

AdviceUK submission to the Timms Review of Personal Independence Payment

Executive summary

AdviceUK urges the Timms Review to recommend to the Government that they must co-design any reforms to personal independence payment (PIP) with the advice sector. AdviceUK represents over 700 free and independent advice services in Britain. Our members support people experiencing a wide range of social welfare issues. Welfare benefits are the largest area of advice, with PIP being the benefit most frequently advised upon. Furthermore, a considerable number of our members are run by and for deaf and disabled people (DDPOs). Many staff at these services rely on PIP to remain in work.

Any changes to PIP will therefore have a significant impact on AdviceUK members. Our members from the free and independent advice sector tell us that PIP reform will increase demand for their services, which are already under immense strain. If the Government is to reform PIP, it needs to set out how advice services will be supported. PIP is crucial in supporting disabled and sick people to move into or stay in work. It is also crucial in ensuring that those who cannot work are not punished. Therefore, PIP eligibility should not be restricted. However, AdviceUK does believe that PIP can be improved. The complexity of PIP's current eligibility criteria creates significant issues for beneficiaries, advisers and the DWP. Reform is needed to improve this. For instance, the application process should be more streamlined and easier to understand. Any reforms must be led by evidence and informed by engagement with the disability benefits sector.

1. Introduction

AdviceUK is the UK's largest network of free and independent advice services. We represent over 700 member organisations across England, Scotland and Wales, including many run 'by and for' deaf and disabled people's organisations. Our members provided advice to around 2.8 million people last year on issues including welfare benefits, debt, housing and immigration. Around 60% of our members provide advice on welfare benefits, with PIP-related cases making up the largest part of this work and driving a significant proportion of demand for independent advice services. Additionally, many of AdviceUK's DDPO members have staff who rely on PIP themselves. Any restrictions on eligibility would undermine capacity at DDPO services at a time when they will likely face unprecedented demand from clients. Therefore, we urge the Timms Review to recommend that any reforms to PIP are co-designed with the advice sector.

The Government should not restrict eligibility for PIP. PIP is not an out-of-work benefit and must remain available to disabled people and those with long-term health conditions, including many who are in work or seeking employment. It is also important that the review makes clear that disabled or long-term sick people who cannot work and rely on PIP should be protected. Finally, the review should recognise that the application process for PIP is currently overly complex, arduous and time-consuming. This affects claimants and the organisations that manage applications on their behalf. The Government should reform the application process to limit the burden on applicants and advice services alike.

We have set out how reforms will affect free and independent advice services and addressed the four themes the steering group is examining below. **If you have any questions about our**

submission or would like to discuss the relationship between PIP and the advice sector further, please contact willem.vandeven@adviceuk.org.uk.

2. Impact on advice services

2.1 Direct impact

Our members are concerned that any reforms to PIP will have an impact on the demand for their services. This will be particularly acute if reforms involve cuts and eligibility restrictions. Data from AdvicePro, a case management software used by much of the advice sector, finds that, between 2024-2025, welfare benefits accounted for 38% of total advice casework.¹ Within welfare benefits, from April 2022 – March 2026, 273,074 cases concerned PIP.² This represents 15% of total welfare rights and benefits cases during the same period.³ Within AdviceUK's membership, the concentration of welfare benefits is even greater; 60% of our members work in this field. For many members working in the disability benefits sector, PIP is among the most common issues they advise on. For example, the Northampton and County Community Law Service have reported that PIP advice made up over a third of their total casework over the previous 12 months.⁴ For a full breakdown of cases by issue type recorded on AdvicePro, please see Annex A and B.

Meanwhile, demand for advice across the sector is reaching crisis point. Data from AdviceUK's Advice Saves Lives Report (2024), informed by a survey of our members, found that 90% of advisers reported an increase in demand over the previous year, yet more than half (55%) said they were not confident they could handle that demand.⁵ Our members are concerned that any reforms to PIP, especially if they involve cuts and restrictions, will further increase demand at their already overstretched services.

