

Mandates of the Special Rapporteur on the rights of persons with disabilities and the Special Rapporteur on extreme poverty and human rights

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(Please use this reference in your reply)

4 September 2025

Excellency,

We have the honour to address you in our capacities as Special Rapporteur on the rights of persons with disabilities and Special Rapporteur on extreme poverty and human rights, pursuant to Human Rights Council resolutions 53/14 and 53/10.

In this connection, we would express the following concerns over the reform process related to health and disability benefits, including the “Pathways to Work: Reforming Benefits and Support to Get Britain Working” Green Paper and the Universal Credit Bill. We fear that this process may have put fiscal considerations before the duties of the United Kingdom of Great Britain and Northern Ireland under the international human rights instruments it has ratified, with a disproportionate impact on the rights of persons with disabilities, particularly the right to an adequate standard of living and social security and the right to be closely consulted and involved in policymaking on issues that concern them. We are deeply concerned at the freezing and cuts to health and disability benefits that have been proposed before the content and mitigating impacts of other proposed measures are known, thus signalling further retrogression in the availability and accessibility of social security for those at heightened risk of poverty.

Background

At the outset, we wish to acknowledge that one of the stated objectives of the reforms was to provide better support for persons with disabilities and people with long-term health conditions to access and maintain employment. We recognize that, as everywhere in the world, persons with disabilities are at higher risk of poverty including due to a lack of equal employment opportunities. However, we are concerned that instead of pursuing a rights-based approach to the right to work and to an adequate standard of living, fiscal considerations and negative perceptions of benefit claimants appear to be the driving rationale behind reforms. We recall that your Excellency’s government is bound by international human rights standards under the Convention on the rights of persons with disabilities (CRPD) and the International Covenant on Economic, Social and Cultural Rights (ICESCR), ratified by the United Kingdom on 8 June 2009 and 20 May 1976 respectively.

We are alarmed that these reforms are proceeding in the context of significant gaps in the protection of the human rights of persons with disabilities, as documented in the 2017 inquiry conducted by the Committee on the rights of persons with disabilities (CRPD/C/15/4). The Committee notably observed failures to guarantee the rights of persons with disabilities to live independently and be included in the community; to work and employment; and to an adequate standard of living and social protection. In the 2024 follow-up to the inquiry, the Committee found that no significant progress has been made and reiterated its earlier recommendations

(CRPD/C/GBR/RFIR/1). Similarly, in March 2025, the Committee on Economic, Social and Cultural Rights warned that reforms over the past decade, including benefit cuts, have eroded the rights to social security and to an adequate standard of living with a disproportionate effect on persons with disabilities and stigmatization of benefit claimants (E/C.12/GBR/CO7).

We note that barriers in accessing disability benefits in the United Kingdom have been extensively documented, including difficulties to access information about their eligibility and entitlements, the high level of complexity of application forms, limited access to guidance and support to navigate the procedures, unprofessional and demeaning communication from assessors occasionally questioning the validity of mental health needs, compounded by long waiting list for related health services. Moreover, the inadequacy of existing social security schemes to meet the needs of persons with disabilities and ensure an adequate standard of living has been widely reported, putting persons with disabilities and their families at disproportionate risks of poverty, debt, food insecurity, and mental health issues.

Regressive proposals to cut, freeze and restrict eligibility to health and disability benefits

In March 2025, the government published a Green Paper entitled “Pathways to Work: Reforming Benefits and Support to Get Britain Working,” announcing changes to health and disability benefits to decrease government spending by £4.8 billion by 2029/2030. The government asserted that the existing incapacity and disability benefits system disincentivizes employment and that, moreover, the number of claimants of disability and health benefits rose significantly since the COVID-19 pandemic creating unsustainable financial expenditures. The increase in mental health conditions was highlighted as driving the increase in claiming health and disability benefits.

We are concerned that the rationale for significant changes to health and disability benefits seems to be largely based on financial expenditures linked to increased numbers of benefit claimants without a comprehensive analysis and response to the causes behind the increased prevalence of disability and long-term health conditions, as well as the challenges persons with disabilities experience to access the labour market, the adequacy and accessibility of social security schemes, quality community-based support services, and health services. Such an approach seems to contradict the spirit of the CRPD which recognizes persons with disabilities as rights-holders rather than mere recipients of social support. We recall that the United Kingdom is bound to adopt all appropriate measures to implement the whole range of rights set out in the CRPD (art. 4(1)(b)), requiring a comprehensive and coordinated policy approach.

We note that the Green Paper outlined 22 policy measures, including changes to two social security benefits: the health element of the Universal Credit and the Personal Independence Payment.

