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Contact: policy@rushmoor.gov.uk
Date: Friday 27th June 2025

The Right Hon. Liz Kendall, MP
Secretary of State for Work and
Pensions
Ministerial Correspondence Team
Caxton House
Tothill Street
London
SW1H 9NA

‘Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper’

Dear Secretary of State,

I am writing on behalf of the Council and our residents regarding the proposed reforms in the Pathways to Work and Welfare Reforms Green Paper. We have heard from many individuals and organisations who are deeply concerned about the potential impact of these changes, particularly on those with disabilities, long-term health conditions, and mental health issues.

We acknowledge the government's intention to reform health and disability benefits and employment support and appreciate the opportunity to contribute to this proposed reform. We also acknowledge the urgent need to reform the welfare system.

However, feedback from a significant number of residents and local organisations highlights a sense of anxiety and uncertainty about the proposed reforms. Many respondents to our recent [survey](#) feel exhausted by repeated changes to the benefits system and fear that the latest proposals will further erode their financial security and dignity. [Our survey](#) found that 70% of those who responded expect negative impacts, with 68% fearing they will struggle to afford essentials and would need to rely more on friends and family¹.

Additionally, during our in-person consultation sessions, residents told us they are deeply anxious about the lack of support structures, particularly those related to accessing employment, navigating the benefits system, and receiving timely, appropriate adjustments for health and disability needs. Residents shared that delays in support have already cost them job opportunities². We have also spoken with many residents who want to work, but have told us that the current system places barriers in their way. We therefore urge that reforms be underpinned by genuine support structures, before any reduction in

¹ See Figure 1 and 2 in Appendix B

² See Figure 3 in Appendix B

benefits is considered. Promises of new advisers are welcome, but they must be in place and effective before changes take effect. For example, the current 32-week wait for Access to Work assessments in our area often results in job offers being withdrawn³.

Many residents and local organisations expressed concern about the lack of training among assessors and work coaches⁴. Without proper understanding of the conditions they are assessing, decisions risk being unfair and inconsistent. We recommend that part of the very welcome £1 billion investment be allocated to specialist training to ensure assessments are informed and compassionate. This is especially important for people who are neurodivergent or have complex needs. We would welcome clarity on who will deliver this training and how consistency will be ensured nationwide.

The proposed changes to Personal Independence Payment (PIP) are particularly troubling. PIP is not a work-related benefit; it exists to help people live independently. Linking it to work capability risks undermining its purpose and could push many into poverty. [The Resolution Foundation](#)⁵ estimates that up to [500,000](#)⁶ people, including 50,000 children, could be affected. Many people use PIP to support their ability to work, not avoid it. Removing it could also affect carers, who may lose their allowance and be forced to seek full-time work, reducing the care they can provide and increasing pressure on already stretched services⁷.

We also highlight the need for better employer accountability⁸. Residents and disability advocates such as Rushmoor Accessibility Action Group (RAAG), Limbicare, Rushmoor Voluntary Service, Citizens Advice Rushmoor, Parkside, Link-Light and the Mayfield Community Partnership feel that the Disability Confident scheme is not delivering meaningful outcomes⁹, with many disabled applicants reporting repeated rejections despite meeting job criteria¹⁰. A cultural shift is needed, supported by education and stronger enforcement. Employers must be held to account if they claim to be inclusive but fail to act accordingly. We have also heard troubling accounts of bullying in the workplace, which undermines confidence and discourages people from trying again. Without meaningful change, the scheme risks becoming a tick-box exercise¹¹.

Our survey showed very low engagement from 18–21-year-olds¹². If we are struggling to reach young people, I would like to understand what the government is doing to help break down those barriers. The consultation only briefly touches on the impact it will have on young people. The 16–18 age group is not mentioned at all in the Green Paper, even though they will be impacted by some of the changes. Without targeted support, these young people risk being left behind. We urge that all provisions for young people be fully embedded before any changes to benefit entitlements are made. The lack of consultation with this age group is a missed opportunity to understand their needs and aspirations.

