

Modernising Support for Independent Living: the health and disability green paper

The Women's Budget Group's Response to DWP's 2024 PIP Consultation

About Us

The UK Women's Budget Group (WBG) is the UK's only think tank focused on exploring the economy through a gender-equal lens. We provide evidence and analysis on women's economic position and propose policy alternatives for a gender-equal economy. We act as a link between academia, the women's voluntary sector and progressive economic think tanks.

Background

1.1. We welcome the opportunity to respond to the Green Paper on the future of Personal Independence Payment (PIP).

1.2. We are not a Disabled women's organisation, but we do undertake research on how gender and disability intersect to disadvantage Disabled people in the economy, labour market, household and social security system.

1.3. There are at least 16 million Disabled people in the UK¹, the majority of whom are women (8.7 million, compared to 6.4 million Disabled men). This means that nearly one quarter (24%) of all women in the UK have a disability.

1.4. Disabled people are more likely to be underemployed and to be in low-paid jobs. Overall, Disabled people earn 19.6% less than non-Disabled people, equivalent to £3,822 per year². However, the gap for Disabled women is significantly higher at 36% (average median gross earnings compared to a non-disabled man)³. This totals an equivalent difference in earnings of £7,020 per year⁴. The risk of in-work poverty is higher for people with a disability than for those without one.

1.5. Disabled people and their carers will face significant additional problems as a result of rising energy costs. On average, Disabled households (with at least one Disabled adult or child) need an additional £975 per month to have the same standard of living as non-

¹ House of Commons Library (2023) UK Disability Statistics: Prevalence and Life Experiences (<https://researchbriefings.files.parliament.uk/documents/CBP-9602/CBP-9602.pdf>)

² TUC (November 2020) Disability pay and employment gaps (<https://bit.ly/3IQp3UV>)

³ Ibid.

⁴ Original calculation with data from TUC (November 2020) Disability pay and employment gaps (<https://bit.ly/3IQp3UV>)

Disabled households. If this figure is updated to account for inflation over the current period 2022/2023, these extra costs rise to £1,122 per month⁵.

1.6. Disabled people also depend more on public services such as health and social care, have unique needs for social security, and have been disproportionately affected by austerity⁶.

1.7. Benefits which help to meet additional disability-related costs are vital to Disabled people's participation in society and are of particular value to women, who are the majority of Disabled people. Women are also more likely to be providing unpaid care for Disabled people. A social security system that provides for these women is vital to recognise their humanity and wider contributions to society beyond paid employment.

1.8. Women have already been disproportionately affected by the cuts to disability benefits, both as claimants and as carers⁷. Data from 2018 showed that Disabled women were set to lose 13% of their annual net income by 2021 from cumulative tax-benefit changes, while Disabled lone mothers stood to lose £7,224 per year by April 2021 (26% of their net income) if they did not have a Disabled child, and £10,506 (32%) if they had. With the cost of living crisis, these losses are likely to have increased.

1.9. The Personal Independence Payment (PIP), which replaced the Disability Living Allowance (DLA), is a non-contributory, non-means-tested benefit intended to contribute to the additional costs of disability. PIP is therefore not an incapacity benefit, but aims to support additional disability-related costs.

1.10. Almost 55% of those receiving PIP are women⁸ and 58% of carers are women (60% among those caring for more than 50 hours per week).⁹

1.11. Benefits like the PIP may be particularly important for Disabled women, given that Disabled people experience domestic violence at twice the rate as non-Disabled people. One in two Disabled women experience domestic violence in their lifetime and they face additional barriers in seeking help and support. Economic dependence makes women more vulnerable to domestic and sexual abuse and violence, since it makes it harder to leave abusive relationships.

⁵ Scope (2023) Disability Price Tag 2023: the extra cost of disability <https://www.scope.org.uk/campaigns/extra-costs/disability-price-tag-2023/>

⁶ Disability Benefits Consortium (2019) [Has welfare become unfair? The impact of welfare changes on Disabled people](#). See also WBG (2024) Who bears the brunt? Intersectional analysis of social security cuts since 2010.

