

# **Pathways to Work: Reforming Benefits and Support to Get Britain Working**

## **Consultation Response from Learning Disability England.**

Learning Disability England members (people with learning disabilities, family members and people in paid roles as supporters, managers, or policy leads) have come together through online sessions to offer feedback to the consultation.

During 2024 over 400 Learning Disability England Members came together to develop the [Good Lives Manifesto](#), sharing the priorities of people with learning disabilities, their families, and supporters. One of the pledged includes in that was to *'Help people with learning disabilities get the jobs they want supported by a system that recognises contributions not forcing poverty.'* We ask the government to *'Co-produce the benefits system that recognises everyone's right to an adequate standard of living and values individual's contribution not penalising disability.'*

Those aims remain a priority for Learning Disability England members as they considered the Pathways to Work Green paper.

## **Chapter 2: Reforming the Structure of the Health and Disability Benefits System**

1. What further steps could the Department for Work and Pensions take to make sure the benefit system supports people to try work without the worry that it may affect their benefit entitlement?

Learning Disability England members tell us the benefits system and many of the services intended to support employment are inaccessible to them.

Ending the conflation of Personal Independence Payments (PIP) and work will help build trust that the government understand the issues disabled people face. PIP is a benefit intended to offer recompense for some of the additional costs disabled people have. The current rhetoric has reinforced for many people with learning disabilities LDE works with that the government does not understand or recognise the reality of their lives.

Members tell us people with learning disabilities want to work but need accessible person-centred information and support to achieve that. Learning disability is a lifelong condition that will likely mean people always need support in their lives, but people can learn and develop new skills in the right conditions. The Good Lives framework chapter outlines some examples of the conditions needed and situations where people thrive: [https://www.learningdisabilityengland.org.uk/wp-content/uploads/2025/06/The\\_Good\\_Lives\\_Framework\\_2025\\_Chapter\\_6-6.pdf](https://www.learningdisabilityengland.org.uk/wp-content/uploads/2025/06/The_Good_Lives_Framework_2025_Chapter_6-6.pdf)

The changes needed in reforming the system to enable people trying work include:

- the opportunity to engage in the system face to face rather than online as there are still high numbers of people with learning disabilities digitally excluded compared to the general population.
- DWP advisers to be trained (and therefore skilled) at facilitating someone with a learning disability to manage their work and benefits. People tell us they need crucial information to make sense of their individual situation as well as the generic rules or principles.
- accessible information (easy read, video, or audio) options readily available on the benefits system and as an option for learning disabled people to provide information to the system.
- Removal of barriers created by other parts of statutory services. For example, we are aware of learning-disabled people who have sought and been offered work but have been unable to take it because of the housing costs of living in Supported Living and needing Housing Benefit to cover the rent. There is also a lack of awareness about the Social Care Charging guidance and disregard of earned income so some people with learning disabilities do not pursue work as they think they will become liable for a higher contribution to their care costs.

Education and colleges should be mandated to positively support young people and their families to know about work, support to work (like supported internships) and how they interact with the benefits system.

Presently there is evidence that often young people do not understand the benefits system and the opportunities present within that system, so any reform of the health and disability benefits system must include cross government efforts to build understanding and trust amongst the young people and their families growing up now and in the future.

Members welcome and support in principle the proposals to be able to return to benefits without reassessment if work is not successful but they want the rules and process on this change to be transparent, concrete, and easy to understand. Members told us the current system is so complex they want this to be different with simplicity and transparency built in.

2. What support do you think we could provide for those who will lose their Personal Independence Payment entitlement as a result of a new additional requirement to score **at least four points** on one daily living activity?

Learning Disability England members do not support the government's plans to change PIP rules as the increased costs of disability remain for individuals and will for future claimants until society changes fundamentally.

The FOI data provided to benefits and work suggests 3% of current PIP claimants with a learning disability do not score 4 points on 1 descriptor. This is approximately 7,000 people who will potentially lose PIP and where relevant the health component of Universal Credit. These are likely to be people with a learning disability with lower support needs so potentially those who have lost access to social care support in recent years ([Chris Hatton's blog: October 2023](#)) face an additional barrier to living a Good Life. Learning Disability England members are concerned this will mean some people with learning disabilities are further excluded and less likely to be able to maintain work, daily living, and wellbeing.

