



Comments from Imtac about the consultation on Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper

(June 2025)

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Making our information accessible

As an organisation of and for Deaf people, disabled people and older people Imtac recognises that the way information is provided can be a barrier to accessing services and participation in public life. We are committed to providing information about our work in formats that best suit the needs of individuals.

All our documents are available in hard copy in 14pt type size as standard. We also provide word and pdf versions of our documents on our website – www.imtac.org.uk. In addition, we will provide information in a range of other formats. These formats include:

- Large print
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About Imtac

The Inclusive Mobility and Transport Advisory Committee (Imtac) is a committee of disabled people and older people as well as others including carers and key transport professionals. Its role is to advise Government and others in Northern Ireland on issues that affect the mobility of Deaf people, disabled people and older people.

The aim of Imtac is to ensure that Deaf people, disabled people and older people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Infrastructure (herein after referred to as the Department).

Background

As a committee of disabled people Imtac's values are firmly rooted in a fundamental principle that we seek to build a society where Deaf and disabled people have the same rights in all aspects of life as non-disabled people do. The existence of Imtac is a recognition that currently disabled people face barriers, discrimination and oppression because of how as a society we design our transport and the built environment. Our experiences in transport and the built environment are replicated in every other aspect of our lives including the right to an adequate standard of living – disabled people are much more likely to live in poverty and lower incomes when compared with non-disabled people.

The UK Government is a signatory to the UN Convention on the Rights of People with Disabilities (UNCRPD). UNCRPD provides a framework for Government to “to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities [disabled people]”. The Convention is based on the principle of progressive realisation of our rights, where there is steady, positive progress towards full implementation. Unfortunately both the special inquiry held by the UNCRPD Committee in 2016 and subsequent periodic investigations undertaken by the Committee in 2017 and 2024 has highlighted regression in the implementation of our rights and examples of “grave and systematic” violations of our human rights particularly with regard to Article 19 (living independently in the community), Article 27 (access to work and employment) and Article 28 (access to an adequate standard of living). The 2024 report from the Committee also highlighted a narrative used by Government towards

disabled people it called “a pervasive framework and rhetoric that devalues disabled people and undermines their human dignity.”

When in opposition the current Government were deeply critical of the approach of the then Government towards social security and disabled people. Commitments were made to work with disabled people and our organisations to build a better social security system. The Labour Manifesto of 2024 also contained the following:

“Labour is committed to championing the rights of disabled people and to the principle of working with them, so that their views and voices will be at the heart of all we do.”

This narrative forms the background to our response to the Green Paper consultation. We have judged the paper from a human rights perspective, on commitments made previously by this Government and whether the proposals represent a shift from the regressive policies of the last two decades.

Comments about the Green Paper

Imtac is deeply disappointed and is fundamentally opposed to the approach of this Government towards our social security as outlined in the Green Paper. Our opposition is based on three overriding reasons: (1) the Government has failed to meet its own manifesto commitments to work with Deaf and disabled people in both developing these proposals and the consultation process itself; (2) since election the Government has continued to perpetuate a negative narrative towards Deaf and disabled people including myths and falsehoods about the social security system; (3) the proposals contained in the Green Paper will not support Deaf and disabled people into work but on the contrary will drive more disabled people into poverty, destitution and despair, representing a further violation of our right to an adequate standard of living.

Based on the above, our sole recommendation is that the Government scrap this Green Paper and honour its previous commitment to work with Deaf and disabled people to develop a rights-based framework for social security.

The Government's approach to engagement with Deaf and disabled people before and after the publication of the Green Paper has been wholly inadequate. There was no engagement with us in developing the

proposals for the Green Paper including the proposed benefit cuts. The decision to exclude the cuts from the Green Paper consultation, demonstrates, in our opinion, that the Government has no respect for the opinions of Deaf and disabled people. This has been compounded by the very limited and limiting consultation events organized by the Department for Work and Pensions. The decision by Government to use legislation as the means to consult on the benefit cuts appears deliberately designed to exclude Deaf and disabled people from this discussion. The use of a Money Resolution Bill also appears to be designed to limit scrutiny and discussion in Parliament of the Government's proposals.

The approach adopted by the Government to consultation and engagement around the Green Paper has sent a clear message to Deaf and disabled people that this Government is not interested in our "views and voices".

