

- **What further steps could the Department for Work and Pensions take to make sure the benefit system supports people to trywork without the worry that it may affect their benefit entitlement?**

*The UK government must shift from demanding public trust in its benefits system to proving its own trustworthiness — through honest, competent, and accountable reforms that reflect the real needs, lived experiences, and rights of disabled people seeking work.*

In 2022, Social Security Advisory Committee (SSAC) revealed DWP acknowledgement that lack of trust towards the Department from disabled people was ‘a major issue’<sup>1</sup>. Evidence from the New Economics Foundation shows that this climate makes it far harder for disabled people to engage with employment support or return to work; the fear of losing benefits remains one of the biggest barriers<sup>2</sup>. This is unsurprising with evidence showing termination of welfare services has resulted in claimant deaths<sup>3</sup>.

To restore faith and encourage genuine employment efforts, the government must guarantee that trying to work will not lead to loss of welfare service entitlement. But this is not simply a messaging challenge—it’s a systemic issue of trustworthiness.

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<sup>1</sup> <https://www.disabilityrightsuk.org/news/2021/january/dwp-should-recruit-large-scale-panel-disabled-people-experience-social-security#:~:text=%E2%80%9CThey%20told%20us%20that%20lack,is%20written%20in%20that%20spirit.%E2%80%9D>

<sup>2</sup> <https://neweconomics.org/2025/03/the-true-scale-and-impact-of-benefit-cuts-for-ill-and-disabled-people>

<sup>3</sup> <https://www.disabilityrightsuk.org/news/2021/may/82-benefit-claimants-have-died-after-some-alleged-dwp-activity-such-termination?srsId=AfmBOoo5nN6czYlq4Yt3cMC5kh-jHvqjmtt4aVS2TUxaApbDkcLrlc7>

As Baroness Onora O'Neill wisely argues, trust is not given lightly; it must be earned. We must shift the focus from whether people “trust” the system, to whether the system is worthy of trust — that is, demonstrably honest, competent, and reliable<sup>4</sup>. So, is the benefits system worthy of peoples’ trust that trying to get into work will not affect their welfare services?

To work on trustworthiness, DWP must:

- Invest in rigorous research to understand why trust is broken.
- Conduct continuous and transparent assessments of its own practices across honesty, competence, and accountability.
- Communicate results accessibly, not just in Westminster but in communities across the UK — using formats that everyone can understand, from detailed reports to Easy Read documents.

It’s also alarming that the current consultation process questions only one behavioural driver — whether people fear losing money. As the ESRC’s Rebuilding Macroeconomics Network has found, work is not a commodity; it’s a profoundly human exchange. A simplistic “you won’t lose out financially” nudge ignores the full emotional, social, and cultural landscape of what it means to return to work. We therefore recommend place-based research that captures the local, lived realities of disabled people, and uses those insights to inform policies that are rooted in reality — not outdated, detached models.

- **What support do you think we could provide for those who will lose their Personal Independence Payment entitlement as a**

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<sup>4</sup> <https://www.thebritishacademy.ac.uk/documents/2563/Future-of-the-corporation-Trust-trustworthiness-transparency.pdf>

**result of a new additional requirement to score at least 4 points on one daily living activity?**

*The government's proposed PIP reforms risk stripping vital support from hundreds of thousands of disabled people, despite evidence showing such cuts won't boost employment and will deepen inequality. What's needed instead is rights-based, evidence-driven reform centred on lived experience and accessibility.*

The UK government's proposed changes to the PIP assessment process are set to remove entitlement from 370,000 existing claimants and prevent 430,000 future awards, amounting to an average annual loss of £4,500 per person<sup>5</sup>. In a country that already ranks near the bottom — 28th out of 30 OECD nations<sup>6</sup> — for incapacity welfare spending, these cuts don't just withdraw critical support; they deepen systemic inequality. The support people need is the PIP being taken away. We strongly recommend that the government completely rethinks its approach to reforming the PIP assessment criteria and the health element of UC.

PIP is not connected to being in or out of work, or one's level of income; rather solely the level of extra costs associated with one's particular disability. What's more, without a clear government mission to accelerate the accessibility of the United Kingdom's infrastructural, digital, systemic and cultural status quo; PIP remains for disabled people as vital as ever. At its core, PIP exists to offset the extra costs of living with a disability—not as a work incentive, but as a matter of justice and rights. To equal the standard of living on a nondisabled household, a disabled household

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<sup>5</sup> <https://commonslibrary.parliament.uk/research-briefings/cbp-10283/>

<sup>6</sup> <https://publications.parliament.uk/pa/cm5804/cmselect/cmworpen/142/report.html>

needs an additional 1010 pounds per month<sup>7</sup> – and even the highest possible PIP payment<sup>8</sup> does not fill

this gap. People use PIP to fund essential support like accessible transport, assistive tech, personal care, and therapies unavailable on the NHS—all of which have become even harder to access due to cuts elsewhere, including to Access to Work<sup>9</sup> and Adult Social Care.

