

Equity member briefing – Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper

Background

The government has announced proposals for changes to the social security system in the [Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper](#). A number of the proposals represent cuts to disability social security support. Equity strongly opposes the cuts and will be responding to the proposals via the government consultation. As part of our response, we are surveying members for their views.

The government is consulting on some of the proposed changes, but not on others. This is indicated below. Equity will be submitting evidence to the government on the proposals that are not included in the formal consultation alongside our consultation response.

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Focussing PIP more on those with higher needs Chapter 2 of green paper, paragraphs 139-144 Not being consulted on	When
What is the proposal: Fewer people will get PIP ¹ . Claimants will need to score at least 4 points in a single daily living activity to qualify for the daily living component as well as the usual 8 point total for standard rate or 12 points for enhanced rate. The mobility component is not changing. Example: Currently a claimant with pain from arthritis who uses 'aids and appliances' to help with daily living might score 8 points via four activities each scoring 2 points. This claimant would no longer qualify for PIP daily living because they do not score 4 points in a single activity.	Nov 2026
Who will be impacted: <ul style="list-style-type: none"> • Current claimants at the first reassessment from November 2026. • New claimants from November 2026. 	
Implementation: through primary legislation	
Impacts: <ul style="list-style-type: none"> • 1.1m people with standard rate daily living component and 209,000 people with enhanced rate daily living component will lose PIP². • <i>Losing the PIP standard rate daily living component would be a cut of £346 per month. Losing the PIP enhanced rate daily living component would be a cut of £518 per month.</i> • Linked payments are carer payments, the new health element eligibility and many passported items which rely on PIP, like reduced travel costs • Losing PIP and the health element will lose a claimant £9,600 a year. • Increased cost to other public services. 	
Thoughts: <ul style="list-style-type: none"> • PIP pays for people to work and engage in society. We have concerns about how people will exist and engage when they lose access to PIP. • Many disabled creatives pay to work. PIP enables work. Combined with the failing Access to Work provision, removing access to PIP will force some disabled people away from work. 	

¹ The basic structure of PIP remains. Claimants can get either or both of a daily living and mobility component in PIP. For each component, a claimant needs to score 8 points for the lower standard rate and 12 points for the higher enhanced rate. The points come from assessment against a number of PIP activities and currently they can come from any combination of points.

² See FOI response: https://www.whatdotheyknow.com/request/personal_independence_payment_pi_7

<ul style="list-style-type: none"> • PIP smooths fluctuating income which is particularly important for the self-employed • What would be the impact of someone losing access to PIP on Carer's Allowance or the carer element of UC. • Breach of 2024 recommendation by the UN Convention on the Rights of Disabled People – paragraph 90(f) • Breach of 2017 recommendation by the UN Convention on the Rights of Disabled People – paragraph 114(b) & 114(g) 	
<p>Scrap the Work Capability Assessment (WCA) & switch to a single assessment (PIP)</p> <p>Chapter 2, paragraphs 37-40, 105, 111-118</p> <p>Not being consulted on</p>	
<p>What is the proposal: Currently the Work Capability Assessment (WCA) determines eligibility for the limited capability for work and work-related activity (LCWRA) element in UC (which DWP now refer to as the 'health element') and for Employment & Support Allowance (ESA). This will change under the proposals.</p> <p>The WCA will no longer exist and eligibility for the health element of UC will be established purely through PIP entitlement, specifically via the daily living component. There will be no need to demonstrate incapacity for work.</p> <p>The government proposes that contributory ESA will be incorporated into the new Unemployment Insurance Benefit – see below.</p> <p>Previous plans to change WCA eligibility are abandoned³. These would have reduced eligibility via the mobilising LCWRA descriptor, getting about, and substantial risk. While the WCA remains, those routes to eligibility remain.</p>	2028-29
<p>Who will be impacted:</p> <ul style="list-style-type: none"> • New claimants from 2028-29. • From 2028-29, the WCA will be scrapped even for current claimants, and those without PIP will cease to be eligible for the health element⁴. Transitional protection for current claimants is not specified. 	
<p>Implementation: to be delivered by primary legislation (para 105)</p>	

³ Measure 3 Spring Statement 2025: <https://www.gov.uk/government/consultations/pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper/spring-statement-2025-health-and-disability-benefit-reforms-equality-analysis>

⁴ Under the heading 'scrapping the WCA' at para 111-118, there is no mention of maintaining eligibility for current claimants based on an existing WCA. Contrast this with para 133 in the context of rebalancing health element and standard allowance says, "We will guarantee that no-one who has been found LCWRA prior to April 2026 and remains LCWRA following reassessment will see their UC health element entitlement change".

