



Law Centre NI: Response to the Department for Work and Pensions
'Pathways to Work: Reforming Benefits and Support to Get Britain Working
Green Paper'
June 2025

Introduction

1. Law Centre NI (LCNI) welcomes the opportunity to respond to the Department for Work and Pensions (DWP) *"Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper"*.
2. LCNI provides free, independent and specialist legal advice, casework and representation in the areas of social security, employment and immigration law. In addition to providing direct support to the public, we provide assistance, legal information, professional learning and quality assurance to the advice sector and across Northern Ireland (NI)
3. The Green Paper is part of a broader welfare reform agenda, following the 'Get Britain Working White Paper'. The Green Paper is designed to cut welfare spending and while there are numerous proposals, there are notably cuts to disability and incapacity benefits, affecting disabled people and those with long-term health conditions.
4. Section 87(1) of The Northern Ireland Act 1998 notes the principle of parity within the social security systems in Northern Ireland and Great Britain.¹ While we operate the parity of principle in NI, it is unknown how many of the proposed policy measures will filter through to NI as the NI Executive may decide to apply these changes in a different manner. We are acutely aware of the significant worry, confusion and uncertainty which has resulted following the Green Paper's publication. The proposed policy measures will result in severe impacts upon many claimants, whilst further bringing forward financial implications and change to the social security system.

¹ Gov UK, [Concordat between the Department for Work and Pensions and the Department for Communities - GOV.UK](https://www.gov.uk/government/consultations/concordat-between-the-department-for-work-and-pensions-and-the-department-for-communities)

5. LCNI's response highlights the adverse impacts which these proposed policies will have upon many individuals, with a specific focus upon Northern Ireland. Based on our engagement, evidence, and research we have outlined a series of recommendations, which we strongly urge DWP and the Department for Communities (DfC) to consider:

Summary of Recommendations

- ❖ **LCNI recommends that DWP does not proceed with these proposals.**

Engagement

- ❖ **LCNI recommends that DWP should ensure that all proposed policy measures are subject to consultation;**
- ❖ **LCNI recommends that following this change, DWP should extend the response timeframe to allow individuals and organisations enhanced opportunity to make their views known and engage in this process;**
- ❖ **LCNI recommend DWP should increase meaningful engagement with people and organisations across NI, particularly in advance of the White Paper. It is important that those who will be affected have adequate opportunity to engage with the responsible Department;**
- ❖ **LCNI recommends that DfC enhances engagement with individuals and organisations to provide clarity on how and when these policies will be implemented in Northern Ireland;**
- ❖ **LCNI recommend DWP should ensure engagement in the support conversation is voluntary. This should not become an additional conditionality or place a mandatory requirement upon the individual;**
- ❖ **LCNI recommends DWP should ensure that communication is user-friendly, with appropriate tone and language used, so as to not cause undue stress or worry to individuals;**
- ❖ **LCNI recommend that all support measures must be voluntary engagements that can support and assist claimants on their health journey.**

Costings Uncertainty

- ❖ **LCNI recommends that DWP and the Executive provide clarification in relations to all costings and the required budget for these proposals so that an accurate and efficient EQIA process can take place.**

Continued Protections

- ❖ Those who are at risk of losing their PIP and/or Carers entitlements must continue to have their needs met, and DWP and DfC must provide specific clarification as to how this will be delivered and achieved.

Further details and clarifications

- ❖ LCNI recommend that DWP should provide further detail on the Unemployment Insurance without further delay;
- ❖ LCNI recommend that DWP should provide further information on their current Safeguarding policy, and make this available so that an assessment can be conducted;
- ❖ LCNI recommend DWP should provide further detail and clarification on the practicalities of the support conversation;
- ❖ LCNI recommends DWP should provide clarification as to how the support conversation will be funded and facilitated in NI;
- ❖ LCNI recommends that DWP provide further clarification as to who would conduct a support engagement, the manner of engagement, and how this will be financed in the devolved nations;
- ❖ LCNI recommends that DWP should implement a tailored approach when engaging with young people, which is reflective of the individual's needs and capabilities.