Furthermore, during our in-person consultation sessions with residents we were concerned to hear that residents with disabilities and those from non-English speaking backgrounds, including our large Nepali community, have shared that they face significant barriers in accessing government communications and consultations. There are currently no Nepali-speaking work coaches in our local job centres. Delays in

³ See Appendix A: 'Introduction of a new employment support system'

⁴ See Appendix A: 'WCA: Ending WCA (Work Capability Assessment)'

⁵ Brewer, M., Fry, E. and Try, L. (2023) The Living Standards Outlook 2023. [online] Resolution Foundation. Available at: <https://www.resolutionfoundation.org/publications/the-living-standards-outlook-2023/>

⁶ *Ibid.*

⁷ See Appendix A: 'PIP- Personal Independent Payments'

⁸ See Figure 6, 7 & 8 in Appendix B

⁹ See Appendix A: 'Introduction of a new employment support system'

¹⁰ See Appendix A: 'Access to Work Scheme'

¹¹ See Appendix A: 'Introduction of a new employment support system'

¹² See Figure 5 in Appendix B

receiving accessible formats from your department and HMRC also create unnecessary hardship and can lead to missed deadlines and penalties. Our residents have asked us to request that accessible Word documents be offered via secure email as the default format¹³.

Lastly, as you can see from our survey, we are concerned that these reforms could push more people into poverty. This point was also emphasised during our in-person consultation¹⁴. The government's own impact assessment suggests up to [250,000](#)¹⁵ people could be affected. A 13-week buffer outlined in the Welfare Bill published on 18 June is not enough to protect people from the consequences of systemic delays and failures. We urge that all positive measures be fully implemented and tested before any changes to benefits are introduced. We believe the risk of unintended harm is too great to proceed without robust safeguards.

Summary of key requests and recommendations:

- **Implement support structures before benefit changes:** Ensure that employment support, and reasonable adjustments are in place and effective before any reduction in benefits is introduced.
- **Reduce delays in Access to Work:** Address the current 32-week wait for assessments, which is causing job offers to be withdrawn.
- **Invest in specialist training:** Allocate part of the £1 billion investment to train assessors and work coaches in understanding complex and neurodivergent conditions
- **Protect the purpose of PIP:** Maintain PIP as a non-means-tested, non-work-related benefit to support independent living and prevent increased poverty.
- **Strengthen employer accountability:** Reform the Disability Confident scheme to ensure it delivers real outcomes, with stronger enforcement and cultural change.
- **Support young people:** Include targeted provisions for 16–21-year-olds in the reforms and ensure they are consulted meaningfully
- **Improve accessibility:** Provide communications in accessible formats (e.g. secure Word documents) and ensure language support, including Nepali-speaking work coaches.
- **Extend the 13-week buffer:** Recognise that systemic delays require a longer transition period to avoid unintended harm.
- **Standardise service delivery:** Eliminate postcode lotteries by introducing national standards for support and assessments.
- **Monitor and evaluate reforms:** Establish a transparent framework to assess the real-world impact of changes before full implementation.

We appreciate your commitment to reform. We urge you to implement changes to the benefits system with care, compassion, and a clear understanding of the lived experiences of those affected. We would welcome the opportunity to discuss these issues further and to work with you to ensure that reforms are fair, effective, inclusive, and genuinely supportive.

Yours sincerely,
Cllr Gareth Williams
Leader of Rushmoor Borough Council

¹³ See Appendix A: 'Access to Work Scheme'

¹⁴ See Figure 2 in Appendix B

¹⁵ Francis-Devine, B. (2025) Poverty in the UK: statistics. [online] House of Commons Library. Available at: <https://researchbriefings.files.parliament.uk/documents/SN07096/SN07096.pdf>

Appendix A

Contribution from Rushmoor Accessibility Action Group -

This section was written by a visually impaired person who works in disability, neurodiversity, accessibility and inclusion. They therefore bring both personal lived experience and professional insight to their contribution.

WCA: Ending WCA (Work Capability Assessment)

The current WCA doesn't work because the people who assess it are not trained in understanding sensory, physical, learning mental health, and neurodiverse conditions and how these may affect someone's ability or disability to carry out limited work or limited capability to carry out work related activity (LCWRA or support group).

