

Dear the Department for Work and Pensions

Re: the Commission on Social Security's response to the Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper consultation and our comments on the Universal Credit and Personal Independence Payment Bill.

Response to the Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper

We write to you with our response to your consultation from the Commission on Social Security, a project led by people with lived experience of the social security system. We have recently completed our own proposal for an alternative benefit to PIP, designed by those with experience of it, that we have attached for your information. We feel this is the best way to respond to your consultation as our project holds a sincere commitment to co-production and our work is an example of co-produced policy-making from its inception.

The circus around the proposed changes to PIP and Universal Credit are a classic example of what happens if policy makers do not work with those whose lives are profoundly affected by government policy. For the last 25 years there has been increasing recognition that effective policy-making - across many different areas - requires a deep understanding of real-world impacts. This is knowledge that can only be gained by working in partnership with those on the receiving end of policies and programmes. Indeed in 2006, the last Labour government set up a cross-government unit, the Office for Disability Issues, with a commitment to co-produce policies with disabled people. It is a shame this Labour government appears to have forgotten about the importance of this. Disabled people's organisations have considerable expertise in how to co-produce and co-design good policy and [had urged those in power to work with them to ensure that their policies addressed the reality of disabled people's lives.](#)

If the government had acknowledged the importance of co-production the cuts to Universal Credit and Personal Independence Payment, which would have seen 3.2 million disabled people seeing a cut in vital income, would never have been proposed. Both the extreme distress for disabled people and the political turmoil for the government could have been completely avoided. There is a reason why the key principle of the disabled people's movement is Nothing About Us Without Us. It has

been clear over the past few months how little understanding there is about how the social security system currently works and particularly the importance of a payment which recognises the additional costs disabled people experience.

The importance of co-production in policy, particularly in the context of social security, was cited as a reason to halt the progress of the Universal Credit and Personal Independence Payment bill in [the reasoned amendment](#) put forward by Labour MPs ahead of the bill's second reading:

“Because its provisions have not been subject to a formal consultation with disabled people, or co-produced with them”.

An understanding of the importance of co-production is also highlighted in the June 2025 [report on the Disproportionate Impact of Poverty and Inequality on Disabled People](#), published by the All-Party Parliamentary Group (APPG) on Poverty and Inequality. The report recommends:

“Co-producing a redesigned social security system with disabled people and disabled people's organisations”

It appears part of the concessions by the government references co-production in resigning the current PIP assessment, but fails to provide detail of what any co-production would look like.

The remaining last minute ‘concessions’ made by the government to try and prevent rebelling MPs will create a two tier system and should not be accepted. If the arbitrary changes to PIP eligibility are unjust and cruel for current PIP recipients, then they are unjust and cruel for new claimants. We are extremely concerned that the entire bill has been rushed without any true consultation with those that understand the impact of these proposals and this is even more the case with the concessions. There is little clarity and no time to be given clarity about how these concessions would work in practice. Within the social security system what can count or trigger what is considered a new claim can be complex and a lack of clarity around this suggests even people supposedly protected by these concessions are unlikely to be so. The key issue is why would the changes proposed in this bill be acceptable for new claimants and not for current ones. How can it be justified that two people with the same level of impairment and additional costs receive different levels of support depending on a date on a calendar. The proposed changes in this bill around requiring someone to get a 4 point descriptor do not appear to be based in any research or consideration of how the assessment works and who would be impacted.

To push ahead with this bill without full impact assessments is incredibly dangerous and harmful.

The 4 point rule change to the PIP assessment, tied with linking PIP eligibility to the Universal Credit Health Element, would leave some people over £10,000 a year worse off than under the current policies.

The Commission on Social Security

The Commission on Social Security began as a project in 2018 with a commitment to set out proposals for an improved social security system, one that is designed by and works for those of us who rely on it. In 2022 we published [*The Plan: for a Decent Social Security System*](#), the culmination of co-produced ideas having additionally undergone two rounds of large-scale consultations. It was clear that further work was needed to develop detail around a more effective benefit which recognises disabled people's additional costs.

While Personal Independence Payment has the capacity to work well, in reality it too often falls short in delivering fair, dignified and holistic support to disabled people. After a project hiatus in 2023, we put together a working group of people with lived experience of disability and the social security system to develop a draft proposal on an improved benefit, named an Additional Costs Disability Payment.

In January 2025 the Commission then launched a public consultation to get feedback on the draft proposal. Interest in our project, and the simultaneous announcement of government plans to reform PIP, meant that over a 6 week period we received over 5000 responses to our online survey as well as high interest in our focus groups.

The consultation told us that there was widespread agreement with our draft proposal. The final project report with a breakdown of responses to our online survey and focus groups will be published later in the Summer. However, we have chosen to publish the proposal itself before then, in part due to this government consultation.

We hosted an online survey that showed:

- 80% of respondents were social security claimants
- Nearly 90% of respondents were disabled people

The message that came through the strongest was just how important it is for people to have a non-means tested payment which recognises the additional costs disabled people experience and what a devastating impact it would have if this was cut or didn't exist.

It was also clear from responses to the online survey and the focus groups that people felt it was important to be part of efforts to co-produce an alternative to PIP. Disabled people have long felt excluded from shaping the policies that affect them and many felt their participation in our project's work was important.

In this consultation for our proposal for an Additional Costs Disability Payment, and previous consultations for other work, we have always encouraged respondents to focus on the solutions that could improve the social security system. However it cannot be understated that a considerable percentage of the written responses and engagement through the focus groups, detailed the immense harm that people have experienced as a result of successive government's oversight of the Department for Work and Pensions. We sincerely thank everyone who contributed. While their experiences are harrowing, it takes great strength to repeatedly offer up lived experience in the hope that one day things will improve. We would assume any other organisation or body consulting on social security policy would find a great deal of responses, if not most, detail deeply distressing experiences of the UK social security system.

Such was the level of response to our own work we felt it was incredibly important our proposal was shared at this stage, to demonstrate this work can be done. The Commission on Social Security is a small project, working with a very limited budget and capacity and despite this we have managed to deliver a co-produced proposal that has seen consultation with disabled people more rigorous than a government department was able to deliver. Unlike the government's current 'consultation', every part of our draft proposal was submitted for comment or criticism through the online survey and focus groups. We strongly believe that the government has gone about its proposals in the wrong way, ignoring the principles of co production entirely. If the government had begun with co-production when forming its plans for changes to Universal Credit and PIP we believe it wouldn't have reached the stage where it was facing a huge public backlash and major rebellion by its own MPs. We hope our approach - which follows the principles and practice of co-production developed by disabled people and their allies - can be a model for the government to rethink its plans.

We thank you for reading our thoughts on the government's proposals.
As mentioned, we have attached our proposal for an Additional Costs Disability
Payment, due to be launched later this summer.

Yours sincerely

The Commission on Social Security