Understanding and responding to the Pathways to Work Green Paper consultation

The UK government has launched the **Pathways to Work Green Paper**, proposing reforms to health and disability related benefits to meet its target of reducing the numbers of economically inactive people and supporting them into employment. While some proposals aim to support people into work without risking benefit entitlement, others will significantly reduce financial support for many.

This briefing is designed to help **VCFSE organisations** across the North West engage in the consultation process by:

- **Understanding the key proposals** and their potential impact.
- **Identifying areas open for consultation** and how to provide evidence-based responses.
- **Exploring alternative advocacy approaches**, including public campaigning.

Voluntary Sector North West

Context

The UK government has recently launched plans to reform health and disability related benefits with the recent launch of the Pathways to Work Green Paper and is now consulting on these proposals.

A big driver of this change is evidence showing that the UK has seen a large increase in the number of people claiming health related benefits since the COVID pandemic at a rate that's not been seen in similar nations. Alongside this, as part of the government's plans to "Get Britain Working", it aims to increase the UKs employment rate to 80% by reducing economic inactivity and moving people into work.

The government's latest proposals for health and disability benefit reforms are supposedly designed to address these issues, however there is some uncertainty on the best approach to address the situation in a way that protects those living with physical and mental health conditions and disabilities. As a result, any **proposals to reduce the numbers of people claiming health related benefits** will be controversial to some degree.

The **Resolution Foundation** has summarised the proposals, noting that while some offer support and may help people feel more confident about trying work without losing benefit entitlements, they are paired with widely unpopular measures that would reduce financial support eligibility for many. Their conclusion is that *"while it includes some sensible reforms, too many of the proposals have been driven by the need for short-term savings to meet fiscal rules, rather than long-term reform. The result risks being a major income shock for millions of low-income households."*

Although this paper does not delve into the specifics of the proposals, **VSNW** recognises that the planned changes will overwhelmingly impact the most vulnerable and those most in need.

The government's own impact assessment projects that by 2029/30, an additional **250,000 people (including 50,000 children) will be in relative poverty** after housing costs due to these reforms. It also estimates that 800,000 people will lose eligibility for the Daily Living component of Personal Independence Payments (PIP), with an additional 150,000 individuals no longer being eligible for Carer's Allowance or the Universal Credit Carer Element. However, it is important to note that, as the Chancellor has stressed, these statistics do not take into account the potential impact of people moving into employment. Nonetheless, they are extremely worrying.

Our **voluntary, community, faith, and social enterprise (VCFSE)** organisations across the North West, who work tirelessly to support communities, lift families out of poverty, and help people into meaningful employment and training, are likely to be deeply concerned about the impact of these proposals.

We know that VCFSE organisations may wish to participate in the consultation process to shape the proposals and ensure the voices of their communities are heard. This briefing highlights the scope of the consultation, what is not included, key questions to answer, and how VCFSE organisations can make effective contributions.

What the consultation process can and can't do

The Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper contains the proposals and consultation questions. It's important to understand that not every aspect is open to consultation through this process. There are 22 individual proposals and only 10 have consultation questions. Even then, those questions often focus on how a proposal should be implemented rather than whether it should.

This does not mean that the proposals are guaranteed to be put in place as they are now. If organisations wish to make a stronger challenge to the proposals, then this is best done outside the consultation process. Traditional campaigning by raising awareness with the public alongside engagement with politicians may be the best approach for this.

Key consultation themes

There are 17 individual questions, and we've identified the following themes for consideration. It's important to recognise that this is not an exam. Not every question needs an answer, and you can focus your responses on areas where you have the strongest evidence.

Design of approaches to support

As mentioned, there are some positive proposals that seek to shift the benefits and employment system away from taking a punitive approach with people to providing encouragement and support. Organisations with experience of providing support and evidence on what works should seek to address these here.

Health and Care issues

There is increasing recognition that health-related benefits like Personal Independence Payment (PIP) not only cover medical costs but also help individuals manage the extra challenges of daily life, such as inaccessible services or higher living costs. The government is exploring how health and care systems can better support people, particularly those who may lose PIP, by addressing broader aspects of daily living. For example, integrating accessible public transport into health planning could help people with health conditions maintain independence and access necessary services.

Thresholds

The DWP are willing to take evidence on who should be exempt from mandatory requirements and at what age eligibility for benefits should start. This is a good sign that some of the concerning proposals that limit access to benefits for young people are not necessarily fixed.

Employers

For people to move into employment, there has to be a job they can take. This is an opportunity for VCFSE organisations not just to provide insight about the behaviour of employers but to think about how they as an employer can be supported to make work more accessible.

How to make a useful response

The previous government held few meaningful consultations, so many organisations may feel out of practice when it comes to responding. Here are some general tips to help guide your response to the current consultation.

Evidence matters more than opinion – civil servants will summarise responses for ministers. What will be included in summaries is evidence presented – particularly if that highlights unintended risks of a proposal or how decisions will create an impact on people and communities. Views on whether a policy is good or bad without evidence will not be influential in this process.

Repetition doesn't reinforce – major charities, think tanks and research bodies will also be making contributions. They will have lots of detailed analysis at their disposal and will make cases for an against the proposal. Providing the same or similar information or repeating their concerns will not add weight to their case. It may be seen that submissions that repeat points are just duplication. Think about the unique evidence that you have access to. It could be from individuals you work with or a small

group you support. That is still valid evidence and can be more powerful than the high-level analysis as it's more human and rooted in experience.

Testimony matters – do quote people and their views. The unvarnished testimony of people who will have to live with these changes can be incredibly powerful in bringing an issue to life. That doesn't mean that stories alone can create change – the quantitative evidence is still important but it's important to enable the government department to understand what the ground truth of the numbers is. There's also a moral case for ensuring that the real voice of people affected by change is heard – whether you're successful in the attempt to change policy or not.

Full list of consultation questions

The full list of questions is provided on the next page and should be read alongside the proposals. An online form to submit your responses is available through the consultation link: Pathways to Work Consultation.

We recommend drafting your answers first, then pasting them into the online form. Be sure to keep a copy of your original responses. You may also want to share your responses with your community or members for additional input.

Please note that the consultation is open until **Monday, 30th June**, so there is ample time to develop thoughtful, evidence-based, and impactful responses.

Chapter 2: Reforming the structure of the health and disability benefits system

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

Chapter 3: Supporting people to thrive

Our new support offer

6. How should the support conversation be designed and delivered so that it is welcomed by individuals and is effective?
7. How should we design and deliver conversations to people who currently receive no or little contact, so that they are most effective?

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

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?
12. Raising the age at which young people start claiming adult disability benefits
13. 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?

Chapter 4: Supporting employers and making work accessible

14. 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?
15. 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?
16. What do you think the future role and design of Access to Work should be?
17. 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?

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

Conclusion

In conclusion, the consultation offers an important opportunity for individuals and organisations to provide feedback on the proposed reforms to the health and disability benefits system. By carefully reviewing the questions and submitting evidence-based responses, you can contribute to shaping policies that affect vulnerable communities across the UK. To participate, please visit the official consultation page: Pathways to Work Consultation. Remember, the consultation is open until **Monday, 30th June**, so there is ample time to submit your responses and ensure your voice is heard.

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