

Introduction to this document

This is currently a live document designed to collate information from submissions to the [green paper consultation](#) on changes on Access to Work. It will be updated between now and June 30th when the consultation closes. If you have any data or case studies you think it would be useful to add - please email them to tom@wearebap.co.uk. We might not include all information, we are specifically looking for information which is an effective argument in the development of policy.

The first section lays out some information directly in relation to the text of the green paper, the second section collates key points we might want to mention in our consultation answers.

1. Our response and arguments to the green paper

Text of the Green Paper	Our Response
Chapter Summary 269. The success of reforms to health and disability benefits are dependent on a strong and dynamic labour market that is accessible and inclusive. To support disabled people into work we need to ensure that the workplaces they enter are able to accommodate their needs. We want to galvanise a cultural shift to ensure that accessibility and workplace adjustments are fully embedded into recruitment and retention practices. Evidence has shown that some disabled people find employers to be inflexible in changing working practices or implementing reasonable adjustments, and similarly employers are often perceived to be ‘untrained and uninformed’ about disability. [footnote 121] We also know that, when asked, just 23% of employers reported	The provision of reasonable adjustments, does not mean a workplace is accessible. One of the metrics that decides whether an adjustment is “reasonable” is the cost of the adjustment, therefore workplaces can provide the cheapest possible adjustment, which is not sufficient. The broad aim of workplace adjustments is not sufficient to make work accessible. This summary also does not take into account self-employed workers who make up 32% of the creative workforce, more than double the rate of self-employment in the UK economy.

they provided workplace adjustments to support disabled staff and staff with long-term health conditions. [footnote 122]	
270. Access to Work is an existing DWP-managed scheme that provides tailored support for disabled people and people with health conditions. In recent years, demand for support from the scheme has increased significantly (contributing to a backlog of claims that is still too high). Spending on the Access to Work Scheme increased considerably in recent years from £142 million in 2019/2020 to reach £258 million in 2023/2024, with the expenditure expected to rise to £385 million in 2025/2026 [footnote 123]. However, even with this increase in resources, it only supports around 60,000 – not much more than 1% – of working disabled people. [footnote 124]	Though these figures seem high, they are not. After the government's u-turn on the winter fuel payments, the programme will continue to cost £1.25 Billion. The cost of the Access to Work programme is small in comparison, and represents approximately 0.0935% of the DWP's annual expenditure. Notably, the Sayce [footnote 11] review reported that AtW recovered £1.48 for every £1.00 spent. This means that the money spent through Access to Work contribute more to the economy than it takes.
271. At the same time, the scheme itself has not changed significantly since it was established in 1994, since then there have been changes in the types of disability that people report and profound changes in the labour market and technology. This government is also embarking on a programme of major reform: to employment support, the benefits system and support to employers (including through the Keep Britain Working review). As part of these changes, we want to consider the future role and functions of Access to Work in this emerging landscape.	There have already been significant changes to Access to Work, including the introduction of a cap to grants in 2015. This has already resulted in cultural organisations paying beyond the cap, for example Graeae often have to pay for BSL interpreters beyond the cap.

272. In this chapter, we will outline: • our plans to help more disabled people into work and to support employers • the role of the Access to Work Scheme and the case for change • the purpose underpinning any changes to Access to Work and the possible models for what that might be. We are consulting on this. This will fundamentally reform the support we provide	
Introduction 273. Plans to reform the labour market and employment rights framework are a central part of the government's plan for long-term national renewal and growth. By strengthening the underlying framework that supports workers, we are making employment more secure and predictable. We are also putting more money in working people's pockets by making wages fairer, and we are strengthening the foundations that underpin a modern economy. A strong package of workers' rights and protections goes hand in hand with a strong economy because a secure workforce will be more productive and have more confidence to spend in the economy. The Employment	Research suggests that reforming the benefit system to offer more support could help an extra 500,000 people into work over ten years, potentially boosting the UK economy by £8 billion a year and saving the taxpayer £4 billion a year.

Rights Bill package is pro-growth, pro-business and pro-worker, and supports the government's objective to boost growth and improve living standards.	
274. Alongside this, the Get Britain Working White Paper highlighted the government's commitment to support employers to promote healthy workplaces and to recruit and retain workers with a health condition or a disability. Changes in employer practice are an important part of enabling more disabled people and people with health conditions to be able to work and to thrive in employment. Flexible working practices, inclusive recruitment and efforts to implement reasonable adjustments will all need to improve in order to increase the employment rate.	
275. To progress these issues, the government has tasked Sir Charlie Mayfield with leading our "Keep Britain Working" review, which will report later this year. The Independent Review will consider and make recommendations on the role of employers in creating and maintaining healthy and inclusive workplaces and preventing health-related economic inactivity. It will focus on what employers and government can do to increase the recruitment, retention and return to work of disabled people and people with long-term health conditions.	

