

VODG Response | Pathways to Work: Reforming Benefits and Support to Get Britain Working

June 2025

Introduction

The Voluntary Organisations Disability Group (VODG), representing over 140 values-based disability charities and social enterprises, responds to the government's Pathways to Work Green Paper with significant concerns. While we fully support the need for welfare reform, many of the proposals risk undermining the independence and dignity of disabled people whilst failing to address the fundamental and systemic causes of economic inactivity.

Our response to the Green Paper comes after the Government has introduced its Universal Credit and Personal Independence Payment Bill, and edits to this ahead of its second reading on the 1 July 2025.

We acknowledge the government's recent announcement to protect existing claimants from immediate cuts and welcome the commitment to co-production in future PIP assessment reviews. However, the proposed creation of a two-tiered system where future claimants receive less support, despite facing identical costs and barriers remains fundamentally flawed and requires urgent reconsideration through the consultation process.

This response to the Green Paper is submitted by VODG, based on the comments and feedback from our members, many of which will be replying individually, as well as our engagement through coalitions such as the Care and Support Alliance, Disability Poverty Campaign Group and Disability Benefits Consortium.

The Real Causes of Economic Inactivity

The government frames rising benefit claims as evidence of a "broken" system requiring cuts to create work incentives. However, our member organisations see daily the real drivers of economic inactivity: years of austerity that have stripped away early intervention services, NHS waiting lists preventing timely treatment,

inaccessible workplaces, and a cost-of-living crisis that disproportionately affects disabled people who face additional costs averaging £1,010 per month.

The pandemic has exacerbated mental health challenges, yet the government's response focuses on restricting access to support rather than investing in the services that could genuinely help people.

Disabled people want to work when barriers are removed, and appropriate support is provided. Our members demonstrate this daily through innovative employment programmes that recognise disabled people's capabilities rather than focusing solely on limitations.

True reform requires addressing these structural barriers, not creating differential support systems that may undermine the very independence needed for workforce participation.

Our Concerns

The four-point PIP Rule will impact those with multiple needs: The requirement for claimants to score at least four points in a single daily living activity will particularly affect people with learning disabilities and those with multiple, lower-scoring needs who require significant support across various activities. A person becoming disabled in 2027 will face the same additional costs as someone who became disabled in 2024, yet they will receive substantially less support to manage these costs.

Two-Tiered Universal Credit (UC) creates new inequalities: While we welcome protection for existing UC health element claimants, reducing support for new claimants fundamentally misunderstands disability. The proposed system creates an arbitrary distinction based on timing rather than need, potentially undermining the principle that social security should provide adequate support regardless of when someone requires help.

Young disabled people face disproportionate impact: Proposals to delay access to the UC health element until age 22 and raise the PIP age to 18 will particularly affect young disabled people transitioning from children's to adult services. Many already face cliff-edges in support during this critical period, and further restrictions may compound difficulties rather than supporting transition into education or employment.

Employment support cannot replace adequate financial support: Whilst we welcome the £1 billion employment support investment and its acceleration, this cannot compensate for reduced disability benefits. Research consistently shows that adequate financial support enables rather than prevents workforce participation by providing the stability needed to engage with employment opportunities.

Proposed reforms will drive more people into poverty: The government's own figures indicate this to be the case, while others, including the [New Economics Foundation](#) and [Trussell Trust](#), share data that demonstrates even more disabled people, families and children could be driven into poverty by the proposed reforms. Many of the mitigations given depend on behavioural changes, which is neither quick or easy to achieve, or financial relief which is in no way proportionate to the amount being lost. While we do not disagree that the system needs reform, it cannot be at the expense of disabled people or by driving more people into poverty.

A constructive alternative

VODG calls for reforms that recognise the expertise of disabled people and the organisations that support them:

Genuine co-production: We welcome the government's commitment to co-production in future PIP assessment reviews and urge that this principle be extended to all welfare reforms with immediate effect. Meaningful engagement with disabled people, families, carers and disabled people's organisations must occur before, not after, major policy decisions. This would lead to reforms being person-centred, based on real life experience, rather than financial cuts and numbers on a spreadsheet.

