to provide general support for those people affected and the legal advice clinic is only a very small part of the service they offer. If the entire organisation is required to become a licensed body, this may discourage these organisations from continuing the clinic.

A full range of business structures would allow for greater flexibility and steps must be taken to ensure that a small part of a bigger organisation can be regulated independently. Regulation of providers, whilst protecting consumers, should not place too big a burden on the special body to enable them to continue to deliver the service they provide to their communities. A simple and clear regulatory framework which accommodates the different types of non-commercial providers is the best option and can be achieved by allowing a full range of business structures.

### **9) Do you agree with our analysis of group licensing?**

In most cases, the LSB's analysis of group licensing is correct. Generally, having group licensing would place a significant burden on the lead body and may not be appropriate for larger organisations where the individual providers are run independently of the umbrella body. However, in our specific circumstances group licensing could be a very beneficial option.

To enable legal advice clinics to continue to deliver the necessary service they provide to the local community, there cannot be too many restraints on them. If the individual clinics needed to apply for licences individually, they may need to employ a permanent member of staff to administer this. This would be a significant burden on the clinic which is often run as collaboration between a law firm and some other organisation such as a law school and would remove the flexibility inherent in the project. If LawWorks were able to apply for a licence on behalf of all member clinics, this could alleviate the burden of regulation on the individual clinics.

The benefit of allowing umbrella bodies to apply for licences on behalf of the individual providers is that they have the ability to dedicate specific resources to the regulatory requirements. The individual providers are often too small to accommodate the necessary time and expense, and

therefore the umbrella body could take on this responsibility easing the burden on the individual providers.

LawWorks offers guidance and support for member clinics and offers best practise models which can be replicated by clinics throughout the network. Although this does not eliminate all risks surrounding competence and quality, it does encourage high standards throughout the network. When taking into consideration the valuable benefit these services deliver to the local community and the risk that some of these clinics may have to close if licensing becomes too burdensome, in certain specified circumstances there should be scope for a lead body to apply for group licences. In order to protect consumers it is important that there are locally focused non-commercial providers and this is one way that the LSB can lessen the burden on individual organisations whilst maintaining standards.

### **10) What are your views on these issues that may require changes to licensing rules?**

We agree with the LSB's analysis of the licensing rules and that many of the rules will need to be adapted so that they are appropriate for non-commercial legal advice providers.

#### Insurance arrangements

Since November 2007, LawWorks has had a waiver in place which allows volunteers at LawWorks clinics to have a lower level of indemnity insurance than would normally be required under the SRA rules. This is appropriate in the circumstances as the advice given at clinics is generally lower risk than traditional firms.

The level of insurance required by special bodies should therefore also be dependent on the activity that the body is carrying out and furthermore, should be proportionate to the risks involved. Without adaptation, these arrangements could pose unnecessary burdens on providers.

#### Accounts Rules

In general, it would be highly inappropriate to regulate special bodies in the same way as standard ABSs in terms of account rules. Particular allowances should also be made for organisations which only deal with disbursements on behalf of clinics. In this one particular case, the LSB should specify a simple and clear method of dealing with these monies separately.

#### Conflicts of Interest

One issue that needs to be clarified in the guidance for licensing bodies is whether individuals who are employed by a law firm but volunteer their services at a legal advice clinic are subject to the potential conflicts associated with their firm or merely the conflicts which arise due to the interests of the non-commercial provider and their own personal knowledge of conflicts. This is an unusual scenario as the volunteers are giving advice independently of their firm and under the name of the host advice agency for the clinic.

This issue does not necessarily mean that stricter regulation is necessary, but the point should be clarified so that all parties involved are aware of their responsibilities.

### Appeals

We agree that there should be a means of appealing decisions to ensure that all applications are fairly considered, however it is absolutely vital that special bodies/non-commercial bodies are not discouraged to appeal decisions due to the costs involved. Therefore, it is important that any fees are kept to an absolute minimum and that there are no risks of unforeseen costs imposed once a body decides to appeal a decision.