Universal Credit (UC) is a non-contributory means-tested income replacement benefit to help cover costs of living. It comprises a standard allowance and other benefits, such as the UC health element for individuals with a health condition or disability and who have been assessed as having limited capability for work and work-

related activity (based on the “Work Capability Assessment”). The announced changes included freezing the amount of the benefit and cutting it nearly by half for new claimants from £97 a week to £50 a week. The government outlined that the freeze and cuts to the UC health element would be partially offset by increasing the UC standard allowance, for example with an increase of £7 per week for single persons above 25 years old.

The Personal Independence Payment (PIP) is a non-contributory non-means tested benefit to help cover extra-costs related to disability and long-term health conditions. PIP is available in England, Wales, and Northern Ireland. It contains two components; the daily living component supports people with everyday tasks, while the mobility component helps people to go out and move around. The Green Paper outlined plans to curb spending on PIP by tightening eligibility and requiring higher scores in the functional PIP assessment. The changes would have meant that people who needed assistance to wash, dress and undress their lower body, to get in and out of bath or shower, and needed supervision to use the toilet might have no longer been eligible.

The changes to the UC health element and PIP were central elements of the Universal Credit and Personal Independence Payment Bill introduced by the government to the Parliament on 18 June 2025. Following opposition from a group of parliamentarians, the government revised the Bill to ensure majority support. In particular, the PIP-related changes and freezing of the UC health element were withdrawn. The Bill was renamed the “Universal Credit Bill,” with the halved rate of the UC health element for new claimants remaining its core provision. The full rate would continue applying to current beneficiaries, those terminally ill, and those with “severe conditions” defined as conditions that are permanent and do not fluctuate. The revised bill was approved by the House of Commons on 9 July and the House of Lords on 22 July. It is due for Royal Assent in early September to become Law.

We welcome that some of the most problematic elements of the Bill were withdrawn, particularly in relation to PIP. Nevertheless, we remain concerned that the Bill contains a regressive clause for accessing a benefit for those in particularly vulnerable situations. On its face, the new two-tier system for the UC health element whereby new claimants will receive a significantly lower amount of the same benefit solely because of the date of their application appears discriminatory and unjustified. It is incompatible with the principle of non-discrimination under art. 5 of the CRPD.

Further, we are concerned that such retrogressive measures are being put forward and adopted without careful consideration of all alternatives and other requirements under the criteria adopted by the Committee on Economic, Social and Cultural Rights in its general comment No. 3. We recall that both the CRPD (art. 4(2)) and ICESCR (art. 2(1)) require States to take measures, to the maximum of their available resources, in order to progressively achieve the full realization of economic, social and cultural rights. This duty entails a strong presumption against retrogression in the protection in economic, social and cultural rights.

Finally, the introduction of the “severe conditions” category for claimants of the UC health element is problematic as the narrow criteria exclude many persons with disabilities and are not aligned with the concept of disability under the CRPD, which relates to those with long-term physical, mental, intellectual or sensory impairments

that can evolve and fluctuate over time (art. 1). This is particularly problematic for people with psychosocial disabilities and mental health conditions. We are concerned that the definition of “severe conditions” disregards functional capacities and individual support needs that different people require, and as such penalizes people who are at particular risk of poverty while experiencing significant barriers to employment.

Stigmatising language targeting benefits claimants, including persons with disabilities

We are dismayed that throughout the reform process, senior governmental officials and politicians used language that stigmatizes benefits claimants and suggests that claimants are abusing and cheating the system, especially considering that official statistics show near nonexistent overpayments for PIP and UC extra elements due to fraud. We are gravely concerned that such language normalizes and encourages a hostile and stigmatizing environment for persons with disabilities, in which they are considered “fakers” and a drain on society. This is particularly troubling as the reforms and reviews of existing support schemes are expected to continue. The targeting of persons with psychosocial disabilities and mental health conditions is especially alarming given that the rhetoric around “overdiagnosis” of mental health conditions enables negative and erroneous perceptions of people pretending or exaggerating mental health problems to avoid work, particularly young people. We underscore that under art. 8 CRPD, the government is required to actively combat stigma and negative stereotypes relating to persons with disabilities.

Lack of meaningful consultations and limited parliamentary scrutiny

The Green Paper indicated that the government would carry out public consultations on only 10 out of the 22 proposed policy measures. It appears that no consultations were carried out on some of the key changes, such as those related to freezing the UC health element and tightening eligibility for PIP, where the government announced it would legislate directly. Furthermore, consultations held on the remaining proposals were limited, with inadequate accommodations and opportunities to meaningfully consult persons with disabilities.

We recall that close consultation and active involvement of persons with disabilities, through their representative organizations, in the development and implementation of legislation and policies concerning issues that directly impact on their lives is a mandatory requirement under art. 4(3) CRPD. Lack of any consultations on law and policy changes to social security benefits that are essential to protect the right to an adequate standard of living of persons with disabilities are a glaring violation of this right. We particularly wish to draw attention to general comment No. 7 of the Committee on the rights of persons with disabilities which provides clear guidance on how to ensure participation of persons with disabilities in line with the CRPD requirements.