Academic evidence across the replacing Invalidity Benefit with Incapacity Benefit in 1995 and later introducing Employment and Support Allowance (ESA) suggests that stricter eligibility does not automatically leads to lower caseloads<sup>10;11</sup> from the labour market.

Structural factors like health trends, geography, and labour market conditions play a major role<sup>12</sup> in labour market participation, and we do not anticipate the proposed reforms will be a key driver of labour market activity; particularly with the strength of other variables; e.g., that the number of vacancies in the UK economy in the three months to May 2025 is 736,000, representing the 35th consecutive quarterly decline<sup>13</sup>.

Importantly, before changes to assessments should even be enacted, or support designed, the impacts of losing or not acquiring PIP must be well known. That the DWP (as of mid-2024) has no plans to commission further research to understand the impact of benefit levels on the health and wellbeing of customers and its relationship with economic productivity, despite a recommendation to do so by the House of Commons

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<sup>7</sup> [https://www.disabilityrightsuk.org/news/extra-costs-faced-disabled-people-continue-rise?srsId=AfmBOoprWmr\\_YniWxAA\\_9O7HCF80-o0FrbX2DLWfPG3mg3KcUgrQsQ-4](https://www.disabilityrightsuk.org/news/extra-costs-faced-disabled-people-continue-rise?srsId=AfmBOoprWmr_YniWxAA_9O7HCF80-o0FrbX2DLWfPG3mg3KcUgrQsQ-4)

<sup>8</sup> <https://www.gov.uk/pip/how-much-youll-get>

<sup>9</sup> <https://www.disabilitynewsservice.com/access-to-work-delays-shoot-up-just-as-government-is-trying-to-address-disability-employment/>

<sup>10</sup> <https://pubs.aeaweb.org/doi/pdfplus/10.1257/jep.29.2.173>

<sup>11</sup> <https://onlinelibrary.wiley.com/doi/full/10.1111/ijsw.12651>

<sup>12</sup> <https://pubs.aeaweb.org/doi/pdfplus/10.1257/jep.29.2.173>

<sup>13</sup> <https://www.cbi.org.uk/articles/cbipertemps-labour-market-update-june-2025/>

Committee, is deeply concerning<sup>14</sup>. “Nothing about us without us” must be central to policy design – as it is to the UN CRPD – and the UK government needs to do better to ensure this, not as a nice to have but as a foundation for all policy development and delivery.

Essentially, we reject the premise of this question: we do not agree that reforms should go forward that cause people to lose PIP support, which already fails to fully service the financial and social gap associated with being disabled by UK society.

- **How could we improve the experience of the health and care system for people who are claiming Personal Independence Payment who would lose entitlement?**

*The government can improve the health and care system by fully funding struggling disability services such as Adult Social Care, Wheelchair Services, NHS Continuing Health Care (CHC), and other disability services. Prioritizing the provision of Assistive Technology (AT) is also vital. Fully funding support services and providing AT will enable disabled people to thrive, reduce their financial inequality and dependence on the state, and enable those who can enter formal employment.*

Cutting PIP will merely “borrow from Peter to pay Paul,” reducing spending in one area of public services by pushing those costs to others -- many of which are already struggling. The Disability Policy Centre<sup>15</sup> projects that the proposed cuts will only deliver savings of £100M by 2030 -- 2% of the £5bn claimed by the government. This is in part

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<sup>14</sup> <https://publications.parliament.uk/pa/cm5804/cmselect/cmworpen/798/report.html>

<sup>15</sup> <https://thedisabilitypolicycentre.org/our-analysis-on-welfare-reforms>

because they are likely to result in £1.2bn of extra costs for the NHS and social care services, and that

“for every pound that someone loses in benefits ... if a council has to step in to cover the shortfall – it’s about £1.50 additional impact.” With these cuts poised to plunge hundreds of thousands of disabled households<sup>16</sup> into poverty, the additional cost to society will be high.

