

Green Paper Consultation on Disability benefits

Cuts: Points to consider in your response

Notes:

- (i) See our separate presentation about what cuts are being proposed:
 - [Green Paper 2025 - GMCDP Session.pdf](#) (857.82 KB) slides
 - [Green Paper 2025 - GMCDP Session with notes and links.pdf](#) (876.78 KB)
- (ii) The most significant cuts are being brought in via separate primary legislation and are excluded from this consultation.
- (iii) We recommend responding to both the [online form](#) and emailing in your answers to:
Consultation.pathwaystowork@dwp.gov.uk
- (iv) We strongly urge you to write your responses in your own words - do not copy & paste from the suggestions below, due to concerns that these will be treated as duplicate responses and excluded from the analysis.
- (v) Deadline for responses: 11.59pm on Monday 30 June 2025

Suggested answers to consultation questions

Below are the questions from the online consultation form, and key points discussed during our Green Paper Consultation Meetings to consider including in your response.

Note that the following proposals are not specifically included in the consultation, so we recommend that you mention them in your responses to the online form and in your email response.

Note: No questions for Chapter 1

Chapter 2 Questions:

1. What further steps could the Department for Work and Pensions take to make sure the benefit system supports people to try work without the worry that it may affect their benefit entitlement?

Points to consider including in response:

- Do not cut PIP as proposed
- Do not cut UC as proposed
- Expand the Severe Conditions Criteria to include more disabled people.
- Consider adjusting the UC taper so that people are less impacted by taking on work until they are in a sustainable and adequate financial position

- Being able to work does not mean you are less affected by impairments - do not use people working as a reason to remove disability-related payments
- Keep PIP non-means tested - the extra costs of being disabled cannot possibly be borne by typical disabled people
- All-Party Parliamentary Group (APPG) on Poverty and Inequality has published its report from its inquiry into the disproportionate impact of poverty and inequality on disabled people. Siân Berry MP and Baroness Lister, Co-Chairs of the APPG, said: “Disabled people already face unacceptable levels of hardship. These proposals won’t remove barriers to employment—they will add new ones by stripping people of the income they rely on to survive. The evidence is clear: these cuts will deepen inequality and force people further into crisis. We urge the government to listen to those most affected and change course immediately.”
- The APPG report recommends:
 - Withdrawing the proposed cuts to disability benefits in the Green Paper
 - Increasing benefit levels to reflect real living costs and disability-related expenses
 - Ending repeated and harmful reassessments
 - Co-producing a redesigned social security system with disabled people and disabled people’s organisations

- Investing in accessible housing and transport to tackle structural barriers and inequalities

2. What support do you think we could provide for those who will lose their Personal Independence Payment entitlement as a result of a new additional requirement to score at least 4 points on one daily living activity?

Points to consider including in response:

- People should not lose PIP - abandon this proposal.
- The new 4-points rule will exclude many people with high support needs, so do not bring in this new rule - it does not focus PIP on people with higher needs, it arbitrarily cuts PIP as a cost saving measure alone (but will introduce more cost elsewhere in the health and social care system).
- If you expect people who lose PIP will need help, then you are knowingly bringing in a policy change that will harm disabled people.
- Instead of dealing with what's driving poverty and soaring living costs, this government is choosing to make cuts. It's doing that by framing people who are disabled, ill, and unemployed as a 'burden'. Blame is wrongly being shifted onto the people most in need, while those in power avoid responsibility.
- Amnesty UK has been investigating how cuts, sanctions and systemic failings of the social security system are pushing

people deeper into poverty. Our new report, Social Insecurity, shows the UK is breaching its human rights obligations, and it's time for change. <https://www.amnesty.org.uk/resources/social-insecurity-report> Read and implement the 6 sets of recommendations to UK Government on page 15.

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

Points to consider including in response:

- See suggested responses to question 2.
- It is likely that the increasing prevalence of disabled people due to the impacts of austerity and the pandemic among other factors will continue - but these reforms will reduce those eligible for financial support. This will leave even more people without the support they need.
- Many PIP recipients use their payments towards the costs of accessing medical treatments not available on the NHS (in a reasonable time frame), and to fund social care (or essentials not covered by social care, such as a cleaner for those unable to clean their homes independently). So cutting PIP will increase demands on the health and social care systems that are already in crisis, while worsening outcomes for disabled people.
- PIP cuts are also likely to mean some current recipients are no longer able to work, if they cannot pay for - for example -

taxis to work, a cleaner and other help at home, and the social care they need to be well enough and meet the necessary standards for work. This will further harm people's health and increase demand on Health and Social Care.

4. How could we introduce a new Unemployment Insurance, how long should it last for and what support should be provided during this time to support people to adjust to changes in their life and get back into work?

