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**BSA - The Business Services Association**

**Response to the Department for Work and Pensions'  
Pathways to Work Green Paper Consultation**

**Monday 30<sup>th</sup> June, 2025**

**Background**

The BSA - Business Services Association - brings together organisations delivering services and infrastructure projects across the private and public sectors. Membership includes large and small businesses as well as VCSE organisations.

Our response draws on the experience of BSA members, who deliver a range of employability and health-related services at national, regional and local levels. This includes the Restart Scheme, health and disability assessments, and other related services. We would welcome a discussion with colleagues in the Department of Work and Pensions (DWP) regarding the themes raised in this paper, alongside other related topics.

A membership list is attached for reference, alongside a summary of the BSA.

**Response**

- 1. What further steps could the Department for Work and Pensions take to make sure the benefit system supports people to try work without the worry that it may affect their benefit entitlement?**

Firstly, we understand that benefits can be reinstated if an employee stops work within six months of starting work. However, this is not well understood amongst claimants, and in practice the process may not be as smooth as intended. Considering extending the period of time in which benefits can be reinstated could be a method to address this, allowing employees longer to establish stability in their employment whilst still maintaining the knowledge that benefits can be reinstated if employment stops.

Secondly, the benefits support system is set up with the expectation that most employees will work a set number of hours each work. Many jobs do not work like this, especially for those employed under zero-hour contracts or other flexible contracts. Some employees could be hesitant to agree to work more hours due to the fear of increased hours impacting their benefit allowance. Some individuals would benefit from increased support with budgeting to help them to understand the fluctuations in benefit allowance that could happen because of working more hours, in order to help them to anticipate and manage this.

Benefits are allocated to a household on the basis of the needs of individuals within that household. It could therefore be effective to develop the skills of advisors and JobCentre Plus work coaches to work with whole households rather than individuals, in certain cases. For instance, if working at National Minimum Wage, a family including 2 adults will likely need both adults to be in employment in order for employment to bring an advantage over receiving benefits.

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**2. What support do you think we could provide for those who will lose their Personal Independence Payment entitlement as a result of a new additional requirement to score at least four points on one daily living activity?**

Those who will lose their Personal Independent Payment (PIP) entitlement as a result of the new additional requirements should easily be able to access professional, effective employment support focused on both health and work, and how these two factors interact. This should be available prior to individuals' PIP entitlement being reassessed. This would support people to proactively manage their financial circumstances and consider potential appropriate employment options if they are concerned that their benefit payments may decrease or be withdrawn.

Where benefits are reduced or withdrawn, this should be actioned in a phased approach so that individuals do not have a major change in financial circumstance and income in a short period of time, and instead can gradually adjust to these changes.

There should also be a considerable amount of time and notice given before the change is implemented.

In addition, it will be important to acknowledge those currently in receipt of PIP who are in employment, including how the loss of entitlement could impact their ability to remain in employment. For instance, PIP entitlement being withdrawn could affect some people's ability to afford to travel to and from their work as PIP may be an important additional income for many claimants.

**3. How could we improve the experience of the health and care system for people who are claiming Personal Independence Payment who would lose entitlement?**

There are several ways in which the experience of the health and care system for those losing their PIP entitlement can be enhanced.

Better case management is needed as the individual navigates through the benefit and employment support system. This should aim to link individuals with appropriate local provision from day one. To facilitate this, a more effective model is needed from the point of a referral from a support conversation or other community service through the entire benefit process.

Those affected should be able to easily and efficiently access health, social care and employment support to help them to address and manage their conditions, in order to have the ability and confidence to move back into employment. This should address the several and often complex barriers that some individuals face to work in order to take a holistic approach.

Those who lose entitlement to claiming PIP should be supported through offering a complete individual review of their financial circumstances, including benefits, debts and an appropriate household budget. This will help those who may struggle to understand their financial circumstances otherwise.

**4. How could we introduce a new Unemployment Insurance, how long should it last for and what support should be provided during this time to support people to adjust to changes in their life and get back into work?**

Individuals are much more likely to return to employment if they receive support quickly. Providing appropriate employment support and wider support to those out of work at the earliest opportunity will therefore be integral.