### Schedule 13

A large number of the legal advice clinics we support are based at universities. The legal advice clinic constitutes a very small part of what the law school does, and therefore only equates to a trivial part of the university as a whole. There are already statutory restrictions on the governance of the university as a whole and therefore any regulation of the university under schedule 13 could be inappropriate and result in conflicting requirements. To ensure that there are no unnecessary and inappropriate restrictions posed on the university, there need to be flexible rules which take account of the regulations already governing the university as a whole entity. To regulate the entire university under these rules would be excessive.

### Requirement for HoLP/HoFA

The LSB has suggested that although it may not be sensible to have a HoFA, it would be appropriate for there to be a requirement for the body to have a HoLP. This rule would require the special body to employ a permanent member of staff. This is an inappropriate requirement for a legal advice clinic in particular as their very existence is often because of the flexibility of the model.

The requirement of a permanent member of staff would be a significant drain on clinic resources and may not be appropriate for all clinic models. Many legal advice clinics are inherently ad hoc in nature due to the constant change in volunteers, and this is possible due to the limited advice provided (usually limited to a one-off letter of advice, with no on-going client relationship or client engagement). To require special bodies to have a permanent member of staff may be possible for clinics which are run by one law firm or at a law centre, but is a completely impractical requirement for those clinics which are manned by lots of individual volunteers. For example, a South London clinic relies on individual volunteers who last year delivered over 3000 pieces of advice. Imposing a requirement of a permanent employee would potentially jeopardise the future of this service, removing a desperately needed resource from the local community.

### Training

In terms of training requirements, we are in agreement with the LSB that this should be dependent on the activities the special bodies will carry out and must be proportional to the size of the special body.

#### Consistency with the LSA requirements for employers and employees

It is essential that the licensing authority's rules do not place any unnecessary burdens on special bodies and that all regulation is consistent with those requirements set out in the LSA. It is also important that these rules are clear and well prescribed for those bodies. To make these rules more accessible to the special bodies that they apply to, examples in addition to clear guidance would be advantageous.

#### **11) Are there any other areas where the LSB should give guidance to licensing authorities?**

We are in agreement with the LSB in relation to the areas already identified.

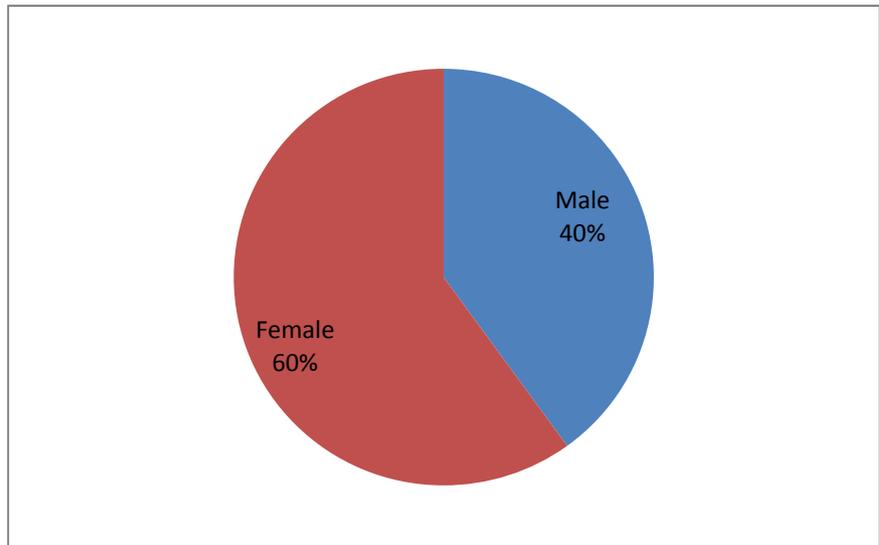
## Appendix 1 – LawWorks Clinic Survey Results, 2011

Every year, LawWorks surveys users of clinics over one week as a representative sample of the 36,000 individuals seen and assisted over the year. The results of this survey for 2011 are included below.