276. We spend a significant proportion of our time at work, and employers play an important role in creating a positive and supportive workplace, free from stigma or judgement. We know that good work can help prevent new mental health problems and support those with existing conditions to get on in work and thrive.[footnote 125] The government wants all employers and employees to understand the benefits of good work. We are committed to working with employers to create accessible and inclusive workplaces.	A positive and supportive workplace is not the same as an accessible workplace. While stigma and judgement do play a role in the accessibility of a workplace, they are not the only contributor.
277. We want to start making changes now to ensure we are maximising the opportunities to create accessible and inclusive workplaces. This includes working with other areas of government to develop the digital support offer to employers. This builds on from the 'Support with Employee Health and Disability Service (SEHD)', which is a digital resource aimed at small and medium-sized employers that helps them to feel more confident having conversations about health and disability, understand and fulfil their legal obligations and signposts to sources of expert knowledge.	

278. We are consulting on how the government can support a shift in culture and practice around workplace adjustments. In line with our wider strategy, we want to reform our support on workplace adjustments so that it is more active, supportive and ensures we support employers to fulfil their legal obligations (see consultation question 13).	
279. These changes are critical to achieving our 80% employment target and making a step change in the number of disabled people in work. For example, if we increased the disability employment rate from 54% to 65% (which would be among the best in the developed world), this would close just over half of the gap to an 80% employment rate overall.	
Access to Work 280. Access to Work is a demand-led, discretionary grant scheme that supports people who have a disability or health condition to move into or sustain, paid employment. The grant is intended to support workplace adjustments that go beyond what would normally be expected from an employer through their duty to provide	

reasonable adjustments under the Equality Act 2010. [footnote 126] 281. The grant is awarded for 3-year periods and provides personalised support and workplace assessments, travel to work, support workers, and specialist aids and equipment. The Scheme also includes the Mental Health Support Service (MHSS) which provides up to 9 months of non-clinical support for people who need help with their wellbeing while in employment.	Not all grants are awarded for three-year periods, those people who have the maximum award (commonly people with complex needs or a high use of BSL interpreters) have their award assessed on an annual basis.
282. Since Access to Work was first designed, the style, scope and cost of support that people require has changed significantly. Whilst these factors have changed, Access to Work has stayed broadly the same in its aims and delivery. We think there is a strong case for looking at the future role and purpose of Access to Work, as part of the wider changes to Get Britain Working. The key issues we want to consider are: ● Recruitment versus retention: We want to consider the right balance between helping people access employment and helping them stay in work. ● Scale and reach: Access to Work currently provides highly personalised support. This limits its reach to a relatively small number of people (around 61,630 in 2023/2024). [footnote 127] To put this	

in context, there are around 5.5 million working disabled people in the UK. So, the scheme is currently reaching just 1% of the working disabled population. We want to consider whether there are ways for resources to help more people or make an impact on a wider number of people.

- **Shared responsibility:** Access to Work awards are based on funding rules rather than an assessment of action that has been taken by the employer. We need to get the balance right between supporting employers to understand and provide reasonable adjustments as part of their legal duties and interventions that go beyond this to enable employment.
- **Efficiency and user experience:** the current scheme is administratively complex, contributing to a significant backlog in applications (in February 2025 there were 62,000 applications outstanding).^{[\[footnote 128\]](#)} This means long waiting times for people and perceived inconsistencies in award decisions. Significant increases in expenditure in recent years also focus the question of how resources should be best directed to have maximum impact, in the context of the government's wider strategy to increase disability

Not all disabled people need Access to Work support in order to work. The aim here seems to be to reach more of the disabled population already working - which will not achieve the stated aim of increasing the disability employment rate. Access to Work should be a targeted programme aimed at individual needs where there are barriers to employment.

Applicants receive a workplace assessment as part of their application process, which identifies where more support is needed based on what is already provided.