NI Specific Recommendations

- ❖ As convenor of the Cliff Edge Coalition, LCNI endorses the Cliff Edge Coalition's response to this Green Paper²;
- ❖ LCNI recommends that DWP should not proceed with the current proposed policy relative to PIP points, due to the disproportionate impact this will have upon claimants in NI;
- ❖ LCNI recommends the NI Executive should ensure that additional funding is allocated to mental health services to support the anticipated rise in demand for services, and to ensure that individuals can access timely support;
- ❖ LCNI recommends that DWP does not proceed with the removal of the work capability assessment;
- ❖ LCNI recommends that clarity is provided by both DWP and DfC if support measures will be available to carers who lose their entitlement to Carers Allowance. This must not place additional conditionality requirements must not be placed upon the individuals in this instance;

² Cliff Edge Coalition NI, <https://www.lawcentreni.org/news/cliff-edge-coalition-responds-to-pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper/>

- ❖ **LCNI recommends the DWP's collaboration committee includes representation from devolved nations. Furthermore, an equivalent body should be established by DfC so as to ascertain employment engagement;**
- ❖ **LCNI recommend that both DfC and DWP enhance their communication with benefit claimants and disabled people in an accessible manner and format;**
- ❖ **LCNI recommend both DWP and DfC should engage with the independent advice sector in NI to ascertain as to how this can complement existing support, rather than present further challenges to individuals.**

Other Strategies

- ❖ **LCNI recommends that the NI Anti-Poverty Strategy and UK wide Child Poverty Strategy are implemented without further delay. These strategies must outline specific targets and actions that will be taken to reduce the rising poverty levels across NI;**
- ❖ **LCNI recommends that the NI Executive implements a Disability Strategy and a Disability Employment Strategy without further delay. These strategies must detail the concrete targets and actions that will be taken to increase disabled people's inclusion in the workforce;**
- ❖ **There must be no regression from current equality and human rights standards, and LCNI continues to call for the incorporation of the UNCRPD.**

The Impact Upon Northern Ireland

6. Our principal concern is the content of the proposals which are being consulted upon, and that numerous changes are being introduced through primary legislation – rather than being subject to consultation. These policies will have significant adverse impacts upon many individuals and we continue to call upon DWP to include all policy proposals within this consultation. DWP should also increase the response timeframe to allow individuals and organisations the opportunity to make their views known.
 - ❖ *LCNI recommends that DWP does not proceed with these proposals;*
 - ❖ *LCNI recommends that DWP should ensure that all proposed policy measures are subject to consultation;*
 - ❖ *LCNI recommends that following this change, DWP should extend the response timeframe to allow individuals and organisations enhanced opportunity to make their views known and engage in this process.*

7. LCNI expresses disappointment that more proactive engagement was not undertaken by DWP in this consultation phase, specifically with devolved nations. LCNI did engage with two DWP consultation events, yet our further attempts to meaningfully engage proved unsuccessful, due to DWP's limited communication. This restrictive consultation phase will result in individuals and organisations not having the opportunity to make their views known, and we have relayed our concerns to DWP and Department for Communities (DfC) in relation to these matters.
8. LCNI is disappointed that the full Green Paper was published in advance of the accessible versions. This did not promote the same equality of opportunity for people with disabilities, including those who will be most impacted by these proposals, to analyse and evaluate these documents.
 - ❖ *LCNI recommend DWP should increase meaningful engagement with people and organisations across NI, particularly in advance of the White Paper. It is important that those who will be affected have adequate opportunity to engage with the responsible Department;*
 - ❖ *LCNI recommends that DfC enhances engagement with individuals and organisations to provide clarity on how and when these policies will be implemented in Northern Ireland.*
9. As convenor of the Cliff Edge Coalition³ and member of the Anti-Poverty Strategy Working Group⁴, LCNI are acutely aware that these policies will impact upon those who are most in need and further deepen poverty levels in NI.⁵ In GB, DWP estimate this will increase poverty levels by 250,000 people, which includes 50,000 children.⁶ These figures have not yet been published for NI.
10. LCNI are disappointed that the Impact Assessment for NI published was published three days before the submission deadline to the consultation.⁷ We had made substantive effort to seek this data from DfC via two Freedom of Information requests, in which we received unsatisfactory responses.⁸ This