### Gender

|        |       |
|--------|-------|
| Male   | 40.0% |
| Female | 60.0% |

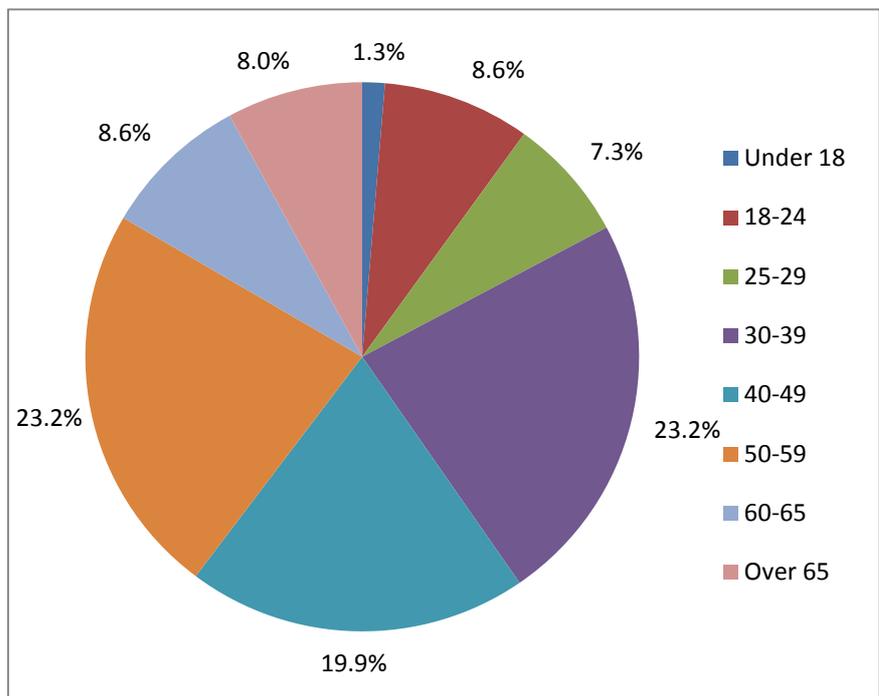
Table A1.1



### Age

| Age-range | Percentage |
|-----------|------------|
| Under 18  | 1.3%       |
| 18-24     | 8.6%       |
| 25-29     | 7.3%       |
| 30-39     | 23.2%      |
| 40-49     | 19.9%      |
| 50-59     | 23.2%      |
| 60-65     | 8.6%       |
| Over 65   | 8.6%       |

Table A1.2



## Housing Situation

|                       |       |
|-----------------------|-------|
| Home Owner            | 41.8% |
| Council Tenant        | 15.1% |
| Private Tenant        | 26%   |
| Hostel                | 1.4%  |
| Housing Association   | 2.7%  |
| Living with relatives | 8.9%  |
| Other                 | 4.1%  |