It is true that there is a need to reduce waiting times and increase consistency - but the measures proposed in this paper do not aim to solve those problems. The measures proposed in this paper are purely focused on reducing the cost of the programme.

employment. Without change, if these trends continue, the service will not be financially sustainable. ● Impact and value for money: through evaluation, ensuring value for money and impact of any future intervention is a priority. 283. For these reasons, we want to consider the future role and design of Access to Work (see consultation question 15).	
Purpose 284. Overall, we want to improve accessibility and support more disabled people into work, which includes helping employers increase productivity by supporting their employees with disabilities and health conditions. It has been estimated that, on average, employers could save between £5,000 and £11,000, for each employee they prevent from falling out of work. [footnote 129] As we consider the future of Access to Work, we are consulting on the potential nature and balance of future support in 3 areas: ● supporting employers directly to make workplaces accessible and inclusive, consistent with their legal responsibilities	Examples provided in our recent briefing demonstrate that even the most accessible workplaces who have industry-leading standards, still require individualised support.

• providing targeted funds to individuals to pay for workplace adaptations, beyond what could be considered reasonable adjustments for employers to make • shaping the market for aids, appliances and assistive technology, to reduce their cost and spread their adoption	
285. As part of considering future options, we are keen to consider the potential for greater support for assistive technology ('Atech') to help people access employment and wider society. There is evidence that assistive technology could transform the employment prospects of disabled people.[footnote 130] However, our findings highlight a gap for many disabled people, with 31% not having the assistive products they need[footnote 131].	
Reform Options 286. We want to create systemic change in the labour market. We want to ensure that employers create accessible and inclusive	

workspaces, and we recognise that more needs to be done to help employers meet their legal obligations. Further, we want the employment and retention of disabled people and those with health conditions to be embedded in our working practices and in how we think about workplaces.	
287. To do this, we are consulting on how we could more directly support the employers that need it most. Evidence suggests that significant numbers of employers remain unaware of their legal responsibilities or, if they are aware, of how to fulfil them (see consultation questions 13 and 16). As we consider the future of Access to Work, we want to consider: • the existing legal duties on reasonable adjustments in the Equality Act 2010 • the support government currently provides to both employers and individuals • advice and guidance available to both workers and employers • the enforcement powers that currently exist	It is the employee that is disabled, not the employer. It is employees that need targeted support. In the cultural sector we do work e.g. set design that does not follow normal structures, or that is complex. This means it is often challenging to identify what a reasonable adjustment is, and, therefore can be expensive to provide these adjustments. A re-focus on employer duties is needed, but financial support is still necessary.

288. The entire system that underpins how we create workplaces that are welcoming and inclusive for disabled people needs to be a part of this process. This means we need to think about how organisations like the Equality and Human Rights Commission (EHRC), the Advisory, Conciliation and Arbitration Service (ACAS), and the Health and Safety Executive (HSE) play a role. Part of making the future of Access to Work sustainable will be considering how we utilise the respective knowledge, legal duties and operating framework of these organisations to leverage this step-change in culture. We see this as a combination of the information government communicates, when it is presented and how. It is also the support we provide to employers to promote accessible and inclusive workplaces, how we empower individuals to seek support and action that can be taken where things aren't working. Our immediate next step to achieve this goal will be informed by both responses to this Green Paper as well as findings from the independent review into the role of employers, Keep Britain Working	
289. In addition, we want to consider the best way to support individuals with specific costs or needs that make a job possible for them, beyond reasonable adjustments. This could consist of grants as now, but also workplace	

assessments and advice on adjustments and other interventions. 290. Finally, we are also keen to explore how a new approach could involve working with suppliers to offer deals or discounts on certain aids or appliances, using the purchasing power of government to drive down costs. Similarly, we want to work with charities, the NHS and local government to improve economies of scale for aids and adaptations. This market shaping will help to lower the cost of specialist technology and encourage more employers to implement assistive software. This would go hand-in-hand with investment from government into innovation in new technology, working with universities and higher education institutions to promote a specialist workforce and to champion this type of adjustment.	
291. In this way, we can be more innovative in how we create accessible workplaces. We have been working closely with disabled people, disability stakeholders, Atech experts and technology companies to understand some of the biggest barriers that disabled people face in accessing Atech to support them into employment and wider society. Feedback from disability stakeholders and research commissioned by the Disability Unit (DU) in the Cabinet Office, published in 2023, found that 87% of disabled people need at least one assistive product, but 31% reported	

not having the products they need to thrive – or even participate – in daily life. [footnote 132]	
292. Insights from this research will inform options for the future, to support individuals and employers. In the short term, the government is going to develop and deliver a digital resource that will help raise awareness of existing Atech and provide guidance on how it can be used to support disabled people. The first stage of the digital resource will be developed and launched in 2025. We will also be setting up an Atech expert working group in 2025, made up of specialists from the Atech industry, disabled people’s organisations, researchers, and relevant public and third sector organisations, to identify and, where possible, develop solutions to the barriers disabled people face when trying to use and access Atech. We will build on the work of the Atech expert working group to identify a longer term, sustainable approach in support of broader Access to Work reform. One initiative the Cabinet Office DU are considering is the establishment of a Centre for Assistive and Accessible Technology, which we are considering as part of these broader reforms.	We would welcome a Centre for Assistive and Accessible Technology, but this must be led by disabled people to ensure that it works in the interests of improving the lives of disabled people.

