

Briefing on Pathways to Work Green Paper:

Impact on unpaid carers

Introduction

Carers UK has produced this briefing following the publication of the Government's '[Pathways to Work: Reforming Benefits and Support to Get Britain Working](#)' Green Paper on Tuesday 18 March 2025.

It provides an overview of the changes the Government is proposing to make to the benefits system, and our analysis of the impact that these changes will have on unpaid carers and the people they care for.

It includes the following sections:

- A summary of our verdict on the proposals
- An overview of the Green Paper and the key proposals it contains
- Detail about the proposals we are concerned about and those we welcome

NOTE: Carers UK will update this briefing over time. Please ensure that you refer to the latest version at <https://www.carersuk.org/policy-and-research/policy-library/>

Summary – our verdict on the Green Paper proposals

- While we agree that the benefit system is not fit for purpose and long overdue for reform and there are some positive measures within the paper, we are concerned that the plans the Government has set out in its Green Paper could have a significant and negative impact on unpaid carers, disabled people and their families, if implemented in full.
- There are several key potential impacts:
 - Higher eligibility requirements for Personal Independence Payments (PIP) could mean carers lose their entitlement to Carer's Allowance (CA) as PIP is a gateway benefit for CA.
 - Overall impacts to unpaid carer household incomes where benefits are reduced.
 - Impacts for carers with disabilities and their own health conditions.
- Carers UK believes that there is also much more that can be done to prevent unpaid carers' poor health and from leaving the labour market. Carer-friendly employers have a huge role to play in ensuring that unpaid carers are able to stay in work.

What Carers UK is doing next:

- Carers UK will be engaging significantly in the process, involving carers, collecting their views and sharing their experiences, campaigning around negative changes, whilst promoting positive solutions. More information can be found on www.carersuk.org

We are particularly concerned about:

- 1. Proposed changes to Personal Independence Payments lower rate of daily living component eligibility will affect some carers' entitlement to Carer's Allowance from November 2026.** Currently, over half of Carer's Allowance awards are tied to PIP as it is a gateway benefit for claiming CA.¹ We do not currently know numbers affected but will be asking Government if they are not provided in the Equality Impact Assessment.
 - 2. Many carers have health conditions or disabilities themselves and could lose access to both benefits – PIP and CA – a double impact.** 28% of carers are disabled (compared with 18% of non-carers).² Around 150,000 unpaid carers also receive both Carer's Allowance and PIP,³ relying on these vital benefits for the extra costs of disability and caring to make ends meet.
 - 3. The financial impact of tightening eligibility to essential disability benefits, including PIP, which could severely impact unpaid carers and disabled people who are already struggling financially.** Raising the qualifying threshold for support could mean even more carers will struggle to afford essentials like food and heating. Many carers who could be affected already face financial hardship. Our research shows 1.2 million unpaid carers in the UK are living in poverty, with 400,000 in deep poverty.⁴
 - 4. We are concerned that new claimants for the UC health element will receive less financial support relative to existing claimants.** This would affect the household income of carers and their families who apply for the benefit for the first time after April 2026, where the carer is living with the person they care for. The reduction of the health element by £47 a week will also have a very severe impact on claimants.
 - 5. Whilst Government is increasing the Universal Credit Standard Allowance by £7 a week, which is welcome and will support families more, it will not compensate for the loss of income set out above.**
- It is important to note that the Green Paper sets out that people who will never be able to work due to having the most severe and life-long health condition will no longer need to be reassessed for PIP. This should help to protect family incomes for those who have the most serious health conditions. We welcome this.
 - The Green Paper also states, *"The government will consider the impacts on benefits for unpaid carers as part of its wider consideration of responses to the consultation as it develops its detailed proposals for change."* Government could and should take the opportunity to do much more for unpaid carers, particularly around enabling and supporting unpaid carers to remain part of the workforce where they are able to do

¹ [Written questions and answers - Written questions, answers and statements - UK Parliament](#)

² Census 2021. <https://www.carersuk.org/policy-and-research/key-facts-and-figures/>

³ [Written questions and answers - Written questions, answers and statements - UK Parliament](#)

⁴ https://www.carersuk.org/media/dnxerxqv/poverty_financial_hardship_uk_web.pdf

so.

