

Response to the UK Government's 'Pathways to Work: Reforming Benefits and Support to Get Britain Working' Green Paper

June 2025

About us

The Poverty Alliance is Scotland's anti-poverty network. Together with our members, we influence policy and practice, support communities to challenge poverty, provide evidence through research and build public support for the solutions to tackle poverty. Our members include grassroots community groups, academics, large national NGOs, voluntary organisations, statutory organisations, trade unions, and faith groups.

Introduction

The Poverty Alliance and our members are deeply concerned by many of the proposed changes to our social security system included in the Pathways to Work Green Paper. We are further concerned about the impact that revised proposals on the Universal Credit and Personal Independence Payment Bill will have on creating unjust inequality in our social security safety net for young disabled people and those become disabled. These proposals will create a two-tiered system of support, disconnected from the needs of individuals and households and based instead on when someone becomes disabled. This is a policy choice that entrenches harm for future generations of disabled people, and risks discriminating against those with fluctuating and degenerative conditions.

As it stands, this Bill remains fundamentally flawed. Rushed through 'concessions', with little or no consultation with disabled people or disabled people's organisations, are no way to develop effective policy that will have a significant impact on the wellbeing of thousands of people. Instead, we need to see policy which will achieve a compassionate, person-centred system that is rooted in adequacy, and gives all people the foundation needed to build a decent life, free from poverty. It is simply not right for the UK Government to maintain its self-imposed fiscal rules at the expense of disabled people and households that are already struggling to keep their heads above water.

The UK Government should withdraw this Bill, work with those who will be affected and develop proposals that will genuinely reform the system of support for sick and disabled people, without accompanying cuts to social security.

Our social security system is a public service and a basic human right that should secure the wellbeing of everyone in society. It is not only a safety net that should be there for all of us when we need it, but also a springboard which provides vital support for accessing suitable educational and employment opportunities, as well as other forms of participation in society. Life can be unpredictable; redundancy, bereavement, illness and caring responsibilities - which can happen to anyone, at any time - are all reasons why someone may need to access financial support. A compassionate system that is rooted in adequacy is therefore an investment in people. It gives us all a secure foundation for the future.

This UK Labour Government was elected on a promise of change. With more than one in five people experiencing poverty across the country, this change cannot come quickly enough. This Government had the choice to restore the value of our social safety net. Instead, they have chosen to propose reforms which will see young disabled people, people who are not yet disabled, and their families have their incomes reduced, forcing them into insecurity. We must be clear that these reforms are a continuation of years of unjust policy decisions which have resulted in one of our most vital public services causing destitution by design, inflicting the very harm it is intended to prevent. Not only will they increase inequality – particularly, in the context of revised proposals, between disabled people - but they also sit in jarring contradiction to the UK Government’s own aims to tackle child poverty and increase living standards.

Disabled people and their families are already at greater risk of poverty, with 63% of those experiencing destitution in the UK being disabled or having a long-term health condition.¹ Organisations in the Poverty Alliance’s network see the impact of this every day. Analysis from Citizens Advice Scotland found that over 40,000 disabled households have sacrificed a cooked meal to run or charge essential medical equipment.² Three-quarters of Trussell foodbank users in Scotland come from households containing a disabled person.³ A 2024 survey of disabled members of Glasgow Disability Alliance found that 68% couldn’t afford utilities and 58% struggled to afford food and essential groceries, with almost three-quarters stating that their income through social security or work did not meet their needs.⁴ This insecurity has negative consequences for families including on children’s life chances, health and wellbeing. Nearly one in three of people supported by Citizens Advice who are receiving Personal Independence Payment (PIP) have dependent children which means that these cuts will negatively impact the work of the forthcoming Child Poverty Strategy.⁵

These figures speak to the need to place increased focus on disabled people’s poverty in our policy-making, a consistent call from the Disabled People’s Organisations in our membership and disabled people across the country.