It is likewise important to note that over half of carer’s allowance awards are tied to PIP, and losing it would push many people caring for disabled people – largely women -- into poverty; Carers UK<sup>17</sup> estimates that if every unpaid carer in the country needed to cease caring to join the “productive” economy instead, it would cost the state £184bn a year. Carer’s allowance, as such, is a highly cost-effective benefit.

Cuts to PIP risk overwhelming an already fragmented<sup>18</sup> and underfunded assistive technology (AT) system. As the lead for the AT2030 programme<sup>19</sup>, funded by UK International Development, focused on testing “what works” to improve access to life-changing assistive technology for all, GDI Hub is uniquely positioned to speak to this issue. We are also the WHO Global Collaborating Centre on Assistive Technology, and led a 2023 national assessment of AT need in England with the Disability Cabinet Unit.

Assistive technology includes essential products and services, like wheelchairs, hearing aids, communication devices, and screen readers, that support people to live independently, access education and employment, and participate fully in society. In the UK, AT provision across

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<sup>16</sup> <https://neweconomics.org/2025/03/the-true-scale-and-impact-of-benefit-cuts-for-ill-and-disabled-people>

<sup>17</sup> [https://www.carersuk.org/media/mfbmjbn/valuing\\_carers\\_uk\\_v3\\_web.pdf](https://www.carersuk.org/media/mfbmjbn/valuing_carers_uk_v3_web.pdf)

<sup>18</sup> [https://www.scope.org.uk/advice-and-support/free-and-cheap-equipment-for-disabled-people?utm\\_source=chatgpt.com](https://www.scope.org.uk/advice-and-support/free-and-cheap-equipment-for-disabled-people?utm_source=chatgpt.com)

<sup>19</sup> <https://at2030.org/#gsc.tab=0>

statutory services is often highly fragmented, with access depending on specific eligibility criteria<sup>20</sup> and subject to a postcode lottery<sup>21</sup>. As a result, many people fall through the cracks. In England<sup>22</sup>:

- **87%** of disabled people report needing at least one assistive product
- **31%** of disabled people do not have access to the assistive technology they need
- Of those without access, **45%** cite cost as a key barrier **60%** of AT users acquire their devices entirely or partially through out-of-pocket payments

PIP is one of the only flexible<sup>23</sup> cash benefits that disabled people can use to pay for devices or services not covered by statutory provision. This includes purchasing or upgrading AT; funding maintenance and repairs; covering running costs (e.g., broadband for digital AT, batteries, software updates); and paying for training or support to use AT effectively. There are also costs associated with integrating AT into an inaccessible world, that are typically borne by the user<sup>24</sup>.

60% of assistive product users in England acquire their devices entirely or partially through out-of-pocket payments<sup>25</sup>. The flexibility of PIP benefits further supports AT users when subsidised AT are not available, suitable,

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<sup>20</sup> [https://www.scope.org.uk/advice-and-support/free-and-cheap-equipment-for-disabled-people?utm\\_source=chatgpt.com](https://www.scope.org.uk/advice-and-support/free-and-cheap-equipment-for-disabled-people?utm_source=chatgpt.com)

<sup>21</sup> <https://www.disabilityinnovation.com/news/england-country-capacity-assessment>

<sup>22</sup> <https://www.disabilityinnovation.com/news/england-country-capacity-assessment>

<sup>23</sup> <https://www.myvision.org.uk/pip-cuts-visually-impaired-people/>

<sup>24</sup> [https://www.theguardian.com/politics/2025/mar/21/pip-cuts-will-ruin-disabled-peoples-lives-this-is-labours-poll-tax-moment?utm\\_source=chatgpt.com](https://www.theguardian.com/politics/2025/mar/21/pip-cuts-will-ruin-disabled-peoples-lives-this-is-labours-poll-tax-moment?utm_source=chatgpt.com)

<sup>25</sup> <https://www.disabilityinnovation.com/publications/at-country-capacity-england>



or provided in a timely manner. Many disabled people have to self-fund or resort to alternative funding for their AT to fill in this gap.

Charitable grants for AT are typically limited in amount and duration, pushing reliance on friends and family to chip in. For example, some trusts offer one-off grants up to £600 for assistive technology<sup>26, 27</sup>.