National charity campaign departments within Scope, Leonard Cheshire, Mind, Sense, Mencap, and RNIB, to name a few, have received information from their service users which highlights the inconsistency of decision making, evidencing that some people in the LCWRA support group could perform limited work but are effectively being written off because there are not enough trained advisors to support them. For similar reasons, there are also many people in the limited work group who should be in the LCWRA.

The WCA is not fit for purpose and should not be replaced by the equally flawed PIP assessment model. Both systems require reform to ensure fair and accurate decisions.

PIP- Personal Independent Payments

PIP sits with Disability Living Allowance and Attendance Allowance; these benefits are not related to work and are not means-tested. It is unacceptable that PIP is being targeted and linked to employment. Yes, more disabled people should be in work, but it is wrong that disabled people are living in fear that PIP will be removed for many who are currently eligible, regardless of which rate they are receiving. PIP is the benefit designed to help cover the extra costs that come with the 'lived experience' of having a disability.

PIP is intended to support people with lived experience of disability by improving their mobility and independence, however, it still doesn't provide the same level of access and freedom that non-disabled people experience daily. Being disabled is not a choice, the government should not further limit the restricted choices disabled people already have to live safely and independently, especially when it comes to essential mobility adaptations.

Many recipients use their PIP for:

- Paying for a carer to assist with toileting and personal care at home, in the workplace, or while working from home
- Allocating time for reading and writing, both for personal and professional needs.
- Covering electricity costs for essential equipment like wheelchairs, phones, tablets, and computers, especially those with speech output features
- Funding accessibility needs, such as software upgrades, wheelchair repairs, and servicing.

- Paying for transport, including taxis to attend GP appointments, go shopping, travel to work, or attend Job Centres, courses, and interviews
- Hiring advocates and interpreters, including British Sign Language (BSL) interpreters and support for those with profound communication needs
- Protecting quality of life, as many disabled people face challenges across multiple areas that PIP is designed to support
- Preventing financial hardship, since for many, PIP is their only source of income.
- Supporting long-term needs, as most recipients live with lifelong, often progressive, disabilities that are not curable

Removing PIP will significantly reduce the quality of life and ability to live with dignity for disabled people. Most PIP recipients have long-term (often lifelong and non-fixable) disabilities, many of which will worsen over time.

Introduction of a new employment support system

The Disability Confidence scheme is a purposeless tick-box exercise that achieves nothing. It doesn't support people with 'lived experience' disability, nor does it support employers. Employers often misuse the Disability Confidence scheme to appear diverse. However, evidence from the [Disability Employers¹⁶ Forum](#) shows that employers don't use the Disability Confidence scheme to recruit or retain new 'lived experience' disabled talent. [The Disability Rights Commission¹⁷](#) reports that many 'lived experience' disabled job seekers invest in programmes and attend interviews only to face discrimination and rejection.

The Small Business Federation Barriers to [Business report, 2022¹⁸](#), finds employers often lack awareness of disabled peoples abilities. Job centre work coaches are not fully trained in disability or making workplaces accessible through reasonable adjustments like adaptive technology as part of the Access to Work (ATW) scheme. Previous Disability Employment Advisers (DEAs) were ineffective and unable to support disabled people into suitable employment.

Locally in Farnborough the M3 Enterprise and Employment Zone believes the Disability Confidence scheme works, but this is because they do not listen to disabled people's lived experience and instead rely solely on employer feedback.

RNIB, Scope, Mencap national charities ran work programmes under the Pathways to Work banner. These were often unsuccessful, with employers failing to retain disabled workers after 3- or 6-month placements. Even charities specialising in disability sometimes dismiss disabled staff during restructures.

Many carers supporting disabled relatives around the clock are simply not able to look for work, due to their full-time care responsibilities.

¹⁶ Pring, J. (2023) One in three 'Disability Confident' employers have employed no disabled people. [online] Disability News Service. Available at: <https://www.disabilitynewsservice.com/one-in-three-disability-confident-employers-have-employed-no-disabled-people/>.