Points to consider including in response:

- An insurance model is fundamentally the wrong approach for social security and should be abandoned.
- There should be a public entitlement to state payments for an adequate standard of living irrespective of work/disability status.
- Recognise within policy, practice and training that people need respite and safe space to recover as much as they can and that the approach of the Employment Insurance policy is in direct conflict with this.

5. What practical steps could we take to improve our current approach to safeguarding people who use our services?

Points to consider including in response:

- These proposals will only increase unemployment, poverty and deaths.
- The DWP has been recognised as having a poor culture.

- John Pring's The Department should be mandatory reading for all DWP staff and ministers within a month of appointment.
- The DWP should publish all reports into claimant deaths, and all internal reviews into safeguarding.
- There should be a Safeguarding Inspectorate, independent of the DWP
- There should be a new and completely separate Department of Social Security, removing PIP, UC and other social security benefits from the DWP.
- Remove sanctions - there is no place for this as part of social security.
- Work coaches and disability advisers should come from Disabled People's Organisations
- All conversations should be opt-in when the claimant initiates a request only.
- Implement the recommendations of the 'Safeguarding Vulnerable Claimants' Work and Pensions Committee Report <https://committees.parliament.uk/work/7866/safeguarding-vulnerable-claimants/publications/>, including that:
 - bold action is required if DWP is to rebuild the trust of claimants
 - demonstrate to all staff that supporting claimants is an important part of DWP's mission.

- The introduction of a statutory safeguarding duty would help to drive and embed culture change in the Department, support the consistent delivery of safeguarding practices, and improve accountability should failures occur. Specified duties should include:
 - a responsibility to proactively conduct a safeguarding assessment or identify if a claimant needs additional support;
 - an obligation to both inform and proactively offer additional support
 - measures to all claimants who might need such support; and
 - a duty to refer vulnerable claimants to other agencies, including those which have a duty of care, to ensure their additional needs are supported
 - all significant new policies and policy changes, including those that fall outside the disability service area, are assessed by the Chief Medical Advisor's team to understand their potential health impact on claimants.
- The June 2025 APPG on Poverty and Inequality's Inquiry into the Disproportionate Impact of Poverty and Inequality on Disabled People recommends:

- Abandon the proposed cuts to disability benefits in the Green Paper
- Increase rates for all social security benefits
- End the pernicious reassessment model
- Redesign the social security system alongside those affected
- Introduce a joined up system of support to help disabled people with additional costs
- Increase provision of accessible social housing
- Invest much more in fully accessible public transport
- Source: <https://appgpoverityinequality.org.uk/wp-content/uploads/2025/06/DisabilityReport-one-page>.

Chapter 3 Questions:

Our new support offer

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

Points to consider including in response:

- Remove the threat of sanctions
- Do not cut people's payments
- Abandon these proposals.
- Recognise and act on the issue of the harmful DWP culture with its targets focus and how high risk this is for individuals.
- What does 'effective' mean here? It should mean that people's wellbeing is protected during difficult times.
- Contact may never be welcomed by some - in fact, contact will always be harmful for some and so contact needs to be opt-in only.
- If you want to design a social security system that is fit-for-purpose then do it in genuine co-production with Disabled People's Organisations, who you should pay at a competitive rate for their expertise.
- No conversations will ever be welcome under a punitive 'guilty first' culture where claimants are assumed to be doing wrong from the outset.

- Staff need proper training to handle such conversations supportively - this needs to be designed and delivered with Disabled People's Organisations.

7. How should we design and deliver conversations to people who currently receive no or little contact, so that they are most effective?

Points to consider including in response:

- Remove the threat of sanctions
- Do not cut people's payments
- Abandon these proposals.
- Recognise and act on the issue of the harmful DWP culture with its targets focus and how high risk this is for individuals.
- What does 'effective' mean here? It should mean that people's wellbeing is protected during difficult times.
- Contact may never be welcomed by some - in fact, contact will always be harmful for some and so contact needs to be opt-in only.
- If you want to design a social security system that is fit-for-purpose then do it in genuine co-production with Disabled People's Organisations, who you should pay at a competitive rate for their expertise

- No conversations will ever be welcome under a punitive 'guilty first' culture where claimants are assumed to be doing wrong from the outset.
- Staff need proper training to handle such conversations supportively - this needs to be designed and delivered with Disabled People's Organisations.
- This is a massive safeguarding risk and issue as some people, due to their health conditions / impairments will always experience DWP contact as policing and harassment.

A new baseline expectation of engagement

8. 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?

Points to consider including in response:

- This is a horrific proposal and should be abandoned.
- No-one should be subject to conditionality that affects payments.
- There is a right to social security.
- We already have a system that does this - there is much that could be improved in the current system, but these new proposals would only make things much worse.