Investment in root causes: Rather than creating differential support systems, government should invest in reducing NHS waiting lists, properly funding social care and early intervention services, making work genuinely accessible through employer support and enforcement of equality duties, and addressing cost-of-living pressures that disproportionately affect disabled people.

Consistent financial support: The social security system should provide an "Essentials Guarantee" ensuring no one needs to use disability-related support to cover basic living costs. Support should be based on need rather than when someone became disabled. We support targeted energy social tariffs for disabled households who face disproportionately high energy costs.

Voluntary, personalised employment support: Employment support must be voluntary, personalised, and address real barriers including workplace accessibility, employer attitudes, and flexible working arrangements. Our members demonstrate that when barriers are removed and appropriate support provided, disabled people thrive in employment.

Accessible assessment processes: People with learning disabilities should be automatically included in Severe Conditions Criteria and exempted from reassessments. Assessment processes must be genuinely accessible, with materials available in Easy Read, Braille and BSL formats, mandatory advocacy support, and specialist training for all decision-makers.

Addressing the consultation questions

Supporting people to try work: Government should guarantee that engaging with employment support or trying work will never trigger reassessment, with legislative protection and extended linking rules that give people genuine security to explore opportunities without fear. This should also apply when supporting people to increase or decrease hours. Currently the system inhibits change, which could prove beneficial to both individuals and businesses. A more flexible system which allows for change, would benefit everyone.

PIP transitional support: For those who may lose PIP entitlement under new rules, we recommend comprehensive transitional support including health and care needs assessments, signposting to alternative support, and genuine consideration of expanding Personal Health Budgets to provide choice and control.

Unemployment insurance design: Any new contributory benefit should provide adequate income replacement for 12 months minimum, with personalised support that recognises the complex needs of disabled people and those with health conditions.

Youth support: Young disabled people need enhanced transition support, including properly funded transition services, accessible apprenticeships and training programmes, and recognition that some may need longer to develop work readiness due to their conditions.

Employer responsibilities: Government must strengthen enforcement of reasonable adjustment duties whilst expanding Access to Work to reach more people. This should include market-shaping initiatives to reduce assistive technology costs and direct employer support.

Outstanding Questions

The consultation process should address several critical questions arising from recent announcements:

- Will existing PIP claimants remain protected beyond the 2028 ministerial assessment review?
- What happens to current UC health element claimants who do not receive PIP when the Work Capability Assessment is abolished?
- How will the government ensure that protection for current claimants does not create perverse incentives against disclosure of changing needs?
- How will the impact of any changes brought in be measured and action guaranteed, if there is a detrimental impact on a person's life, for example growing numbers of people in poverty, worsening health outcomes or poorer school attendance?

In conclusion

We appreciate the government's willingness to listen to concerns and protect existing claimants. However, true reform requires addressing the systemic barriers that prevent disabled people from participating fully in society. The reforms set out in the Green Paper fall short of the systemic changes needed, and the Bill instead focuses on financial cuts and creating differential support systems based on timing rather than need.

VODG stands ready to work constructively with government to develop evidence-based reforms that genuinely improve disabled people's lives whilst supporting those who can work to do so and protecting those who cannot. The consultation process provides an opportunity to get this right - to build a system that invests in people and communities rather than one that may inadvertently perpetuate inequality between disabled people.

Only through genuine partnership with disabled people and their organisations can we develop reforms that provide adequate support, remove barriers to participation, and treat all disabled people with the dignity and respect they deserve, regardless of when they require support.

Alex Saul and Sarah Woodhouse
Research.policy@vodg.org.uk

VODG is a registered charity no 1127328
www.vodg.org.uk | Research.policy@vodg.org.uk