- We agree with Government's intention to create a greater focus on prevention, early intervention and personalised support are much needed and welcome, but this has to be done in the right way. It must also focus on supporting unpaid carers to juggle work and care.
- In [a document](#) published alongside the Green Paper, the Government recognises that around 550,000 carers are out of work due to working age ill-health, with an associated cost to the economy of £37 billion a year. Carers UK has consistently called for more support to enable carers to juggle work and care, who are able to do so, including the introduction of a statutory right to paid carer's leave and stronger flexible working rights.
- Unpaid carers and their families need to get adequate financial support, whether they are in or out of the workplace. They also need better support from the NHS with their own health as well as good quality, affordable social care to help them stay in or re-enter work.

Overview of the Green Paper and key proposals

The Government has said it will be consulting on some, but not all, of its proposed reforms: A full consultation document is available [here](#). The consultation will take place over a 12-week period, the deadline for responses is 30 June 2025, 11:59pm. Carers UK will be engaging with carers and local Affiliates of Carers UK, campaigning for changes, with other organisations in the coming weeks before submitting our full response.

The Green Paper sets out the Government's objectives for reforming the benefits system and encouraging more people to enter employment, including:

1. A system where people can engage with support and try work, without the fear of losing access to additional financial support related to their health condition or disability. This would be achieved by:
 - a. No longer asking people to demonstrate incapacity to work to receive financial help for a health condition or disability, by scrapping the Work Capability Assessment (WCA).
 - b. Removing barriers to trying work.
2. A system where people have adequate financial support if they are not working, irrespective of the reason, as part of a benefit system designed to promote employment and reduce economic inactivity. This would be achieved by:
 - a. rebalancing between UC standard allowance and the UC health element.
 - b. consulting on establishing a new Unemployment Insurance that will provide a higher rate of time-limited financial support for those who have paid in by reforming contributory benefits.
 - c. investing significantly in additional employment support.

The following is a top-line overview of the key proposals included in the Green Paper:

- 2028/29 - Work Capability Assessment (WCA) would be scrapped and replaced by one route to health and disability-related benefits, via a reformed Personal Independence Payment (PIP).
- November 2026 - Focusing PIP on those with higher needs by requiring at least 4 points in one domain for the daily living component of PIP.
- 2026/27 - Reduction in assessments for those with severe conditions (see detail below).
- 2027/28 – Support for those with health and eligible care needs who are no longer eligible for PIP.
- A bigger review of the PIP assessment process which is due to replace WCA from 28/29 is a separate process from the Green Paper consultation.
- Until PIP is reformed, WCA and PIP reassessments will restart and more will be done face-to-face. No exact date given for when these are due to restart.
- From 2026/27 - Changes to the Universal Credit (UC) Standard Allowance to ensure it is higher relative to the health element of Universal Credit.
- Health element changes in UC - rates will be frozen at £97 per week until 2029/30 for existing claimants and new claimants from April 2026 will only get £50 per week. The Standard Allowance in UC will go up by £7 per week.
- Both the Work Allowance and single taper rate in Universal Credit will remain unchanged to continue to incentivise claimants trying work.
- 2028/29 - Introducing a new Unemployment Insurance by reforming contributory benefits.
- 2027/28 – Delaying access to the health element of UC until someone is aged 22, on the basis of switching resources into an expanded Youth Guarantee programme, and on raising the age at which people can claim PIP to 18 (No date for implementation is provided)
- Changes to Access to Work scheme and the support to work offer, by introducing a new support conversation and periodic engagement for claimants in the benefits system.
- Investing £1bn in employment support.
- A new 'Pathways to Work' support offer and new support conversation (testing on voluntary basis to begin over the next year)
- 2017/28 - A new baseline expectation of engagement for those who receive the UC health element

In the following section, we provide our assessment of which of these we are concerned about, and which we welcome. We are continuing to work through the complex interactions and impacts on unpaid carers.

Carers UK's view on the proposals:

1. Scrapping Work Capability Assessment (WCA) and replacement with PIP assessment

- Currently, many people in England and Wales must go through both the WCA and PIP assessment processes to get full access to the benefits they are entitled to. This is complex, time consuming and duplicative.
- From 2028/29, this will be based on a single PIP assessment in England and Wales. Without the WCA eligibility criteria, the additional health element in Universal Credit (UC) will no longer be linked to someone's capacity to work or

their work status. Instead, eligibility to the additional UC health element will be based on whether someone is receiving PIP.