We all want to see the best possible employment outcomes for disabled people and people living with long term conditions. Improving access to good quality, secure and well-paid work - which is appropriate for a person’s skills and circumstances - should be central to meaningful anti-poverty action. Alongside supporting people into work, it is right that the Green Paper acknowledges the need to drive improvements in the labour market, and places focus on employers’ central role in achieving this.

However, better outcomes for disabled people - and a future free from poverty - will take urgent and well-resourced action across a suite of interventions, all of which depend on the foundation of a strong social security system. The right to work is a fundamental human right

¹ Joseph Rowntree Foundation (2023) What is destitution and how do we tackle it? Available at:

<https://www.jrf.org.uk/deep-poverty-and-destitution/what-is-destitution-and-how-do-we-tackle-it>

² Citizens Advice Scotland (2024) *Tens of Thousands of Disabled People Sacrifice Cooked Meals to Charge Medical Devices*. Available at <https://www.cas.org.uk/news/tens-thousands-disabled-people-sacrifice-cooked-meals-charge-medical-devices>

³ Trussell (2023) *Hunger in Scotland*. Available at: <https://cms.trussell.org.uk/sites/default/files/wp-assets/2023-Hunger-in-Scotland-report-AW-web.pdf>

⁴ Glasgow Disability Alliance (2024) *‘Disabled People Challenge Poverty’: Survey Findings Headline*. Available at: <https://gda.scot/resources/disabled-people-challenge-poverty-survey-findings/>

⁵ Citizens Advice (2025) *Pathways to Poverty – How planned cuts to disability benefits will impact the people we support*. Available at: <https://www.citizensadvice.org.uk/policy/publications/pathways-to-poverty-how-planned-cuts-to-disability-benefits-will-impact-the/>

and one that is too often denied by a society that does not do enough to enable equal participation. The right to social security is no less important, and it is incumbent on our decision makers to create systems that realise this right for all people. That includes those who will become eligible for social security support in the future.

That is why we are deeply frustrated that many of the proposals included in the Green Paper are not being consulted on, including the removal of the Work Capability Assessment and cuts to the value of the Universal Credit health element. Notable in these proposals are restrictions to PIP. PIP is not a work-related benefit and is meant to cover the additional costs of being disabled. It is not, and never has been, related to work or someone's work capability. Rather, this payment is an enabler of work; restricting this support risks pushing people further away from the workplace. Financial pressure may force people to take on work before they are ready, or to engage in unsuitable work, potentially damaging their recovery and making work unsustainable long-term, directly undermining aims of the Green Paper.

Furthermore, for people in Scotland, accessing social security is complex. These reforms will have a significant impact on people in Scotland and the devolved social security system; for example, while changes to PIP do not automatically apply to Adult Disability Payment, we are concerned that financial pressures may force the Scottish Government to follow suit. Despite this, it appears that these proposals were put forward without engagement with the Scottish Government. Clear communication between administrations, and meaningful engagement with organisations that support disabled people in Scotland, is imperative to deliver the best outcomes for people navigating both reserved and devolved systems.

Ultimately, this is a question of about the kind of society we want to be. Scotland is a country that believes in justice and compassion and people want our governments to make decisions which align with those values. The proposed reform in the Green Paper – and further revised proposals in the Universal Credit and Personal Independence Payment Bill - will not only lead to an increase in poverty, a fall in living standards for millions of households, and the further undermining of disabled people's rights, it will also create a new entitlement inequality between disabled claimants. While we agree that change is needed in the sickness and disability support system, restricting eligibility and reducing adequacy will not achieve the stated aim of many more people into work. Rather, it will push some of those families who face the biggest barriers to employment into deeper poverty, and potentially further away from the workplace.

The UK Government can and must act quickly to address the wide-ranging concerns on their proposals, and work towards a human rights based social security system which is non-stigmatising, ensures those in need are guaranteed an adequate income, and which enables access to fair, rewarding employment.

Chapter 2

Reforming the structure of health and disability benefits systems

Question 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?