¹⁷ Pring, J. (2023) Top Disability Confident members 'do no better on jobs than non-members'. Disability News Service. Available at: <https://www.disabilitynewsservice.com/top-disability-confident-members-do-no-better-on-jobs-than-non-members/>.

¹⁸ Federation of Small Businesses, (2022) Business Without Barriers. Policy report. Federation of Small Businesses. Available at: <https://www.fsb.org.uk/resources/policy-reports/business-without-barriers-MCQUI2L27TSFHF3KUR3ZGLOI6D2U>.

Work Coaches have targets to meet, which can result in disabled people being pushed into unsuitable interviews or placements, just to meet quotas.

Access To Work Scheme

Currently, ATW is a post code lottery, effective in some areas and inadequate in others. Devolution and Local Government Reorganisation may worsen this issue if there is no national enforced standard.

Giving employers money to purchase access products is inappropriate. Under ATW equipment follows the disabled employee remaining in their name. Giving it to the employer instead will:

- Remove the employee's right to request IT adaptations
- Prevent equipment from moving with the worker to a new job
- Risk misuse of funds — employers may buy cheaper, unsuitable alternatives
- Lead to poor user experience or outright inaccessibility

The current ATW process is slow:

- People can wait up to 6 months for the initial assessment.
- Another 4–6 months for equipment delivery.
- And up to 3 further months for installation.

This results in lost job offers, few employers hold positions open for up to 16 months.

When a disabled person's circumstances change, reassessment and equipment updates can take up to 15 months, frequently leading to unemployment through no fault of their own.

Employers

Money shouldn't be given to entice employers to employ disabled people. Employers should recognise that a diverse workplace better represents their community and brings business benefits, disabled employees contribute valuable skills and often remain with organisations longer.

Government

Currently, the DWP is inaccessible to many disabled people. For example, those requiring Braille, audio, or large print formats (due to visual impairment, stroke, dyslexia, etc.) often wait 12–16 weeks for accessible information. A letter dated 1 January might not arrive in accessible format until 1 April or later, resulting in missed deadlines through no fault of the recipient.

The DWP and HMRC do not offer password protected Word documents, which would be the most accessible format for many visually impaired people in employment.

Young People. Aged 16-18

Many young disabled people live independently in supported accommodation. If they are not supported into work experience or work trials, they will not gain the experience needed to access employment. ATW does not currently support voluntary work or work experience, so how can these people gain workplace skills?

It is crucial that the important value specialist Schools play in delivering specialist independent living skills on top of the educational curriculum are not disadvantaged. They enable people with long term severe disabilities to develop key life skills to help them participate in living in their local community which includes taking up employment. This is linked to the benefit reform because many 16–18-year-olds in specialist educational settings are in receipt of disability related benefits and are not able to be educated in mainstream schools.

Third Sector Organisations

Charities, Volunteer Centres and Citizen's Advice Bureaus cannot continue to support disabled people and carers if funding continues to be cut. These organisations are already seeing a drop in volunteers. Many national charities reported a significant surge in volunteers during COVID, numbers which have since fallen below pre-COVID levels.

