

“Nothing is going to change”

Removing unnecessary PIP reassessments for people with a learning disability



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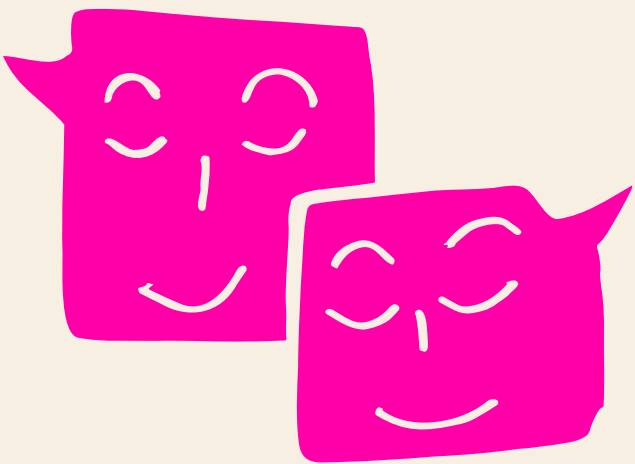


“ In the past I have filled in the pages long form for my son James and have sourced the supporting information having to write down the most personal of information. The Personal Independence Payment (PIP) reassessment process is exhausting, degrading and soul-destroying but it's important to relay so you have to do it. The problem we always had is that the questions were always worded in a way that shows learning disabilities were and still are not fully understood by the Department for Work and Pensions (DWP) so very often the decision of the awards the DWP make regarding learning disabilities are inadequate.

James was granted the enhanced rate for daily living component and mobility. He has now been awarded an ongoing lifelong award so I hope that we will not have to do another assessment for James soon because it makes me feel physically sick when I have to constantly go over questions for James who has severe learning disabilities, autism, global delay, pica, and epilepsy and needs twenty four hour care seven days a week at all times. For the above reasons I think people who have learning disabilities should be exempt from regular reassessments." - Jane, mom of James

MENCAP

Mencap’s vision is for the UK to be the best place in the world for people with a learning disability to live life to the full. We do this by supporting the 1.5 million people with a learning disability in the UK and their families.



LEARNING DISABILITY

A learning disability is a reduced intellectual ability and resulting difficulty with everyday activities which affects someone for their whole life. It is caused when the brain is still developing (before, during or soon after birth). A learning disability, for example Down Syndrome, is different to a learning difficulty (e.g. dyslexia), mental health condition, or autism, though they can co-occur.

As a group, people with a learning disability are very diverse, and the type and degree of support needs will vary significantly from person to person. A learning disability can be mild, moderate, severe, or profound. Many people with a learning disability find everyday activities challenging; other people with a learning disability need to be fully supported in all areas of their life. With the right support and an inclusive community, people with a learning disability can thrive.

EXECUTIVE SUMMARY

Learning disability is a lifelong condition that cannot be cured and does not improve over time. Despite this, many people with a learning disability continue to receive fixed-term PIP awards. This can cause huge distress for them and their families, as well as yielding little new information and rarely altering their PIP entitlement, whilst consuming significant DWP administrative resources.

- **72%** of new PIP awards for people with a learning disability were issued for a fixed term last year, meaning they had to face repeated reassessment.¹

- On average, **798** people with a learning disability undergo a PIP reassessment every month.²

- At reassessment, their award is unlikely to change: **87%** of people with a learning disability who already received a PIP Daily Living Award and who got reassessed did not have their award changed, the highest of the top 50 health conditions in DWP data.³

- In the latest 12 months of data **£929,000** was spent on PIP award reviews for people with a learning disability only for them to maintain or increase their level of award.⁴

Regular planned award reviews serve a legitimate purpose, but they should not be applied to claimants with a lifelong condition like learning disability. The Timms Review offers an important opportunity to address these issues through reforms to the PIP reassessment process.