As a lifelong impairment that affects people's ability to manage aspects of daily living it is likely many learning-disabled people will not need additional health services to replace PIP, though that should be available for those who need it in lieu of funding to purchase the services needed. To maintain independent living members told us access to support at the right time (local, flexible, person centred and timely for example, a

community group or local flexible service like a Keyring network) and transport are significant. A cross-government approach to addressing the inequalities people with learning disabilities experience could help mitigate the negative impacts of withdrawing PIP from some people. This could include promoting inclusion and justice by increasing low level community support for those who do not meet social care eligibility criteria.

This might take the form of low-level support to maintain a tenancy. Some support provider members have told us of people who use PIP to self-fund low level community or tenancy support (instead of the social care service they have been assessed as eligible for). Adult social care or tenancy support will be needed to replace this or risk people's lives being significantly adversely affected and additional costs to statutory services (like housing evictions, homelessness claims or increased social care support after a crisis).

Learning Disability England members recognise the importance of strong local self-advocacy groups. There is considerable [evidence](#) of their positive impact including [The Henry Smith and Social Finance evidence](#) on £12 return for every pound invested in community advocacy.

Investment in self and community advocacy could help some people navigate the changes to the welfare system as well as offering wider benefits including developing skills or confidence for work.

However, Learning Disability England members believe that investment in community support will not replace the role of PIP in making up for the additional costs of disability. In 2024 members shared what they use PIP for ([Learning-Disability-England-PIP-Consultation-Response-2024.pdf](#)) - much of it could not be replaced by additional health and social care services. Specifically:

*'Being able to use PIP to see and do activities with family and friends is very important, the Belonging Forum found in a 2024 poll that 40% of disabled people reported experiencing loneliness and social isolation. Being socially connected was associated in the poll with higher levels of health, mental health and life satisfaction. Using PIP to support social connection is good way to prevent poor outcomes from loneliness.'*

3. How could we improve the experience of the health and care system for people who are claiming Personal Independence Payment who would lose entitlement?

Members have previously told us [that Health and Social Care systems are often inaccessible](#) to learning disabled people. People's [experience is improved](#) when there is a local, in person, relational based service that can make the reasonable adjustments people need.

Ensuring that there is such an offer from local DWP or the Third Sector can help reduce the risk of exclusion for learning disabled people. It is unlikely the Health and Social Care system will immediately be in a position to support more people with a learning disability without significant reform of their systems. We advocate not relying on them but investing in User led or local community capacity.

The current proposals could be improved by slower, phased implementation allowing more change in NHS reform and improved investment in community supports.

The experience of people of people with learning disabilities would be improved if services were designed to be accessible for them with reasonable adjustments embedded for communication, managing systems and decision making.

5. What practical steps could we take to improve our current approach to safeguarding people who use our services?

It is essential that the proposed review of safeguarding is fully inclusive and enables people with a learning disability to contribute.

A good understanding of the Mental Capacity Act and issues of consent are often critical to safeguarding with learning disabled people or providing a good service generally. There is learning from [resources](#) developed in health that can be considered in DWP practice. Particularly important is the issue of learning from failings around [mental capacity](#) and communication.

Learning Disability England members support rights-based approaches and would advocate integrating human rights into the

safeguarding framework. Making safeguarding personal is a person led outcomes-based approach that the DWP can learn from.

The safeguarding approach should consider the role of family, friends, or advocates in any process as often people have informal or formal support to navigate DWP systems which are generally inaccessible to people with learning disabilities.

Transparency of the system, decisions made, and lessons learned can help build trust. The DWP having open routes to raise concerns or share outcomes will help reduce the uncertainty and the prevalent fear of the DWP (in our interactions with LDE members during the consultation period we heard much anguish, fear, and mistrust).

### **Chapter 3: Supporting People to Thrive**

6. How should the **support** conversation be designed and delivered so that it is welcomed by individuals and is effective?

Ahead of a specific support conversation wider change is needed for people with learning disabilities to stop them being some of the most excluded people in the employment market (23% working vs 55% of other disabled people). Conversations about the opportunities of work or contribution must start early with young people and their families.

[Preparing for Adulthood](#) has significant evidence and resources to support education, young people, their families integrate conversations about contribution and work into all future planning. It is important these conversations value all contribution and widen opportunities, paid and unpaid to lay a foundation for adulthood.

Ensuring there are positive role models of learning-disabled people working is important for building aspirations of people, their families, supporters, and employers themselves. These early conversations and public demonstration of achievement can help reduce some of the barriers the [NDTi \(for Mencap\) research identified](#).