- This means health-related financial support in UC would be focused on those with long-term conditions and disabilities that have lasted for 3 months and are expected to last for at least a further 9 months.
- The Government's consultation recognises that there will be gaps left by the removal of WCA. Some individuals who currently qualify for limited capability for work and work-related activity (LCWRA) would not be eligible for PIP because of the shorter-term nature of their illness. For example, those affected by cancer treatment, people with short-term conditions that get better, women with a high-risk pregnancy and those currently classed as having substantial risk.
- In the proposed reformed system these groups will still be eligible for UC and for the proposed new higher rate Unemployment Insurance, if they meet relevant eligibility criteria. Those nearing their end of life will be able to access PIP fast track route.
- A full review of the PIP assessment process is due to take place, separately from the Green Paper consultation, together with stakeholders' input.

Carers UK view:

- *Some disability organisations have welcomed a single assessment which prevents duplication. But there is also concern about those who might no longer qualify. It also creates a cliff edge, where PIP eligibility is a gateway to significantly higher incomes through the health element of Universal Credit and for Personal Independence Payment. A person would be entitled to both or neither. Those who 'pass' the PIP assessment will typically receive combined UC and PIP payments under the reforms of between £11,200 and £19,500 (without payments related to housing or children). Those who 'fail', will get only the basic UC payment of £4,900 per year (including rises already announced). This means that the result of people's assessment will be the difference between them receiving an income that falls far below what they need as a person with disabilities/health conditions to live on and better levels of income.*
- *We are pleased that reform of PIP will be done in consultation with key stakeholders. However, it is very likely that the changes proposed will leave gaps in support for some. We will need to assess the impact of the reforms once the process is underway, including the impact of changes on carers and their families.*

2. Focusing PIP more on those with higher needs and reducing access for those with lower needs

- Government has confirmed that PIP will remain a non-means tested benefit for disabled people and people with health conditions – regardless of whether they are in or out of work.
- While the whole PIP assessment process will be reviewed together with stakeholders before being re-launched in 2028, some changes will be introduced much earlier.
- From November 2027, people who have lower needs in the daily living activities must score at least 4 points in at least one activity to receive the daily living component of PIP. This means that anyone scoring less will no longer be eligible

for the daily living element of PIP. This element is not being consulted on, which is a real concern that we don't know the impact yet and are waiting for the Equality Impact Assessment. This change will affect carers in several ways (see below).

- This change will be introduced through primary legislation. It will apply to new claims and for existing people who claim, with future eligibility to be decided at their next award review.
- People with a higher level of functional need in at least one activity – for example, people who are unable to complete activities at all, or who require more help from others to complete them – will still receive PIP.
- From 2026/27, there will be also be a reduction in reassessments for those with severe conditions and disabilities.
- The consultation will look at options for transitional protection for those who are no longer eligible for PIP as well as how to support those with lower needs in a multiple number of PIP activities.
- Anyone in receipt of PIP now who would lose entitlement when they are reassessed under the new eligibility criteria, would have their health and eligible care needs met in another way. Government is consulting on this, including whether health needs could be met via Personal Health Budgets. However, these changes are not due to be introduced until 2027/28, meaning that there could be a gap for this group in the support they receive.
- Whilst the WCA is still in place, reassessments will restart, although no firm date has been provided in the consultation document for this. During the COVID-19 pandemic, scheduled reassessments were turned off and the number of reassessments has fallen from 611,000 in 2019 to 118,000 in 2023. The number of Face-to-Face assessments in PIP and WCA will increase. Assessments will also be recorded so that they can be referenced back to increase trust in the process.
- Government also proposes to reduce the initial assessment requirement in PIP for certain groups with very severe conditions. For example, many young people,, who have been living with very severe conditions since childhood move onto PIP having already received awards for Disability Living Allowance for children (DLAc).
- Medical evidence plays an important role in the PIP assessment. People are asked to voluntarily provide evidence about how their health condition or disability affects their daily life. Government will explore how the process of transferring supporting medical evidence from the NHS to the department could be digitalised, where people have already consented to the NHS sharing of data.
- Impact on devolved nations:
 - All of these measures affect carers across England and Wales.
 - In Scotland, consideration will be needed as to how entitlement to the new UC health element will be determined, given that UC is reserved and PIP is devolved and has been replaced by Adult Disability Payment (ADP). This is a gateway benefit for carers receiving the Carer Support Payment.
 - If there is a cut in the budget for PIP, a proportionate figure will be cut from the amount the Treasury gives to the Scottish government. Scottish ministers would have the choice of applying a similar scale of cuts, or of finding funds from other spending, or tax, to fill that gap.
 - Most of the measures will not apply directly to Northern Ireland.