¹ Z2K, Prove it Again; The cost of unnecessary PIP reassessments research report, (June 2026) Z2K analysis of DWP administrative data via Stat-Xplore, PIP clearances, <https://z2k.org/wp-content/uploads/2026/06/Z2K-PIP-Reassessment-Report.pdf>
² Mencap analysis of Stat-Xplore PIP Award Review Clearances, latest 12 months available (July 2026)
³ Mencap analysis of Stat-Xplore data, PIP Award Review Clearances, previous 12 months. Top 50 based on volume of reassessments in the past 12 months.
⁴ Mencap analysis of FOI and latest 12 months Stat Xplore data

MENCAP’S ASKS:

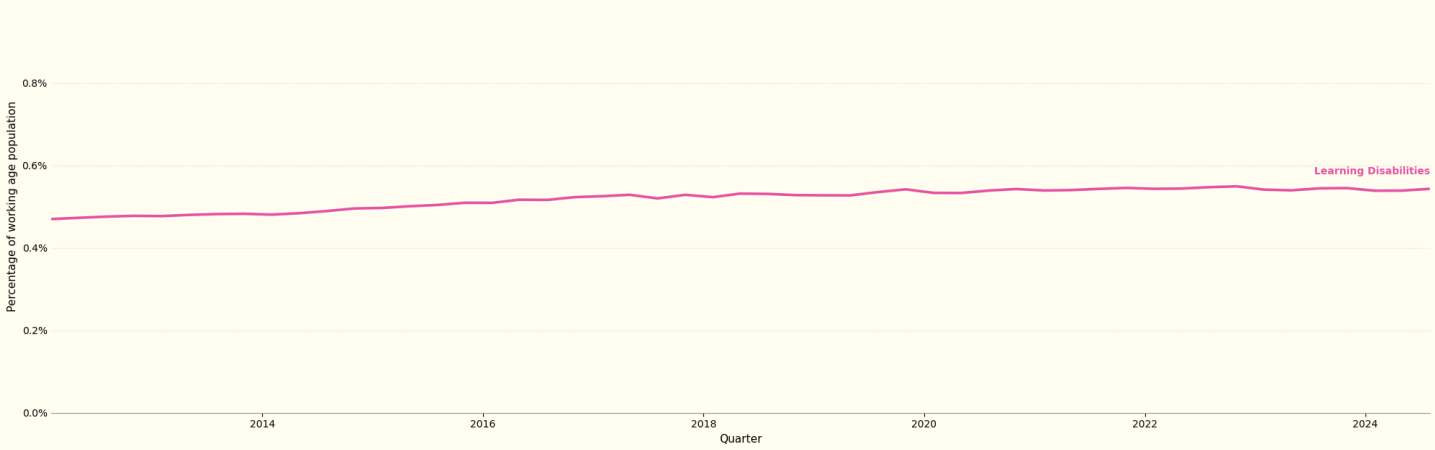
1. Introduce genuinely indefinite awards for people with a learning disability aligned with the ADP model. At the very least, claimants whose primary disabling condition is a learning disability should ordinarily receive an ongoing PIP award, rather than a fixed-term award subject to regular reassessment.
2. Any PIP award reviews should focus on the extent to which the claimant’s needs have changed since the previous assessment, instead of requiring them to effectively repeat the full PIP assessment process from scratch.
3. DWP should review the decision to only apply their improved reassessment frequency policy to over-25s and should publish a more comprehensive Equality Impact Assessment.
4. Any reviews involving claimants with a learning disability should be handled by staff who have received specialist training on learning disability.

