



Consortium for the Regional Support for Women in Disadvantaged and Rural Areas

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

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Foyle Women's
Information
Network



Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas

1. Introduction

1.1 This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

1.2 The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.¹ The seven groups are as follows:

- ♀ Training for Women Network (TWN) – Project lead
- ♀ Women's Resource and Development Agency (WRDA)
- ♀ Women's Support Network (WSN)
- ♀ Northern Ireland's Rural Women's Network (NIRWN)
- ♀ Women's TEC
- ♀ Women's Centre Derry
- ♀ Foyle Women's Information Network (FWIN)

¹ Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisations.

1.3 The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

1.4 The Women's Regional Consortium appreciates 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.

1.5 At the outset the Women's Regional Consortium wish to state our **strenuous opposition to the proposals contained in the Green Paper**. We believe that these are an attack on disabled people and will ultimately punish those who are the most vulnerable in our society.

1.6 We have serious reservations about the format of the consultation document including that some of the proposals which will have the greatest impacts are not subject to consultation, the use of leading questions which make the assumption that consultees accept that people should lose their disability benefits and the online questionnaire does not give a facility to provide further comments outside of the consultation questions – see Section 4.0 of this response. **The Women's Regional Consortium do not agree with the way this consultation is being carried out. We will therefore not be providing answers to the specific questions asked in the consultation and submit this document as our response. We strongly urge the Government to pause the reforms and carry out full and genuine consultation on these proposals.**

1.7 As the consultation states *“health and disability benefits are the responsibility of the Northern Ireland Executive, although the UK Government and the Northern Ireland Executive work closely together to maintain parity between their respective social security systems.”* Given that the vast majority of social security in Northern Ireland maintains parity with GB we urge the DWP to consider the implications for Northern Ireland, where these proposals will have an even bigger impact due to high rates of disability and the higher percentage of people in receipt of disability benefits. **We encourage Government to carefully consider the particular circumstances that exist in Northern Ireland that we have outlined in our response which have not been considered within the Green Paper.**

1.8 The consultation states *“We are committed to putting the views and voices of disabled people and people with health conditions at the heart of everything we do.”* Throughout this response the Consortium has sought to ensure the voices of women are clearly represented and we have spoken to women with lived experience as the basis for our response to this consultation. We believe that it is essential for policy makers and Government to genuinely listen to those with lived experience. We include the voices and experiences of women throughout this response and we encourage the DWP to take particular note of these important contributions.

1.9 We wish to endorse the responses made by the **Cliff Edge Coalition** in NI and the **Women’s Policy Group** both of which we are members of. We fully endorse their responses and urge the Department to take their evidence fully into consideration particularly as they highlight the situation in Northern Ireland where these proposals are likely to have greater impacts.

“That disability rates in NI are unexplainably high alongside the already poor outcomes for people living with disability in NI make the ongoing piecemeal rollout of budget cuts in NI particularly concerning. And these cuts are not happening in a vacuum but are following the COVID-19 pandemic and the ongoing cost-of-living crisis which both have had disproportionate impacts on people with disabilities.”²

² Dr Anne Devlin, Economic and Social Research Institute, August 2023
<https://qpol.qub.ac.uk/disability-rates-in-northern-ireland-in-a-time-of-unprecedented-budget-cuts/>

2.0 Introduction

The Women's Regional Consortium is deeply concerned by the proposals contained in the Green Paper and we believe that they seek to remove the dignity of disabled people and those living with health conditions. Having sufficient income to live a dignified, healthy life is essential for everyone and these proposals seek to reduce the amount of money paid out through social security regardless of the impact on the lives of the most vulnerable in our society – those who are sick and disabled.

Scope research shows that life costs a lot more for disabled people. On average, disabled households need an additional £1,010 a month to have the same standard of living as non-disabled households.³ However, because of welfare cuts and austerity policies since 2008 disabled people have already lost average benefit payments of around £1,200 a year.⁴

A report by the All Party Parliamentary Group (APPG) on Poverty and Inequality⁵ found that: *“disabled households face additional barriers and costs, including higher spending on food, heating, transport and medical support, which can amount to additional costs of over £1,000 per month. These costs, combined with inaccessible public services and a punitive social security system, already push many disabled people to the brink.”*

A report into destitution in the UK by the Joseph Rowntree Foundation⁶ showed that there are strong links between disability and destitution. This research showed that almost two-thirds (62%) of destitute survey respondents stated that their day-to-day activities were limited because of a chronic health problem or disability. The report

³ <https://www.scope.org.uk/campaigns/disability-price-tag>

⁴ Dismantling the social safety net: social security reforms, disability and mental health conditions, Boardman J, BJPsych Bulletin, October 2020
<https://www.cambridge.org/core/journals/bjpsych-bulletin/article/dismantling-the-social-safety-net-social-security-reforms-disability-and-mental-health-conditions/B73ED8C6EBEBD1A663EE964146451705>

⁵ The Disproportionate Impact of Poverty and Inequality on Disabled People, APPG on Poverty and Inequality's response to the Pathways to Work Green Paper, June 2025
<https://appgpovetyinequality.org.uk/home-page/appg-publishes-report-on-the-disproportionate-impact-of-poverty-and-inequality-on-disabled-people/>

⁶ <https://www.jrf.org.uk/deep-poverty-and-destitution/destitution-in-the-uk-2023>

found inadequate social security is a driver of destitution. The most common source of income for all destitute households was social security benefits (72%).

Research and personal testimonies have shown that the PIP process is already failing disabled people. Indeed, the Women's Regional Consortium have highlighted significant concerns with the PIP process and the need for reform in our response to the Green Paper on Modernising Support for Independent Living.⁷ We believe that implementing the proposals in the Pathways to Work Green Paper would make this situation even worse contributing to higher levels of destitution for disabled people. The Women's Regional Consortium agree with Disabled People Against Cuts in Northern Ireland (DPAC NI) who have stated:

*"The cuts will have far-reaching consequences, including increased costs to the NHS, social care, and local authorities, alongside significant losses to the economy through reduced spending power in disadvantaged communities. In Northern Ireland, the impact is likely to be especially severe, as devolved authorities struggle to mitigate additional bedroom tax liabilities and support those affected."*⁸

In Northern Ireland Welfare Supplementary Payments are in place which highlight the need for financial support for disability within the social security system. **The Women's Regional Consortium believe that what is needed is investment in the social security system to ensure that it provides the safety net of support that disabled people can rely on and in the long term reduces the pressure on other services, including the health service, which is so impacted by inadequacies in social security support for disabled people.**

⁷ Women's Regional Consortium Response to Modernising Support for Independent Living: The Health and Disability Green Paper, May 2024
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/07/Womens-Regional-Consortium-Response-to-Modernising-Support-for-Independent-Living-The-Health-and-Disability-Green-Paper-July-2024.pdf>

⁸ <https://dpacni.com/2025/05/01/missing-information-and-unanswered-questions/>

2.1 The Impact on Personal Independence Payment (PIP) Claimants in Northern Ireland

The most recent PIP claimant statistics for Northern Ireland (February 2025)⁹ should be an important consideration for Government in its work on the Green Paper:

- 220,060 claimants were in receipt of PIP on 28 February 2025.
- Of the total claims in payment 54% were made to women and 46% to men.
- The average (median) clearance time, from the date a claim is registered to the initial decision being made during February 2025, was 18 weeks.
- 42% (93,060) of claims in payment are awarded the enhanced rate for both the daily living and mobility components.
- 46% (100,400) of claims in payment have a main disabling condition recorded under the highest medical category of 'Psychiatric disorders (Mental Illness)'.
- During February 2025, 75% of mandatory reconsiderations resulted in no change to the award.

In Northern Ireland over 88,410 PIP claimants are in receipt of the lower Standard Rate Daily Living and are therefore more likely to be affected by the Green Paper proposal to introduce a minimum score of four on at least one of the daily living activities. In addition, the latest data shows that 46% of claims in payment have a main disabling condition recorded under the highest medical category of 'Psychiatric disorders (Mental Illness)'. **The Women's Regional Consortium is extremely concerned that those with mental health issues are at higher risk of not scoring four points on a single daily living descriptor.** This is despite the context of the mental health emergency which currently exists in NI which means that there are significant barriers and waits for people to access the mental health support and interventions they need. The data also shows that 105,520 of PIP claimants (48%) are 55 and older and who are likely to have larger barriers to employment, particularly if they are awaiting health treatment.

⁹ Personal Independence Payment Statistics, Department for Communities & NISRA, February 2025 <https://datavis.nisra.gov.uk/communities/personal-independence-payment-statistics-february-2025.html>

“My husband is on the standard rate of PIP. He is ex-army and suffers from mental health issues, PTSD and hearing loss. He needs to get out of the house for his mental health and has a part-time job. His PIP helps to pay for his taxis to work as he doesn’t drive. If they take away his PIP it won’t help him to stay in work. It costs him £8-£10 to get there and that’s only one way.”

“If you push people back to work when they are not ready then suicide rates will go up – people will be under too much pressure.”

“There’s no funding for mental health – so many people have mental health issues and they can’t get mental health support as it is. How can they kick somebody off support when they’re waiting on an appointment or assessment – the waiting lists are so long.”