Appendix B

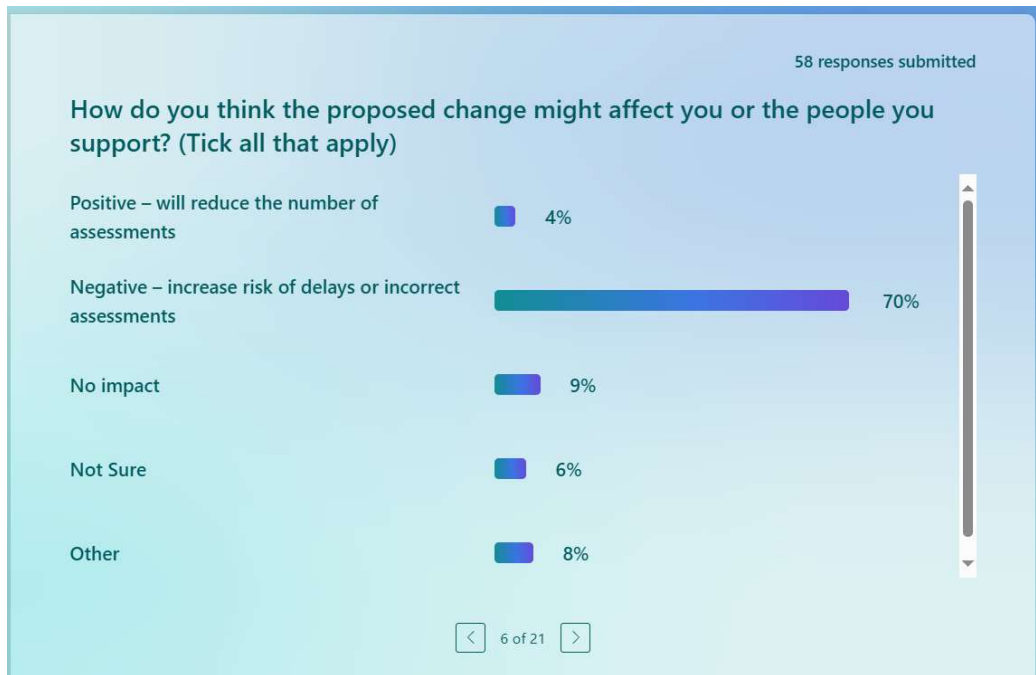


Figure 1: Question 6 - How do you think the proposed change might affect you or the people you support?

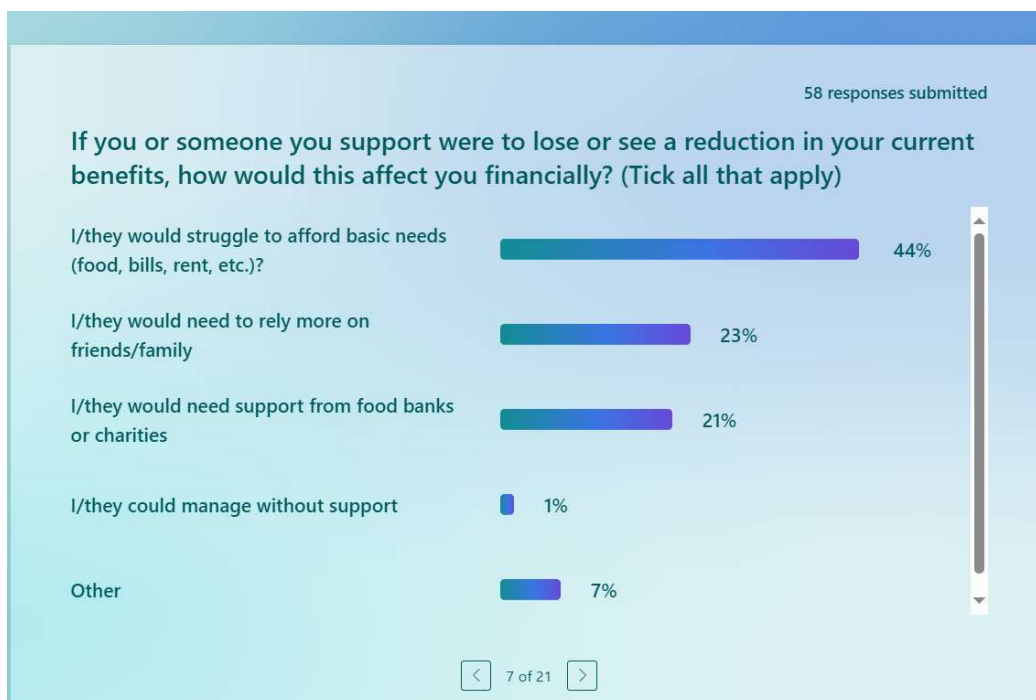


Figure 2: Question 7 – If you or someone you support were to lose or see a reduction in your current benefits, how would this affect you financially?