³ Cliff Edge Coalition, <https://www.lawcentreni.org/cliff-edge-coalition/>

⁴ Anti-Poverty Strategy Group, <https://www.lawcentreni.org/news/the-launch-of-the-anti-poverty-strategy-group/> and https://www.barnardos.org.uk/sites/default/files/uploads/Anti-Poverty_BriefingPaper_D3.pdf

⁵ 291,000 individuals and 90,000 children live in absolute poverty in NI. Department for Communities, March 2025, https://datavis.nisra.gov.uk/communities/PII_report_2324.html

⁶ Department for Work and Pensions, <https://assets.publishing.service.gov.uk/media/67e667fe4a226ab6c41b1fe2/spring-statement-2025-health-and-disability-benefit-reforms-impacts.pdf>

⁷ Department for Communities, June 2025, <https://www.communities-ni.gov.uk/publications/universal-credit-and-personal-independence-bill-impact-analysis-tables>

⁸ Law Centre NI, <https://www.lawcentreni.org/news/law-centre-ni-raises-concerns-over-absence-of-key-statistics/>

data should have published alongside FB data to allow individuals and organisations sufficient time and opportunity to fully evaluate and analyse the data.

- ❖ *As convenor of the Cliff Edge Coalition, LCNI endorses the Cliff Edge Coalition's response to this Green Paper.⁹*
- ❖ *LCNI recommends that the NI Anti-Poverty Strategy and UK wide Child Poverty Strategy are implemented without further delay. These strategies must outline specific targets and actions that will be taken to reduce the rising poverty levels across NI;*

11. Significant funding and resources is required to implement the proposed changes. However, DWP provides no clarification as to when and if additional allocations will be provided to the NI Executive to implement the proposals.

- ❖ *LCNI recommends that DWP and the Executive provide clarification in relations to all costings and the required budget for these proposals so that an accurate and efficient EQIA process can take place.*

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

12. LCNI is severely concerned around the proposals relative to Personal Independence Payment (PIP). DWP estimate that around 370,000 individuals are expected to lose their entitlement (upon an award review) and 430,000 people will not get the PIP they would have been entitled to, with an average loss of £4,500 per year in GB.¹⁰ In NI, DfC estimate that by 2029/30, 39,000 PIP claimants will be affected by the 4 point rule for the daily living component, in addition to 7,000 people claiming carer's benefits.¹¹

13. This loss of PIP will escalate further in NI, and we recognise that these proposals will have a disproportionate impact upon new claimants with ill mental health in NI. As of February 2025, 220,060 people in NI were in receipt of PIP, with 93,060 of these claimants in payment for the enhanced rate for both the daily living and mobility requirements.¹² Psychiatric disorders (mental

⁹ Cliff Edge Coalition NI, <https://www.lawcentreni.org/news/cliff-edge-coalition-responds-to-pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper/>

¹⁰ Department for Work and Pensions, <https://assets.publishing.service.gov.uk/media/67e667fe4a226ab6c41b1fe2/spring-statement-2025-health-and-disability-benefit-reforms-impacts.pdf>

¹¹ Department for Communities, June 2025, [dfc-ni-pip-impact-analysis-tables-jun2025.ods](https://www.communities-ni.gov.uk/publications/personal-independence-payment-statistics-february-2025)

¹² Department for Communities, February 2025, <https://www.communities-ni.gov.uk/publications/personal-independence-payment-statistics-february-2025>

illness) accounts for 46% of the main disabling conditions in payment for Personal Independence Payment (PIP) in NI.¹³ This is a much higher statistic than in England and Wales in which psychiatric disorder accounts for 40% of claims.¹⁴ Our case study below highlights the impact which the PIP application process and provision of evidence can have upon an individual and their mental health:

LCNI Case Study

John* was referred to LCNI for representation at appeal. John had suffered a traumatic life event, and his PIP application was refused.