Impacts: <ul style="list-style-type: none"> • 615,000 receive UC/ESA but not PIP⁵ • <i>Losing the UC health element and the PIP standard rate daily living component would be a cut of £795 per month.</i> 	
Thoughts: <ul style="list-style-type: none"> • Without PIP, a claimant will have to rely on low out of work payments for long periods. • Part of policy sequencing and gradual erosion of rights – abandoning the idea that those with limited work capability get social security. • PIP looks at fundamental functions not ability to work. • Who will assess conditionality if no health element – this must be statutory not discretionary. • How will current contributory ESA continue once WCA is scrapped? • No substantial risk route to health element – strict points-based system via PIP. Substantial risk is a vital catch-all especially for mental health issues. • If long-term LCWRA then lose (e.g. due to high earnings), will be treated as a new claimant at the lower rate • What about short-term conditions – PIP is for long-term conditions only (3+9 months) • Breach of 2024 UN recommendation for inquiry into scrapping WCA policy – Para 90(d) & 2017 recommendation para 114(g) 	
Changes to LCWRA element and standard allowance Chapter 2, paragraphs 41, 42, 107, 131-138 Not being consulted on	
What is the proposal: ‘rebalancing the standard allowance and the health element’ so there is less incentive to get the health element.	2026-27
Who will be impacted: <ul style="list-style-type: none"> • Everyone: UC standard allowance to increase above inflation from £92 pw (2025-26) to £106 pw (2029-30) • New claimants: in 2026-27 health element cut from 2025-26 rate of £97 pw to £50 pw • Existing claimants: freeze health element at 2025-26 rates (£97 pw) until 2029-30 	
Implementation: Through primary legislation	

⁵ Stat-Xplore figures for August 2023, from Geiger, B. (2024). After the WCA: Competing visions of disability and welfare. CSMH Report R011. London: ESRC Centre for Society and Mental Health.

Impact: <ul style="list-style-type: none"> • Cut to health element for new claimants is a reduction of £227pcm⁶ so increase to standard allowance goes nowhere near offsetting the reduction to health element. • Increase to standard allowance is worth £165 pa to a single adult⁷ 	
Thoughts: <ul style="list-style-type: none"> • Welcome the increase to basic UC standard allowance. But the increase is nowhere near what is needed to re-set Tory austerity policies. Basic UC entitlement needs to be much higher if the intention is to disincentivise claimants from claiming PIP & health element. • Contrary to the 2024 recommendation by the UN Convention on the rights of Disabled People (paragraph 90(f)) to provide adequate social security. 	
New Unemployment Insurance contributory benefit Chapter 2, paragraphs 53, 54, 151-156 Included in the consultation	
What is the proposal: replace contributory Employment & Support Allowance and contribution-based Jobseeker's Allowance with a single time-limited entitlement paid at the current ESA plus support group rate of £138 pw. No health assessment would be required. The national insurance record will give entitlement. This includes the self-employed (para 156). Minimum requirement of employment support involving requirement to 'participate in conversations ... with appropriate exemptions' (para 154) The green paper suggests that Unemployment Insurance could last 6-12 months (para 153)	2028-29
Who will be impacted: Existing cESA claimants would retain the indefinite entitlement beyond 2028 as now (para 53), but it is not clear how this would sit with scrapping the WCA From 2028-29, new claimants would have the time-limited combined entitlement.	
Thoughts: <ul style="list-style-type: none"> • Should not be time limited. Currently those claiming cESA can get it indefinitely if they are ill/disabled enough to get into the support group. • Current cESA claimants in the support group must be protected beyond 2028. 	

⁶ <https://www.jrf.org.uk/social-security/how-health-related-benefit-cuts-add-up>

⁷ <https://www.resolutionfoundation.org/publications/a-dangerous-road/>

<ul style="list-style-type: none"> • UIB must include the self-employed on equal footing - so Class 2 NICs must enable full entitlement to UIB. • Must be tied with a complete overhaul of NI Contributions Office record-keeping and training so that citizens can check their rights via their NI records. The NI record available on gov.uk currently does not give anywhere near enough information to check rights to NI-based social security. E.g. exact type of NI credit (class 1 or class 3) or what the NI record gives you. • How will 'unemployment' be defined? Will it include self-employed people or workers/employees (e.g. in the gig economy) with fluctuating earnings during a period of no earnings? • Work-related requirements for UIB must be based on a statutory framework not on DWP staff discretion. • Must allow prolonged period of 'same job' search akin to Reg 97(4) The UC Regulations 2013, to enable people who have lost a job to look for the same work rather than all and any work. • Assuming the self-employed get UIB during periods out of work, how would this tie in with the minimum income floor on UC? • Will this be available alongside SSP? If so the self-employed will get less because of no SSP. 	
<p>Access to Work Chapter 4, paragraphs 284 – 295 Included in the consultation</p>	
<p>What is the proposal: Fundamental reform to Access To Work (ATW). Will establish a <u>collaboration committee</u> on the future direction of ATW. Consulting on:</p> <ul style="list-style-type: none"> • Supporting employers • Giving targeted funds to individuals • Shaping the market for items and tech <p>Shift in culture around workplace adjustments.</p>	TBC
<p>Thoughts:</p> <ul style="list-style-type: none"> • Welcome reform and shift in culture. • Should be statutory with clear appeal rights and time expectations • ATW is invaluable for those who have it, but the ATW application process and delays get in the way. • There is no reference at all to the self-employed in this section of the green paper. • The green paper does not mention support workers for the self-employed working to get work (12 hours a week, probably more for disabled workers). • Remove the annual cap. 	