An AdviceUK member, Agnes Smith Advice Centre, demonstrated this concern when cuts were proposed in June 2025. They dealt with 565 PIP cases in the 2024-2025 financial year, including support relating to both the daily living and mobility components of PIP.⁶ The centre expected "an increase in enquiries relating to disability benefits, including appeals, but also for other matters such as crisis support and debt advice because of insufficient income to meet household expenses because of loss of benefit entitlements."⁷ The centre had already received enquiries from clients concerned about proposed changes; the mere discussion of reform has already increased demand.⁸

Other AdviceUK member organisations expressed similar concern last year. The Nishkam Civic Association stated "a lot of our clients became concerned and sought us out to find out what impact it would have."⁹ 60% of the association's clients are in receipt of PIP meaning that "any changes would definitely affect a major portion of our clients... [and] demand would increase... which will impact our capacity so we may need to turn people away, and the waiting times would

¹ AdviceUK, [Member Survey Report](#), 2025.

² AdviceUK, AdvicePro data. Available upon request.

³ Ibid.

⁴ AdviceUK member data, available upon request.

⁵ AdviceUK, Advice Saves Lives Report, 2024.

⁶ AdviceUK member case study, available upon request.

⁷ Ibid.

⁸ Ibid.

⁹ AdviceUK member case study, available upon request.

increase, creating further distress etc. for clients.”¹⁰ The Bridge Plus+ in Norfolk made similar predictions. From June 2024-2025, they supported 170 service users with 214 welfare benefits-related cases and expected demand to rise further if reforms were taken forward.¹¹ Banburyshire Advice Centre concurred, warning that “we expect service demand to be high.”¹² It is imperative that, if any changes are to be taken forward by the Government, advice services are adequately supported to meet the expected increase in demand.

2.2 Impact on DDPO staff

Many of AdviceUK’s DDPOs are directly affected by the Government’s PIP policy. Staff working within these organisations rely on PIP to remain in work and deliver advice to disabled people in their communities. Any restrictions to PIP eligibility would risk reducing the capacity of specialist disabled-led advice organisations at the very time demand for their services would increase. This would not only undermine access to independent advice but also place greater pressure on public services including local authorities, housing providers, NHS services and social care systems. Any reforms to PIP must therefore be developed in close partnership with the advice sector and disabled people themselves, with full consideration given to the wider impact on advice sector infrastructure.

3. Four key themes

3.1 Role and purpose of PIP

As our member organisation the Romanian and Eastern European Hub has stated, the purpose of PIP should be to provide “support for people with health issues... [and take] away the financial pressure that these incur.”¹³ AdviceUK urges the Timms Review to recognise that PIP exists to help meet the extra costs of disability and long-term ill health and to support independence. Furthermore, many staff at AdviceUK’s DDPOs rely on PIP to provide life-saving advice for vulnerable people. PIP must continue to be available for our members’ staff.

It is also key to recognise that PIP is not an incapacity benefit. Indeed, 17% of claimants were in employment as of March 2024.¹⁴ Our member organisation, Inclusion London, states that “many disabled people use PIP to help pay for work related costs including accessible transport, mobility aids, and assistants to help them get ready for work in the morning.”¹⁵ Inclusion London, discussing proposed cuts to PIP in 2025, referenced Institute for Fiscal Studies’ data which estimated that DWP’s alternative employment support package would “lead to only tens of thousands of disabled people being able to work, whereas 3.8 million disabled people will lose payments.”¹⁶ Far from increasing employment, cuts to PIP may leave more disabled people out of work and reliant on state support, ultimately costing the public purse more in the future.

¹⁰ Ibid.

¹¹ AdviceUK member case study, available upon request.

¹² AdviceUK member case study, available upon request.

¹³ AdviceUK member case study, available upon request.

¹⁴ DWP, [Pathways to Work: Evidence pack: Chapter 2 reforming the structure](#), 30 October 2025.

¹⁵ *Inclusion London, Time to Stand Together: Say No to Devastating Disability Benefits Cuts*, 2 May 2025.

¹⁶ Ibid.

The role of PIP should continue to be to support people with long-term illnesses, health issues and disabilities to manage the financial problems these issues cause. It should not be manipulated to try to force those who cannot work into employment. Inclusion London's analysis makes it clear that this is likely to indirectly reduce the current employment rate of disabled people who rely on PIP to work.