The lack of engagement and consultation has been accompanied by a narrative both before and after the publication of the Green Paper that perpetuates the negative narrative of previous Government's towards Deaf and disabled people. This narrative is often based on misinformation including:

- Saying the welfare budget is out of control when overall spending in relation to GDP has remained constant since 2010.
- Constantly inferring that Personal Independence Payment (PIP) is an out of work benefit when it is not.
- Falsely claiming that benefits are a disincentive to work for disabled people, when PIP enables many disabled people to work.
- Falsely implying that PIP and other benefits are too easy to claim, despite the high number of applications rejected (and the lived experience of disabled people).
- Falsely implying there is over diagnosis / self-diagnosis of people with certain impairments, particularly people who experience mental distress.
- Giving the false impression that there are high levels of fraud of disability benefits with many people "taking the Mickey".

The rhetoric adopted by Ministers has largely perpetuated the negative narrative of previous Government towards Deaf and disabled people, undermining our dignity as well as our trust in this Government that it is truly "committed to championing our human rights".

It is impossible to comment on the content of the Green Paper without focusing on the proposed cuts to both PIP and other out-of-work disability benefits. Any other proposals contained in the paper are overshadowed by what is an almost unprecedented attack on the standard of living of Deaf and disabled people. The OBR assessments published by the Government make clear that these changes will increase the levels of poverty amongst Deaf and disabled people (including children) and carers. This assessment has been challenged by many reputable sources as underestimating both the extent of the cuts and the number of Deaf and disabled people and carers impacted by them.

The Government has claimed that the numbers of people moving further into poverty will be offset by people moving into work but has produced no assessment of the numbers of people predicted to do so. Both assessments undertaken for previous proposed cuts to benefits and the current assessments of organisations such as the Joseph Rowntree Foundation all predict that the numbers of disabled people moving into work will be very small – in the region of 1 to 3% of those affected. This means the vast majority of people and households affected will see their incomes reduced by in some cases by over £10,000 annually. Many also question whether the £1 billion promised additional investment in support services is sufficient, particularly given the well-determined existing issues for DWP in this area.

Pursuing these cuts without a clear picture of the employment impact is irresponsible and callous as the reductions in income proposed will inevitably destroy lives if people cannot move into employment. This will inevitably lead to hardship, destitution and an increase in the number of benefit deaths.

The Government has also failed to provide any assessment of the impact of these cuts on other services including our health and social care services. Reducing the incomes of Deaf and disabled people and carers will inevitably increase the pressure on other already overwhelmed services. This has its own costs which may negate the savings anticipated by cutting benefits. For the Government not to make any assessment of these in considering these changes is again irresponsible and inexplicable.

These proposed cuts will have a very specific and major impact in Northern Ireland. Although social security is devolved, our Executive has

indicated that they cannot mitigate the proposed cuts. If implemented they will drastically increase levels of poverty and hardship here for tens of thousands of people and increase pressures on already crumbling public services. Forcing cuts on Government in Northern Ireland will destroy any plans of the devolved administration to work with Deaf and disabled people to improve our lives and could potentially, in the opinion of the Committee, destabilise our political institutions.

The proposals outlined in the Green Paper do not represent reform designed to improve the lives of disabled people. In line with the approach of previous Government, the primary driver for the Green Paper proposals appears to be to deliver savings and help the Government meet its fiscal rules, regardless of how these impact on the lives of Deaf, disabled people and carers. As a Committee of Deaf, disabled people and including carers we completely reject this regressive Green Paper and its contents.

Conclusion

Imtac is an organization that promotes and work for implementation of the right for Deaf and disabled people to live as equal and active members of society. We do this through working for the removal of barriers to travel and within the build environment. This is important work but not as important as ensuring that as Deaf and disabled people we have adequate incomes to live our day to day lives.

We join the united voices of Deaf and disabled people and our organisations, our allies from across civil society including experts in the field of social security and poverty, the Trade Union movement and many of elected representatives in urging this Government to rethink, scrap this Green Paper and work with Deaf and disabled people to bring forward evidence based proposals that will both improve access to social security system here and better pathways into work for those that can.

Addendum

Since drafting this response there have been two developments. The first was the decision by the UK Government to change some of the proposals to cut benefits for existing recipients. These concessions / changes are inadequate and do not address the fundamental concerns

of the Committee outlined above. Our Department for Communities also published statistics for the impact of the cuts in Northern Ireland only days before the consultation on the Green paper closes. These statistics only confirm the huge impact of these cuts in Northern Ireland. Neither of these developments change the recommendation of the Committee that this Green Paper be scrapped and the Government work with Deaf and disabled people to deliver a future rights-based approach to social security.