“They need to look at the root cause of the problems – they need to look at the causes of mental health issues here then maybe more people would be able to go out to work. This comes right down to the core – what will they do for all those people suffering from mental health problems – what help will they give them? They’ll be even more depressed if they take their money away.”

“I get PIP as a single parent and I’m struggling as it is to get by. If I was to go back to work I’d only be able to go back part time with the children and my current physical and mental disabilities (cerebral palsy and mental health issues). I would need a high wage to be able to survive on part time work pro-rata.”

(Participants at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper)

A high percentage of PIP decisions are successfully appealed in Northern Ireland pointing to problems with the assessment process. This has led to widespread calls for the assessment process to be changed. There have been more than 14,000 appeals lodged against a PIP decision between 2019 and 2024. In answer to an Assembly Question on this issue, Communities Minister Gordon Lyons stated that 65% of those who appealed a decision in relation to a PIP application in the last five years have been successful in having their original decision overturned.¹⁰

¹⁰ <https://www.belfastlive.co.uk/news/northern-ireland/minister-reveals-how-many-pip-30738117>
<https://aims.niassembly.gov.uk/questions/printquestionssummary.aspx?docid=420305>

“The PIP Daily Living award is akin to a load-bearing wall in a house. The whole financial structure and integrity of a household is often predicated upon it. Once it gets removed the house collapses. This will become even more serious once the UC health component is dependent on PIP eligibility.”¹¹

Paul Woods, Disability Advocacy Officer, Community Advice Fermanagh

2.2 The impact on Universal Credit Claimants in Northern Ireland

The most recent Universal Credit claimant statistics for Northern Ireland (August 2024)¹² must also be an important consideration for Government in its work on the Green Paper:

- 197,780 claimants were on Universal Credit in Northern Ireland
- 51% of claimants (100,160) were in the ‘no work requirements’ conditionality regime
- 39% of Universal Credit claimants were male and 60% were female
- There were 61,600 lone parent households in payment (39%) and we know that 93% of lone parents in Northern Ireland are women
- There were 37% (58,350) households in payment claiming the limited capability for work element.

Government analysis of the impact of the health and disability benefit reforms across the UK states that they expect 2.25 million current recipients of the UC health element to be impacted by the freeze with an average loss of £500 per year. They expect 730,000 future recipients of the UC health element to be impacted with an average loss of £3,000 per year. Although both of these cuts will be slightly offset by the small rise in the basic rate of UC. **The Women’s Regional Consortium is concerned about the impact of the Green Paper proposals on Universal Credit given that Northern Ireland is a low-income economy and more people are entitled to means-tested benefits like Universal Credit for this reason.** Analysis

¹¹ Taken from Cliff Edge Coalition NI response to the Pathways to Work Green Paper: <https://www.lawcentreni.org/news/cliff-edge-coalition-responds-to-pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper/>

¹² Universal Credit Publication, Department for Communities & NISRA, August 2024
<https://datavis.nisra.gov.uk/communities/universal-credit-publication-august-2024.html>

of the Universal Credit data for Northern Ireland shows that of the 156,270 households in payment 58,350 (37%) were in receipt of the limited capability for work element indicating there are likely to be a large number of claimants in Northern Ireland who will be impacted by these proposals.

Women's Regional Consortium research with women in Northern Ireland on Universal Credit¹³ paints an overwhelmingly negative picture of life for women living on Universal Credit fraught with financial insecurity, worry, debt and in some cases cold and hunger. We believe the current rates of Universal Credit do not provide enough income to meet essential bills.

“With just Universal Credit it’s no life to live. We can’t have the heating on just when it’s really cold because we can’t afford the gas, we had to have just hot water bottles at night. Thank God for food banks otherwise eating would have been much worse.”

“Universal Credit has put me in more debt. I was getting enough to get by before. At no point was I going without electricity, worried about how I was going to feed my kids for the next 3 nights, sitting with no oil, but now I am.”

“It’s degrading. I’ve worked my entire life and due to illness I had to go on UC. It’s impossible to budget as you only find out a few days before payday what you’ll get. I’m in arrears with my rent. It’s very stressful.”

(Participants in The Impact of Universal Credit on Women Research, September 2020)

We therefore welcome the increase to the standard allowance of Universal Credit as many claimants are suffering financial hardship as a result of inadequate levels of support through Universal Credit. Indeed, the Green Paper acknowledges that the standard allowance of Universal Credit is too low and driving destitution:

*“A series of benefit freezes and benefit increases at a lower rate than inflation has left the value of the standard allowance at a 40 year low by the early 2020s, contributing to hardship and destitution.”*¹⁴ However, while we welcome the increase to the standard allowance it is a very modest increase and insufficient to address

¹³ The Impact of Universal Credit on Women, Women's Regional Consortium, September 2000 <https://womensregionalconsortiumni.org.uk/wp-content/uploads/2021/04/September-2020-The-Impact-of-Universal-Credit-on-Women.pdf>

¹⁴ Para 41 <https://www.gov.uk/government/consultations/pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper/pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper>

rising costs of essentials. **The Women's Regional Consortium supports the Essentials Guarantee¹⁵ campaign from the Joseph Rowntree Foundation and the Trussell Trust to ensure the basic rate of benefits at least covers life's essentials and can never be pulled below that level.**

The Women's Regional Consortium is also concerned about the gendered impacts of these proposals particularly in relation to Universal Credit where claimant statistics show that in Northern Ireland 60% of Universal Credit claimants are women. The proposals in the Green Paper are therefore likely to have greater negative impacts on women – see Section 2.5.

The Green Paper proposals outline the development of further proposals to help reduce the real or perceived risks people feel to trying work because of its impact on their benefits. Research by the Women's Regional Consortium shows considerable levels of fear around taking a risk on a job. Many of the women feared losing their benefits and being worse off. They also worried that if the job didn't work out for them that it would take a long time to get their benefits reinstated. This was a particular concern for those women with children who felt unable to take these risks as it might impact on their ability to provide for their children. Some had concerns that a smooth return to benefits if a job didn't work out would not actually be a reality and there was some mistrust around this.

"I've been out of work for a long time and the biggest part of it is the fear of adapting to new finances. At the minute you float along because you know things are covered – you're not loaded – but you know your bills are paid. It's not rocking the boat. Something where you can see what happens with a job and know that if it doesn't work out you could be guaranteed your benefits would be reinstated then a lot of people would try it. It's about the fear."

"It's really difficult when you're on your own, if you've got kids to support, you're not so quick to take risks on a job. If it wasn't for that I'd be more likely to try work."

"Will it be the reality that you can go back to your benefits? Is that what's going to happen or will they try and force you to stay in the job?"

¹⁵ <https://www.jrf.org.uk/report/guarantee-our-essentials>

“Do you really think with the practicalities of it and this current Government that’s going to happen – they’re going to let you go back to your benefits?”

“Work Coaches for UC need to be trained better. You can be in the exact same position as a friend and on the same benefits but the number of times you’re getting told a completely different thing. How are we supposed to know what we’re allowed to do, what we’re allowed to earn if they don’t know. When you ask a question – one says one thing and another says another – what is right? This just adds to the fear of trying work if you’re hearing different things. What am I going to do – I’ll just stay where I am on benefits where I know I’m safe. You don’t know what Work Coach you’re getting, what they know and what they’re going to say to you.”

(Participants at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper)

2.3 The Impact on Carers in Northern Ireland

Statistics in relation to carers and claimants of carers payments through the social security system should also be considered by Government in its work on the Green Paper:

- Most recent figures for Universal Credit in Northern Ireland (August 2024) show there are 32,010 households (20%) receiving the carers element in Universal Credit.¹⁶
- There are 48,000 recipients of Carer’s Allowance in Northern Ireland and 33,520 are female (70%) (February 2025).¹⁷
- 2021 Census Data for NI shows 29.3% or 64,130 of carers are disabled.
- Nearly 60% of unpaid carers in Northern Ireland are women.¹⁸
- The poverty rate for carers in Northern Ireland is 28.3% – a rate which is higher than the poverty rate for carers in the rest of the UK (23.6%) and considerably higher than poverty rates amongst adults in Northern Ireland who do not have caring roles (17.4%).¹⁹

¹⁶ Universal Credit Publication, Department for Communities & NISRA, August 2024

<https://datavis.nisra.gov.uk/communities/universal-credit-publication-august-2024.html>

¹⁷ Carer’s Allowance Summary Statistics, Department for Communities & NISRA, February 2025

<https://www.communities-ni.gov.uk/publications/benefits-statistics-summary-publication-accredited-official-statistics-february-2025>

¹⁸ Career or Care, Women, unpaid caring and employment in Northern Ireland, Women’s Regional Consortium & Carers NI, February 2024

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/02/Career-or-care-Women-unpaid-caring-and-employment-in-Northern-Ireland.pdf>

¹⁹ Policy measures to tackle poverty among unpaid carers in Northern Ireland, A WPI Economics report for the Carer Poverty Commission NI, October 2023