3.2 Eligibility, fairness and equity in the award of PIP

The current system does not work effectively for many people with disabilities or long-term health conditions. Application processes and eligibility criteria often fail to account for fluctuating conditions, meaning people are assessed on a static understanding of their health that does not reflect the reality of their lives. For example, AdviceUK member organisation, Friends, Families and Travellers, have said that the most common problems their advisers see when assisting people claiming PIP include “assessment summaries stating that the client ‘didn’t appear to be in pain’ and that when considering disabilities that “are not [severe] for the majority of days [, they] are completely disregarded.”¹⁷ Furthermore, our member Bristol Law Centre states that “there is a real lack of awareness in the assessment criteria for how neurodivergence maps onto the activities - especially in women[;] for how trauma maps onto the activities - especially gender-based violence/abuse [and] how mental and physical health are interrelated... [as] the activities seem to encourage assessors to separate the two.”¹⁸

There is work to do to improve fairness and equity in the award of PIP. Our member, Shpresa Programme, recommends that, to improve assessment accuracy, DWP should consider “reduc[ing] the] reliance on functional tick-box assessments [, including] better recognition of fluctuating and non-visible conditions [and] introduc[ing] routine quality audits of assessment reports to identify systemic errors.”¹⁹ They also recommend “simplify[ing] the] application process” through measures such as “shorter forms[,] greater use of existing medical evidence [and the] reduced need for repeated submissions.”²⁰ We recommend that the Government improves fairness and accessibility in the award of PIP for those with long-term, invisible and fluctuating conditions. The Government must work directly with independent advice services to co-design reforms to ensure they are practical and fair.

3.3 Experience of claiming PIP

Advisers spend much of their time navigating overly complex, time-consuming and stressful PIP application processes. Our members support disabled people through lengthy forms, repeated requests for evidence and confusing communication from the DWP. Advisers tell us that the process can be particularly difficult for people with fluctuating conditions, mental health issues and learning disabilities.

¹⁷ AdviceUK member case study, available upon request.

¹⁸ AdviceUK member case study, available upon request.

¹⁹ AdviceUK member case study, available upon request.

²⁰ Ibid.

For example, the Romanian and Eastern European Hub recently supported a 64-year-old woman applying for PIP who has mobility issues, digital exclusion and limited English proficiency.²¹ The case notes demonstrate how the application process failed this client and led to stress and anxiety.²² They state that “the client would have benefited from remote communication due to her mobility issues. However, we were not permitted to provide translation support unless she was physically in the same room as us.”²³ Additionally, the “client did not receive a digital application link, which could have enabled us to complete the process in a single supported session. As a result, she had to wait for a paper form to be issued and travel to our office one more time.”²⁴ The Hub states that this “created additional stress, anxiety, and physical strain, particularly given her health condition.”²⁵ These negative outcomes from the client’s experience claiming PIP required additional support from the Hub, adding further strain on their services.

Furthermore, the Nishkam Civic Association described supporting a client with fibromyalgia who relies on workplace adjustments, taxis and prepared meals in order to remain in employment and manage daily living.²⁶ The member explained that, despite the ongoing nature of the client’s condition, they are repeatedly required to reapply for PIP, refused at the initial decision stage and only had support reinstated following appeal.²⁷ The member described the process as a “nightmare” for both claimants and advisers to navigate.²⁸ They also highlighted that many clients experience the system as adversarial rather than supportive, creating distress, uncertainty and financial instability rather than enabling independence.²⁹ It is evident that much of the strain on advisers’ time is driven by the inadequacies of the PIP application process. Therefore, AdviceUK urges the Timms Review to recognise that the application process needs to be improved.

3.4 Changing context and the impact on PIP

It is important that the Timms Review avoids assumptions that rising disability benefit claims are primarily being driven by dependency or unwillingness to work. Our members are clear that PIP is not an out-of-work or incapacity benefit. It is intended to help disabled people manage the additional costs associated with disability and ill health, including enabling many people to remain in or move into employment. DWP data shows that around 17% of PIP claimants were in employment as of March 2024, demonstrating that many disabled people rely on the benefit to work.³⁰ Any narrative that portrays PIP primarily as a driver of economic inactivity risks oversimplifying the complex factors affecting disabled people’s participation in the labour market. A significant number of AdviceUK’s members are DDPOs. Many of the staff at these organisations rely on PIP themselves to remain in work and continue delivering support to disabled people in their communities. Therefore, it is evident that PIP is often directly responsible for the employment of disabled people.

²¹ AdviceUK member case study, available upon request.

²² Ibid.

²³ Ibid.