Carers UK view: *We are very concerned that the proposed changes to PIP could mean that people will lose entitlement to the daily living component of PIP and potentially other entitlements linked to this award. This will begin from November 2026. It could also mean that people who currently are entitled to Carer's Allowance will lose that entitlement, as their PIP award is the 'gateway' benefit for accessing Carer's Allowance.*

We know that around half a million Carer's Allowance claims are linked to PIP. Whilst not all could lose entitlement in the future, many could do so.

We also know that around 150,000 unpaid carers also have PIP themselves as a result of their own disabilities. This is a worry that they might lose their own entitlement to PIP if they do not score at least 4 in one category.

Carers have been getting in touch with Carers UK, deeply concerned about how changes might affect them.

3. Changes to Universal Credit standard allowance and Universal Credit health element

- Currently, the means-tested support available through UC for the LCWRA/health element is £416.19 per month, which is in addition to, and is more than the £393.45 per month for the standard allowance for a single person over aged 25.
- The Government wants to address this imbalance, by legislating to reset payment rates in UC over this Parliament, starting from April 2026. This will include:
 - Increasing the UC standard allowance for new and existing claims. This would mean the single person 25+ rate of UC standard allowance increasing by £7 per week (pw) (from £91pw in 2024/2025 to £98pw in 2026/2027).
 - For people who already receive the UC health element the rate of the UC health element will be frozen at £97pw until 2029/2030. This could also get the higher standard allowance, partially offsetting this reduction.
 - For new claims the rate of the UC health element will be reduced by £47pw (from £97pw in 2024/2025 to £50pw in 2026/2027). However, this group will benefit from the higher standard allowance, which will partially offset this reduction.
 - For those receiving the new reduced UC health element after April 2026, those with the most severe, life-long health conditions, who have no prospect of improvement and will never be able to work, will see their incomes protected through an additional premium. The government will guarantee for both new and existing claims in this group that they will not need to be reassessed in future.

Carers UK view: *We welcome the proposed £7 a week rise to the UC standard element and the additional premium people will receive. However, we are concerned that new claimants for the UC health element will receive significantly less financial support relative to existing claimants. This would affect the household income of carers and their families who apply for the benefit for the first time after April 2026,*

where the carer is living with the person they care for. The reduction of the health element by £47 a week will have a very severe impact on claimants.

4. Young people and delaying UC health element

- Consultation also includes proposals to delay access to the health element of UC until someone is aged 22, on the basis of switching resources into an expanded Youth Guarantee, and on raising the age at which people can claim Personal Independence Payment (PIP). This change is expected to come into effect from 2027/28
- The money saved would fund more opportunities to young people through the guarantee, so they can sign up to work or training rather than long-term benefits.
- However, the government will consider what special provisions need to be put in place for those young people where engagement with the Youth Guarantee is not a realistic prospect. In September 2024, there were 66,000 people aged 18 to 21 in the LCWRA group.
- Proposals also include raising the age at which people can claim PIP to 18. However, no date for implementation is provided.

Carers UK view: *We are concerned that new claimants for the UC health element aged 22 and under will receive less financial support from 2027. This would affect the household income of carers and their families who apply for the benefit for the first time after April 2027, where the carer is living with the person they care for.*

5. Work allowances in Universal Credit

- Both the work allowance and single taper rate will remain unchanged to continue to incentivise those trying work.
- The Government will establish in law the principle that work will not lead to a PIP award review or a WCA reassessment for people receiving UC, PIP (in England and Wales), or New Style Employment and Support Allowance (NS ESA).

Carers UK view: *Carers UK welcomes the fact that trying work would not lead to a review. Given the barriers that many disabled people have to try to work, and worries about impacts on income, this is welcome.*

Carers UK has already recommended that carers who are in receipt of Universal Credit Carer Element could benefit from having access to a work allowance in UC. Some carers currently are not eligible for this and, where they may be able to combine their caring role with some paid work, they lose their entitlement to UC very quickly.