AT supports people to get into work by helping them access job opportunities, travel to interviews, and participate in recruitment processes, and to succeed in work, by enabling them to communicate with colleagues, manage daily tasks, boost productivity, helping users to earn more<sup>28</sup>. The UK government has even acknowledged the benefits of AT for employment<sup>29</sup>. Cutting PIP runs directly counter to this goal. In practice, less access to AT means fewer opportunities for disabled people to gain, sustain, and thrive in employment: “Technology, including assistive technology, plays a vital role in supporting disabled people into and in work — but access is often fragmented, delayed, or unaffordable without individualised support.”<sup>30</sup> — *Policy Connect ‘Connect with Success’, 2024*

Likewise, AT enables people to be active consumers, getting out of the house to spend money in shops, restaurants, and more. Moreover, AT benefits families and carers. When disabled individuals are supported to

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<sup>26</sup> [https://dateurope.com/wp-content/uploads/2024/04/DATEurope-Report-Final.pdf?utm\\_source=chatgpt.com](https://dateurope.com/wp-content/uploads/2024/04/DATEurope-Report-Final.pdf?utm_source=chatgpt.com)

<sup>27</sup> [https://www.disabilityrightsuk.org/resources/funding-charitable-trusts?srsId=AfmBOoqPuDOzpm7bmwO7VqF xayUt8KgONM8TyVqs-oBAYCbWHLqVcytT&utm\\_source=chatgpt.com](https://www.disabilityrightsuk.org/resources/funding-charitable-trusts?srsId=AfmBOoqPuDOzpm7bmwO7VqF xayUt8KgONM8TyVqs-oBAYCbWHLqVcytT&utm_source=chatgpt.com)

<sup>28</sup> [https://static1.squarespace.com/static/5b3f6ff1710699a7ebb64495/t/5fbf5c44eaf37e3b64932e6c/1606376534765/Case\\_for\\_Investing\\_in\\_AT\\_a11y.pdf](https://static1.squarespace.com/static/5b3f6ff1710699a7ebb64495/t/5fbf5c44eaf37e3b64932e6c/1606376534765/Case_for_Investing_in_AT_a11y.pdf)

<sup>29</sup> <https://committees.parliament.uk/committee/164/work-and-pensions-committee/news/97724/assistive-technology-government-response/>

<sup>30</sup> <https://www.policyconnect.org.uk/research/connect-success-technology-and-employment-support-disabled-people>



live and work independently, family caregivers can increase their own workforce participation. As ATscale (2020) reports, "...meeting the unmet need for AT can enable family supporters to increase their time spent at work, resulting in nearly USD 2 trillion of additional income for families over the users' lifetimes."<sup>31</sup>

This raises urgent questions:

- Has DWP assessed how many PIP recipients use their benefit to fund, maintain, or support their AT?
- How will DWP monitor the impact of PIP cuts on AT access for disabled people?
- How will DWP monitor the impact of PIP cuts on those who need AT to access work?
- How will DWP monitor the impact of PIP cuts on family caregivers?
- How will DWP mitigate the loss of AT funding for individuals no longer eligible for PIP?

Many disabled people currently do not have their needs met by the existing systems, and the UK cannot afford to take steps backward. For the UK government to get more disabled people into work, it must move away from a narrow cost-minimizing view. Failing to do so risks deepening existing inequalities, undermining public trust, and placing the financial burden back onto individuals and other government budgets. Instead, the government should rethink how public sector-led investment, including flexible benefits like PIP and working with the disability community, can

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<sup>31</sup>[https://static1.squarespace.com/static/5b3f6ff1710699a7ebb64495/t/5fbf5c44eaf37e3b64932e6c/1606376534765/Case\\_for\\_Investing\\_in\\_AT\\_a11y.pdf](https://static1.squarespace.com/static/5b3f6ff1710699a7ebb64495/t/5fbf5c44eaf37e3b64932e6c/1606376534765/Case_for_Investing_in_AT_a11y.pdf)

better support equitable access to AT and create the conditions needed for disabled people to participate fully in employment and in society.

### Chapter 3: Supporting people to thrive

#### Our new support offer

- **How should the support conversation be designed and delivered so that it is welcomed by individuals and is effective?**

*The employment support conversation is not welcomed by individuals because it was not designed to meet their concerns and lives, and it will remain ineffective until this changes. The system must evolve to meet the growing needs of people with mental health conditions and an ageing population — whose experiences are often complex and fluctuating — by investing in inclusive assessment, tailored support, and employment pathways aligned with the UN Convention on the Rights of Persons with Disabilities.*

Evidence shows<sup>32</sup> that the composition of claimants has shifted significantly. Mental and behavioural disorders have become the most common primary condition, especially among younger adults. The prevalence of disability tends to increase with age. In the UK, approximately 45% of people of State Pension age are considered disabled<sup>33</sup>.