²⁴ Ibid.

²⁵ Ibid.

²⁶ AdviceUK member case study, available upon request.

²⁷ Ibid.

²⁸ Ibid.

²⁹ Ibid.

³⁰ DWP, [Pathways to Work: Evidence pack: Chapter 2 reforming the structure](#), 30 October 2025.

4. Conclusion

The Timms Review should recommend that any reforms to PIP are co-designed with the free and independent advice sector, and the people they support. This is because advice services have extensive knowledge of welfare benefits, being the largest area of work undertaken by our members. PIP represents a substantial proportion of welfare benefits casework. The evidence that has informed our response is derived from PIP data and casework from our members. This evidence illustrates that any changes to PIP, particularly if they involve restrictions to eligibility, are likely to increase demand at already overstretched services. The Government must set out how advice services will be supported if any reforms are taken forward. Furthermore, a considerable number of AdviceUK's members are DDPOs, which themselves have staff that rely on PIP to support vulnerable people in their communities. The Government will need to co-design changes to PIP with the advisers who rely upon it to work.

Our members are clear that the purpose of PIP should be to help meet the extra costs of disability and long-term ill health, and to support independence. They also tell us that the current system is overly complex and stressful for claimants and advisers to navigate. AdviceUK supports reforms that improve the accessibility, fairness and administration of PIP, including clearer communication, simpler application processes and greater recognition of fluctuating and invisible conditions. However, reform must not come at the expense of access to support.

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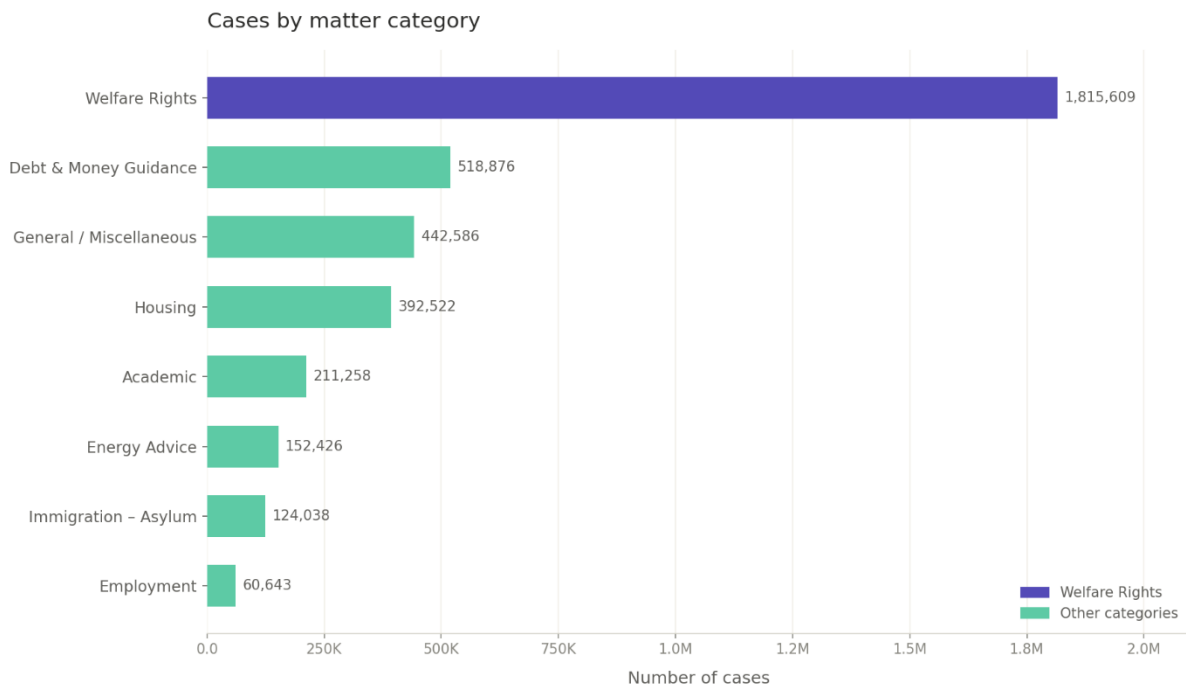
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Appendices

Annex A.



Annex B.

PIP as a share of Welfare Rights & Benefits
Apr 2022 - Mar 2026