We welcome the support conversation proposed in the Green Paper. We expand upon this point in our answer to Question 6.



**5. What practical steps could we take to improve our current approach to safeguarding people who use our services?**

There are several ways in which the current approach to safeguarding service users could be enhanced.

There should be accommodations in which longer appointments may be available for, for instance, people who speak limited English.

There should also be several potential ways to communicate with service users, for instance offering phone calls or translation options for those who speak limited English, rather than communicating solely through writing.

Individuals should be supported to ensure that they understand the next steps. This could involve, as an example, allowing and encouraging individuals to be accompanied by a family member or friend at their appointments.

It would also be helpful to distinguish safeguarding from the more general duty of care to service users.

**6. How should the support conversation be designed and delivered so that it is welcomed by individuals and is effective?**

For the support conversation to have a meaningful impact, it should take place as early on in the process as possible to facilitate early intervention. There should be structured and clear objectives for both the individual and provider of the conversation.

These conversations can be held by telephone or online, or face-to-face, depending on the preference of the individual. Each individual should be aware of the various options available to them. For in-person meetings, special attention should be paid to ensure that the environment is welcoming and accessible, with options for private spaces if preferred by the individual. Support conversations should also be presented and viewed as independent from the Jobcentre in order to develop trust from those engaging.

Conversations should be supported by digitalised technology, for instance electronic appointment reminders and easy rebooking appointments to encourage engagement

All conversations should be delivered using an approach based on the individual's clinical and wider barriers to work, recognising that many barriers that people who are economically inactive face are not intrinsically linked to health. Other barriers such as transport, housing, caring responsibilities and having no qualifications, need to be considered and addressed in conjunction or separately to health factors depending on the individual's circumstances. This could also help to avoid unnecessary delivery costs by recognising that not every economically inactive individual will need clinical assessments.

The practitioner involved in the support conversation should be empowered to make a reasonable judgement about the timing and length of the next conversation, based on the initial conversation with the individual and the individual's needs. For instance, it could be appropriate to book a subsequent discussion in a longer amount of time if an individual is preparing for extensive medical treatment.

The same practitioner should be expected to book and deliver the next conversation wherever possible, so that a trusting relationship can be built between the practitioner and the individual.



When the practitioner identifies that the individual is ready for a different method of support, the practitioner should be able to make the appropriate referrals, for instance to Jobcentre Plus routine work-coach support, or to contracted provision.

**7. How should we design and deliver conversations to people who currently receive no or little contact, so that they are most effective?**

As above in the response to Question 6. We particularly emphasise the importance of addressing all needs and potential barriers to work for an individual, opportunities to utilise digitalised technology, and ensuring that the environment that a conversation occurs in is welcoming and accessible.

**8. How we should determine who is subject to a requirement only to participate in conversations, or work preparation activity rather than the stronger requirements placed on people in the Intensive Work Search regime.**

Determination should be through a combination of the judgement of the practitioner, and the self-reported abilities and support needs of the individual.

We are aware that some claimants could perceive being placed on the Intensive Work Search regime as a burden. With this in mind, there could be opportunities to reframe the Intensive Work Search regime as a gateway to receiving comprehensive support.

**9. Should we require most people to participate in a support conversation as a condition of receipt of their full benefit award or of the health element in Universal Credit?**

Support conversations should be almost universal, but exceptions should be made for those with the most significant support needs who would be unable to meaningfully engage.

**10. How should we determine which individuals or groups of individuals should be exempt from requirements?**

In cases where individuals have severe health conditions or disabilities, and may have an appointed advocate or attorney, a meeting or phone-call with the advocate or attorney could be helpful to review support and benefit changes. This could be done on an annual basis. However, for those whose conditions are very unlikely to change, the Department should consider not requiring a regular meeting, and instead signposting to channels for the advocate or attorney to access if they choose to get in contact.

**11. Should we delay access to the health element of Universal Credit within the reformed system until someone is aged 22?**

No. Young people should receive effective and timely support, which may include receiving benefits. As previously mentioned, early support and action will be imperative to supporting individuals back into employment where appropriate.

**12. Do you think 18 is the right age for young people to start claiming the adult disability benefit, Personal Independence Payment? If not, what age do you think it should be?**

All people aged 18 or over should be able to claim adult disability benefits.