INTRODUCTION

PIP plays a critical role in supporting more than 170,000 people with a learning disability to live with dignity and autonomy. Our research last year showed that PIP helps people with a learning disability and their families manage the myriad and unavoidable extra costs of their learning disability; from necessities like specialised food, clothing, and bedding; to mobility equipment, sensory aids, therapeutic interventions, and personalised care.⁵ Crucially, PIP is not a means-tested benefit and is awarded to disabled people regardless of whether they are in or out of work. The rate of fraud in PIP claims is low, at 1.4%.⁶

The graph below of DWP data shows that the prevalence of PIP recipients with a learning disability has remained steady over the last 10 years

Prevalence of PIP/DLA receipt in the working age population, England and Wales learning disabilities as primary condition, Feb 2012 to Aug 2024



Prior to PIP’s introduction in 2013, Disability Living Allowance (DLA) was the main disability benefit for working age adults. DWP could review whether a claimant’s award was correct at any time, but there was no established process for the routine reassessment of whether PIP awards continued to reflect claimants’ circumstances. Instead, PIP introduced a process of scheduled reassessments to confirm claimants’ eligibility. PIP can be granted as a fixed-term award (for a specific period, for example 3 or 5 years, after which DWP review a claimant’s circumstances) or an indefinite award, which are in practice ‘ongoing’ awards (given when a condition or disability is expected to remain the same or worsen; claimants normally receive a “light-touch” review after about 10 years.) Under the current system, PIP claimants can still request a review before the end of their award period if their circumstances change.

People with a learning disability have consistently highlighted to us that they are subject to significant levels of PIP reassessment, even though their support needs and resultant extra costs are unlikely to change. They find reassessments time-consuming, adversarial and stressful and do not see a clear rationale for regular reviews of their cases.

These issues came to the fore during the 2025 benefit reform proposals in the Pathways to Work Green Paper which noted that the government ‘*still hears that people with lifelong and progressive conditions are concerned they are being put through unnecessary repeated assessments.*’⁷ These reforms ultimately resulted in the Universal Credit Act and the establishment of the co-produced Timms Review, which offers a vital chance to finally get PIP right for disabled people. As noted in the Timms Review interim report, Call for Evidence respondents reported widespread concern that claimants whose conditions are unlikely to improve are repeatedly required to prove their needs through stressful and burdensome review processes.⁸

Informed by analysis of government administrative data, Freedom of Information requests, insights from Mencap’s Policy Shaper group and participants from our 2025 PIP research and our 2026 PIP workshops, this policy paper examines the existing reassessment system and sets out recommendations for how the Timms Review should reform it.

⁵ Cordis Bright, Research study on the extra costs of living with a learning disability, (May 2025) https://www.mencap.org.uk/sites/default/files/2025-05/Extra%20costs%20of%20learning%20disability_Final.pdf
⁶ GOV.UK, Fraud and error in the benefit system financial year ending 2026 estimates, (May 2026) <https://www.gov.uk/government/statistics/fraud-and-error-in-the-benefit-system-financial-year-ending-fye-2026-estimates/fraud-and-error-in-the-benefit-system-financial-year-ending-fye-2026-estimates>
⁷ DWP, Pathways to Work: Reforming Benefits and Support to Get Britain Working green paper consultation response, (March 2025) <https://www.gov.uk/government/consultations/pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper/pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper>
⁸ DWP, The Timms Review of Personal Independence Payment interim report, (July 2026) <https://www.gov.uk/government/publications/timms-review-of-personal-independence-payment-interim-report/the-timms-review-of-personal-independence-payment-interim-report>

THE CURRENT PIP REASSESSMENT SYSTEM

Currently many people with a learning disability are trapped in a cycle of unnecessary repeated reassessments that are unlikely to lead to any meaningful change in entitlement, but which cause them significant levels of distress. These challenges are compounded by poor-quality decision making, which can lead to incorrect outcomes, avoidable appeals and further costs to both claimants and DWP, undermining confidence in the current approach.

“The PIP reassessment and award review system is failing people with a learning disability and their families. It is forcing frightening and unnecessary processes onto people who often struggle with form filling, may not have recent medical evidence (as nothing will have changed since their diagnosis, often many years ago), and who struggle to get heard and understood due to inaccessible systems. Families also tell us that the DWP confuse learning disability with learning difficulties, and with autism, and that assessors do not appear to understand the challenges that people with a learning disability may face.”