Health and Benefit Analysis

Short Summary

- The Matrix shows the correlation between health and benefit claims
- The rows shows comments or health status descriptions, while the columns shows the types of benefits or support schemes (like PIP, DLA, ESA) and other conditions

Health and Benefit Insight + NHS waiting times

- Many with Physical Health Conditions claim ESA (20 mentions - 34.5% of total respondents)
- Those with Mental Health Conditions also claim ESA and PIP (10 and 8 mentions - 31.03% of total respondents)
- At least 16 respondents are waiting 6 months+ for treatment (27.6% of total respondents)

"None of the above" low count

- Only 5 respondents chose "None of the above", which is very low (8.6% of total respondents)
- Suggests that most people in this survey are reliant on the system

Carer Insight:

- Only 6 respondents have carer-related benefits, which is low (10.3% of total respondents)
- This implies:
 - Either it is mostly direct claimants, not carers or carer support is under-represented or under-claimed. Possible outreach gap?

Universal Credit and Health Element Insight

- Low total for UC and Carers Allowance (5) and Universal Credit with health element (1) - (10.3% of total respondents)
- Suggests this benefit type is either:
 - Not suitable for this group's health condition complexity or
 - poorly understood/underclaimed – another outreach group? - ESA/PIP seem to be more familiar for respondents

[Link to Power BI data](#)

Figure 3: Health and Benefit Analysis

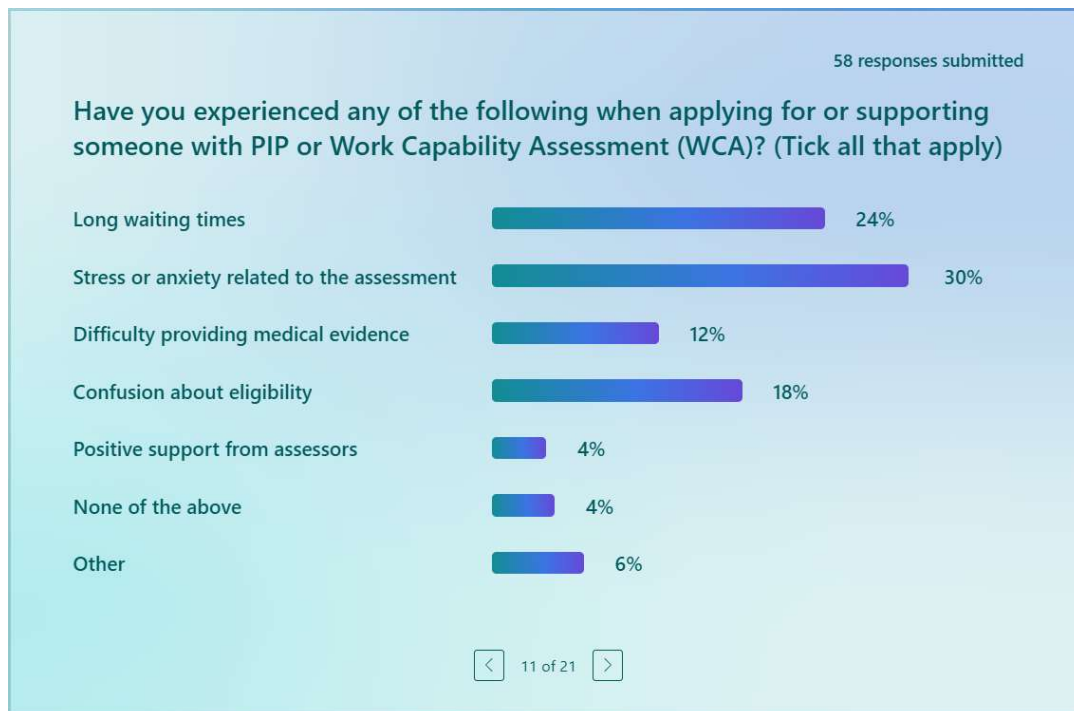


Figure 4: Question 11 - Have you experienced any of the following when applying for or supporting someone with PIP or Work Capability Assessment (WCA)?