Our social security system is a public service and a basic human right that should secure the wellbeing of everyone in society. As we make clear throughout our submission, years of cuts and negative political narrative have resulted in our social safety net causing destitution by design. It often inflicts the very harm it is intended to prevent through inadequacy and a stigmatising, punitive approach. We urge the UK Government to restore the value of social security support so that it meets the cost of life's essentials and allows households to live in decency and dignity.

In the first instance, this means greater clarity on what skills support is permitted within existing social security rules. As the Green Paper itself acknowledges, many of the rules determining access to social security are complex, particularly for people in Scotland who are navigating both reserved and devolved systems. That means that people are worried about being punished for getting things wrong, while simultaneously being made to look for or enter work that is inappropriate when considering their health, skills or experience.

In 2023, the Poverty Alliance were commissioned to recruit, support and facilitate a Citizen's Panel seeking their views on the Scottish Government's Lifetime Skills Offer.⁶ Panellists noted challenges in accessing upskilling and reskilling support through Jobcentre Plus, and a lack of clarity around what training they could access without impacting their entitlements. Some were struggling to get appointments to speak to Jobcentre staff due to staff shortages. Others stated that when they had added questions related to training opportunities to their online journal, there were delays in staff responses. Where there had been a lack of clarity, or delays in being able to seek advice from frontline staff, participants reported stress, uncertainty and fear that accessing training would impact their social security entitlements. In some instances, this uncertainty had prevented people from accessing training due to the fear of greater financial insecurity due to lost income.

Therefore, there must be clear messages related to what is permitted on training and reskilling, communicated without jargon, and available to everyone who is accessing social security support.

Question 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?

⁶ The Poverty Alliance (2023) *The Lifetime Skills Offer: Participation of people with experience of poverty and equalities organisations in the development of the Scottish Government's Lifetime Skills Offer*. Available at: <https://www.povertyalliance.org/get-heard-scotland-lifetime-skills-and-equalities/>

We are deeply frustrated that many of the proposed changes in the Green Paper – including that to restrict Personal Independence Payment (PIP) - are not being consulted on. PIP is not a work-related benefit and is meant to cover the additional costs of being disabled. It is not, and never has been, related to work or someone's work capability. Rather, this payment is often crucial in helping disabled people both enter and remain in work. Reducing or eliminating this vital support will have devastating consequences to the health and livelihoods of thousands of households.

We therefore strongly oppose the proposed changes to PIP, as well as the removal of Work Capability Assessments and cuts to the value of the Universal Credit health element that are included in the Green Paper. As we have laid out in the introduction to our response, we are further concerned about the impact that revised proposals on the Universal Credit and Personal Independence Payment Bill will have on creating unjust inequality in our social security safety net for young disabled people and those become disabled.

The UK Government should withdraw this Bill, work with those who will be affected and develop proposals that will genuinely reform the system of support for sick and disabled people, without accompanying cuts to social security.

Question 5

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

We welcome the Department for Work and Pensions openness to improving their approach to safeguarding.

The inadequacy of our social security system is causing physical, mental and financial harm to those in need of support. To be clear, a principal way to improve safeguarding would be to restore the value of social security to ensure that support, at a minimum, covers the real cost of living. This would not only prevent people from being pulled into poverty and destitution, but also the harm that comes along with that.

One of the first steps to achieving this would be reviewing the conditionality regime from a safeguarding perspective, to understand the extent to which prescriptive and mandatory work-related requirements can contribute to safeguarding concerns for the most vulnerable claimants, particularly as sanctions can pull them under an acceptable income level for meeting life's essentials.

These punitive sanctions, as well as intrusive assessment and complex application processes, showcase the role that stigma currently plays in our social security systems. There is a clear lack of appropriate support based on compassion and dignity in current service delivery.