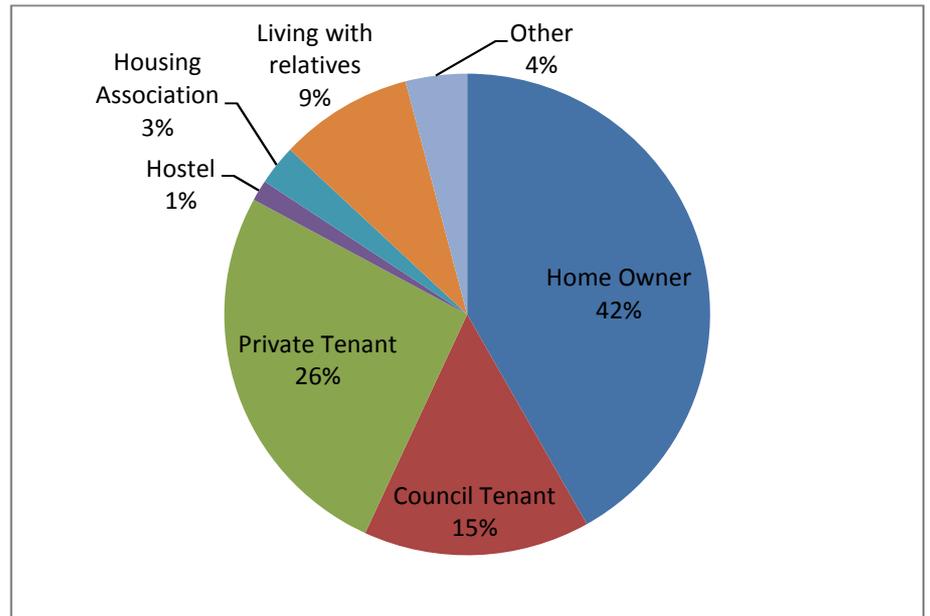
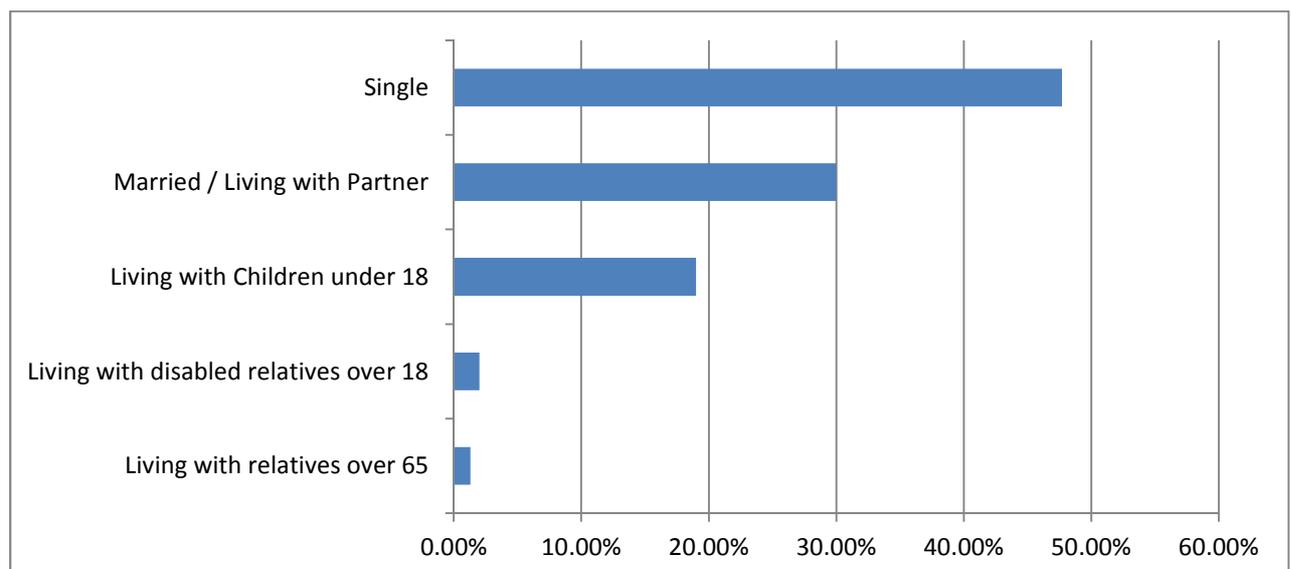


Table A1.3

## Family Situation

|  |       |
|--|-------|
| Single                                 | 47.7% |
| Married / Living with Partner          | 30.0% |
| Living with Children under 18          | 19.0% |
| Living with disabled relatives over 18 | 2.0%  |
| Living with relatives over 65          | 1.3%  |