For example, Craig told us

*Craig works for a national inclusion charity, with one of his main responsibilities being providing learning disability and autism training to health and social care staff across the country. He is also a man with*



*dyslexia, autism, and a mental health condition. Craig says, “I love working – I thrive at work.”*

*In his previous role, Craig was thriving in many parts of the job. But because reasonable adjustments weren’t made – such as support with timesheets – he was unable to continue in the role. Now, things are different. Craig says he has “never experienced a barrier” in his work there. The team puts simple adjustments in place to help him succeed – like having someone support with forms or using an earpiece to help with tricky words when reading out news updates.*

*As Craig explains, it often comes down to “just one extra hour of support in a 7.5-hour shift.” That small change makes the difference between not being able to do the job – and being able to do it really well.*

*Craig believes the government is right to say that good employment improves quality of life, he says work “improves my wellbeing and my life,” but “it has to be the right job, with the right support – especially for people with a learning disability. People shouldn’t be pushed into certain lower-paid jobs just because that’s what others think they can do.”*

Learning Disability England members told us that currently conversations about work are limited to forcing people to take any job rather than exploring what job roles might suit their skills and attributes. Fidelity with the Supported Employment Quality Framework (SEQF) and embedding the [critical factors of success for Supported Employment](#) would help make the support conversation relevant for learning disabled people. This includes ensuring there is the additional investment needed for successful employment support people with learning disabilities need. The evidence suggests generic support conversations will rarely work for learning disabled people.

Learning Disability England members told us that the support conversation should acknowledge the barriers in society (like discrimination and lack of reasonable adjustments) rather than locating all the responsibility in the individual when there are significant blocks to them working that they cannot remove alone. The majority of people with learning disabilities want to work in some capacity but success requires employment market and societal changes as well as improved support for significantly more people to enjoy the same benefits of employment

as non-disabled people. All work-related conversations need to be accompanied by high quality benefits advice so people can overcome the existing misinformation and fear ([NDTi Mencap 2022 research](#)).

7. How should we design and deliver conversations to people who currently receive no or little contact, so that they are most effective?

Design conversations to explore people's current situation (rather than move immediately to conclusion) - Person centred conversation tools can help with that and provide accessible and inclusive frameworks for DWP to build trust and shared understanding.

The accessibility of the conversation or the inclusion of a trusted ally or family (where appropriate) can create a situation where someone considers future opportunities. Members told us for learning disabled people that will include considering flexible working, job carving, and voluntary work opportunities.

The conversations should be designed to allow this open exploration with a view to building possibilities of work and contribution. All work-related conversations need to be accompanied by high quality benefits advice so people can overcome the existing misinformation and fear ([NDTi Mencap 2022 research](#))

8. How should we determine who is subject to a requirement only to participate in conversations, or work preparation activity, rather than the stronger requirements placed on people in the Intensive Work Search regime?

Learning Disability England's work on Good Lives and the work of Employment Is For Everyone demonstrates the aspirations of autistic people and people with a learning disability to work. People, their families and supporters want more people with learning disabilities to experience the positive benefits of good work. For some people with learning disabilities that good work may not be traditional. They want a system that is flexible enough to recognise that.



Members told us they want a system that moves away from threat and fear to one of valuing contribution and that offers person centred, flexible support. The decision on what requirements DWP has for people needs to be properly person centred and include appropriate reasonable adjustments. If for example the DWP cannot consistently offer communication in accessible formats, then it cannot sanction someone for not understanding. Members told us they want a system and staff who can help create the conditions for people to work (as outlined [here](#) where the additional input needed to support people with learning disabilities successfully work is outlined) building on evidence-based approaches like the Supported Employment Quality Framework and [Project Search](#) for young people.

9. Should we require most people to participate in a support conversation as a condition of receipt of their full benefit award or of the health element in Universal Credit?

Learning Disability England members told us this needs to be a decision tailored to individual circumstances. People want to be able to volunteer or do small pieces of paid work that suit their skills without threat of loss. A person-centred support conversation could help people consider those opportunities but only if person not system centred. The learning-disabled people in receipt of the health element are more likely to require additional support to engage in the conversation or specific reasonable adjustments. That must always be considered when working with people with learning disabilities.

10. How should we determine which individuals or groups of individuals should be exempt from requirements?

It is essential in making this decision and creating the policy that DWP and other government departments understand what a [learning disability](#) is and the different ways it can affect people's lives. Clarity on this can help ensure there are not poor decisions made based on incorrect assumptions.