Research conducted as part of the Welfare Experiences project with people receiving Universal Credit and Personal Independence Payment found that multiple participants had experienced events where they felt as if they had been singled out, targeted, or traumatised by an interaction with Department for Work and Pensions or other staff.⁷ Further to this, in

⁷ Welfare Experiences is a 5-year comparative project exploring the experience of receiving benefits in the UK and four other European countries. See here for further information: <https://welfare-experiences.org/>

2024, the Poverty Alliance worked with a Citizen's Panel - comprised of 16 individuals living on low incomes and with experience of social security in Scotland – to highlight the impacts of poverty stigma on accessing entitlements.⁸ Panel discussions evidenced that stigma around social security is felt keenly and exists on every level, creating powerful barriers to accessing support, harming mental health and undermining public trust in our social security systems.

This stigma is fuelled by language and messages of politicians and the media, but is also reflective of wider, ingrained social values, with *“politicians saying what they think people want to hear”*. Panellists felt that stigma had become more pervasive with austerity and the UK Government level ‘welfare reform’.

Tackling stigma in the delivery of social security should therefore be a safeguarding priority. The Citizen's Panel produced a number of practical steps that decision makers can take to address stigma in social security processes:

- **Promote positive and inclusive language.** Language used by decision makers and media directly impacts public attitudes and service user's experiences. The Citizens Panel reported being harmed by rhetoric framing benefit recipients as *“scroungers”* or *“burdens”*, contributing to shame and social exclusion. Suggested actions include:
 - Reviewing and replacing the term “benefits” with less stigmatising alternatives such as “income support” or “entitlements”.
 - Avoiding divisive narratives (e.g. “hardworking families”) which marginalise those unable to work; and
 - Commissioning a national awareness campaign to humanise social security and celebrate it as a shared safety net, using stories from people with lived experience.
- **Design processes and systems for dignity.** Processes that are overly complex or require repeated retelling of personal struggle were identified as re-traumatising and a significant barrier to accessing entitlements. Suggested actions include:
 - Introducing simplified, adaptive (‘smart’) forms that tailor questions to individual circumstances and accessibility needs; and
 - Improving data-sharing between bodies like the Department for Work and Pensions and Social Security Scotland to reduce duplicative processes and unnecessary reassessments.
- **Expand access to advocacy and personalised support.** Advocacy is not merely support, it is a form of safeguarding that enables individuals to navigate complex systems safely, particularly during periods of trauma, ill-health or crisis. Suggested actions include:
 - Enshrining a universal right to advocacy for all social security claimant;
 - Increasing funding for local, independent welfare rights and advocacy services; and
 - Integrating social security advice within trusted services such as schools, GP practices, and mental health teams.

⁸ The Poverty Alliance (2024) *The impact of stigma on benefit take-up: Report of a Get Heard Scotland Citizens' Panel*. Available at: <https://www.povertyalliance.org/get-heard-scotland-impact-of-stigma-on-benefit-take-up-report-of-the-citizens-panel/>

- **Embed stigma-informed training across the workforce.** Stigma is often “baked into” systems through unconscious bias or policy design, with Panellists describing interactions with some staff as dehumanising and dismissive. Suggested actions include:
 - Providing mandatory training on poverty stigma, inequality, and trauma-informed practice for all frontline staff, policy designers, and decision-makers; and
 - Including lived experience experts in the design and delivery of training.
 - Link training to the Public Sector Equality Duty and Human Rights frameworks to ensure accountability.
- **Ensure lived experience is embedded in systems design.** Panellists expressed concern about contributing to consultations without seeing meaningful change. For safeguarding reforms to be trusted, the experiences of those living in poverty must be visible. Suggested actions include:
 - Establishing permanent lived experience panels at national and local levels to review safeguarding practices and benefit delivery; and
 - Publishing regular impact reports demonstrating how lived experience feedback has shaped policy.

Ultimately, as the last point above suggests, there should be a clear process of service user participation to support the planning, implementation and monitoring of outcomes around improvements to safeguarding to ensure that services are working for – and protecting - the people that use them.

Chapter 3

Supporting people to thrive

Our new support offer

Questions 6 and 7

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

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

We have taken questions 6 and 7 together.