6. Introducing a new Unemployment Insurance by reforming contributory benefits

- A new Unemployment Insurance is expected to be introduced in 2028/29 by reforming contributory benefits.

- Contributory element of the New Style Employment and Support Allowance (NS ESA) and New Style Jobseeker's Allowance (NS JSA) will not change – claimants will need 2 to 3 years' worth of National Insurance credits prior to claiming.
- Under the reformed system, there will be a consultation on replacing NS ESA and NS JSA with one new Unemployment Insurance benefit. The rate of financial support would be set at the current higher rate of NS ESA. The benefit would not require a health assessment and would be based on an individual's National Insurance record as is currently the case. Individuals, such as those with long term health conditions, would also be able to claim other relevant benefits where eligible, but health would not be assessed/affect the levels of JSA/ESA.
- The proposals also include improving the income protection available to people who lose their job, while time-limiting that entitlement (for example for 6 to 12 months) to create a strong incentive to get back into the labour market.

Carers UK view:

Carers UK is considering the impacts of this on unpaid carers. In principle, higher payments could be positive, but the time-limited nature could pose some challenges.

7. Greater employment support offer

- Building on the Get Britain Working White Paper, £1 billion per year additional investment by the end of the decade would support new “pathways to work”. The guarantee of an employment support offer will include:
 - Introducing a new support conversation to explore people's goals and aspirations, and help them to access the right support for them
 - Specialist one-to-one support alongside access to more intensive employment and skills support where appropriate
 - Periodic engagement - an expectation that most people in receipt of the health element of Universal Credit (UC) will need, as a minimum, to periodically participate in conversations to discuss their goals and needs and to hear about the services that would be available to support them
 - Getting more young people earning or learning, by reforming the system of benefits and support to underpin the government's Youth Guarantee
 - The government also wants to create a coherent “Pathways to Work” offer – building on and extending existing provision, and employment support through the Connect to Work programme, WorkWell and local Get Britain Working ‘trailblazers’
- Most people in receipt of the health element in UC will be expected in the reformed system to, as a minimum, engage in conversations from time to time about their aspirations to work and to hear about the support available to them. The proposals do not suggest that this group will be required to undertake specific work-related activity or to look for work or take jobs.

Carers UK view:

Carers UK has welcomed the new Pathways to Work support if they are person-centred and tailored to need. These systems need to be sensitive to any kind of caring responsibility in relation to other disabled, ill or older relatives or friends i.e.

those who don't have entitlement to Carer's Allowance or Carer Element, as this makes engaging with work harder.

8. Access to Work scheme changes

- Access to Work is a demand-led, discretionary grant scheme that supports people who have a disability or health condition to move into or sustain, paid employment. The grant is intended to support workplace adjustments that go beyond what would normally be expected from an employer through their duty to provide reasonable adjustments under the Equality Act 2010.
- The grant is awarded for 3-year periods and provides personalised support and workplace assessments, travel to work, support workers, and specialist aids and equipment. The Scheme also includes the Mental Health Support Service (MHSS) which provides up to 9 months of non-clinical support for people who need help with their wellbeing while in employment.
- When preparing to decide on the future of Access to Work, the government will consider:
 - the existing legal duties on reasonable adjustments in the Equality Act 2010
 - the support government currently provides to both employers and individuals
 - advice and guidance available to both workers and employers
 - the enforcement powers that currently exist

Carers UK view:

Disability organisations⁵ have expressed some concerns about the current delays and waiting times for assessments.

About Carers UK

Carers UK is a charity set up to help the millions of people who care for family or friends. We are a membership organisation of carers, run by carers, for carers. We provide information and advice about caring alongside practical and emotional support for carers. We also campaign to make life better for carers and work to influence policy makers, employers, and service providers, to help them improve carers' lives.

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⁵ <https://www.epilepsy.org.uk/news/delays-in-access-to-work-scheme-leaves-thousands-of-disabled-people-with-no-financial-support-for-employment>
<https://www.disabilityrightsuk.org/news/access-work-wait-times-leading-lost-jobs>
<https://www.rnib.org.uk/campaign-with-us/support-a-campaign/access-to-work-delays/>