293. All of these elements taken together will mean that, in the future, our support will be more coordinated, underpinned by a clear strategy. In this landscape, we need to consider the future of the current delivery model of Access to Work. This is why we are also consulting on future delivery models (see consultation question 17). This could range from continuation of a DWP-administered programme through to alternative organisational forms that could more directly involve disabled people and employers.	
294. For example, a hybrid scheme that supports both employers and individuals with direct funding could require a new delivery model. This is, in part, because the existing model is set up to provide individual grants so it would need wider functions and expertise to also support employers. We would need a model that brings together people who understand workplace adjustments, assistive technology, commercial opportunities (to deliver economies of scale) and the labour market. This approach would need to assess both employer-based applications and individual grant applications. A key question would be whether DWP is best placed to deliver this model directly, or whether: i. We could deliver some or all aspects in partnership, either through a third sector partner, a privately contracted provider or an arms-length public body.	

ii. We could explore devolving any aspects of this model to national, regional or local government.	
295. We are clear that any model will need to integrate the views of disabled people and people with health conditions. This means a governance structure that embeds the voice of disabled people within it and that is accountable to them. Similarly, we want employers to be at the heart of any new delivery model. We will therefore establish a collaboration committee on the future direction of Access to Work (as outlined in the Stakeholder Engagement section below).	

2. Our response to the green paper consultation

Below we have started collating our current response to the green paper consultation and the questions proposed. It is nowhere near complete. If you have case studies, data or information to add that you're happy to make publicly available, please email tom@wearebap.co.uk.

The link to respond to the consultation is here:

<https://www.gov.uk/government/consultations/pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper>

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?

- Not everyone who received Access to Work is an employee, at least 32% of the creative workforce are self-employed. Self-employed individuals cannot rely on larger entities to pay for their reasonable adjustments. It is important that any eventual plan recognises

the importance of Access to Work in supporting self-employed people. [It would be good to give examples of how important Access to Work is if you are self-employed]

- Even if workplaces know what adjustments they can make, it is important we recognise that some workplaces will remain inaccessible to some people without significant investment.
- In the cultural sector we work in workplaces that are difficult to change, for example a stage or a listed building. In making theatre there are some aspects of the architecture or roles that cannot be changed, and AtW is essential in providing access in these areas.
- The government should invest comprehensively in further research into the lived experiences of disabled people in the labour market, so employers are better equipped to support employees with disabilities or a health condition. In the UK, 3.3 million disabled people are categorised as non-participatory in its labour market (i.e. economically inactive: considered neither employed nor unemployed); a number nearly three times higher for disabled people than it is for non-disabled people (42.9 percent vs 14.9 percent) [1] This lack of participation in the labour market may partially explain why so many disabled people (31 percent) are facing poverty in the UK[2]. The current data collection methods underpinning these statistics, which quantify if disabled people are employed, unemployed, or if they are economically inactive, can be considered as accurate based on the parameters set by statisticians. [i]However, the data gathered does not investigate why disabled people choose to seek out employment, leave it, or not consider it as a viable option. This void requires conversations with disabled people followed by a thorough analysis of the resulting qualitative data. Their lived experiences of employment can contribute to a better understanding of why disabled people face such high rates of unemployment and as such would support the government's aim to 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.
- The Independent Review should reconsider the definition of 'reasonable adjustment' as this term needs review and deeper clarity of understanding for employees, employers and the DWP (or any future model of ATW delivery). Workplace adjustments are advised by DWP case workers based on the term 'reasonable adjustments'. What is reasonable for one employee may not be considered so for another, therefore a focus on individualised access in this area is key.

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?

- DWP should fund any and all measures that might not be considered "reasonable". One of the metrics used to decide whether an adjustment is reasonable is the cost, and often access measures are prohibitively expensive.
- Not fulfilling the duty to make reasonable adjustments has been recognised by the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) as a

form of discrimination. However, even though these rights are enshrined in legislation, adjustments may be unevenly available and the concept of 'reasonable' in reasonable adjustments remains vague and contributes to why employers can face challenges in understanding their obligations under the law. This is in large part due to the courts who have had difficulty determining if disability legislation has been violated and who have failed at providing clear and distinct guidelines concerning RAs. This grey area of understanding has resulted in the use of definitions of 'reasonable' that are weak, and which see little enforcement taking place.