We cannot lose sight of the continued discrimination and structural inequalities in our labour market that too often deny disabled people their right to work. We therefore need strong national level policy action to create a labour market that is accessible to all people who are able to work.

Data highlights that being in quality paid work, with adequate hours and fair pay, continues to be positively correlated with a lower risk of poverty. Supporting those able to work into good quality jobs which embody fair work principles is therefore a key means of reducing poverty in the UK. Despite this, we believe that the current approach taken to employment support, particularly within the Jobcentre Plus (JCP) service, often undermines this ambition. Support conversations are increasingly viewed as focused on compliance with social security rules, rather than support.

To meet ambitions related to paid work, compassionate employment support needs to be central to the role of work coaches. That means that support conversations should take a person-centred and human-rights based approach and be initiated on the basis that work is something that the individual wants and is able to do. In that way, support conversations should facilitate finding work that is a good fit for an individual, rather than forcing them to take any available job which may not be sustainable, desirable, or relevant. The onus should be on work coaches to set out the range of support that is available to people, and how they can access it.

Recently published research from the Joseph Rowntree Foundation found that only 12% of disabled people said they trust work coaches to have their best interest in mind when supporting them around work.⁹ Disabled people forced to go to "*work focussed interviews*" felt that they had not been treated with "*dignity, respect or compassion*". They also reported fear in accessing the system, including being fearful that attempting paid work would lead to benefit reassessments and the safety net of social security being removed if their entry into paid work was not successful.¹⁰ Participants in the Welfare Experiences project, echoed these experiences, stating that Department for Work and Pensions staff showcased a fundamental lack of understanding around disability and long-term illness.¹¹

⁹ Joseph Rowntree Foundation (2024) *Unlocking benefits: Tackling barriers for disabled people wanting to work*. Available at <https://www.jrf.org.uk/work/unlocking-benefits-tackling-barriers-for-disabled-people-wanting-to-work>

¹⁰ Ibid.

¹¹ Welfare Experiences is a 5-year comparative project exploring the experience of receiving benefits in the UK and four other European countries. See here for further information: <https://welfare-experiences.org/>

There are also continued issues with so-called ‘parking’ and ‘creaming’ of claimants, with work coaches often focusing on individuals who were easiest to help into work, so they could meet targets, rather than focus on those who required more substantial support to get into paid work.¹²

We spoke to Glasgow Disability Alliance (GDA), one of the Disabled People’s Organisations in our membership, to learn more about the experiences of their members. They highlighted that work coaches do not always understand why a disabled person might be anxious around engagement with them, and places like JCP in general. Often, it has to be explained that people will be anxious about possible sanctions and the impact of negative experiences with JCP in the past.

Our members have reported that disabled people have variable experiences of interactions with JCP staff around conditionality, sanctions and requirements on attending appointments, with the approach often seemingly being determined by the attitudes of individual frontline staff. Conditionality and sanctions should not form part of the system and therefore should not be a necessary component of any support conversation, which should recognise that people have a right both to social security and to work, and that the social security system is there to help realise those rights.

Official statistics show that the disability employment rate was 53% in Q2 of 2024, compared to 81.6% for non-disabled people.¹³ This equates to a disability employment gap of almost 30 percentage points. GDA noted that this discrimination and structural inequality in the labour market is not always well-understood by work coaches. Indeed, there is often a deficit model approach adopted with the individual which implies that it is personal failings, rather than structural inequalities, which are preventing disabled people from getting into work.

Therefore, it is particularly important that people who have previously had no or little contact do not find an invitation to engage threatening. Many people have a justifiable fear of engaging with the social security system, so support conversations must be genuinely supportive, avoiding stigmatising and punitive content. They must also follow best practice on inclusive communications, ensuring that both the conversations themselves and any supporting information are available to people in the formats that best suit them.