9. Should we require most people to participate in a support conversation as a condition of receipt of their full benefit award or of the health element in Universal Credit?

Points to consider including in response:

- No
- There is no place for conditionality in the safety net of social security
- People should have to give active, informed consent for any 'support conversations' with the ability to withdraw at any point without negative consequences.

10. How should we determine which individuals or groups of individuals should be exempt from requirements?

Points to consider including in response:

- Self declaration (as for tax returns)

Delaying payment of the health element of Universal Credit

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

Points to consider including in response:

- No
- This is age discrimination - it is wrong and probably unlawful.

- Disabled children who survive childhood become disabled adults and their impairments do not magically (or otherwise) go away between the ages of 18 and 21.
- Disabled children becoming adults have a right to social security too.

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

12. 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?

Points to consider including in response:

- Yes

Chapter 4:

13. 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?

Points to consider including in response:

- Carrot & stick approach:
 - Genuine enforcement of breaches - Employment Tribunals are ineffective for addressing disability discrimination-related breaches of the Equality Act 2010.
 - Reform of Disability Confident - the government should: require all employers at Disability Confident Levels 2 and 3 to meet minimum thresholds regarding the percentage of disabled people in their workforce; and remove accreditation from employers that do not move up within 3 years from Level 1 to Levels 2 or 3.
 - The government should ensure award decisions for all public sector contracts take into account the percentage of disabled people in the workforce of tendering organisations; require government contractors to work towards a minimum threshold regarding the percentage of disabled people in their workforce; and take failure to achieve this threshold into account in future contract award decisions.

- The government should require employers to notify employees on decisions regarding reasonable adjustment requests within two weeks; make the option to work flexibly from day one the legal default for all jobs; introduce stronger rights to paid disability leave for assessment, rehabilitation and training; and fund an increase Statutory Sick Pay to the European average.
- The government should take into account increasing disability prevalence in calculating the disability employment gap, and use the 'prevalence corrected' employment gap measure in monitoring national progress on disability employment.
- Direct resources to Disabled People's Organisations, who are already experts at recruiting and retaining disabled employees, to educate other employers about how to do this.
- The government should create a 'one stop shop' portal to provide information, advice and guidance to employers on recruiting and retaining disabled people, and to disabled people on their employment rights.
- While the right work at the right time can be good for disabled people, work is not always a good thing even for disabled people who may be able to work in some capacity, and work will never be right for some disabled people. The system needs to recognise and support this.

14. What should DWP directly fund for both employers and individuals to maximise the impact of a future Access to Work and reach as many people as possible?

Points to consider including in response:

- Every single aid, adaptation, adjustment, therapy, coaching and training should be provided free of charge to remove all disability barriers, funded entirely by the state.
- Self-employed people should not have to pay up-front for items of their grant, and greater allowances should be given to what can be included in the grant for self-employed people compared with SMEs or large organisations.
- If the state does not fund removing disabling barriers but requires employers to do so, this will act as an incentive to employers to NOT employ disabled people.

15. What do you think the future role and design of Access to Work should be?

Points to consider including in response:

- Comprehensive, holistic, fully funded, no caps on support
- Removes barriers from the workplace and labour market so that disabled people can thrive
- Co-produced with Deaf and Disabled People's Organisations
- Equipment provided becomes the property of the disabled person, not the employer, so that the disabled person is

guaranteed to have the equipment they need for their next role without having to undergo the delays of re-assessment and re-ordering and to save Access to Work from having to provide duplicate equipment when suitable equipment is already available.

- Any disabled people eligible to apply, not only those in work or with a formal offer of work.
- Grants offered 'in principle' in advance of securing employment so that disabled people and employers know what will be provided
- Able to provide decisions within 2 weeks (as suggested in the Disability Employment Charter as the timescale for employees to notify employers on decisions regarding reasonable adjustments)

16. How can we better define and utilise the various roles of Access to Work, the Health and Safety Executive, Advisory, Conciliation and Arbitration Service and the Equalities and Human Rights Commission to achieve a cultural shift in employer awareness and action on workplace adjustments?

Points to consider including in response:

- Primary legislation is needed to bring in enforceable legal duties and provide disabled people with adequate social security

- The current proposals will sabotage the goal of achieving a cultural shift in employer awareness and action on workplace adjustments

17. What should be the future delivery model for the future of Access to Work?

Points to consider including in response:

- An independent government agency to deliver the holistic removal of barriers faced by disabled people in the labour market (all types of employment and work).
- This arms-length public body, should be outside of the DWP
- Support packages / grants need to be agreed prior to the start of work