- We challenge the notion that the aim is to make a small impact on a large number of people, the success of Access to Work has been in providing a personalised approach for individuals where they are not able to access work otherwise. There's a significant number of disabled people that do not require Access to Work grants to access or remain in employment. [It would be good to include examples of the importance of an individualised approach here]

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

- Access to Work is currently a world-leading system that has been a fundamental part of the development of the disability arts sector in the UK. It is an essential mechanism to make progress with the disability employment rate in the arts. It must urgently be given more capacity to overcome delays.
- If leaked information is correct, and you're planning cuts to Support Worker roles like job aides, one year renewals, and 35 hour cap on BSL interpreters, these should be reversed immediately.
- Any DWP or alternative administered programme MUST incorporate recruitment of trained case workers with lived experience of disability, consistent CPD and training for staff, improved awareness of the system for those who cannot access it in its current form and accessible and consistent administration processes. All too often, guidelines around award rules flex and change, which leads to confusion and a lack of transparency
- Workplace assessments and advice should be disabled-led, with adjustment processes designed and implemented by people with lived experiences and clinicians/ therapists working with the social model of disability. Assumptions about blanket/ one-size fits all interventions are unacceptable when looking at individualised access.
- We would welcome a Centre for Assistive and Accessible Technology, but this must be led by disabled people to ensure that it works in the interests of improving the lives of disabled people. For example, recent reports indicate instances of in-person BSL/English interpreter services within the health service being replaced by interpreters via video technology, which is inaccessible and isolating for the Deaf health service users. This change was implemented with no consultation. This replacement of in

person support work within would be equally inaccessible for those working within the creative and arts industry.

- It should not be assumed that Atec (AT) can replicate or replace the role of an in-person support worker/ sign language interpreter. Assistive software may be a useful adjustment for some but often it makes the workplace inaccessible to some employees. For example, whilst using automated speech to text software in a meeting context with many attendees, an employee may find it difficult to differentiate between speakers, the transcription is often inaccurate, the employee may need to sit in a separate room, which is isolating and not inclusive. This is why flexible and individualised access must be a focus.

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?

- We know that cultural shifts take time - years. The effect of cutbacks is instantaneous, and immediately threatens people's jobs and their candidacy for new jobs. You can't pull the latter and hope that that expedites the former; they're aimed at two different groups for starters - the cultural shift is for the employer to make, but the employee is immediately threatened by cuts to Access to Work. Stakes for employers are much lower than they are for workers.
- Cultural shifts are limited in their scope and effect. It is predictable, without a fully functioning mechanism like Access to Work, that workplaces will look to 'showcase' and promote a cohort of 'less disabled' people (people who face fewer barriers to participation in the workplace, like me) whilst ignoring and casting off 'more disabled' people (people who face more barriers, and who will be too expensive to employ under these new proposals).
- It is predictable that disabled people will become funnelled into seeking employment only with large corporations - the only ones with the money and the infrastructure to pay for their access needs - and SMEs will become no-go zones for disabled people.
- The government must comprehensively support and enforce a shift in culture and practice in the workplace, for all employees, including self-employed and freelance workers in the creative industries. There is much work to do around shifting the culture to remove the expectation on disabled people to 'fit in' and 'not complain' and support employers to understand their legal obligations on a human level, rather than just a contractual obligation or tick-box exercise. For example, reports by some UK think-tanks show that 63–78 percent of employers believe there are 'perceived barriers' or 'specific challenges' to employing disabled people. According to the Centre for Social Justice, only 9 percent of employers in the UK believe there is a good business case for hiring disabled people and 34 percent of employers do not believe disabled people possess

the ability to do the job Thirty-one percent of employers also reported being afraid that disabled people will claim discrimination if the job does not work out.

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

- Devolving Access to Work to local or combined authorities risks an inconsistency in delivery across different areas. This is acutely damaging to theatre and cultural touring projects where cultural workers will move between different areas but require one agreement to cover the whole tour.
- Any partnership model with third party contractors and/ or public bodies MUST be disabled led. People who understand workplace and adjustment and do (or could use) Assistive Technology would be best placed to consult with other groups to ensure equality of opportunity, compatibility within a specific workplace as well as value for money.
- If AtW is to be moved away from DWP, then it should be operated by the department for business and trade. Access to Work is currently administered like a social security measure, but it is a strategic investment programme that enables disabled to remain in work and lead business.