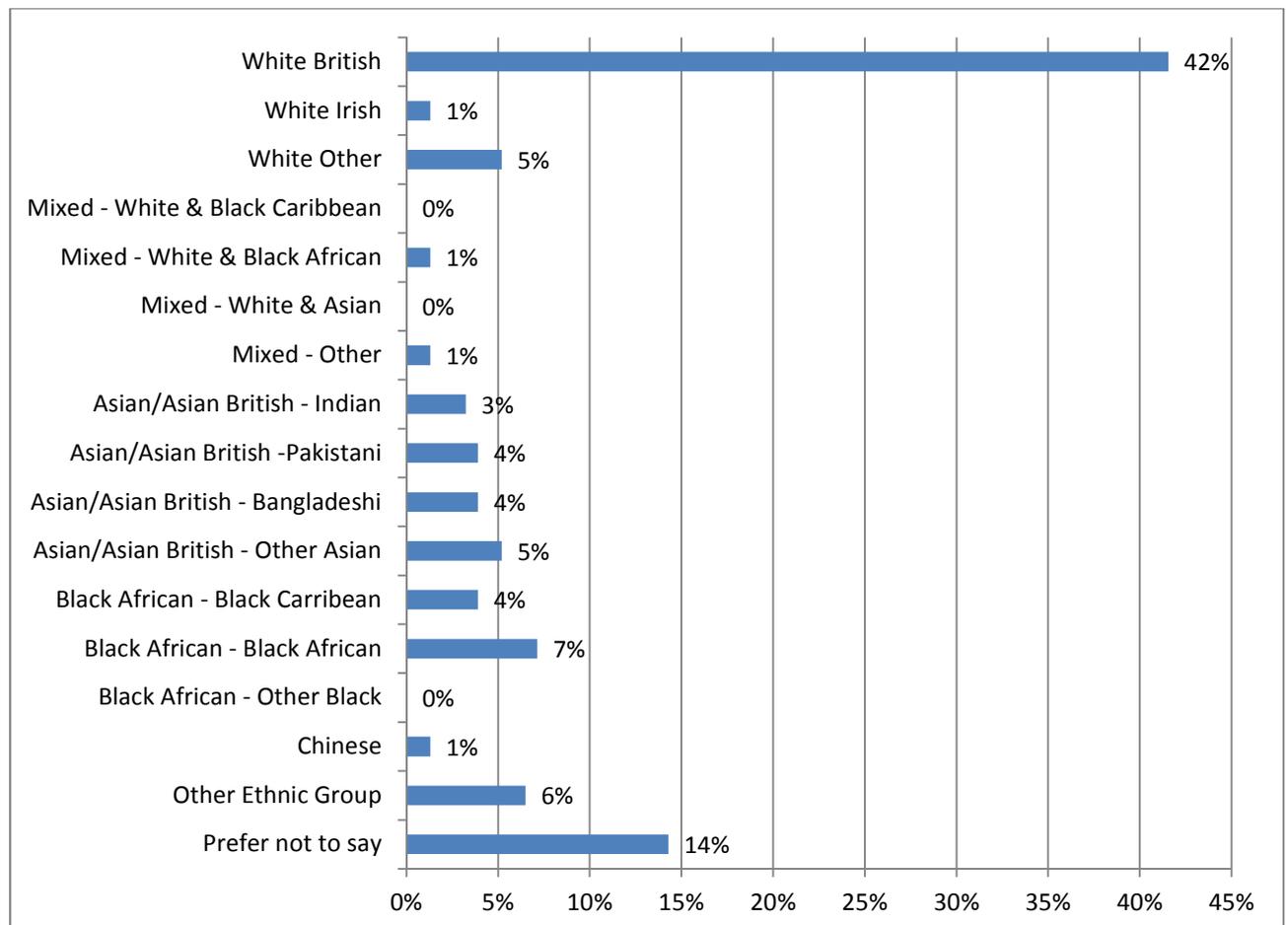
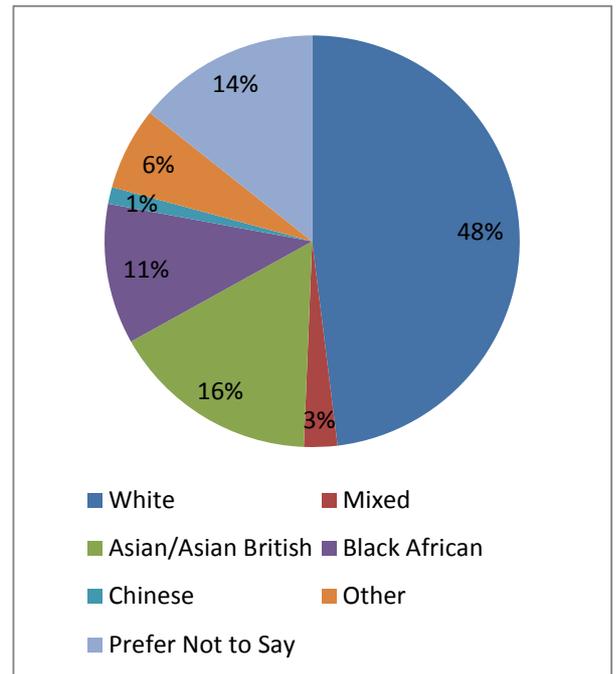
Table A1.4