LCNI reviewed the paperwork, advised on additional evidence that would support the appeal and assisted with obtaining this. Once received we completed submissions on John's behalf and upon arrival at the hearing the Tribunal indicated they were satisfied on the papers they could make an award. This was discussed with John and the offer was accepted; John was awarded approximately £7400.00.

John was delighted he did not have to go through hearing and discuss the ordeal that resulted in the deterioration on his health.

*Name changed.

14. Additionally, we are concerned as to how the proposals will impact upon individuals in receipt of Universal Credit (UC). The number of households paid in receipt of UC is increasing, with 176,030 households in receipt of UC as of February 2025.¹⁵ The households in receipt of additional elements is also increasing, with 70,860 in receipt of Limited Capability for Work (LCW) element, 40,130 in receipt of Carers Element, and 24,040 were in receipt in the disabled child element.¹⁶ Specially related to LCW, 40% of households were in receipt of this element, and only 1% of households received no additional element.¹⁷ Our concerns further relate to the UC health element, which will be determined by receipt of the PIP daily living award following the removal of the Work Capability Assessment (WCA). We recognise this will result in many of these households losing this element, including young people, from their current entitlement if they do not score highly enough under

¹³ Department for Communities, [Ibid.](#)

¹⁴ Department for Work and Pensions, <https://www.gov.uk/government/statistics/personal-independence-payment-statistics-to-april-2025/personal-independence-payment-statistics-to-april-2025#PIP-statistics-by-disabling-condition>

¹⁵ Department for Communities, June 2025, <https://datavis.nisra.gov.uk/communities/universal-credit-publication-february-2025.html#Claimants>

¹⁶ Department for Communities, [Ibid.](#), Figure 10.

¹⁷ Department for Communities, [Ubid.](#)

the new proposals. DfC's Impact Assessment indicates that by 2029/30, 88,000 current claimants and 12,000 future claims will be affected by the UC health element changes.¹⁸

15. We acknowledge the resulting impact this will have upon the 77,460 people claiming Carers Allowance across NI.¹⁹ If an individual loses their PIP entitlement, this will result in their carer no longer being eligible to receive Carers Allowance, despite care needs not having changed. This risks increasing carers poverty and may result in a loss of care for the individual.

- ❖ *LCNI recommends that DWP should not proceed with the current proposed policy relative to PIP points, due to the disproportionate impact this will have upon claimants in NI;*
- ❖ *LCNI recommends the NI Executive should ensure that additional funding is allocated to mental health services to support the anticipated rise in demand for services, and to ensure that individuals can access timely support;*
- ❖ *LCNI recommends that DWP does not proceed with the removal of the work capability assessment;*
- ❖ *LCNI recommends that clarity is provided by both DWP and DfC if support measures will be available to carers who lose their entitlement to Carers Allowance. This must not place additional conditionality requirements must not be placed upon the individuals in this instance;*
- ❖ *Those who are at risk of losing their PIP and/or Carers entitlements must continue to have their needs met, and DWP and DfC must provide specific clarification as to how this will be delivered and achieved.*

16. LCNI welcome that work in and of itself will not trigger a reassessment or a potential loss of benefits for claimants. However, DWP and DfC must take targeted measures to ensure that additional barriers to work for claimants are removed. A cross departmental approach must be taken to remove barriers to accessing and engaging with employment support, which must be personalised to the needs of the individual.