⁷WBG (2018) [Disabled Women and Austerity](#)

⁸ Calculated from [DWPStatExplore](#): PIP cases with entitlement, age and gender by Daily Living Award Status, as of January 2024

⁹ See Carers UK fact sheet (<http://bit.ly/2lCyN5d>)

General response to the Consultation

2.1. It is important to be clear about the aims of the policies proposed in the Green Paper. What the Green Paper fails to mention is that the UK already has one of the [least generous welfare systems](#) in Western Europe. It fails to mention that PIP claimants are not “exploiting” the system – new [DWP figures](#) show that by PIP fraud fell from 0.2% in 2022/23 to zero in 2023/24 (of total spending on PIP of about £21.6 billion)¹⁰.

2.2. The green paper frames the need for change around an “unsustainable” rise in PIP claimants. But it fails to address the clear reasons why PIP claims have increased. The rise in benefit costs is driven by an ageing population, working age people experiencing more disability and becoming less healthy¹¹. The number of working-age people reporting that they have a disability has increased from 5.9 million in 2012-13 to 8.9 million in 2022-23¹².

2.3. Attempts to restrict benefits will likely impact people who need them, without improving their health situation or job prospects. The government should therefore focus on the underlying causes, rather than limiting the security provided by PIP.

2.4. Given the financial insecurity and social vulnerability of those affected by these decisions, policy should be made with the wellbeing of Disabled people as an overriding priority.

2.5. Cuts to other benefits and the cost of living crisis have meant that health-related benefits are more important for incomes than they were ten years ago.

2.6. The paper makes no reference to the need for social security policies to be co-produced with Disabled people, and it completely ignores the need to maintain PIP as a cash benefit, which is essential for its ability to meet the extra costs of disability and maximising the choice and control of Disabled people. Personal Independence Payment is a vital piece of social infrastructure.

2.7. The green paper takes a medical-model approach to the experience of disability and to the lives of Disabled people. Focusing on how impairments may be “cured” or “fixed” through different interventions ignores the role of social security as social infrastructure, which removes barriers Disabled people face to participate in society. The introduction of any of the policies in this green paper would lead to even higher numbers of attitudinal, institutional, environmental and information barriers for Disabled people.

2.8. In March 2024, the Work and Pensions Committee published its [report examining the level of benefits in the UK](#). The report highlighted the 'fundamental inadequacy' of social

¹⁰ Some of the content in this section is drafted from [Disability Rights UK's Template Submission](#)

¹¹ Resolution Foundation (2024) Under Strain (<https://www.resolutionfoundation.org/app/uploads/2024/06/20-Under-strain.pdf>)

¹² Ibid.

security support and recommended developing a framework of principles for setting benefit levels that link to living costs and work incentives.

2.9. Any reforms to PIP should ensure they are not punishing Disabled people, nor pushing more people into poverty.

Direct responses to relevant consultation questions

Q15. Do you think the current entitlement thresholds levels are set at the right levels to define the need for Government financial support and why?

Yes. Disabled people report that the current entitlement thresholds levels are effective at providing additional support to millions of people and any changes are likely to be aimed at reducing that support¹³. Any future changes to the PIP system must be co-produced with Disabled people.

Q16. What are your views on changing the length of the current three-month qualifying period for PIP which is used to establish that the functional effects of a health condition or impairment have been present for a certain time period before entitlement can start?

The current qualifying period works effectively as it is and does not need revising.

Q17. What are your views on retaining, removing, or changing the length of the current nine-month prospective test which is used to determine if the functional effects of a health condition or impairment are likely to continue long-term?

The current qualifying period works effectively as it is and does not need revising.

Q20-23. What are the benefits and disadvantages of moving to a new system for PIP claimants? - one-off grants, voucher scheme, a catalogue/ shop scheme, or a receipt-based system.

Vouchers are demeaning and badly targeted. There is no evidence that they are needed by Disabled people, and they remove flexibility and autonomy about what and where to buy goods and services, which is key for respecting Disabled people's independence and dignity. Disabled people are in the best place to know what they need.

Q39 - Obligatory question: Are you an individual or an organisation supporting claimants applying for PIP?

No.

¹³ Disability Rights UK (2024) DR UK responds to proposed changes in PIP (<https://www.disabilityrightsuk.org/news/dr-uk-responds-proposed-changes-personal-independence-payment-pip>)