- Those providing unpaid care for sick or disabled family members collectively save Northern Ireland's health service £5.8 billion in care costs each year.²⁰
- The Family Resources Survey shows that carers are more likely to be economically inactive due to sickness/disability (13%) than the adult population overall (10%).²¹

There is a high potential for double impacts on carers as a result of these proposals as many carers *have disabilities themselves and could lose access to both PIP and Carer's Allowance or the UC carer's element for those they care for*. **Higher eligibility requirements for PIP will mean carers could lose their entitlement to Carer's Allowance (worth around £4,300 a year) and the carer element in Universal Credit (worth around £2,400 a year) as PIP is a gateway for accessing carer benefits.**

The Women's Regional Consortium is concerned about the gendered impact of these proposals given that women are more likely to provide care and about the impacts in relation to carer poverty which is already at high levels in Northern Ireland. Carer Poverty Commission figures show that the poverty rate for carers in Northern Ireland is higher than the poverty rate for carers in the rest of the UK and considerably higher than the poverty rates for adults in Northern Ireland who do not have caring roles. Many carers have higher household bills due to the requirements for maintaining a warmer home and associated utilities as well as the costs of food and medical/health supplies. **These proposals are likely to have severe financial impacts for unpaid carers who are already struggling financially and who are more likely to be women.**

<https://wpieconomics.com/wp-content/uploads/2023/10/CPC-Report-Web.pdf>

²⁰ Valuing Carers 2021, Northern Ireland, Carer's NI and Centre for Care, November 2023

<https://www.carersuk.org/media/irkn5e00/valuing-carers-northern-ireland.pdf>

²¹ Family Resources Survey: Northern Ireland 2023/24, Department for Communities & NISRA, May 2025

https://datavis.nisra.gov.uk/communities/FRS_report_2324.html#

2.4 The Knock-on Impacts

The loss of PIP has a knock-on impact not just on the individual claimant themselves but on their wider families, households and support networks. There are a range of knock-on impacts flowing from the loss of a PIP award including the loss of the Universal Credit health element, entitlement to Carer's Allowance and the carers element of Universal Credit as well as top-ups to other benefits including Housing Benefit and housing costs through Universal Credit. In terms of housing the proposals will also force many people under 35 onto the shared accommodation rate resulting in their housing support being drastically cut. The proposals will make many who were previously exempt from the Bedroom Tax subject to it which will ultimately cost the Department for Communities more in mitigation payments.

The case study below taken from the Cliff Edge Coalition submission²² to these proposals highlights how a family could lose half of their income because of the knock-on impacts of losing PIP:

Case Study: The knock-on impacts of the Green Paper proposals

Susan and John* are a couple with no children, savings or pensions. They live together in a house they own paying a mortgage of £600/month with rates of £128/month. Susan suffers from fibromyalgia and depression and John is her carer.

Susan receives PIP Standard Daily Living and Standard Mobility of **£446.77 per month**

John receives Carer's Allowance for caring for Susan of **£360.97 per month**

Together they have a joint claim for UC of **£892.09 per month** which is made up as follows:

Standard Allowance - Couples Rate	= £628.10
LCWRA for Susan	= £423.27
Carers Element for John	= £201.68

²² <https://www.lawcentreni.org/news/cliff-edge-coalition-responds-to-pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper/>

TOTAL ENTITLEMENT

= £1253.05**

Susan and John sought advice with their housing costs because they were in debt with their mortgage. Their advice centre, Community Advice Fermanagh, ran a check to see if they could increase their income any further and found they were entitled to a Rate Rebate of **£127.62/month** and a **Support for Mortgage Interest Loan of £143.35/month.*****

In total, under the current rules, Susan and John are entitled to **£1970.80/month in social security benefits. The Support for Mortgage Interest is a loan to help with housing costs and has to be repaid if/when the house is sold or transferred.**

Susan currently receives the following points from the PIP activities:

Activity	Descriptors	Points
1. Preparing food	c. Cannot cook a simple meal using a conventional cooker but is able to do so using a microwave	2

Activity	Descriptors	Points
4. Washing and bathing	c. Needs supervision or prompting to be able to wash or bathe	2

Activity	Descriptors	Points
6. Dressing and undressing	c. Needs either – (i) prompting to be able to dress	2

Activity	Descriptors	Points
9. Engaging with other people face to face	b. Needs prompting to be able to engage with other people	2

Under the new rules, Susan would lose her entitlement to PIP as she **does not meet the criteria for 4 points in one activity**. This would mean that John would lose his entitlement to Carer's Allowance. This would also have a knock-on impact on their UC, Rate Rebate and Support for Mortgage Interest awards.

Using the **Entitled To** benefits calculator Susan and John would be entitled to **£899.07/month in social security benefits** made up as follows:

Universal Credit	= £628.10
Rate Rebate	= £127.62
Support for Mortgage Interest	= £143.35

Under the new rules, Susan and John would see a monthly reduction in their income of £1071.73/month.

In addition, conditionality rules for UC will mean that John will be required to look for work despite caring for Susan for 35+ hours per week. If John manages to obtain work, the new rules would mean they would be unable to receive the £684 Work Allowance in UC.**** Therefore, 55% of John's earnings would come off the couple's UC award.

If John is able to get 23 hours of work or more a week at minimum wage this would then put them out of UC entitlement altogether and also out of entitlement to a Rate Rebate and Support for Mortgage Interest despite effectively now having two jobs.

* Not their real names

** From this total the amount of Carers Allowance is deducted as it is an earnings replacement benefit leaving John and Susan with a UC claim of £892.09/month

*** The Support for Mortgage Interest is a loan to help with housing costs and has to be repaid if/when the house is sold or transferred

**** You can get a Work Allowance in UC if you and/or your partner who you live with have a limited capability for work due to illness or disability

“This isn’t just a cut to benefits, it’s a cut to everything. If they want you to go back to work then you’ve to pay your rent with no help, you’d have no free school meals, no uniform grant, you’re not entitled to any other help. Then social services will get involved because they’ll say you’re not looking after your kids.”

(Participant at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper)

2.5 Gendered Impacts in Northern Ireland

Women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work, more likely to be providing care either for children or other family members which limits their ability to carry out paid work and are more likely to have to make up for cuts to public services through unpaid work. All these factors contribute to keeping women’s incomes generally lower over their lifetimes and therefore puts them at greater risk of living on a low-income and in poverty.

Women are generally more likely than men to live in poverty across their lifetimes and lone parents are even more vulnerable to poverty (Census figures for Northern Ireland show that 93% of lone parents are women). In Northern Ireland the family type at the highest risk of being in relative poverty was ‘single with children’ at 38%.²³

Welfare reform and austerity policies disproportionately impact on women. Research by the House of Commons Library²⁴ showed that previous welfare reform and austerity policies hit women harder. In Northern Ireland an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)²⁵ showed that across most income levels the overall cash impact of the reforms is more negative for women than for men. It also found that disabled households in Northern

²³ https://datavis.nisra.gov.uk/communities/PII_report_2223.html

²⁴ [Estimating the gender impact of tax and benefits changes \(parliament.uk\)](https://www.parliament.uk/research-and-factsheets/estimating-the-gender-impact-of-tax-and-benefits-changes)

²⁵ [Publication - Cumulative impact assessment of tax and social security reforms in Northern Ireland | Northern Ireland Human Rights Commission \(nihrc.org\)](https://www.nihrc.org/publication/cumulative-impact-assessment-of-tax-and-social-security-reforms-in-northern-ireland/)

Ireland lose more on average from the social security reforms than their counterparts elsewhere in the UK. **The Women's Regional Consortium is concerned about the gendered impacts of the proposals contained in the Green Paper because women are more likely to claim social security benefits and are therefore more likely to be adversely impacted.**

In Northern Ireland, UC claimant statistics show that 39% of claimants were male and 60% were female. 39% of the claims in payment were made to lone parent households (61,600) and Census figures show that 93% of lone parent households are women. In terms of PIP claimants by gender it is 54% female and 46% male. Carer's Allowance figures also show the potential for gendered impacts with 70% of Carer's Allowance recipients being female.

We have previously highlighted that economic inactivity levels are stubbornly high in Northern Ireland. In addition, the female rate of economic inactivity is consistently higher than the male rate with most recent figures showing the female rate at 31.4% compared to the male rate at 22.3%.²⁶

We also wish to raise concerns about the impact of these proposals on a women's ability to leave an abusive partner. Figures show that disabled women are nearly three times more likely to experience domestic abuse in comparison to non-disabled women.²⁷ Restricting eligibility to disability benefits increases the likelihood that women will feel unable to leave abusive relationships because of financial issues and may feel forced to stay with abusive partners as without these benefits they would find it even more difficult to be financially independent from their abuser.