- ❖ *LCNI recommends the DWP's collaboration committee includes representation from devolved nations. Furthermore, an equivalent body should be established by DfC so as to ascertain employment engagement;*

¹⁸ Department for Communities, June 2025, [dfc-ni-uc-impact-analysis-tables-jun2025.ods](#)

¹⁹ Department for Communities, February 2025, <https://www.communities-ni.gov.uk/system/files/2025-05/benefits-statistics-summary-feb-2025.pdf>

- ❖ *LCNI recommend that both DfC and DWP enhance their communication with benefit claimants and disabled people in an accessible manner and format.*

17. In relation to the Unemployment Insurance, further information must be provided such as the criteria for receiving this must be explicitly outlined, and its function, and as to how this is different from NICS. Further information and clarity must be provided in relation to the support conversation. This must not be an additional conditionality placed upon claimants, and must certainly not place them under further stress and worry, which may exacerbate pre-existing health and wellbeing needs.

- ❖ *LCNI recommend that DWP should provide further detail on the Unemployment Insurance without further delay.*

18. As we await further detail to be provided on the new Safeguarding approach, it is imperative this is centred upon the needs of individuals and utilises a trauma informed approach.

- ❖ *LCNI recommend that DWP should provide further information on their current Safeguarding policy, and make this available so that an assessment can be conducted.*

Comments on 'Chapter 3: Supporting people to thrive'

19. LCNI welcome the proposal of a new support conversation as this may assist in removing barriers to individuals accessing employment and education. We continue to call for this specialist support to take an individual approach specific to the needs and accessibility requirements of the individual. However, from our engagement with DWP, it is clear that substantial detail relative to this proposal is not yet known, including who the 'appropriately skilled person' conducting this engagement will be or how it will be financially resourced. This must be clarified urgently so that an accurate analysis of this proposal can be undertaken. It must be stressed that the introduction of any support measure does not place additional conditionalities upon claimants, as this will result in detrimental impacts upon their health needs and increase the risk of sanctions.

- ❖ *LCNI recommend DWP should provide further detail and clarification on the practicalities of the support conversation;*
- ❖ *LCNI recommends DWP should provide clarification as to how the support conversation will be funded and facilitated in NI;*
- ❖ *LCNI recommend both DWP and DfC should engage with the independent advice sector in NI to ascertain as to how this can*

complement existing support, rather than present further challenges to individuals;

- ❖ *LCNI recommend DWP should ensure engagement in the support conversation is voluntary. This should not become an additional conditionality or place a mandatory requirement upon the individual.*

20. As an independent advice organisation, LCNI provide a critical role in supporting many individuals across NI. Alongside our colleagues in this sector, we regularly engage with those who may not seek support from the Department, providing a critical lifeline of support for many. Our case study below highlights the importance of seeking independent advice, and the vital support which this can provide when engaging in the appeal process:

LCNI Case Study

Emily* was awarded PIP standard rate of both components. However, self-referred to LCNI as she felt there were specific issues which had been overlooked that would result in being awarded the Enhanced rate of Daily Living if properly considered. LCNI reviewed the case and medical evidence, agreeing that several arguments could be advanced to warrant an increased award.

LCNI compiled written submissions outlining where and why a possible higher award of points could have been awarded and upon arrival at the listing hearing the Panel advised they were satisfied on the papers that the increase of points could be awarded.

Emily was delighted, advising the additional money would make it easier to afford medication which was privately prescribed.

*Name changed.

- ❖ *LCNI recommends DWP should ensure that communication is user-friendly, with appropriate tone and language used, so as to not cause undue stress or worry to individuals;*
- ❖ *LCNI recommend that all support measures must be voluntary engagements that can support and assist claimants on their health journey;*
- ❖ *LCNI recommends that DWP provide further clarification as to who would conduct a support engagement, the manner of engagement, and how this will be financed in the devolved nations.*

21. LCNI raises further concerns relative to the Youth Guarantee proposals, relative to 18 to 21 year olds. This is an unrealistic proposal, as not all young people,

particularly those with disabilities, may be able to engage in employment or education opportunities due to barriers preventing this engagement.