## Ethnic Origin

| Group                             | Percentage |
|-----------------------------------|------------|
| White British                     | 41.6%      |
| White Irish                       | 1.3%       |
| White Other                       | 5.2%       |
| Mixed - White & Black Caribbean   | 0.0%       |
| Mixed - White & Black African     | 1.3%       |
| Mixed - White & Asian             | 0.0%       |
| Mixed - Other                     | 1.3%       |
| Asian/Asian British - Indian      | 3.3%       |
| Asian/Asian British -Pakistani    | 3.9%       |
| Asian/Asian British - Bangladeshi | 3.9%       |
| Asian/Asian British - Other Asian | 5.2%       |
| Black African - Black Caribbean   | 3.9%       |
| Black African - Black African     | 7.1%       |
| Black African - Other Black       | 0.0%       |
| Chinese                           | 1.3%       |
| Other Ethnic Group                | 6.5%       |
| Prefer not to say                 | 14.3%      |

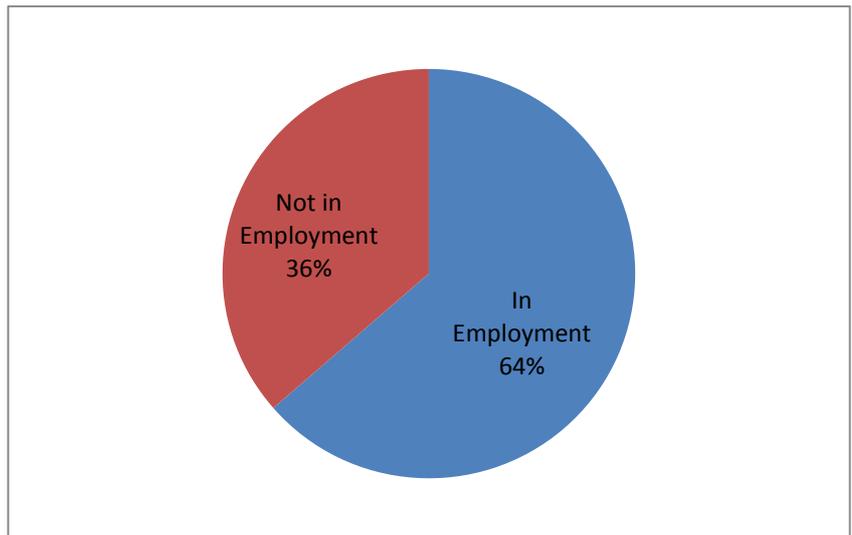
Table A1.5



## Employment Situation

|                   |       |
|-------------------|-------|
| In Employment     | 63.6% |
| Not in Employment | 36.4% |