Ensuring that disabled people can access good quality, person-centred employment support in welcoming and trusting environments requires fundamental reform to the culture and approach to service delivery and conditionality. We are supportive of re-orienting support conversations at places like JCP towards genuine engagement, rather than compliance with prescriptive social security rules. As outlined by the New Economics Foundation, key features of such a model would include:¹⁴

- **Initial communications to people that highlight that there is a general expectation that they engage with support and try to make progress towards work, but that the aim will be to work together voluntarily.** It should be clear that

¹² National Audit Office (2019) *Supporting disabled people into work*. Available at: <https://www.nao.org.uk/reports/supporting-disabled-people-to-work/>

¹³ Department for Work and Pensions (2024) *Official Statistics: The employment of disabled people 2024*. Available at: <https://www.gov.uk/government/statistics/the-employment-of-disabled-people-2024/the-employment-of-disabled-people-2024>

¹⁴ New Economics Foundation (2024) *Terms of Engagement: Rethinking Conditionality to Support More People into Better Jobs*. Available at: <https://neweconomics.org/2024/07/terms-of-engagement>

this would only be reviewed if someone was refusing to engage with no apparent good cause. We believe the expectations and responsibilities in the system should be written in a Charter, which replaces the Claimant Commitment.

- **A first meeting that focuses on people's experiences, skills, aspirations, and barriers.** This should inform a genuinely co-produced and personalised plan, setting out what the person and the work coach will aim to do, how they will communicate, and how often they will meet. This should take into account any barriers to work, such as caring responsibilities, to ensure that support is adequately flexible.
- **Introducing an initial three-month period where engagement with work coaches is on a voluntary basis.** During this period, work coaches should be proactively reaching out to people and seeking feedback if things do not seem to be progressing, and people accessing the system should be encouraged to raise concerns if they do not feel they are being supported.

A new baseline expectation of engagement

Question 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?

The Poverty Alliance would not support any wider application of conditionality and sanctions than at present. We urge the UK Government to ensure that those who are currently exempt from conditionality are excluded from stronger requirements.

Also, as we have stated in our answer to question 5, the conditionality regime must be reviewed from a safeguarding perspective, to understand the extent to which prescriptive and mandatory work-related requirements can contribute to safeguarding concerns for the most vulnerable claimants, particularly as sanctions can pull them under an acceptable income level to live in decency and dignity.

Question 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?

As with our answer to question 8, we would not support any wider application of conditionality and sanctions than at present. Therefore, we do not agree with requiring people to take part in support conversations in order to qualify for receipt of the Universal Credit (UC) health element. Instead, this should be offered as a voluntary option to individuals who are willing and able to take it up. Support should be person-centred and specific to the needs and skills of that person.

Further to this, as we have made clear throughout our submission, we are in strong opposition to the proposed changes to the UC health element. Any reduction in the support offered through our vital social security systems will lead to greater incidence of poverty and destitution and will – consequently – worsen health.

Delaying payment of the health element of Universal Credit

Question 11

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

No. All people – regardless of age – should be able to live in decency and dignity, but this is not possible when there is inequality built into the systems which are supposed to help keep our heads above water. In addition to opposing the other changes to the Universal Credit health element, we strongly disagree with the proposal that more young people should be denied access to parts of our social security system based on age.

Age discrimination is already built into Universal Credit. All under 25s receive less than older claimants in the same circumstances. This is having a particularly devastating impact on households with young parents, with couple parents under 25 losing out by £130.55 per month, and single parents losing out by £83.16, compared to their counterparts aged over 25. As highlighted by our member organisation, One Parent Families Scotland, this ‘Young Parent Penalty’ is visible in the reality that 55% of children with mums under 25 in Scotland are in poverty - double the overall rate of child poverty.¹⁵ It is clear then that this inequality is something that we cannot repeat, particularly as - like parents - disabled people have higher and additional everyday costs.