- Mencap helpline manager

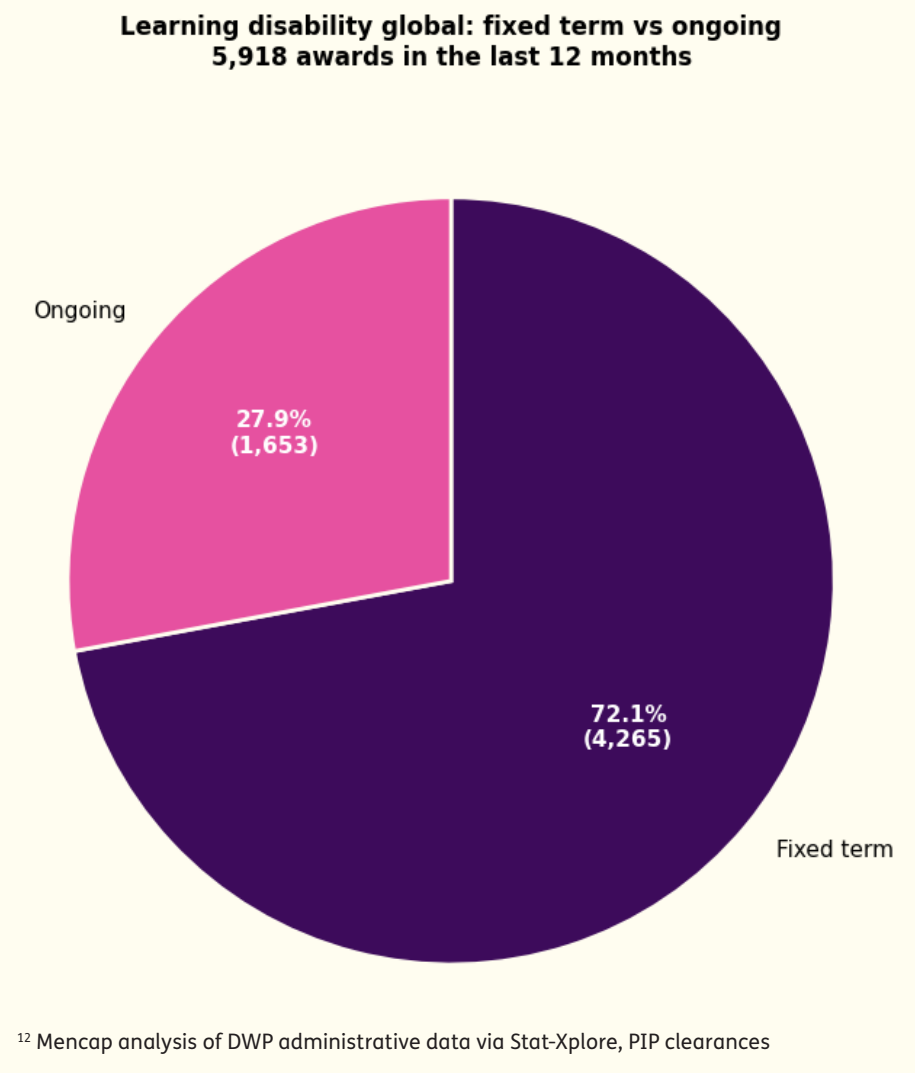
CHANGES TO PIP REASSESSMENT FREQUENCY

At the 2025 Autumn Budget, the Government announced changes to the frequency of PIP reassessments. From April 2026 they introduced a minimum award length of 3 years for people making a new PIP claim over the age of 25; for people going through reassessment this increases to 5 years. This welcome change was introduced to help reduce the reassessment backlog and ensure the PIP assessment system doesn’t “fall over” as outlined by the Social Security Advisory Committee.⁹ However, the fundamental problem remains that a high volume of PIP award reviews will continue to be undertaken despite delivering limited value for claimants or the wider social security system.