- ❖ *LCNI recommends that DWP should implement a tailored approach when engaging with young people, which is reflective of the individual's needs and capabilities.*

Comments on 'Chapter 4: Supporting employers and making work accessible'

25. There must be accessible and suitable employment opportunities for disabled people who seek and are able to undertake employment. The United Nations Committee on the Rights of Persons with Disabilities noted that Northern Ireland was hit especially hard by the loss of EU funds', and 'DDPOs in Northern Ireland say the Access to Work scheme does not include vocational and technical training'.²⁰ Recent statistics highlight the economic inactivity levels in NI are 26.9%, which is much higher compared to the rest of the UK at 21.3%.²¹ This identifies that there is a specific gap in the employment market for jobs which are suitable and accessible for many people in NI. Furthermore, employers must take concrete actions to ensure that workplaces are accessible and inclusive which will facilitate a strong, dynamic and accessible labour market. LCNI welcome the numerous commitments outlined in the Department for Economy's 'The Employment Rights 'Good Jobs Bill', and continues to call for the implementation of these proposals.²²
26. 243,000 (1 in 5) people of working age in NI have a disability.²³ The disability employment rate is 36% (compared to 80% for non-disabled people), which is the lowest in the UK.²⁴ The UNCRPD notes 'most disabled people using food banks are in employment, indicating disproportionately prominent levels of poverty arising from insecure employment, low wages, and high cost of living'.²⁵ We continue to call for the implementation of the Disability and

²⁰ United Nations Committee on the Rights of Persons with Disabilities, March 2024, [tinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD/C/GBR/FUIR/1&Lang=en](https://internet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD/C/GBR/FUIR/1&Lang=en)

²¹ Northern Ireland Statistics and Research Agency, June 2025, <https://datavis.nisra.gov.uk/economy-and-labour-market/labour-market-report-june-2025.html>

²² Department for Economy, April 2025, https://www.economy-ni.gov.uk/sites/default/files/2025-04/The%20Good%20Jobs%20Employment%20Rights%20Bill%20-%20The%20Way%20Forward%20-%20Final%20tagged%2028.4.25-2_0.pdf

²³ Ulster University, 2022, <https://www.ulster.ac.uk/epc/pdf/2022/disability-and-the-labour-market/Disability-and-the-labour-market.pdf>

²⁴ Ulster University, 2022, <https://www.ulster.ac.uk/epc/pdf/2022/disability-and-the-labour-market/Disability-and-the-labour-market.pdf>

²⁵ United Nations Committee on the Rights of Persons with Disabilities, March 2024, [tinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD/C/GBR/FUIR/1&Lang=en](https://internet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD/C/GBR/FUIR/1&Lang=en)

Disability Employment Strategies, as it is critical there are enhanced measure that will increase employability outcomes for disabled people and their carers.

- ❖ *LCNI recommends that the NI Executive implements a Disability Strategy and a Disability Employment Strategy without further delay. These strategies must detail the concrete targets and actions that will be taken to increase disabled people's inclusion in the workforce;*
- ❖ *There must be no regression from current equality and human rights standards, and LCNI continues to call for the incorporation of the UNCRPD.*

Conclusion

LCNI welcomes further engagement with the Department's and interested parties on this matter, and we encourage concerned individuals to seek independent advice on these matters.

For further information about this response please contact:

Holly Knox, Policy and Community Engagement Officer.

 028 9024 4401

 holly.knox@lawcentreni.org

 *Law Centre NI, State Building, 2 Arthur Place, Belfast, BT1 1HG.*

Date of submission: Monday 30th June 2025