

PIP Reforms in the Universal Credit and Personal Independence Payment Bill

This briefing sets out the Spinal Injuries Association's analysis of Clause 5 of the Universal Credit and Personal Independence Payment Bill, with a focus on its implications for people with spinal cord injury (SCI), and women in particular. It also provides recommendations for amendment and highlights areas of concern regarding compliance with the Equality Act 2010.

The Irreversible and Long-Term Nature of Spinal Cord Injury

Spinal cord injury is a life changing and permanent condition. The support structures that surround individuals following injury, particularly through welfare support, are vital to enable mobility, independence, vocational and employment activity, mental wellbeing, and ultimately, physical health. Without sufficient support, SCI individuals face severe limitations on their ability to manage daily living tasks, access employment, and participate fully in society.

Summary of Clause 5: PIP Eligibility Changes

Clause 5 revises the eligibility criteria for the daily living component of Personal Independence Payment (PIP). Under the new system, to qualify for the standard or enhanced daily living component, a claimant must receive at least 4 points from a single activity. This replaces the existing system, where points can be accumulated across multiple areas of need.

Impact on People with Spinal Cord Injury and Others with Long-Term Conditions

- Individuals with SCI often experience multiple moderate needs across a range of daily living activities. This change is likely to strip support from individuals who need help in several areas of daily life, such as preparing food, dressing, managing hygiene, or toileting.
- The new threshold means that someone who scores 2 points in four different activities would no longer qualify despite clearly needing support.
- These combined challenges are particularly common among people with spinal cord injury and other long-term conditions. This change risks removing vital support from individuals who rely on it to maintain independence and dignity.
- Many will no longer be able to afford necessities, pay for accessible equipment including wheelchairs, the costs of which are not fully met by the NHS, and not be able to employ carers for their daily, sometimes 24/7 care that is needed.
- Research by the Disability Benefits Consortium (DBC), a network of over 100 organisations, has shown that:
 - 84% of disabled people say PIP helps them stay independent.
 - 70% say it helps them manage their health better.
 - Almost half (45%) say that without PIP, they would be unable to work.
 - 1 in 3 say they would have to go into hospital or residential care without it.

Specific and Disproportionate Impact on Women with Spinal Cord Injury

- The revised criteria fail to consider gender-specific care needs.
- Key areas such as menstruation, continence, and intimate hygiene are absent from the assessment framework.
- This gender-blind policy design poses a serious risk of indirect discrimination under Section 19 of the Equality Act 2010 and fails to uphold the Public Sector Equality Duty (Section 149).

Legal and Equality Considerations

The proposed changes risk breaching

- Section 19, Equality Act 2010 – Indirect Discrimination.
- Section 149, Equality Act 2010 – Public Sector Equality Duty.
- This is also particularly relevant for women with SCI whose dignity and independence are reliant on support for menstruation, hygiene, and continence care.

Systemic Risks to Health and Social Care

At a time when the NHS and continuing healthcare systems are already under extreme pressure, withdrawing or limiting support to people with SCI and other permanent disabilities will exacerbate system failures. There have already been unavoidably tragic deaths linked to failings in continuing healthcare. Reducing support under PIP will accelerate health deterioration, increase hospital re-admissions, and create further strain on an already overstretched health and care infrastructure.

Poverty and Economic Insecurity

According to the Government's own impact assessments, the proposed welfare changes will push at least 700,000 people into poverty. Many of these individuals are disabled, chronically ill, or caring for others who are. For people with SCI, poverty does not simply mean reduced spending power; it means reduced access to mobility aids, personal assistance, and essentials like continence supplies or home adaptations.

Recommended Amendments

- Amend the scoring mechanism to allow claimants who have a life-long condition like spinal cord injury to aggregate points across multiple daily living activities. Require the explicit inclusion of menstruation, continence, and hygiene needs in the PIP assessment framework.
- Extend transitional protections to all current and new claimants until a comprehensive Equality Impact Assessment is completed.
- Review the long-term fiscal and societal impacts of reduced welfare support on NHS resources and social care.
- Mandate regular independent reviews of the PIP criteria with disaggregated equality data.

- Introduce a requirement for annual equality reporting on the impact of PIP eligibility rules on disabled people and considering further impacts rising from intersectional disadvantages such as gender.

Conclusion

The Spinal Injuries Association urges MPs to consider the implications of these changes for some of the most vulnerable in society. Clause 5 of the Bill, if implemented without amendment, will cause lasting harm to the spinal cord injured community and other groups with permanent disabilities. It risks deepening poverty, undermining health, and exacerbating gender inequality. Without urgent and significant amendment, this Bill risks removing essential support from disabled people and compounding existing inequities.

About SIA

The Spinal Injuries Association (SIA) is the leading national charity dedicated to supporting over 105,000 individuals affected by spinal cord injury (SCI) across the UK. Our mission is to be the expert guiding voice for life after spinal cord injury, ensuring that everyone touched by SCI can lead a fulfilled life. We offer a comprehensive range of services, including a free advice line, specialist nurse support, accredited training for healthcare professionals, and a network of community groups. Through advocacy, education, and direct support, we strive to break down barriers and promote inclusion for the SCI community.

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