UNDER UTILISATION OF ONGOING PIP AWARDS

Whilst fixed term awards are the default award for PIP, DWP guidance states that ongoing awards should also be used for claimants that meet a criterion that include “very stable needs which are unlikely to change over time, or high level needs which will either stay the same or get worse”.¹⁰ Ongoing awards are intended to reduce unnecessary reassessments for people with lifelong and stable conditions, whilst still allowing DWP to carry out a light-touch review after around 10 years. Such reviews are considerably less intensive than a standard reassessment; they involve a short 6-page form that asks a few high-level questions about whether the claimant’s health conditions or needs have changed, rather than a full reassessment of their entitlement.

Use of ongoing awards is low; in 2025, only 6.9% of all new PIP awards were granted an ongoing award, despite many claimants having conditions that are lifelong and unlikely to improve.¹¹ Even amongst people with a learning disability, 72% of new awards were issued for a fixed term last year.¹² The current framework used to determine PIP award length relies heavily on the judgement of individual healthcare professionals and decision-makers. In practice, this may encourage a cautious approach in which fixed-term awards are granted even where a claimant’s condition is permanent and unlikely to change. It also indicates a gap between policy and practice where many people with lifelong and stable conditions continue to face perpetual PIP review, even where there is limited reason to expect a different outcome from previous award review decisions.



LENGTHY PROCESS

People with a learning disability and their families also tell us the current reassessment process is protracted and complex. The average wait for a PIP review to be completed is 38 weeks, meaning many claimants spend months in uncertainty about their entitlement.¹³ During this period, individuals may have to respond to requests for further information, engage with assessment

providers and repeatedly seek updates on the progress of their claim. For people with a learning disability, these administrative requirements can present specific accessibility barriers, often requiring significant support from family members, carers or advocacy organisations. This adds to a process that already leads to a higher administrative burden for people with a learning disability, as noted in the Timms Review interim report.

⁹ Social Security Advisory Committee, Minutes of the meeting held on 4th March 2026, <https://www.gov.uk/government/publications/social-security-advisory-committee-minutes-of-meetings-in-2026/minutes-of-the-meeting-held-on-4-march>
¹⁰ DWP, Guidance: PIP handbook, <https://www.gov.uk/government/publications/personal-independence-payment-fact-sheets/pip-handbook>
Z2K, Prove it Again; The cost of unnecessary PIP reassessments research report, (June 2026)
¹¹ Z2K analysis of DWP administrative data via Stat-Xplore, PIP clearances, <https://z2k.org/wp-content/uploads/2026/06/Z2K-PIP-Reassessment-Report.pdf>
¹² Mencap analysis of DWP administrative data via Stat-Xplore, PIP clearances
¹³ Trussell, Making PIP work; Six reforms to build security, remove fear and reduce hardship. (May 2026) https://cms.trussell.org.uk/sites/default/files/2026-07/making_pip_work.pdf

POOR DECISION-MAKING

The current system is also dogged by high levels of inaccurate decision making. The PIP award review form (AR1) is 25 pages long and closely mirrors the initial PIP claim form (PIP2). It requires claimants to provide detailed information about how their condition affects them across all 12 PIP assessment activities, and there is no structured pathway for claimants to simply share if their support needs have meaningfully altered since their last PIP assessment. Instead, healthcare professionals use the same reporting framework for both new PIP claims and PIP review cases, effectively meaning that claimants and healthcare professionals revisit the full PIP assessment process from scratch during an award review, rather than focusing on whether a claimant’s circumstances have changed since their previous assessment.

By inviting a fresh consideration of entitlement each time, the scope for misunderstanding and error increases. Claimants with unchanged circumstances can receive different award outcomes because of variations in evidence gathering, assessor judgement or decision-making, particularly where previous evidence and findings are not given sufficient weight.

