

Daily Living Activity 6: Dressing or Undressing

Descriptors	Points
a. Can dress and undress unaided.	0
b. Needs to use an aid or appliance to be able to dress or undress.	2
c. Needs either – (i) Prompting to be able to dress, undress or determine appropriate circumstances for remaining clothed, or (ii) Prompting or assistance to be able to select appropriate clothing.	2
d. Needs assistance to be able to dress or undress their lower body	2
e. Needs assistance to be able to dress or undress their upper body.	4
f. Cannot dress or undress at all.	8

Legislative Definitions

“Dress and undress” includes putting on and taking off socks and shoes.

Select Case Law

- [PE v SSWP \[2015\] UKUT 309; \[2016\] AACR 10](#) – Tribunals must focus on the functions involved in this activity and how the disability limited this functional ability. Paragraphs 12-20 outline the correct approach.
- [DB-v-DfC \(PIP\) \[2018\] NICom 40](#) – Endorses PE. The test must be a hypothetical one addressed to clothes normally worn in society at large. Thus, the applicant’s ability to manage buttons is something which would fall to be determined.
- [AP v SSWP \[2016\] UKUT 501 \(AAC\)](#) - There should be a connection between the need for the aid and the activity – what is usual or normal is both a relevant and a necessary consideration (para 18).
- [JM v SSWP \[2016\] UKUT 542](#) – No points for shoes if claimant can manage slip on shoes. However, if cannot manage socks, points should be scored

because in the legislative definition - put on *and* take off socks *and* shoes – and is disjunctive.

- [ML v SSWP \(PIP\): \[2017\] UKUT 171 \(AAC\)](#) - If a physical or mental health condition restricts the ability to dress in a reasonable time period then the extra time needed to select clothes on the basis of appearance can lead to an award of points.
- [MR v SSWP \(PIP\): \[2019\] UKUT 293 \(AAC\)](#) - Although sitting on a bed is ruled out as an aid to dress in [CW v SSWP \(PIP\) \[2016\]](#), this case is distinguished by the appropriate use of a crutch as an aid to complete the final stages of dressing.