Some people with learning disabilities are unlikely to meet the accepted requirements of the job market. Those people are often described as having a severe learning disability or profound and multiple learning disabilities. Learning Disability England members still want a system that

values all contribution and want all people to be able to work (paid or unpaid) in creative ways. Income should be stable for everyone so people may not be subject to DWP work requirements but that should not be equated to their worth as citizens. There will also be people with a learning disability who have fewer support needs who should be exempt from requirements because of how the learning disability or other impairments affects their lives. Whatever the decision on exemption there must be a properly embedded understanding of reasonable adjustments in how the DWP, and its officers or suppliers enact the policy. Important in that is an openness to understanding the multi-faceted nature of a learning disability and the significant societal, attitudinal, and practical barriers they experience regularly.

**11.** Should we delay access to the health element of Universal Credit within the reformed system until someone is aged 22?

Members told us that young people experience additional barriers to inclusion and increased costs that should be recognised in the benefits system. Any change to Universal Credit eligibility should only be made once there are credible widely available employment and inclusion supports.

**12.** Do you think 18 is the right age for young people to start claiming the adult disability benefit, Personal Independence Payment? If not, what age do you think it should be?

Learning Disability England has no evidence that young disabled people should not be treated like other 18 yr olds. Appropriate benefit support can help them build a life as an adult and support inclusion, community presence and contribution.

#### **Chapter 4: Supporting Employers and Making Work Accessible**

**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?

There are some great examples of people with learning disabilities working as valued contributing employees, but they are often not heard. Specific work with employers is shown as a factor for success in the

[evidence](#) for Supported Employment outcomes, [Employment is for Everyone](#) is building a movement for Change in South Yorkshire based on [strategic organisational actions](#) across an ICB that builds relationships with employers of all kinds. This kind of present relational support to employers is successful in reducing barriers to employing disabled young people in Project Search too. Learning Disability England members have told us that employers need to see stories of success as well as be able to access practical local support or advice. Some of this can be delivered through online campaigns but evidence suggests there also needs to be local skilled staff who can help employers and employees work out the best workplace adjustments.

**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?

Access to Work is a valuable and important resource for many people and their employers. For many people with learning disabilities funding a support worker for their job role is critical to them maintaining paid work. They can very successfully do their job role, but where the job requires understanding some complex information, travel or diary management, literacy or digital skills that may not be possible for someone with a learning disability to manage alone. Members have shared examples of Access to Work funded workers ensuring people can manage the information as well as complete time sheets, expense claims or annual leave requests – the basics of maintaining work. Many core parts of jobs are automated now in formats inaccessible to learning disabled people. Most employers will not be in a position to fund support workers support so it is important Access to Work fund it so people with learning disabilities can be employed in a range of positions.

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

The future work and design should be done with disabled people, employers (currently employing disabled people and those not). This design should be done in true coproduction that allows detailed discussion and the weighing of pros and cons of an approach.

For Learning Disability England members this would include consideration of:

- Creating a community support contact, networking with local businesses, voluntary organisations both health and disability organisations, and local specialist services. (building on DEA role)
- Moving to consistent point of contact for organisations and having a small team to work with. When an assessment is complete, ensuring that the employee or organisation can go back to that assessor, rather than having to start over.
- Assessments being undertaken considering the person's skills and needs in a person-centred framework as well as the work / employer context.
- Efficient and timely claims and decision-making processes.
- Incorporating AI in inclusive and equitable ways. Some members are concerned AI developments could further exclude people with learning disabilities, but many see opportunities from the expansion of AI to help people do their jobs.

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

Learning Disability England members in response to this consultation have talked about:

- A rights-based model including a focus on the right to work as well as the right to good support to enable working.
- Framing Access to Work to remove barriers to work (The Social model of disability)
- An efficient and proactive system that supports the employee and employer.
- The success of the model decided by the outcomes for employees and employers not only cost.
- Making best use of technology but not at the cost of support workers when needed.

**About Learning Disability England**

Learning Disability England is bringing people and organisations together to create a movement for change where people with learning disabilities, families, friends, and paid supporters come together on an equal basis.

As a membership organisation, members work together to build a world where people with learning disabilities have good lives with equal choices and opportunities as others.

Learning Disability England works nationally across England with 166 organisational members and over 500 individual members.

You can find out more about our work here:

<https://www.learningdisabilityengland.org.uk/>

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