We support the comments made by the Women's Budget Group²⁸ in their open letter to the Chancellor which we co-signed particularly the following paragraphs:

²⁶ Northern Ireland Labour Market Report, NISRA, June 2025

<https://datavis.nisra.gov.uk/economy-and-labour-market/labour-market-report-june-2025.html>

²⁷ <https://www.womensaid.org.uk/impact-of-gender-based-violence-mental-health-disabled-women/>

²⁸ Cuts to Social Security for Disabled Women, Open Letter from the Women's Budget Group, March 2025

<https://www.wbg.org.uk/article/cuts-to-social-security-for-disabled-women/>

Women make up the majority of Disabled people. They also make up the majority of people caring for Disabled people. And it will be women who take on or increase unpaid care for their loved ones when their benefits are stripped back – often to the detriment of their own health and wellbeing. Some women are likely to lose the carer's allowance that is tied to the eligibility of their spouse or family member to PIP or the health element of UC. Some may have been managing to balance paid and unpaid work and used every bit of annual leave, unpaid carer's leave and emergency leave to keep a foot in the labour market. This could be the final straw, pushing women out of the labour market and having the unintended consequence of reducing women's employment rate when these reforms are intended to increase people's access to paid work.

Further, Disabled women are nearly twice as likely to experience economic abuse compared to non-disabled women, and are nearly four times more likely to have a partner or ex-partner stop them, or try to stop them, accessing benefits that they or their children are entitled to.

So while additional safeguards are welcome, removing benefits from ill and Disabled women subjected to abuse could be removing a vital lifeline – making it harder to flee abuse and harder to rebuild their lives if they do.

Funding cuts to social security and to public services will undermine efforts to tackle child poverty, close the gender pay gap, halve violence against women and girls, boost the employment rate and grow the economy.”

“How do we protect our kids – the next generation – there's going to be so much poverty as a result. It's 2025 and our kids are still suffering.”

“Where's the childcare that allows people to get into work at a good price so that your wage allows you to pay your bills?”

“The results of going ahead with this will be dangerous. A lot more women will have to stay in bad relationships. If you take away this support it could force a lot of women to have to stay with their partner because they can't afford to leave.”

“These changes will impact more on women. Women are always left to get on with it they’re left with the kids and trying to manage the money they get on benefits which doesn’t even cover the basics.”

(Participants at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper)

2.6 Impacts on Young People in Northern Ireland

There will be significant impacts for young people aged 18-22 as a result of proposals to raise the age at which someone can receive the Universal Credit health element to age 22. This means that some young claimants will receive £97 a week less than they would have done.

Research by the Mental Health Champion for Northern Ireland²⁹ on the factors affecting mental health and wellbeing in children and young people shows that the wellbeing of 11-year-olds in Northern Ireland has declined in recent years to its lowest level since 2010. A high proportion of 11-year-olds have worries relating to relationships with peers, relationships at home, and pressure to do well at school with concern about the household finances was also a common source of stress. The research also found that 45.2% of 16-year-olds (over half of females) had a probable mental illness (32.8% of males and 52.9% of females). Prevalence rates were higher among children living in an area of deprivation, children living in a single parent household, those living in urban areas and children living in households where an adult was in receipt of benefits. Higher rates of poor mental health were associated with having poor physical health and additional educational needs.

A Samaritans report³⁰ has highlighted that among under-18s, self-harm and suicidal ideation have risen sharply, increasing by 76% since 2012/13. The report also stated research which shows that suicide rates are highest in deprived areas with three times as many deaths in the most disadvantaged decile compared to the least. High-risk groups include men, carers, people with disabilities and LGBTQIA+ people.

²⁹ Factors Affecting Mental Health and Wellbeing in Children and Young People in Northern Ireland, Mental Health Champion for Northern Ireland, 2023
https://www.mentalhealthchampion-ni.org.uk/files/mentalhealthchampionni/2023-08/MHC%20KLT-YLT%20Report%20FINAL_1.pdf

³⁰ Lost Futures, Poverty, Inequality and Suicidality in Northern Ireland, Samaritans, March 2025
https://media.samaritans.org/documents/Samaritans_Lost_FuturesReport_web_2.pdf

The Women's Regional Consortium is very concerned about the likely impacts on young people by denying them access to Universal Credit health element. This risks undermining the opportunities of young people with disabilities or health conditions and impacting on their human rights.

2.7 Impact on Food Insecurity in Northern Ireland

Figures from the Family Resources Survey³¹ show a higher prevalence of food insecurity in households with a disability. 85% of households with a disabled adult were food secure (79% with a disabled adult under pension age) compared to 96% of households with no disabled adults. Households in receipt of income-related benefits also experienced low levels of food security with an estimate of 74% in 23/24.

Figures from Trussell³² show that 114,000 people who live in disabled families now face hunger and hardship. If you live in a disabled family (with either a disabled adult or child) you are far more likely to face hunger and hardship than if you live in a non-disabled family (15% vs. 8%).

Trussell have recently conducted modelling³³ to estimate the potential impact of the proposed reforms to disability and incapacity benefits may have on the number of people in Northern Ireland who are at risk of facing hunger and hardship. Trussell's evidence concluded that Northern Ireland is impacted disproportionately by the rebalancing of Universal Credit, seeing a 0.2 percentage point increase compared with an increase of 0.1 percentage points for the UK as a whole concluding an additional 15,000 people in Northern Ireland will face hunger and hardship as a direct consequence of the proposed reforms.

Research by the Consumer Council in Northern Ireland³⁴ shows that low-income households are spending more on their food shopping than any other bill. Food

³¹ Family Resources Survey: Northern Ireland 2023/24, NISRA & DfC, May 2025
https://datavis.nisra.gov.uk/communities/FRS_report_2324.html#

³² The cost of hunger and hardship in Northern Ireland, Trussell, 2024
[https://cms.trussell.org.uk/sites/default/files/2024-](https://cms.trussell.org.uk/sites/default/files/2024-10/Cost%20of%20Hunger%20and%20Hardship_Northern%20Ireland.pdf)

[10/Cost%20of%20Hunger%20and%20Hardship_Northern%20Ireland.pdf](https://cms.trussell.org.uk/sites/default/files/2024-10/Cost%20of%20Hunger%20and%20Hardship_Northern%20Ireland.pdf)

³³ Trussell (2025) WPI Economics briefing on behalf of Trussell Trust: Policy Assessment Spring Statement 2025. Disability Benefit Reforms - The cost of hunger and hardship. Available on request.

³⁴ Northern Ireland Household Expenditure Tracker, Q4 2024 October to December, Consumer Council for Northern Ireland, June 2025

costs accounted for almost a quarter (23%) of low-income households spending and lower earning households in Northern Ireland experienced their highest level of food spending as a percentage of their total spend in four years.

2.8 Access to Work in Northern Ireland

Access to Work (AtW) provides support to help people with physical or mental health conditions or a disability to get work and to stay in work which are above and beyond the reasonable adjustments that employers are legally required to provide. The Green Paper is seeking views on the future role and design of Access to Work.

We support the concerns about the problems with Access to Work shared by RNIB in NI included in the Cliff Edge Coalition response:³⁵

"In Northern Ireland, employers are expected to pay a contribution to costs depending upon their size, with large employers expected to pay all costs. As such, it appears that the Green Paper is suggesting harmonisation downward, with the rest of the UK beginning to operate as Northern Ireland currently does. RNIB's Employment Team in Northern Ireland found that these costs can put some employers off, especially small businesses with limited resources. This is particularly true for blind and partially sighted employees, whose costs can be much higher than most other AtW applicants due to the cost of assistive technology.

Access to Work is not working well in the UK, owing to significant delays, and a lack of awareness amongst both job seekers and employers, which has been identified as a key problem in Northern Ireland. Additionally, unlike other AtW applicants in the UK, employees in Northern Ireland are asked to furnish medical evidence to receive AtW funding, which acts as an additional barrier to a source of funding which is already difficult to access. As such, RNIB NI is unconvinced that Access to Work will serve as an effective counterbalance to PIP cuts."

<https://www.consumer council.org.uk/research/q4-2024-northern-ireland-household-expenditure-tracker>

³⁵ <https://www.lawcentreni.org/news/cliff-edge-coalition-responds-to-pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper/>

As we have already outlined Northern Ireland's employment rate for disabled people is the lowest across the UK. A report from the Ulster University Economic Policy Centre (UUEPC)³⁶ has highlighted that progress on helping more disabled people into work had been *"glacially slow despite numerous government interventions"*. It stated: *"NI's disabled population comprises a higher incidence of more limiting conditions and a lower qualifications profile. This structural composition helps explain why NI's disability employment rate gap is wider than the average UK region, and why the NI disability employment rate is below the UK average. However, after controlling for these factors there is still evidence of a disability employment penalty in the NI labour market."*

As highlighted by the Cliff Edge Coalition³⁷ Northern Ireland has a patchwork of disability support which at present is not equipped to cope with increased pressure without extensive investment and significant action to increase accessibility. The Green Paper proposals include a commitment to invest £1 billion annually into an employment, health and skills support package. Employment support is devolved in Northern Ireland and it is unclear what Northern Ireland will receive as part of any subsequent Barnett Consequential. In addition, any Barnett Consequential will not be ring-fenced and could fall victim to funding pressures in other public services such as health and education.