**13. How can we support and ensure employers, including Small and Medium Sized Enterprises, to know what workplace adjustments they can make to help employees with a disability or health condition?**



Both national and local government can work to promote the national services such as Access to Work and Access to Work Mental Health Support Services.

SMEs should be made aware of these programmes so that they have the resources and knowledge to help employees with a disability or health condition. Resources and training should include reference to how to discuss adjustments with employees, and what could be appropriate in certain cases or examples. SMEs could also be offered training courses to help them to take on the disability confident certification.

The Government could offer loans and grants to SMEs alongside Access to Work training, and employees could be supported to ‘passport’ their adjustments between employers to ease the onboarding process for both new employers and employees.

**14. What should DWP directly fund for both employers and individuals to maximise the impact of a future Access to Work and reach as many people as possible?**

The Government should clearly state what is fundable under Access to Work.

There could be opportunities to establish a helpline to answer questions and support both employers and employees in their discussions about workplace adjustments. This could support all involved through the process of discussing what adjustments may be needed and help to improve the experience for both employers and employees when adjustments and health conditions.

If good quality discussions can be encouraged and facilitated, there may be scope to reduce the need for on-site Access to Work assessments or the funding of adjustments. It is however crucial that, in addition to finding solutions which may reduce the current workload, funding for Access to Work is sufficiently bolstered to ensure that the programme is able to achieve the wider policy objectives set out in this paper.

**15. What do you think the future role and design of Access to Work should be?**

Both the Department and employers should continue to raise awareness on Access to Work and workplace adjustment. This should include emphasising the positive outcomes of Access to Work, including to help to encourage employees into long-term, sustainable work at their organisation.

To improve engagement and transparency, Access to Work should clearly and promptly state what adjustments employers may need to pay for.

Having one Access to Work service, to cover all aspects of support, could be more effective than separating mental health support and other forms of support, especially when considering that some mental and physical health conditions may interact with each other and could be difficult to separate entirely.

There could be opportunities to ‘passport’ the support and work adjustments that an individual has received between different employers. This could facilitate an efficient start to work, alongside helping to identify cases in which a rapid reassessment of needs would be required if a new employment necessitates markedly different adjustments.

There are also opportunities for digital technology and data advancements to speed up the processing of Access to Work, which could mark a positive change for both employers and employees. For instance, suppliers have to email encrypted individual records back and forth to the Department using the Access to Work service, which can delay the implementation of workplace adjustments. Digital and data advancements and modernisation within the systems used could help to significantly speed up this process.



Technology can also help to support effective case management, including through data sharing between departments and agencies involved in an individual's case to facilitate more holistic and integrated support. AI and other new technologies could also help to identify the main barriers to employment and can help to fast-track a response to these. Any data sharing will need to take into account concerns around confidentiality.

A single online portal with rapid access to referral information and basic online support could also support those waiting for the outcome of their Access to Work or benefit claims.

Gaps in current support should also be identified to allow the Department and the service provider to stimulate innovation. Signalling these needs to the market could then lead to the development of cost-effective alternative solutions, for instance those utilising advanced technologies such as AI.

Accessible and remote Access to Work support could also help a wider group of disabled people that may not be currently engaging with support.

In addition, Access to Work could be made more sustainable by exploring models to align the Access to Work and support conversation process and wider employability provision. This could avoid duplication of support, create a more holistic and integrated approach, and encourage earlier intervention.

**16. How can we better define and utilise the various roles of Access to Work, the Health and Safety Executive, Advisory, Conciliation and Arbitration Service and the Equalities and Human Rights Commission to achieve a cultural shift in employer awareness and action on workplace adjustments?**

Employer awareness and action on workplace adjustments could be enhanced by encouraging further accountability for both employers and employees to engage in discussions about workplace adjustments. There could be opportunities to posit Access to Work as being able to support employees in their performance, productivity, safety and wellbeing.

Case studies should be publicised to support this cultural shift, alongside promotion of awards for good practice in order to raise awareness and celebrate the successes of the scheme. There may be additional opportunities to encourage employers to engage with workplace adjustments, such as potential tax breaks for workplace health and wellbeing support.