Poor decision-making also contributes to the low levels of trust in the department which is evident in the DWP’s own research which has consistently found that disabled people experience PIP assessment as an adversarial process.¹⁴

When PIP entitlement is wrongly reduced or removed following award review despite no material change in the claimant’s circumstances it can have a profound impact on people with a learning disability and their ability to manage their extra costs and afford their essentials. Even if decisions

are ultimately rectified on appeal, people with a learning disability and their families still have to face periods without the money they are entitled to, which can increase their risk of material hardship.

A COSTLY AND INEFFICIENT WIDER SYSTEM

PIP award reviews are often justified as a mechanism for controlling PIP expenditure. However, in reality they risk generating administrative costs without corresponding policy benefits by diverting time and resources of the DWP, healthcare professionals and assessment providers. Findings from Z2K research show that most planned award reviews do not result in any change to entitlement; in 2025, 526,072 planned award reviews (74% of all such reviews completed) resulted in awards being maintained at the same level as prior to the review.¹⁵

Our analysis shows that the latest 12 months of data an estimated £929,000 was spent on award reviews for people with a learning disability only for them to maintain or increase their level of award.¹⁶

This suggests that the current system is inefficient, requiring significant resources whilst delivering limited savings.



PEN PORTRAIT: SARAH

Sarah is 34. Although she lives independently, she requires support with understanding complex information, budgeting, planning journeys and faces a range of barriers that affect her day-to-day life and create unavoidable additional costs. Sarah does not have a family member or advocate to help her navigate the benefits system. When she receives letters from DWP she often finds them difficult to understand as they are not in Easy Read.



When Sarah’s PIP award comes up for review, she is required to undergo a full reassessment. During it she struggles to explain the support she needs in her daily life and feels the assessor doesn’t understand what a learning disability is. The assessor’s report makes no reference to whether Sarah’s condition has changed, and instead seeks to fully re-assess her eligibility from scratch. DWP subsequently concludes that she is not entitled to PIP, and her award is stopped. The loss of PIP has an immediate impact on Sarah’s finances; The additional support she relies on becomes harder to afford, and she begins cutting back on her essentials. She worries constantly about money and becomes increasingly anxious about meeting her bills.