There are critical issues with the funding provided through the UK Shared Prosperity Fund (UKSPF) which replaced the European Social Fund (ESF). The UKSPF provides only a partial replacement for ESF with the loss of funding particularly impacting employability services which help marginalised people.³⁸ The Cliff Edge Coalition has outlined in their response³⁹ that *"the interventions are short term in nature (normally six months) in comparison to the European Social Fund (ESF) which provides between 1-3 years of support depending on individual needs. This*

³⁶ Maximising potential: A review of labour market outcomes for people with disabilities in Northern Ireland, UUEPC, 2022
<https://www.ulster.ac.uk/epc/pdf/2022/disability-and-the-labour-market/Disability-and-the-labour-market.pdf>

³⁷ <https://www.lawcentreni.org/news/cliff-edge-coalition-responds-to-pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper/>

³⁸ <https://www.belfastlive.co.uk/news/belfast-news/loss-esf-funding-will-cripple-26470323>

³⁹ <https://www.lawcentreni.org/news/cliff-edge-coalition-responds-to-pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper/>

means that those who are targeted are more likely to be closest to the labour market.”

The funding gap which exists between ESF and UKSPF has resulted in losing significant numbers of training and employment staff. There is also a lack of regional co-ordination of specialist provision and therefore progress on reducing the employment disability gap has been limited. There remains uncertainty about the future of the UKSPF and it is unclear how it will interact with the proposals outlined in the Green Paper.

Participation in UKSPF funded projects in Northern Ireland was restricted to those who are economically inactive. This restriction meant that those in work on low pay who need additional qualifications to progress to higher paid jobs could not avail of any of the training provided. Government departments in Northern Ireland do not provide any funding for community-based training and education with wrap around services such as childcare which is particularly vital for women wanting to enter and progress in the labour market.

Women’s Regional Consortium research on Women, Skills & Barriers to Work⁴⁰ in Northern Ireland shows that 55% of women involved in the research were out of work due to sickness and disability. In detailing what would help them to move into education or work 50% said better supports for illness and disability. This research made a number of recommendations around support for illness/disability including the need for more Government funded training and education schemes to improve access to education and learning opportunities for people with disabilities, investment in improving access to mental health support services in Northern Ireland and for employers to do more to make it easier for workers to combine work with illness and disability including through the provision of flexible working arrangements.

“It’s the waiting lists for counselling for mental health. I’m on a waiting list and I’ve been waiting for 6 months. Counselling and support groups are

⁴⁰ Women, Skills & Barriers to Work, Women’s Regional Consortium, December 2024
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/12/Women-Skills-Barriers-to-Work-1.pdf>

underfunded for this work which could really help people to work and move on with their lives.”

“I’m disabled and you’re supposed to have things in jobs to help you but there isn’t anything especially for the mental health side of it. There’s nothing there to help with that.”

“You don’t know how you are from one day to the next. There’s classes I’ve missed because I didn’t know if I was going to be able to get out of bed, that’s the way it is with mental health.”

“The reason I’m out of work is my mental health. I’m trying to get a part-time job but there’s no part-time jobs. I don’t want to sound lazy but because I’ve been out of work so long I couldn’t throw myself into a full-time job.”

(Participants in Women, Skills & Barriers to Work Research, December 2024)

There is a need to work intensively with employers and businesses to ensure they are equipped to provide the flexibility and reasonable adjustments that facilitate more disabled people to enter the labour market. This is a particular consideration for Northern Ireland which is a small business economy. Small businesses account for 99.9% of all businesses in Northern Ireland and employ more people than all the larger businesses and the entire public sector combined.⁴¹ Therefore, in order to make any significant change in the area of employability small businesses must be supported so that they can properly support those with disabilities and health conditions.

“Businesses don’t want to employ people with mental health issues – if they need mental health days and things like that.”

“It will fall on to employers, they will have to deal with it and they don’t want to.”

“Where are the jobs? Employers don’t even have the money to make reasonable adjustments. If you go to work with a disability then you’re going to need reasonable adjustments and support. There isn’t the money to support that.”

⁴¹ <https://www.fsb.org.uk/standing-up-for-you/national-offices/northern-ireland>

“People with disabilities shouldn’t be discriminated against when they go to work but they are.”

“Employers are not going to do it unless they’re going to be compensated for it. The business needs to make money. They will not want to take on someone with a disability if they’re going to need more time off. Employers need support to employ people with disabilities.”

“My daughter has serious mental health problems and has pushed herself into college and got herself a job as a trainee hairdresser. Her employer wouldn’t work around her mental health so now doesn’t have a job. She wanted some flexibility in the job for her bad days but the employer wouldn’t have that. She’s just a trainee to them. It’s going to get to the point where if no one is going to take her on and support her she’ll end up on benefits because of this.”

“They need to look at providing support services in schools to help early on, to help children prepare for work and to help them deal with mental health issues.”

“The Government should have employment programs to ease people into work over 6 months so people can see if it is feasible for them mentally and physically. They need programs like this with support and help.”

(Participants at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper)

The Women’s Regional Consortium are concerned that there is no localised information on the Access to Work Scheme in Northern Ireland making it difficult to understand how these proposals will translate to Northern Ireland. **The Women’s Regional Consortium agrees with RNIB NI who are unconvinced that Access to Work will serve as an effective counterbalance to the PIP cuts.**

2.9 Other Northern Ireland Considerations

The Northern Ireland Assembly has carried a Motion which opposes the cuts proposed in the Green Paper and that they risk making poverty worse:

“This Assembly opposes the approach of the UK Government to reforming disability benefits; believes that withdrawing or cutting social security support for those most in need risks exacerbating poverty and increasing pressure on other public services.”⁴²

We point the Government to the following statistics for Northern Ireland which provide important considerations around levels of disability, benefit dependency and socio-economic issues. These considerations mean that **Northern Ireland is likely to feel the impact of the proposals contained in the Green Paper much more severely:**

- Northern Ireland has traditionally had a much higher proportion of people claiming disability benefits than other areas of the UK. Prior to the introduction of PIP in 2016 around one in nine people in Northern Ireland (208,760 people) were on DLA.⁴³ At that time Northern Ireland had proportionately twice as many people claiming DLA compared to the rest of the UK. *“This higher uptake in NI remains unexplained, though poorer mental health, possibly resulting from the civil unrest known as The Troubles, might be significant.”⁴⁴*
- Disability rates in Northern Ireland (NI) are higher than in other countries within the UK regardless of the type of measure used. The 2021 Census found that 24% of the NI population report being limited in their day-to-day activities either a little or a lot. This compares to 17% and 22% respectively in England and Wales.⁴⁵
- Disability prevalence varies notably by Local Government District (LGD) with Derry City and Strabane having the highest disability prevalence at 36% compared to the average across LGDs in NI at 24%.
- Over the last 10 years the number of people with a disability has grown for both males and females with approximately 244,000 females and 225,000 males in NI reporting having a disability.

⁴² <https://aims.niassembly.gov.uk/plenary/details.aspx?tbv=0&ptv=0&mcv=0&mtv=0&sp=0&spv=-1&per=1&it=0&pid=2&sid=p&pn=0&ba=1&doc=432926%20&fd=01/04/2025&td=01/04/2025>

⁴³ Northern Ireland Benefits Statistics Summary, Department for Social Development, November 2015 <https://www.communities-ni.gov.uk/sites/default/files/publications/dsd/benefit-statistics-summary-november-2015.pdf>

⁴⁴ https://pureadmin.qub.ac.uk/ws/portalfiles/portal/234059841/SSM_final_.pdf

⁴⁵ Disability rates in Northern Ireland in a time of unprecedented budget cuts, Dr Anne Devin, Economic and Social Research Institute, August 2023 <https://qppl.qub.ac.uk/disability-rates-in-northern-ireland-in-a-time-of-unprecedented-budget-cuts/>

- Research shows that the gap in DLA/PIP receipt between England and Northern Ireland, although significantly associated with observable health and labour market factors, is largely unexplained by these factors. Research offers a number of explanations such as higher levels of deprivation in NI, the legacy of conflict, and differences in benefit uptake.⁴⁶
- Northern Ireland has the highest uptake of disability benefits in the UK. The latest figures (April 2025) indicate that 18.3% of the Northern Ireland population use some form of disability support. The region with the next highest uptake is Wales (14.7%).⁴⁷
- Northern Ireland has higher levels of benefit dependency than other parts of the UK with the Consumer Council for Northern Ireland reporting that income from social security benefits is at 70% in Northern Ireland compared to 61% in the UK.⁴⁸
- Northern Ireland has a much higher proportional share of the most deprived areas in the UK than Scotland, Wales, or any of the nine regions of England, at 25%. Education deprivation is highest in Northern Ireland at 27% and health deprivation (using self-reported health) is particularly pronounced for Northern Ireland – nearly 28% of areas in Northern Ireland rank within the most deprived 10% by poor health across the UK.⁴⁹
- Over the last 15 years, economic inactivity in NI has been consistently higher than the UK average.⁵⁰ The latest economic inactivity rate is 26.9% compared to the UK rate of 21.3% and is the second highest of the twelve UK regions.
- In February to April 2025, the most common reason for economic inactivity in Northern Ireland among the working age population was ‘long-term sick’. There were 122,000 ‘long-term sick’, accounting for 38.3% of the total

⁴⁶ Why are Disability Rates for Older Working-Age Adults in Northern Ireland So High?, The Economic and Social Review, Vol 54 No 1, Spring 2023
<https://www.esr.ie/article/view/2287>

⁴⁷ <https://factcheckni.org/articles/mental-health-in-ni-does-northern-ireland-have-the-highest-rate-of-people-claiming-disability-benefits-and-the-highest-prevalence-of-mental-ill-health-in-the-uk/>

⁴⁸ Northern Ireland Household Expenditure Tracker, Q4 2024 October to December, Consumer Council for Northern Ireland, June 2025
<https://www.consumerCouncil.org.uk/research/q4-2024-northern-ireland-household-expenditure-tracker>

⁴⁹ A deprivation index for the UK: exploring spatial variations within and between nations, QUB, Nuffield Foundation, deprivation.org, University of Leeds, April 2025
<https://www.nuffieldfoundation.org/wp-content/uploads/2022/02/UKDI-Short-Briefing-1.pdf>

⁵⁰ Northern Ireland Labour Market Report, NISRA, June 2025
<https://datavis.nisra.gov.uk/economy-and-labour-market/labour-market-report-june-2025.html>

economically inactive (aged 16 to 64), or 10.2% of the working age population.