The Government should also build awareness that Access to Work can contribute to some cost adjustments for some businesses. This is important to address potential barriers to having open discussions about workplace adjustments.

**17. What should be the future delivery model for the future of Access to Work?**

The foundations underpinning future programmes should be based on previous programmes that operated at scale, such as the JETS and the Work and Health Programme. Government should shape an employment and skills landscape that utilises the potential of both national and local provision, crowding in expertise across the public, private and voluntary sectors.

Any changes should be aligned to wider Departmental and Government planning on both nationally and locally commissioned employment and skills support. It will be crucial to roll support out as soon as possible, both to support those who need it and to reduce the occurrence of experienced employment advisers leaving the sector due to a lack of work opportunities.



## Business Services Association

### Who We Are:

The Business Services Association (BSA) is a policy and research organisation. We are here to represent all those who are interested in delivering efficient, flexible, and cost-effective service and infrastructure projects across the private and public sectors. We are based in the United Kingdom and hold meetings and events throughout the country.

Our members are key providers of service and infrastructure projects to the private and public sectors. Members include large and small businesses, charities, and social enterprises.

### What We Do:

We provide a forum for service providers to come together to discuss issues of common interest. We also have a wide-ranging policy programme which can be broken down into three interconnected core themes: inform, advocate, and engage.

### How We Do It:

#### Inform

We ensure that our members are kept up to date with government policy and wider market trends, whilst also keeping government informed on the issues affecting the sector. This includes producing daily, weekly, and monthly political and media monitoring reports for members; conducting our monthly Economic Tracker survey and sharing the insights with relevant stakeholders across central, devolved, and local government; and arranging briefing sessions and meetings with officials on pertinent policy areas.

#### Advocate

We champion the good work the sector does by collating case studies and producing reports that highlight the sector's contributions to the UK economy. It also involves working collaboratively and constructively with policy makers on key policy areas for the sector such as procurement reform.

#### Engage

We arrange regular engagement opportunities to promote positive relationships between the sector and key stakeholders. This ranges from holding roundtables with government ministers and prominent members of the opposition, to arranging large summits that bring together over 100 members and stakeholders to discuss a specific theme. Recent examples include summits on Digital Skills and the transition to Net Zero.

### Why We Do It:

Our sector lies at the very heart of the UK economy. Service and infrastructure providers are key innovators and growth facilitators, spearheading our transition to a green and digital economy, and operating throughout both the public and private sectors. The sector also invests in providing high quality administrative services, facilities management, infrastructure, and IT so other businesses can do what they do best.

It is therefore crucial that the sector's voice is heard and its good work recognised.



## List of BSA Members, June 2025

3C3 Ltd	GoodPeople
4Merit	HP
AECOM	HPO Technologies
AKG	IBM
Amey Plc	Ingeus
Aramark	ISS UK
Arcadis LLP	Kier Group Plc
Arcus FM	KPMG
ArvatoConnect	Laing O'Rourke
AtkinsRéalis	Mace
Atos	Maximus UK Ltd
AutogenAI	McLaughlin & Harvey
Baachu	Medallia
Balfour Beatty Plc	Mitie
Barclays Corporate	MTC
Bellrock	NatWest
Bevan Brittan LLP	NCG
Birkin Group	Oxfordshire Business Consultancy Ltd
Browne Jacobson LLP	P3
BT Group Plc	Pinsent Masons LLP
Business 2 Business	Public Digital
Capita Plc	Reed in Partnership
Catch 22	Robertson FM
CGI	Royal Voluntary Service
City FM	Seetec Group Ltd
Clyde & Co LLP	Serco Group Plc
CMS Cameron McKenna Nabarro Olswang LLP	Sharpe Pritchard LLP
Compass Group Plc	Sodexo Ltd
Connections Consulting	Sopra Steria Ltd
Costain	Space Solutions
Deloitte	The Grichan Whitestone Partnership
DWF LLP	The Growth Company
Ecolog International	The Palladium Group
Elior UK Ltd	The Shaw Trust
Equans	The Sustainability Group
Eric Wright FM	Turley
FedCap	Twin UK
Forvis Mazars LLP	VINCI Facilities
Fujitsu UK	VPS Group
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