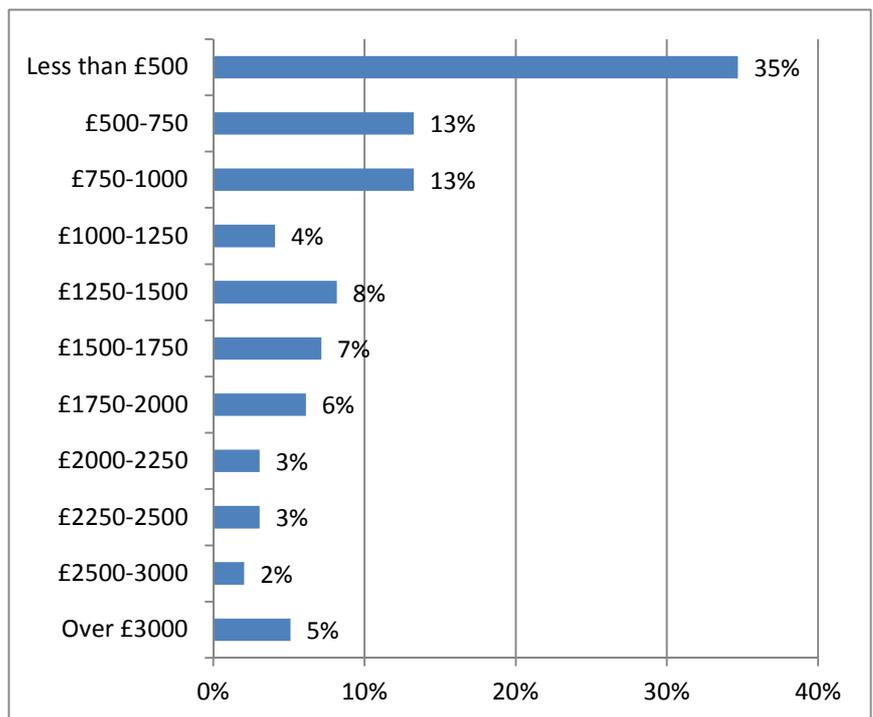
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## Monthly Income (after income tax and national insurance deductions)

|                |       |
|----------------|-------|
| Less than £500 | 34.7% |
| £500-750       | 13.3% |
| £750-1000      | 13.3% |
| £1000-1250     | 4.1%  |
| £1250-1500     | 8.2%  |
| £1500-1750     | 7.1%  |
| £1750-2000     | 6.1%  |
| £2000-2250     | 3.1%  |
| £2250-2500     | 3.1%  |
| £2500-3000     | 2.0%  |
| Over £3000     | 5.1%  |

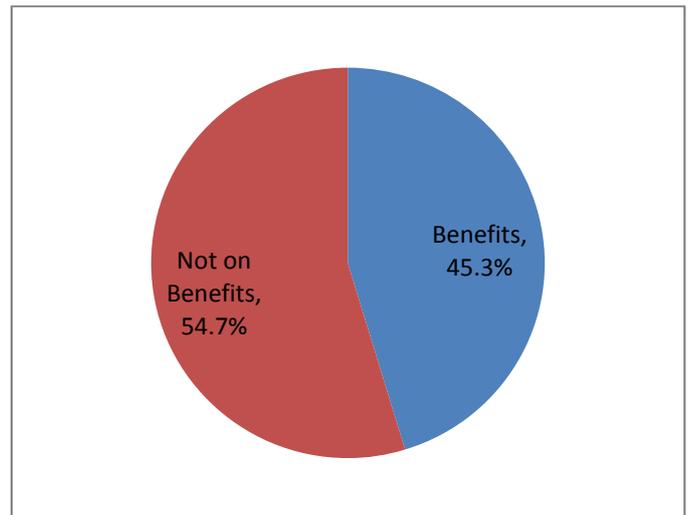
Table A1.7



## Benefits

|                                       |       |
|---------------------------------------|-------|
| Individuals on State Benefits         | 45.3% |
| Individuals not on any State Benefits | 54.7% |