- In Northern Ireland, women are more likely to be economically inactive than men with the female rate at 31.4% compared to the male rate at 22.3%.
- One in four people in Northern Ireland (24.3% or 463,000 people) had a limiting long-term health problem or disability, 40% of which were aged 65 or more (185,300 people).⁵¹
- Northern Ireland has the worst hospital waiting lists with half of patients waiting over a year for treatment.⁵²
- At March 2023, 401,200 people were waiting for a first outpatient appointment, with 49% waiting over a year; 121,900 were waiting for inpatient treatment, with 53% waiting longer than a year; and 173,200 were waiting for a diagnostic test, with 27% waiting over 26 weeks.⁵³
- Equivalent of 26.3% of the Northern Ireland population are on waiting lists compared to 12.4% in England and 24% in Wales.⁵⁴
- Northern Ireland is reported to have the highest prevalence of mental health problems in the United Kingdom, around 25 per cent higher than in England. The higher prevalence levels in Northern Ireland are associated with both greater levels of deprivation and the impact of the 'Troubles'.⁵⁵ However, comparing mental ill health prevalence amongst various parts of the UK is complicated by inconsistent data and other difficulties as detailed by FactCheck NI. FactCheck NI have stated that the claim that NI has the highest prevalence of mental ill health in the UK is not clearly supported by data. However, they have stated that based on research there is evidence to support that the levels of mental ill health in NI are worse than in other parts of the UK.⁵⁶

⁵¹ <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-2-statistical-bulletin-health-disability-and-unpaid-care.pdf>

⁵² [Half of Northern Irish patients wait over a year for treatment \(economist.com\)
https://www.belfasttelegraph.co.uk/news/health/over-half-a-million-ni-patients-waiting-for-first-consultant-appointment/a781816013.html](https://www.belfasttelegraph.co.uk/news/health/over-half-a-million-ni-patients-waiting-for-first-consultant-appointment/a781816013.html)

⁵³ Tackling Waiting Lists, NI Audit Office, October 2023
<https://www.niauditoffice.gov.uk/files/niauditoffice/documents/2023-10/NI%20Audit%20Office%20Report%20-%20Tackling%20Waiting%20Lists.pdf>

⁵⁴ Ibid

⁵⁵ [00293490 - Mental Health Report WEB.pdf \(niauditoffice.gov.uk\)](#)

⁵⁶ <https://factcheckni.org/articles/mental-health-in-ni-does-northern-ireland-have-the-highest-rate-of-people-claiming-disability-benefits-and-the-highest-prevalence-of-mental-ill-health-in-the-uk/>

- 21% of the adult population has a possible mental health problem (identified in the NI Health Survey 2021-22).⁵⁷
- The Mental Health Champion for Northern Ireland reports that evidence shows how the impact of the conflict continues to be felt in Northern Ireland. In the 2023 NI Life and Times study 29.9% reported that the conflict impacted their mental health. Similarly, 30% reported a traumatic conflict-specific event in the 2024 study of trauma and childhood adversities, and almost half the population had witnessed conflict related violence (47.5%).⁵⁸
- A study of Adverse Childhood Experiences (ACEs) in NI shows that 60% of the NI adult population reports at least one ACE with nearly one in five experiencing four or more ACEs. 30% reported conflict-specific adversities. Adults with 4 or more ACEs were 5 times more likely to report chronic health issues, 14.8 times more likely to experience PTSD and 9.6 times more likely to have a diagnosed mental health condition. High ACE exposure was associated with higher rates of excessive alcohol consumption, drug use, smoking and reduced physical activity all contributing to long-term health burdens. These figures point to the increased likelihood of claiming disability benefits in NI and the need for increased support including community investment.⁵⁹
- Figures for December 2023 show that around 6,500 people are waiting to access a first appointment with psychological therapies. Performance against waiting time targets has also deteriorated with around three-quarters of those on psychological therapies waiting lists waiting longer than the 13-week target time.⁶⁰ Without timely treatment peoples' conditions will deteriorate becoming more difficult and costly to treat and impacting significantly on the health service. The Public Accounts Committee believes that addressing issues early can often result in better value for money and better solutions.⁶¹

⁵⁷ Ibid

⁵⁸ <https://www.pivotalppf.org/our-work/pivotal-platform/145/trauma-and-mental-health-in>

⁵⁹ The Prevalence and Impact of Adverse Childhood Experiences in Northern Ireland, The Executive Programme on Paramilitarism and Organised Crime, February 2025
https://pureadmin.qub.ac.uk/ws/portalfiles/portal/631630700/Impact_of_Adverse_Childhood_Experiences_-_Tagged.pdf

⁶⁰ [Report on Mental Health Services in Northern Ireland \(niassembly.gov.uk\)](https://www.niassembly.gov.uk/reports/Report-on-Mental-Health-Services-in-Northern-Ireland/)

⁶¹ Ibid

- More than 3,500 people in Northern Ireland are waiting for home care packages and some of the longest delays for full and partial care packages have been up to five years.⁶²
- In 2013, a report⁶³ showed that disability benefit reform would remove £750m from the economy annually with the most deprived areas facing the largest losses. While this research is some years old we are arguably in a worse position now than in 2013 given the ongoing impacts of the Cost-of-Living Crisis, the crisis in health and social care and difficulties accessing mental health supports.
- While social security is devolved in Northern Ireland and the NI Assembly could provide mitigations against the proposed cuts these would have to be funded out of Stormont's budget. The Minister for Communities, Gordon Lyons, has said that mitigations for the proposed changes could cost £150million but Stormont does not have the money to fund them.⁶⁴
- A Northern Ireland Human Rights Commission report outlined that larger family sizes are more common in Northern Ireland - ONS statistics show that 21.4% of families in Northern Ireland have three or more children, compared to 14.7% of families in the UK as a whole.⁶⁵ Therefore, the two-child limit will have a disproportionate impact on families in Northern Ireland. The Department for Communities has estimated that the average number of monthly recipients on Universal Credit and Child Tax Credit affected by the policy will be 14,000 in 2022/23, rising to 16,000 in 2023/24 and 19,000 in 2024/25.⁶⁶

⁶²

<https://www.bbc.co.uk/news/articles/c722qd900v4o#:~:text=Care%20packages%20are%20designed%20to,been%20up%20to%20five%20years>.

⁶³ The Impact of Welfare Reform on Northern Ireland, Centre for Economic Empowerment & NICVA, October 2013

<https://www.shu.ac.uk/centre-regional-economic-social-research/publications/the-impact-of-welfare-reform-on-northern-ireland>

⁶⁴ <https://www.belfasttelegraph.co.uk/news/northern-ireland/how-will-the-proposed-welfare-cuts-affect-people-in-ni/a1308953595.html>

⁶⁵ Cumulative impact of tax and social security reforms in Northern Ireland, NI Human Rights Commission, November 2019, [Final CIA report Oct 2019.pdf \(qub.ac.uk\)](#)

⁶⁶ Welfare Mitigations Review, Independent Advisory Panel Report, October 2022 <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-welfare-mitigations-review-independent-advisory-panel-report-2022.pdf>

- A follow up report into the Funding and Delivery of Public Services in Northern Ireland by the Northern Ireland Affairs Committee⁶⁷ heard that public services in Northern Ireland were under pressure with funding failing to keep pace with demand. The Committee heard that public services in Northern Ireland “*are at risk of collapse*” and that the scale of the crisis was much greater in Northern Ireland compared with Great Britain. The Committee was told that “*under-performing public services needed to improve for the sake of people’s quality of life, and their ability to work and participate in their communities*”.
- The Disability Employment Gap in Northern Ireland has consistently been higher in Northern Ireland than the rest of the UK. The Disability Employment Gap for 2021 was 47.6 percentage points. The employment rate for people without disabilities was 85.9% and for those with disabilities was 38.3%.⁶⁸ In the UK, the disability employment gap in 2021 was 28.4 percentage points.
- An ARK research paper⁶⁹ found that around 25% of households in Northern Ireland could not afford to pay an unexpected £500 bill and just over 24% of households reported having to turn the heating down or off due to costs (over half (52.1%) of respondents who described themselves as low income had turned the heating down or off because they could not afford it). Respondents who reported financial hardship were asked to identify how they have been coping and 44.6% reported borrowing from friends and family and 26.6% reported increasing credit card debt.