The health element of Universal Credit is there to replace income lost through incapacity to work because of sickness and disability. The cost of essentials does not change depending on age, so it is unjustifiable to build further age discrimination into Universal Credit. A growing number of younger adults claiming sickness and disability support is not a reason for installing blanket restrictions based solely on age. The proposed changes do nothing to address the root causes for increasing numbers of young people accessing this support, and it is likely that investment in additional training support will take time to implement and filter through to communities. This means that there may be a lag between young people losing entitlement and being able to access support, with implications for their financial security, health and wellbeing.

We understand that this question is being asked in the context of delivering a Youth Guarantee, where young people *“have work and training rather than a pathway to economic inactivity.”* However, we want to be clear that framing receiving health-related social security support as “economic inactivity”, particularly for disabled young people, is incredibly harmful and emboldens the current political narrative that appears to be depending on stigma to achieve its aims.

Data from CPAG spotlights that this change would mean that more than 100,000 people who are deemed to have work-limiting disabilities would be £97 a week worse off. This is a total cut to household income of over £500 million. The Green Paper states that this £500 million could be *“diverted instead to expanding and improving the work and training opportunities available as part of the [Youth] Guarantee”*. While the expansion of employment support is welcome in principle, this should not be viewed as an adequate replacement for financial

¹⁵ See more information here: <https://opfs.org.uk/policy-and-campaigns/campaigns/end-young-parent-poverty/>

support that young people with disabilities rely on. It is likely that many young people who will lose their health element entitlement will see no change in work status as a result of increased employment support, leaving them substantially worse off. Some of these claimants will have severe disabilities, meaning moving into employment is not a realistic proposition.

It is not right that ill and disabled young people will themselves pay for the expansion of the Youth Guarantee through savings made from their loss of entitlement, rather than through additional investment by fairer means like general taxation or industry levies.

The UK Government should be striving to create a social security system that restores adequacy, rather than restricts it. This proposal is in direct opposition to this and is one that we strongly reject.

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

Question 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?

Disabled young people generally transition from children to adult services at the age of 18. In many ways, it makes sense to align the age of eligibility for adult disability payments. However, there will also be some 16 and 17-years-olds who would meet the current eligibility criteria for Personal Independence Payment (PIP) but who are not eligible for Disability Living Allowance (DLA). In that case, they would miss out on receiving vital support.

As CPAG have highlighted, one option here could be to mirror practice in Scotland. Those already in receipt of Child Disability Payment (CDP, the Scottish equivalent of DLA) are allowed to remain on CDP until the age of 18 or make a claim for Adult Disability Payment (the Scottish equivalent of PIP) if they wish, allowing young people at a transitional stage of their lives more flexibility.

Whatever the choice made here, we urge the UK Government to engage with the Scottish Government to ensure that our reserved and devolved social security support are carefully co-ordinated, and that changes don't create unnecessary complex systems for disabled young people to navigate.

Chapter 4

Supporting employers and making work accessible

Question 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?

Change is needed to ensure that people can access good quality, secure and well-paid work that works for their personal circumstances. Paid work is not currently a guaranteed route to financial security; in Scotland, 61% of working-age adults and 75% of children in poverty were living in a household where someone was in paid work.¹⁶ That means that we must design a labour market that works for everyone, and we welcome the UK Government's Employment Rights Bill in making progress towards this ambition.

While this will take accelerated efforts at a national policy level to significantly increase the availability of good work opportunities for disabled people, there is also a clear role for employers here, and particularly those employers in the private sector. Our engagement work frequently highlights the role that employers have as the 'gatekeepers' of fair and flexible work; findings from our Serving the Future action research project - which seeks to work with hospitality employers and workers to understand, reduce and prevent in-work poverty by identifying changes that could be made within the hospitality sector¹⁷ - draws attention to the job aspects which differentiate positive and negative experiences of the sector, including things like:¹⁸

- Supportive management and respectful workplaces;
- Training and progression opportunities;
- Scheduling and work life balance;
- Financial stability and pay transparency; and
- Ethical practice and safety in the workplace.

