



**PATHWAYS TO WORK CONSULTATION
END FUEL POVERTY COALITION RESPONSE
30 June 2025**

The End Fuel Poverty Coalition is a [broad coalition of more than 100 anti-poverty, health, housing and environmental campaigners, charities, local authorities, trade unions and consumer organisations](#). It is also supported by academics, social enterprises and those working on the front line of fighting fuel poverty.

This consultation plays a vital role in reforming Britain's broken energy system. In 2025, we urge all policy makers to understand how their decisions can affect the affordability of energy bill, avoiding discriminatory pricing, delivering longer-term reforms that bring down the cost of energy and improving the energy efficiency of homes.

We share the concerns of many others and some of our members have already responded individually to the consultation and the wider End Fuel Poverty Coalition membership wish to add their support to the views put forward by Mencap, Scope and Sense.

However, we are also responding to this consultation as a group to raise urgent concerns about how the proposed changes will impact disabled people, carers and those on low incomes already struggling with unaffordable energy bills and the wider cost-of-living crisis.

In particular, we oppose the proposed cuts to disability-related benefits, the restriction of eligibility for Personal Independence Payment (PIP), and changes to Universal Credit (UC) that will lead to large-scale reductions in support. The overall package of reforms represents a net cut of £6.5bn to social security for disabled people and carers by 2029/30. These proposals risk:

- Forcing hundreds of thousands of households deeper into poverty.
- Removing vital income from people with lifelong conditions and high support needs.
- Making it harder for people to afford energy, heating, food and care.
- Undermining the goal of increasing employment by creating further stress, instability and hardship.

Our main concerns relate to the following six areas.

1. PIP Eligibility Restrictions and Gateway Removal

The proposal to restrict PIP eligibility – requiring claimants to score at least 4 points in a single activity to qualify for daily living support – will see at least 800,000 disabled people lose entitlement to this essential benefit. Many of these individuals live with complex needs across multiple areas and rely on PIP to:

- Access other benefits (UC health element, Carer's Allowance, local housing support).
- Afford the extra costs of living with a disability.
- Cover essential energy costs for heating, equipment and care.

Removing access to PIP will cause serious financial harm. The average loss of £4,500 a year is equivalent to the entire winter energy bill for many households – a gap that cannot be filled by other forms of support. This will lead directly to worsening cold, damp homes, increased health risks, and higher NHS and social care costs.

The Government must abandon this restriction and ensure PIP remains accessible to those with multiple moderate needs as well as severe single impairments.

2. Freezing and Cutting the Universal Credit Health Element

Freezing the current UC health element and cutting it to £50 per week for new claimants will lead to:

- Real-terms losses of £500/year for 2.2 million existing claimants.
- Losses of £3,000/year for 700,000 new claimants.

This is a regressive step that reduces support at a time of growing need. For many with learning disabilities, mental health conditions or chronic illness, this element is a vital income stream used to cover essentials such as heating, specialist food, medical supplies, and transport to appointments.

We oppose this freeze and cut, and urge the Government to uprate the UC health element in line with inflation and need, not reduce it.

3. Scrapping the WCA Without Conditionality Protections

We are alarmed that the proposed replacement to WCA (linking UC health element entitlement solely to receipt of PIP) will leave many without protection from conditionality and sanctions.

Currently, claimants placed in the Support Group or Limited Capability for Work and Work-Related Activity group are shielded from unrealistic work commitments. If these protections are lost, people with high support needs – especially those with learning disabilities – may be forced into inappropriate claimant commitments, increasing anxiety and risking unjust sanctions.

We urge the Government to:

- Ensure protections from sanctions are maintained for those unable to work.
- Train Work Coaches in disability awareness, especially learning disabilities.
- Guarantee that participation in employment support remains voluntary for this group.

4. Safeguards and Reassessments

People with learning disabilities and other long-term conditions frequently report that the benefits system is adversarial, demeaning and destabilising. Reassessments often fail to acknowledge the lifelong nature of their condition, leading to unnecessary stress and fear. We support proposals to reduce reassessments for those with severe or lifelong conditions and call for this to explicitly include people with a learning disability.

We also urge a cultural shift in the DWP away from suspicion and punitive enforcement and towards trust, dignity and genuine support.

5. Access to Work Support Must Be Maintained

Support workers funded through Access to Work are vital in enabling disabled people to secure and retain meaningful employment. Cutting back these awards or shifting the cost to employers risks undermining the effectiveness of the scheme, especially for those who need intensive support.

We call on the Government to:

- Maintain and enhance the Access to Work scheme.
- Protect support worker funding.
- Set realistic benchmarks for value-for-money that reflect the needs of those furthest from the labour market.