“If they’re going to take away that help we all need here in NI especially with mental health then they need to put something in place to help people with their mental health.”

“They don’t care about us here in NI that were left behind for all those years.”
“If they want us to get into work then they need to increase the wages here to make people want to go out to work.”

⁶⁷ <https://publications.parliament.uk/pa/cm5901/cmselect/cmniaf/477/report.html#heading-0>

⁶⁸ [https://datavis.nisra.gov.uk/vitalStatistics/Disability-employment-gap-2021.html#:~:text=of%20these%20differences.-,2021%20update%3A%20disability%20employment%20gap,figure%20\(52.3%20percentage%20points\).](https://datavis.nisra.gov.uk/vitalStatistics/Disability-employment-gap-2021.html#:~:text=of%20these%20differences.-,2021%20update%3A%20disability%20employment%20gap,figure%20(52.3%20percentage%20points).)

⁶⁹ The Other Division in Northern Ireland: public attitudes to poverty, economic hardship and social security, ARK Research Update, May 2022
<https://www.ark.ac.uk/ARK/sites/default/files/2022-05/update146.pdf>

“People will owe more money – they’re going to end up borrowing more especially in NI and going to the wrong groups for money and getting into debt. They will have to borrow to live and many could end up borrowing from paramilitaries.”

“They don’t care about people! There’s no help here in NI especially for kids and mental health – the CAHMS waiting list is so long. There needs to be more mental health services in place in schools to stop mental health issues getting worse and make children healthier minded. The fighting you have to do for your kids – the fighting!”

(Participants at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper)

2.10 History of Trauma in Northern Ireland

As outlined in the statistics above the history of the trauma as a result of the conflict in Northern Ireland continues to have an impact. The Women’s Regional Consortium are concerned that the UK Government have not taken into account place-based considerations in relation to the proposals in the Green Paper. The result of these proposals would undoubtedly have much greater impacts in Northern Ireland, a society still struggling to deal with the impacts of the conflict particularly in the area of mental health.

The Mental Health Champion for Northern Ireland, Professor Siobhán O’Neill, has called for Northern Ireland’s significant history of trauma to be factored in to any welfare cuts before carrying them out.⁷⁰ Professor O’Neill also called for the NI Assembly to make a very strong argument that Northern Ireland should be treated differently from other parts of the UK due to the significant history of trauma and violence that has affected the mental health of the population. She said: *“We have high rates of PTSD and they’ve gotten a lot worse, actually, over the past 20 years. They’ve changed from 5.1% to 6.1%. And that’s higher than other places worldwide, and certainly higher than other parts of the UK. And the Troubles accounts for that difference.”*⁷¹

⁷⁰ <https://www.belfasttelegraph.co.uk/news/health/nis-significant-history-of-trauma-needs-to-be-factored-into-welfare-cuts-warns-mental-health-champion/a1800691745.html>

⁷¹ Ibid

Professor O'Neill raised concerns about taking money from people and that this could have implications for the rates of suicide in Northern Ireland which are double in Northern Ireland's most economically deprived areas. She said: *"the reality is that simply taking money away from someone doesn't make them go back to work and it won't."*⁷²

In discussing how to tackle the relationship between mental illness and welfare Professor O'Neill proposed providing people with the *"right kind of support"* to return to work. She stressed the need for greater emphasis on early intervention and prevention to reduce *"the transgenerational transmission of trauma"* by supporting parents in vulnerable areas. *"What we need to do is invest in programmes and support employers to employ people with poor mental health. Give them a bit extra there so that you're nearly incentivising that and providing support for people, particularly young people."*⁷³

2.11 Paramilitary Lending in Northern Ireland

Northern Ireland is in the unenviable position of having paramilitary groups involved in illegal money lending bring additional levels of fear, secrecy and danger.⁷⁴ Some of the most vulnerable borrowers are forced into this type of borrowing because of a more urgent need for money. Research conducted by Advice NI on behalf of the Consumer Council⁷⁵ in Northern Ireland has highlighted that one of the themes around illegal lending is low income and lack of access to mainstream credit. This research showed that clients who accessed illegal lending were vulnerable. Many suffered from poor health, including mental health and/or addiction issues and for most lack of access to credit, low income or benefit dependency caused them to turn to illegal lending.

⁷² Ibid

⁷³ Ibid

⁷⁴ Expensive Lending in Northern Ireland, Centre for Economic Empowerment, NICVA, May 2013 https://www.nicva.org/sites/default/files/d7content/attachments-resources/cee_expensive_lending_in_northern_ireland_2013.pdf

⁷⁵ Illegal Lending – The Human Story, Advice NI, September 2019 <https://www.adviceni.net/policy/publications/illegal-lending-human-story>

Research by Ulster University found that Universal Credit was repeatedly described as a driver for illegal lending⁷⁶ particularly around the harm caused by the five-week wait and issues with short-term benefits loans that were repaid from future benefits. This ensured that benefit claimants were often short of the funds they needed to support their household leading them to look to other means of getting the money they needed.

Women's Regional Consortium research⁷⁷ with women in Northern Ireland found examples of borrowing through loan sharks including paramilitaries. We know that welfare reform and austerity policies leading to inadequacies in social security support especially during a Cost of Living Crisis can drive more people to debt especially more dangerous forms of lending which is immediate and has less checks and paperwork. **The Women's Regional Consortium is very concerned that introducing the proposals outlined in the Green Paper will lead to increased levels of illegal and paramilitary lending especially for those who are the most vulnerable.**

"It is usually just done through friends or people you know saying don't worry I can get you a loan. If you don't pay them [paramilitary] they just keep putting it up."

"I've been to a loan shark – it's not good. The interest they put on. If you miss a payment they're at your door – you don't miss those payments."

"I have a debt to a paramilitary lender. On every £100 I pay £30. I pay it back every 2 weeks. On £1,000 I pay £300 interest. I work full time but still have difficulty making ends meet on a low income. You ask these lenders can I borrow £1,000 today and they will leave it round to you that night."

⁷⁶ Illegal Money Lending and Debt Project, Research Report of Findings, Ulster University and the Consumer Council, March 2020

[Illegal Money Lending Report.PDF \(consumercouncil.org.uk\)](https://www.consumer-council.org.uk/wp-content/uploads/2020/03/Illegal-Money-Lending-Report.pdf)

⁷⁷ Making Ends Meet: Women's Perspectives on Access to Lending, Women's Regional Consortium, February 2020

[Making-Ends-Meet-Womens-Perspectives-on-Access-to-Lending.pdf \(womensregionalconsortiumni.org.uk\)](https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf)

Women Living with Debt, Women's Regional Consortium, September 2022

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2022/09/Women-Living-with-Debt-1.pdf>

“The local paramilitary charges £40 for every £100.”

“If you can’t get a bank loan, a Credit Union loan because you have to have savings, or payday loans then after that it’s paramilitaries.”

“I’m a single parent on disability benefits. I knew there were people lending money in the area and I put the feelers out about a loan as I was short of money. A local paramilitary lender loaned me £300 the first time and once it was paid off I kept borrowing off them. I pay £40 for every £100 I borrow from them. I borrowed from these lenders because it was easy to apply and to get the money. It usually comes down to borrowing money for my kids.”

(Participants in Women Living with Debt Research, September 2022)

For all the reasons listed above we support the Cliff Edge Coalition’s call that these proposals should have considered the importance of place:

“It is concerning that the Government has not considered the importance of place in bringing forward these proposals. This is despite past learning which has necessitated the NI Executive to introduce a £585m welfare reform mitigation package (negotiated with HM Treasury) in recognition that the cuts would have a disproportionate impact on people in NI.”⁷⁸

3.0 Negative Impacts on the Economy

The Women’s Regional Consortium believes that it makes economic sense to invest in the social security system. Reducing support to those on the lowest incomes through the benefits system is damaging as it reduces the amount of money that people have to spend in local economies reducing demand at a time when action is needed to create jobs and revive businesses.

We support the assertion from DPAC NI that the proposals in the Green Paper will have a potentially negative impact on the UK economy for a variety of reasons: *“The UK economy could potentially suffer from these cuts due to increased additional*

⁷⁸ <https://www.lawcentreni.org/news/cliff-edge-coalition-responds-to-pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper/>

pressures on public services, loss of employment, reduced retail spend, increased survival crime and increased expenditure on addressing the impacts of poverty.”⁷⁹

Professionals working in the advice sector have long advocated the principles of the ‘multiplier effect’. This argues that there are economic advantages to high levels of benefit take-up as claimants spend money on goods and services in the local community. Ambrose and Stone (2003) found that a multiplier effect of 1.7 exists, meaning each pound raised in benefit entitlements for claimants should be multiplied by 1.7 to give a much greater overall financial benefit to the economy.⁸⁰

The Cambridge University economist Ha Joon-Chang argues that the mainstream political narrative that welfare spending is a drain and should be reduced is illogical. He asserts that ‘a lot of welfare spending is investment’ and believes that appropriate funding in areas such as unemployment benefits can improve productivity and workforce capability.⁸¹ We are very much in agreement with these statements as spending on social security benefits is spent and not saved and spent in local economies. This means that investment in social security not only provides better results in terms of the individuals concerned but to the wider economy and society in general.