This highlighted the extent to which an inclusive workplace culture is in the direct control of employers. Action is therefore needed to secure employer buy-in, not only for making reasonable adjustments, but also for creating a more accessible workplace culture.

Research from the Centre for Social Justice spotlights that 63% of employers feel that there is a significant barrier to hiring someone with a disability. One of the most commonly perceived barriers was the cost and inconvenience of making reasonable adjustments. This sentiment is echoed in research by Inclusive Recruiting around employers hiring someone with a learning disability, which evidenced a lack of awareness of Access to Work and long waiting times for the scheme's funding, which meant that employers often have to front costs.¹⁹

¹⁶ Scottish Government (2025) *Poverty and Income Inequality in Scotland 2021-24*. Available at: https://data.gov.scot/poverty/#Working-age_adults

¹⁷ More information available here: <https://www.servingthefuture.scot/the-project>

¹⁸ Serving the Future (2025) *Understanding experiences of low-paid work in the hospitality sector over time*. Available at: <https://www.servingthefuture.scot/blog/report/understanding-experiences-of-low-paid-work-in-the-hospitality-sector-over-time-lxddd>

¹⁹ Inclusive Recruiting (2024) *Research on Employer Behaviour Regarding Hiring People with Learning Disabilities*. Available at: <https://fraserofallander.org/wp-content/uploads/2024/10/Final-Report.pdf>

Inclusive Recruiting's research provides several initial steps for supporting employers with workplace adjustments including:

- **Creating of an obtainable and accessible Resource Bank:** This could include toolkits, guidance and fact sheets with examples of reasonable adjustments, guidance on how to recruit, examples of accessible job adverts, and ways to make the process more inclusive and accessible. This could be platform-based, and it has been indicated through the research that employers would be willing to pay for such a resource. A live example of this kind of resource bank is the Tourism and Hospitality Toolkit which provides a range of support for both employers and employees to navigate challenges and opportunities in the industry.²⁰
- **Building a community of practice:** Developing a network, where employers could work alongside disabled people to develop tools and inclusive processes would benefit employers and support disabled people into roles that match their skills and needs.
- **Delivering workshops to expand understanding of inclusive practice and support schemes like Access to Work.**

Question 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?

Any future Access to Work scheme should directly fund all support that is necessary for an individual to enter and remain in employment that is not already covered by the Equality Act's requirement for reasonable adjustments, including adaptations to workplaces and to homes to make it suitable to work from. Any changes which instead place increased emphasis on employers to pay for reasonable adjustments, without cultural change and awareness raising, will undermine the ambitions and objectives of Access to Work.

Question 15

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

There is no doubt that investment in employability schemes - which offer tailored support and promote accessible workplaces - are a vital anti-poverty tool.

The Green Paper itself recognises that, while the current Access to Work scheme has stayed broadly the same in its aims and delivery since its establishment, the style and scope of support people require has changed significantly. It is in this context that the Poverty Alliance views the key areas identified in the Green Paper - supporting employers directly, targeted funds to individuals, and shaping the market for aids and assistive technology - as positive in principle.

However, we do not agree with the assertion that the current funding model for Access to Work, which provides support directly to individuals, is unsustainable. This scheme should not be framed as a cost to the Government. Rather, it is an investment. The Sayce Review

²⁰ See further information about the toolkit here: <https://www.tourismhospitalitytoolkit.co.uk/>

found that for each pound that the Government pays out in Access to Work grants, the Treasury receives £1.48 in increased tax receipts, with the social investment return even higher.²¹

It is therefore essential that support for employers is in addition to, rather than in place of, individual support. There must not be a reduction in the grants paid to those currently entitled to them. Many disabled people will still require tailored individual supports, including in relation to aids, appliances and assistive technology, particularly if they will be working from home on a regular basis.

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²¹ Liz Sayce (2011) *Getting in, staying in and getting on: Disability employment support fit for the future*. Available at: <https://assets.publishing.service.gov.uk/media/5a78e01a40f0b62b22cbd7f0/sayce-report.pdf>