Young People Extra data

Mentions

- Only two mentions of young people in the responses

Extracts

1. "Young people aged 18–21" - Respondent 55. It lacks context, but the respondent shows that they represent a young, people, but doesn't say the name of the organisation
2. "Families with young adults with additional needs are particularly struggling where the young person is still dependent on the family but comes off the UC of a parent and is expected to go through the process of doing their own. Some young people aren't capable of doing this and so parents are supporting on a shoestring, whilst other young people might claim but as it goes directly to the young person they spend it irresponsibly. Perhaps if a young person is awarded a benefit and is living at home a portion is paid directly to the parent as a rent/living costs contribution?" — Respondent 9.

R

[Link to Power BI data](#)

Figure 5: Young People Extra Data

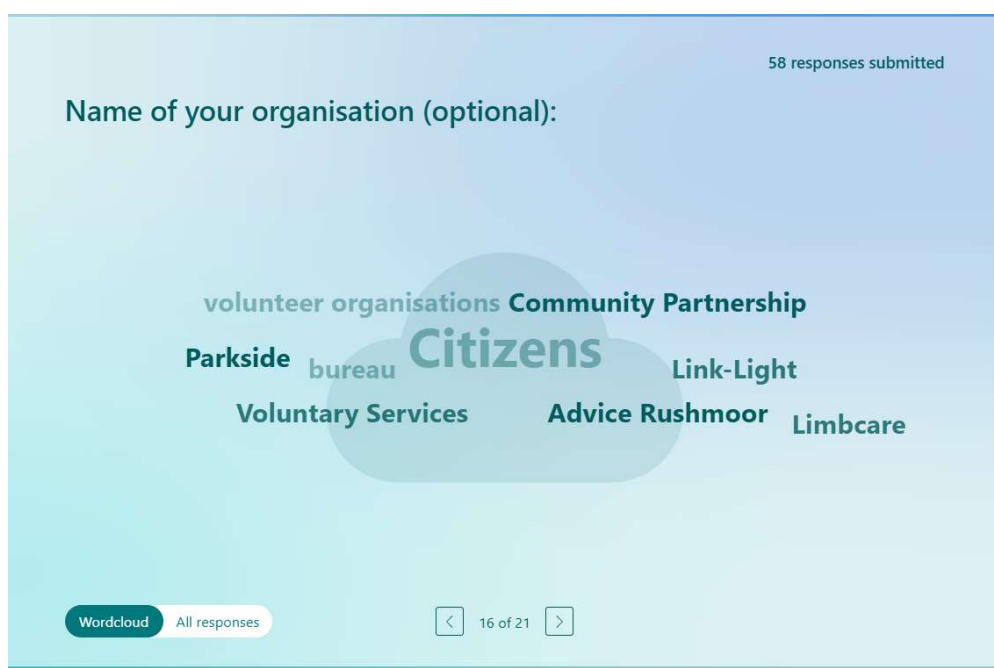


Figure 6: Name of your organisation (optional):

17. Which group(s) do you primarily support or represent? (Tick all that apply)

[More details](#)

Disabled adults	3
People with mental health conditions	5
Young people aged 18-21	1
People with long-term health conditions	8
Carers/families	3
Other	10



18. What concerns (if any) do you have about the reforms and their impact on you or your service users?

[More details](#)

22
Responses

Latest Responses

"Impact on charities and businesses and those using the provision"

...

9 respondents (41%) answered people for this question.



Figure 7: Question 17 & 18 - Which group(s) do you primarily support or represent? & What concerns (if any) do you have about the reforms and their impact on you or your service users?



Figure 8: Question 19 & 20 - What additional guidance or support would help you to respond to these changes? & Do you have any other feedback on the proposed reforms or how we can support residents?

Full Data Set

https://forms.office.com/Pages/AnalysisPage.aspx?AnalyzerToken=VBw5dwobxaALPUyqsEeEU6QGxrlDxW5O&id=xrIKROOSyU6l_0zpYWLz9mQkQRObrVvHuzt9kk5Z2sdUMzBZSVBSOVVQQUFVNUVHTFuxUjk1MFZGTC4u