6. Fuel Poverty and the Additional Costs of Disability

Disabled people are disproportionately affected by fuel poverty. They are more likely to live in inefficient homes, need higher indoor temperatures for health, use energy-intensive medical equipment, and spend more time at home.

Any cuts to disability benefits will directly increase the number of households in fuel poverty – worsening existing inequalities and placing greater strain on health and social care services.

We urge the Government to conduct a full impact assessment of all proposed reforms on:

- Fuel poverty rates.
- Disability-related extra costs.
- Public health outcomes.
- Safeguarding risks.

Conclusion

The current proposals in the Pathways to Work Green Paper risk pushing hundreds of thousands of disabled people and carers into deeper hardship. A benefits system that supports people into work cannot be built on fear, sanctions, and sweeping cuts.

We urge Ministers to rethink these proposals and deliver reforms that genuinely support disabled people to thrive – including financial security, access to voluntary employment support, and insulation from poverty and fuel crisis.

We would be grateful if you could keep the Coalition informed about developments in this consultation.

About the End Fuel Poverty Coalition

The End Fuel Poverty Coalition is a [broad coalition of more than 100 anti-poverty, health, housing and environmental campaigners, charities, local authorities, trade unions and consumer organisations](#). It is also supported by academics, social enterprises and those working on the front line of fighting fuel poverty.

We believe that everybody has the right to a warm, dry home that they can afford to heat and power.

Members of the Coalition include: [Action with Communities in Rural England](#), [ACE Research](#), [Age UK](#), [All Birmingham's Children](#), [Austerity Action Group](#), [Association of Green Councillors](#), [Association of Local Energy Officers](#), [Association for Decentralised Energy](#), [Asthma + Lung UK](#), [Basingstoke & Deane Borough Council](#), [Beat the Cold](#), Bruton Town Council, [Camden Federation of Private Tenants](#), [Carers Trust](#), [Child Poverty Action Group](#), Church Poverty Action, [Chartered Institute of Environmental Health](#), [Chartered Institute of Housing](#), [Community Action Northumberland](#), [Centre for Sustainable Energy](#), [Climate Action Network West Midlands](#), [Debt Justice](#), [Disability Poverty Campaign Group](#), [Disability Rights UK](#), [E3G](#), [Energise Sussex Coast](#), Energy Advice Line, Energy Cities, [Epilepsy Action](#), [Exeter Community Energy](#), Fair Energy Campaign, [Fair By Design](#), [Foster Support](#), [Friends of the Earth](#), [Fuel Poverty Action](#), Fuel Poverty Research Network, [Generation Rent](#), [Good Law Project](#), [Greenpeace](#), [Groundwork](#), Hackney Foodbank, [Heat Trust](#), Home Start Oxford, [Independent Age](#), [Independent Food Aid Network](#), [Inner City Life](#), [Joseph Rowntree Foundation](#), [Lambeth Pensioners Action Group](#), [London Borough of Camden](#), London Borough of Lewisham, [Marie Curie](#), [Mencap](#), [Mayor of London](#), [MECC Trust](#), Moorland Climate Action, [National Pensioners Convention](#), National Union of Students / [Students Organising for Sustainability](#), NCB, [National Energy Action](#), [New Economics Foundation](#), National Federation of Women's Institutes, [Northern Health Services Alliance](#), [Oxford City Council](#), [Positive Money Tower Hamlets](#), [Plymouth Community Energy](#), Redcar & Cleveland Council, [Repowering London](#), Retrofit Bruton, Right To Energy Coalition, [Rossendale Valley Energy](#), [Ryecroft Community Hub](#), [Save the Children](#), [Sense](#), [Severn Wye](#), [Scope](#), [Shaping Our Lives](#), [Social Workers Union](#), [South Dartmoor Community Energy](#), [South East London Community Energy](#), [Southwark Group of Tenants Organisations](#), [South West London Law Centres](#), [Stop The Squeeze](#), [Tamar Energy Community](#), [Thinking Works](#), Uplift, [UNISON](#), Warm & Well North Yorkshire, [Warm & Well in Merton](#), [Winter Warmth Network](#), [Young Lives vs Cancer](#), [361 Energy](#).

The Coalition is also part of the [End Child Poverty Coalition](#) and the [Renters Reform Coalition](#). We work closely with [Energy Action Scotland](#), [NEA Wales](#) and the [Fuel Poverty NI coalition](#). The coordination for the [End Fuel Poverty Coalition](#) is provided by social enterprise [Campaign Collective](#).

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