The lack of meaningful consultations is even more alarming given the unusually swift parliamentary proceedings of the Universal Credit Bill. The House of Commons adopted the Bill after three readings compressed into three weeks, without the possibility for parliamentary committees to organise consultations with experts and interest groups, including persons with disabilities. Moreover, the government

designated the Bill as a “Money Bill” (i.e. laws only concerned with national taxation, public money or loans). As such, the upper house of Parliament, the House of Lords, could not amend or delay the Bill which will become law after one month with or without approval of the House of Lords.

Impact assessments of planned reforms, including compliance with international human rights obligations

Earlier this year, the government published an impact assessment of some of the measures outlined in the Green Paper. It estimated that by 2029/2030, 370,000 current PIP beneficiaries would lose their entitlements upon review and 430,000 future PIP recipients would not qualify under the stricter criteria. Some 2.25 million of current recipients would be impacted by the freeze of the UC health element and 730,000 future recipients by its reduction. Overall, in 2029/2030, 3.2 million families (both current and future recipients of health and disability benefits) were estimated to lose out financially (on average £1,720 per year), while 3.8 million families would gain (£420 per year on average). The vast majority (98%) of families on the losing end have a person with disabilities in their household. Additional 250,000 people, including 50,000 children, would be exposed to relative poverty.

We express strong concern that the government proposed measures which by its own assessment would lead to increased poverty levels, especially impacting those already at disproportionate risk of poverty such as persons with disabilities and their families. We note that the impact assessment did not include analysis about mitigation measures or the impact other planned measures, including the £1 billion annual funding by 2029/2030 to support persons with disabilities and long-term health conditions into employment. Interconnected issues, such as effects on access to food and housing were also not considered. This raises questions about how the government is fulfilling its obligations to guarantee the right to an adequate standard of living and social security under ICESCR art. 9 and CRPD art. 28, including the prohibition of retrogressive measures.

Moreover, no formal assessment of compatibility of the planned reforms and of the Universal Credit and Personal Independence Payment Bill with human rights obligations under ICESCR and CRPD had been conducted.

Future reforms related to the Green Paper

Further reforms to implement the Green Paper measures are expected to be announced by the government in Autumn 2025. These may reportedly include scrapping the “Work Capability Assessment” and replacing it by the PIP assessment; extending conditionality (with the threat of sanctions for not following instructions issued by advisors) to retain UC benefits to all recipients with limited capability for work and work related capacity except the narrow category of “severe conditions criteria;” investments up of up to £1 billion by 2029-2030 for additional employment, health and skills support to help people start or stay at work; a new contributory unemployment insurance; delaying access to the UC health element until the age of 22 instead of 18 with savings to be re-invested into work support and training opportunities for this age group; and reforming the Access to Work grant scheme which supports persons with disabilities with accessibility, personalised support and workplace

adjustments, including by more directly supporting employers to fulfil obligations related to accommodations at work.

The government is also planning to conduct a review of the PIP system, including the way assessments are conducted, and indicated it will consult persons with disabilities. The outcomes of the review and expected changes to the system will be published in Autumn 2026.

In light of these observations, we strongly urge your Excellency's Government to withdraw the Universal Credit Bill and pause planned measures in the Green Paper until a comprehensive assessment of the adequacy and accessibility of social security schemes for persons with disabilities and people with long-term health conditions is conducted, in close consultations with persons with disabilities and all other concerned groups.

As it is our responsibility, under the mandates provided to us by the Human Rights Council, to seek to clarify all cases brought to our attention, we would be grateful for your observations on the following matters:

1. Please provide any additional information and/or comment(s) you may have on the above-mentioned analysis.
2. Please provide information on compliance of the Universal Credit Bill and measures announced in the "*Pathways to Work*" Green Paper with commitments under international human rights law, including the International Covenant on Economic, Social and Cultural Rights and the Convention on the Rights of Persons with Disabilities, and on any related assessments conducted in this respect.
3. Please provide information on mechanisms and measures to ensure close and meaningful consultations with persons with disabilities, including their representative organizations, in the drafting and adoption of any future law and policy reforms that impact on their lives, and particularly on any future reforms associated with the Green Paper.
4. Please clarify what steps is your Excellency's Government taking to guarantee the right to an adequate standard of living and social security to persons with disabilities and other groups at disproportionate risk of poverty, without discrimination and retrogression.
5. Please provide information on measures to raise awareness and combat stigma and negative attitudes towards benefit claimants and persons with disabilities, particularly persons with psychosocial disabilities and people requiring access to mental health care and support.

This communication, as a comment on pending or recently adopted legislation, regulations or policies, and any response received from your Excellency's Government will be made public via the communications reporting [website](#) after 48 hours. They will also subsequently be made available in the usual report to be presented to the Human Rights Council.

Please accept, Excellency, the assurances of our highest consideration.

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