<ul style="list-style-type: none"> Access riders – is there a good way to support engagers to include these and comply with their existing obligations. 	
<p>Supporting employment & conditionality Pathways to work support offer, support conversation, additional support, baseline expectation of engagement, investment in employment support, removing barriers to trying work</p> <p>Chapter 3 (paragraph numbers below)</p> <p>Included in the consultation</p>	
<p>What is the proposal: there are several DWP proposals relating to claimants getting work or more work. Some of these are expressed as employment support and others relate to conditionality and sanctions.</p> <p>Establish legal principle that work will not lead to reassessment (para 126)</p> <p>Remove other barriers to work and reinforce work preparation within the benefit system (para 128 & 163)</p> <p>A new support conversation (para 217 – 223) with a trained specialist in an appropriate format, time, location and channel. Consulting on whether it should be compulsory (para 242).</p> <p>Additional support options (para 224 – 234) to ensure increased level of engagement. Personalised approach. Specialist 121, intensive longer-term and/or periodic engagement. Consulting on whether it should be compulsory and on how to determine for whom these conversations and work preparation are compulsory (para 240 & 242). Work search will remain compulsory for jobseekers.</p> <p>A 'new baseline level of engagement' (para 235-247). Consulting on whether it should be compulsory (242).</p> <p>Consulting on who should be exempt (244).</p> <p>A backstop of sanctions will exist to 'underpin the expectations of engagement but this should be used only as a last resort' (para 247).</p>	<p>2026-27</p> <p>2027-28</p>
<p>Who will be impacted:</p> <p>All UC claimants</p>	
<p>Implementation:</p> <p>Primary legislation</p>	
<p>Cost:</p> <p>£1bn employment support</p>	

<p>Thoughts:</p> <ul style="list-style-type: none"> • Must all be voluntary with no repercussions for non-engagement • How will expectations be 'tailored' both for those with the health element and those without? This must be statutory, appealable and not discretionary. Experience from MIF adjustments show work coaches get this wrong. • Who makes decisions – work coaches? The quality of work coach discretion is currently poor. How will they engender trust after DWP reputation shredded? How can the exercise of discretion be challenged? • Whilst 'many people would welcome this contact' (para 227) those who do not welcome this contact need to also be front and centre. The 'periodic engagement' category must be considered carefully (para 224). • Voluntary Additional Work Coach Support study of LCWRA UC claimants showed that 3%-point more (11% vs 8% of 12,000 claimants) were in work after 12 months if they had the extra support. (para 228) 	
<p>Safeguarding Chapter 2, paragraphs 177-185 Included in the consultation</p>	
<p>What is the proposal & who will be impacted:</p> <p>Support those who are "vulnerable or at risk" (para 175). Review current processes and improve them.</p> <p>Significant change from old approach.</p> <p>Build trust and provide clarity</p>	Now
<p>Thoughts:</p> <ul style="list-style-type: none"> • Welcome the desire to build trust but this will require an enormous change after prolonged failures and benefits deaths. 	
<p>Reducing assessments for those with severe conditions Chapter 2, paragraphs 168-173 Not being consulted on</p>	
<p>What is the proposal: those with the most severe conditions will get an additional premium on UC. Paras 168-169.</p> <p>Reviewing communication for light touch reviews (paras 170-173)</p>	2026-27
<p>Who will be impacted: no detail on how to qualify</p>	
<p>Thoughts:</p> <ul style="list-style-type: none"> • The devil will be in the detail. 	

<ul style="list-style-type: none"> There is a concern that this will use the medical model of disability, not the social model. 	
Young people Chapter 3, paragraph numbers below Included in the consultation	
What is the proposal: <u>PIP:</u> raising age for PIP from 16 to 18. Paras 260 - 265 <u>UC health element:</u> no entitlement until age 22. Paras 248 - 259	TBC 2027-28
Who will be impacted: under-22's	
Thoughts: <ul style="list-style-type: none"> This is a straight cut for young people. No provision for long-term disabled children becoming adults. Who will decide if this group is capable of looking for work? Work coaches? See comments above about work coach discretion. 	
Those who lose PIP: supporting people who lose PIP, health and care needs of those who lose PIP Chapter 2, paragraphs 143-150 Included in the consultation	
Consulting on: Whether those who lose PIP need support and what type Offering review of health and care needs to those who lose PIP	
Thoughts: <ul style="list-style-type: none"> The government must consider lived experience when making their decisions in this area. 	
Assessments: Switching back on WCA reassessments, focusing on those with 'substantial risk' and short-term conditions. Increasing the number of face-to-face assessments in PIP and WCA Recording Assessments Chapter 2, 161-167	

Not being consulted on	
What is the proposal: these are DWP procedural matters and they can largely do this without consulting or legislating.	TBC
Who will be impacted: everyone affected	
Review of the PIP assessment – to follow Chapter 2, 157-158 Not being consulted on now, this will follow as a separate process	
What is the proposal: in a separate process to this Green Paper, there will be a fundamental review of the PIP assessment involving policy experts, stakeholders and disabled people.	TBC