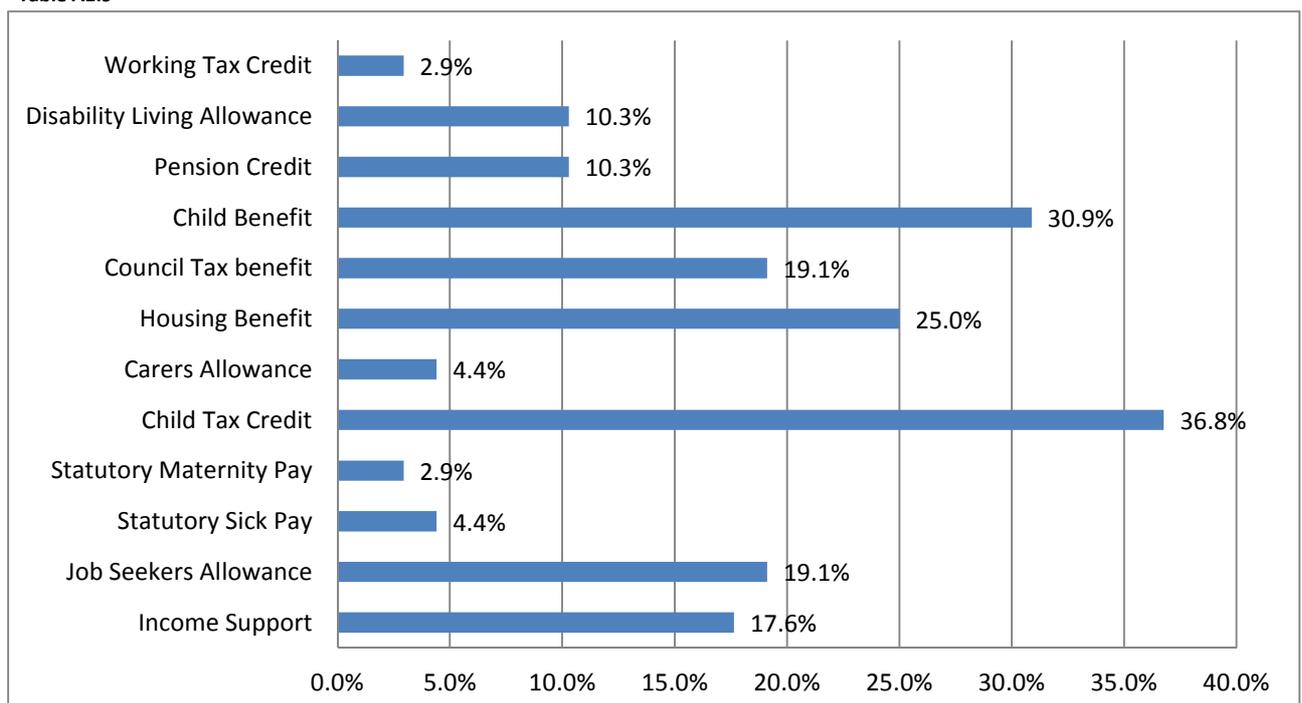
Table A1.8



## Individuals in receipt of State Benefits

|                             |       |
|-----------------------------|-------|
| Income Support              | 17.6% |
| Job Seekers Allowance       | 19.1% |
| Statutory Sick Pay          | 4.4%  |
| Statutory Maternity Pay     | 2.9%  |
| Child Tax Credit            | 36.8% |
| Carers Allowance            | 4.4%  |
| Housing Benefit             | 25.0% |
| Council Tax benefit         | 19.1% |
| Child Benefit               | 30.9% |
| Pension Credit              | 10.3% |
| Disability Living Allowance | 10.3% |
| Working Tax Credit          | 2.9%  |

Table A1.9



## Disabilities

Individuals who indicated that they had one or more of the following conditions within the last 12 months:

|                                       |      |
|---------------------------------------|------|
| Deafness of severe hearing impairment | 0.0% |
| Blindness or severe vision impairment | 0.7% |
| A physical disability                 | 8.0% |
| A learning disability                 | 0.7% |
| A chronic illness                     | 4.0% |

Table A1.10