The implication is that the system must adapt to better support people with mental health conditions and ageing populations, which are often harder to assess and treat. Traditional models of disability assessment and

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<sup>32</sup> <https://academic.oup.com/jrssa/article/178/4/815/7058637?login=false>

<sup>33</sup> <https://commonslibrary.parliament.uk/research-briefings/cbp-9602/#:~:text=The%20prevalence%20of%20disability%20rises,or%20over%20reported%20a%20disability.>

support may not capture the fluctuating nature of these conditions. We anticipate these changes to require significant investment, research, structural and cultural change in civil services.

For support conversations to be effective there must be favourable supply of accessible, inclusive and empowering employment opportunities in companies compliant with the UN CRPD; to match the demand. Those delivering the support must be clear on the supply of this to base their recommendations and dedicate time to curate bespoke pathways for each individual.

- **How we should determine who is subject to a requirement only to participate in conversations, or work preparation activity rather than the stronger requirements placed on people in the Intensive Work Search regime.**

Longitudinal data is important to understand how people move on and off benefits and how reforms affect different groups over time. Future reforms should be accompanied by robust evaluation frameworks to assess not just fiscal impact but also well-being, employment outcomes, and equity<sup>34</sup>.

- **Should we delay access to the health element of Universal Credit within the reformed system until someone is aged 22?**

No, this directly penalises disabled adults because of their age (18-22), and less support may be the reason they cannot work.

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<sup>34</sup> <https://academic.oup.com/jrsssa/article/178/4/815/7058637?login=false>

## **Raising the age at which young people start claiming adult disability benefits**

- **Do you think 18 is the right age for young people to start claiming the adult disability benefit, Personal Independence Payment? If not, what age do you think it should be?**

The government will need to provide financial support for the extra cost of disability whatever the age of the disabled person.

## **Chapter 4: Supporting employers and making work accessible**

- **How can we support and ensure employers, including Small and Medium Sized Enterprises, to know what workplace adjustments they can make to help employees with a disability or health condition?**

***If the government is serious about inclusive employment, it must define “good work” in terms of enforceable standards—and ensure that disabled people are not left navigating a system that rewards private profit while punishing public need.***

The government’s green paper claims to champion a thriving, inclusive labour market, yet it fails to define what “good work” actually means or to hold employers accountable for accessibility and reasonable accommodations under the UN Convention on the Rights of Persons with Disabilities. Instead of structural reform, it leans on vague notions of culture change and limited measures like disability pay gap reporting—while disabled workers continue to face discrimination at work or sanctions for being out of it.

This lack of clarity leaves employers without a clear standard and disabled people at the mercy of inconsistent, often uninformed

interpretations of what support should look like. The omission of organizational justice—a well-established concept in behavioural psychology—ignores how perceptions of fairness and accountability directly affect wellbeing, job satisfaction, and even sickness absence. Without systemic accountability, voluntary measures are unlikely to shift entrenched inequalities.

Present data shows that on top of hardship due to health and impairment, disabled people face high external barriers to work, particularly due to negative attitudes and discrimination: Over half (54%) of UK employers surveyed express concerns over whether a disabled person could perform as well as a non-disabled person at work<sup>35</sup>. Among disabled adults who had left work for disability-related reasons, 28% reported experiencing discrimination from a manager or colleague<sup>36</sup>, and 90% said that discrimination led to or contributed to their departure<sup>37</sup>. One in 3 Disability Confident accredited employers employ no disabled people at all<sup>38</sup>.

Meanwhile, the imbalance is stark: as disabled people face poverty and benefit cuts, Maximus—the private company contracted to assess disability benefit eligibility—reported a 23% rise in UK profits, reaching £29.1 million, and paid out £10 million in dividends. This raises urgent questions about who profits from a system that too often fails those it's meant to support.

<sup>35</sup> Scope and Opinium polling of 269 HR decision makers in the UK. 27 January - 2 February 2023

<sup>36</sup> <https://www.scope.org.uk/campaigns/research-policy/attitudes-towards-disabled-people>

<sup>37</sup> Scope and Opinium polling of 1000 disabled adults in the UK aged 18 - 65 who have left the workplace because of a reason related to their disability or impairment 29 January - 2 February 2023

<sup>38</sup> [https://www.disabilitynewsservice.com/one-in-three-disability-confident-employers-have-employed-no-disabled-people/#:~:text=Nearly%20a%20fifth%20\(19%20per,on%20DWP's%20behalf%20by%20Ipsos.](https://www.disabilitynewsservice.com/one-in-three-disability-confident-employers-have-employed-no-disabled-people/#:~:text=Nearly%20a%20fifth%20(19%20per,on%20DWP's%20behalf%20by%20Ipsos.)