In their report on a Ground Up Community Wealth Building Approach to Target Poverty,⁸² Advice NI also highlighted an example of this multiplier effect through the Local Multiplier3 (LM3) spend analysis tool which was applied to the additional benefits achieved in two benefit take-up campaigns in Newham and Lancashire: *“They found that the additional benefit income had an economic multiplier of 1.77 as these campaigns targeted people on a low income who spent the money in local businesses. The businesses in turn used the money to purchase goods and services and employ people. The people they employed spent their wages on more goods and services which generated more spending and income for more people. This*

⁷⁹ <https://dpacni.com/2025/05/01/disabled-people-against-cuts-ni-key-concerns-with-governments-plans-to-dramatically-cut-social-security-for-deaf-and-disabled-people/>

⁸⁰ Four reasons why welfare reform is a delusion, London School of Economics Blog, June 2017 <https://blogs.lse.ac.uk/politicsandpolicy/four-reasons-why-welfare-reform-is-a-delusion/>

⁸¹ Ibid

⁸² It's the Local Economy, Stupid!, Advice NI, 2022 <https://www.adviceni.net/policy/publications/its-the-local-economy-stupid>

created a powerful multiplier effect in the local economy. They concluded that benefit take-up campaigns are not just about welfare they are also effective local economic development strategies.”

4.0 Format of the Consultation

The Women’s Regional Consortium wishes to raise concerns about a number of aspects of how this consultation is being done:

- **Non-consultation** - of the 22 reforms proposed by the Green Paper, 12 are listed as not included in the consultation ([Annex A of the Green Paper](#)). Arguably, these are the most significant parts of these proposals and will lead to widespread negative impacts for disabled people. DPAC NI have raised their concerns about this saying: *“Pre-election, Labour pledged to co-produce their social security policies with Deaf and Disabled people. Now they are not even adequately consulting on major legislative and policy changes.”*⁸³
The Women’s Regional Consortium is strongly opposed to the lack of consultation on aspects of the Green Paper and calls on Government to stop progressing these proposals without genuine consultation with those most likely to be impacted.
- **Involving Lived Experience** - While the Green paper claims *“We are committed to putting the views and voices of disabled people and people with health conditions at the heart of everything we do”* not consulting on the most significant parts of these proposals is in effect silencing the voices of disabled people and those with health conditions. **The Women’s Regional Consortium is concerned that disabled people and those with health conditions are being silenced due to non-consultation on aspects of the proposals.**
- **Leading Questions** – the questions in the online consultation are leading and make the assumption that consultees accept the aspects of the Green Paper which are not being consulted on such as restricting eligibility for PIP – for example, Question 2 - *What support do you think we could provide for those*

⁸³ <https://dpacni.com/2025/05/01/disabled-people-against-cuts-ni-key-concerns-with-governments-plans-to-dramatically-cut-social-security-for-deaf-and-disabled-people/>

who will lose their Personal Independence Payment entitlement as a result of a new additional requirement to score at least 4 points on one daily living activity? **The Women's Regional Consortium have serious concerns about the framing of questions in the consultation and stress that in answering these questions many consultees will not agree with the changes proposed which are not being consulted on.**

- **No space for additional comments** – the online consultation provides no space for consultees to provide additional information to outline their opposition to the other aspects of the proposals which are not being consulted on or to provide clarification of the answers they have given.
- **Evidence of Impacts** – key information that would allow consultees to make informed decisions on the proposals have not been made available. We do not have information from DWP or DfC in Northern Ireland which provide an accurate estimate of how many current claimants would lose their award on review if their condition remains unchanged and these proposals are introduced. **The Women's Regional Consortium stress it is impossible to provide informed answers to the consultation without the necessary information to evidence likely impacts.**
- **MPs not having all the information before voting** - DPAC NI have highlighted that the expected employment outcomes will not be published by the Office for Budget Responsibility (OBR) until October 2025, the published impact assessment does not cover the increased poverty impacts of cuts to out of work disability benefits nor of the abolition of the Work Capability Assessment (WCA) and information from the Ministry of Justice concerning increased expenditure on additional appeals is not yet available.⁸⁴ **The Women's Regional Consortium calls for a halt to the reforms so that a more substantive impact assessment can take place on which MPs can make informed decisions.**

⁸⁴ <https://dpacni.com/2025/05/01/disabled-people-against-cuts-ni-key-concerns-with-governments-plans-to-dramatically-cut-social-security-for-deaf-and-disabled-people/>

“Would the fact they are not consulting on these changes not fall under discrimination? Really it’s against our human rights.”

“It’s not good that the government is not consulting on some of these changes, it comes across as deceitful.”

(Participants at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper)

5.0 Conclusion

“If these cuts go ahead the suicide rate will go up, drug and alcohol problems will get worse too. Crime rates will go up through shoplifting, etc. You can’t blame people, it’s horrible.”

(Participant at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper)

The Women’s Regional Consortium is strenuously against the proposals contained in the Pathways to Work Green Paper and calls on the Government to halt these plans which will have a devastating impact on some of the most vulnerable members of our society including disabled people, carers, young people and their families. We support the calls by the All Party Parliamentary Group (APPG) on Poverty and Inequality who have urged the Government *“to abandon its current plans and instead work with disabled people to build a system that supports equality, independence, and opportunity for all.”*⁸⁵

These proposals have generated significant levels of fear and anxiety among those with health conditions and disabilities many of whom are already struggling financially and face significant barriers in accessing support and work. Reducing their incomes will only increase the challenges they face, undermine any efforts to support them into work, increase the pressure on already stretched public services and lead to the further growth of poverty and deprivation levels.

⁸⁵ <https://appgpovetyinequality.org.uk/home-page/appg-publishes-report-on-the-disproportionate-impact-of-poverty-and-inequality-on-disabled-people/>

It is simply untrue to claim that cutting PIP has any connection to increasing employment levels and in many cases PIP provides important support to enable disabled people to enter into and remain in work. Instead, what is needed is a greater focus on prevention, early intervention and personalised support and work with employers to encourage them to provide those who want to work with the support they need.

We have significant concerns about the likely impacts of these proposals in Northern Ireland and that the consultation document has not considered the importance of place. These proposals will have a disproportionate impact on people in Northern Ireland given higher claimant rates for disability benefits, greater prevalence of mental health issues arising from the impact of the conflict and the highest disability employment gap in the UK. We also have concerns around the gendered impacts of these proposals given that women are more likely to rely on social security benefits, provide unpaid care, be economically inactive and have already been disproportionately impacted by welfare reform and austerity policies.

We are calling on the Government to reverse the decision to cut disability benefits and instead invest in the social security system so that it provides effective support and protects the living standards of people with disabilities. At a minimum the reforms should be paused until a detailed impact assessment which includes a place-based analysis is carried out. This would enable a more meaningful consultation and decisions being made on the basis of comprehensive and robust data.

Essentially, we support the recommendations outlined by the report from the APPG on Poverty and Inequality⁸⁶ and call on the Government to act by:

- Withdrawing the proposed cuts to disability benefits in the Green Paper
- Increasing benefit levels to reflect real living costs and disability-related expenses
- Ending repeated and harmful reassessments
- Co-producing a redesigned social security system with disabled people and disabled people's organisations
- Investing in accessible housing and transport to tackle structural barriers and inequalities.

“Child poverty is going to up significantly as a result of these changes. People can’t even afford to buy their kids shoes. They’re having to buy for one child one week and another child two weeks later as they don’t have the money. People are getting themselves in debt – you’re cutting down what you buy and it’s still not enough. You’re not able to buy food and gas at the same time, you’re buying yellow label foods and it’s still not enough.”

“I’m really struggling for money as it is never mind if these changes come in. There’s parents and kids going without and they really are. It’s true, it’s absolutely true. They’re really having to choose between food and heat.”

“People on benefits are scared to say anything about these changes because they’re scared of losing what they have. They’re scared due to the stigma around benefits which makes it hard to speak up.”

(Participants at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper)

⁸⁶ The Disproportionate Impact of Poverty and Inequality on Disabled People, APPG on Poverty and Inequality’s response to the Pathways to Work Green Paper, June 2025
<https://appgpovertyinequality.org.uk/home-page/appg-publishes-report-on-the-disproportionate-impact-of-poverty-and-inequality-on-disabled-people/>

Other

18. Which of the following best describes how you are responding to this consultation. Are you responding:

- ☐ as a member of the public
- ☐ as or on behalf of an individual business
- ☐ as or on behalf of an employer/ business representative organisation
- ☒ as or on behalf of an interested charity or other representative organisation
- ☐ other

19. Do you consider yourself to have a health condition or a disability?

- ☐ Yes
- ☒ No
- ☐ Prefer not to say

20. Do you live in:

- ☐ England
- ☒ Northern Ireland
- ☐ Scotland
- ☐ Wales
- ☐ Prefer not to say