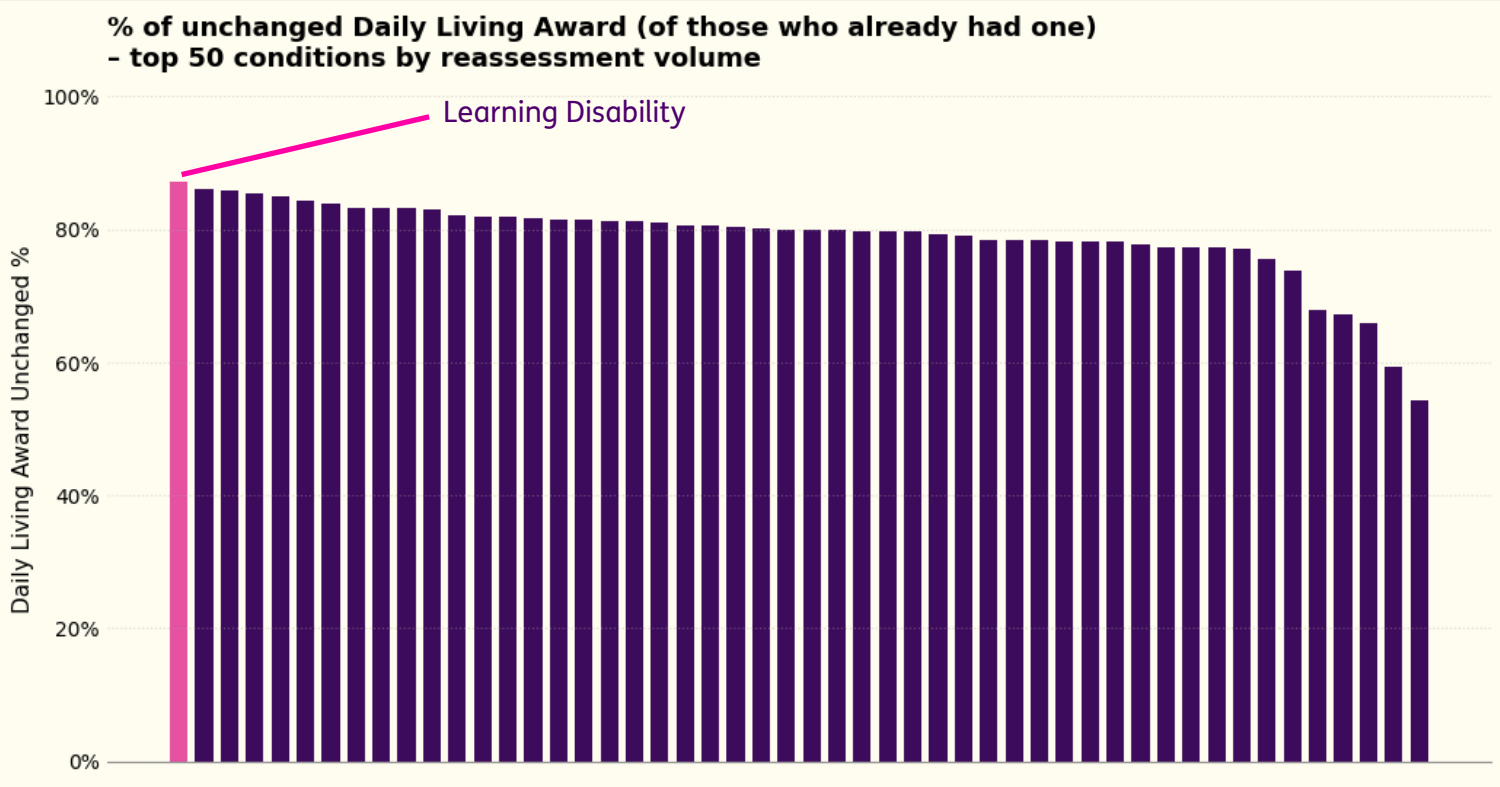
With support from a local advice service, Sarah decides to challenge the decision. The mandatory reconsideration does not change the outcome, so she appeals to an independent tribunal. 7 months later, the tribunal carefully considers the evidence and hears directly from Sarah about how her learning disability affects her daily life and how it is lifelong. The panel overturns the original decision and reinstates her PIP award. For Sarah, the appeal confirms what had been true all along: her needs had not changed and she remained entitled to support. The process, however, caused months of avoidable stress, uncertainty and financial hardship.

¹⁴ Ipsos MORI and Department for Work and Pensions, Personal Independence Payment Claimant Research: Final Report. DWP Research Report No. 963. (September 2018)
¹⁵ Z2K, Prove it Again; The cost of unnecessary PIP reassessments research report, (June 2026) Z2K analysis of DWP administrative data via Stat-Xplore, PIP clearances, <https://z2k.org/wp-content/uploads/2026/06/Z2K-PIP-Reassessment-Report.pdf>
¹⁶ Mencap analysis of FOI and latest 12 months Stat Xplore data¹⁰

UNNECESSARY REASSESSMENT OF PEOPLE WITH A LEARNING DISABILITY

A learning disability arises from brain development before birth, during birth, or in early childhood. As stated in guidance from NHS, NICE and the government’s Office for Health Improvement and Disparities, ‘in all cases, a learning disability is a lifelong condition and cannot be cured’.¹⁷ While some people with a learning disability may develop new skills if they are provided with the right support, opportunities and environment, this does not mean that the underlying cognitive impairment on which their support needs are based has fundamentally changed. In most cases, any gains in independence are not of a scale that would remove the unavoidable extra costs and barriers associated with living with a learning disability, which PIP is intended to help address. In all cases there is no clinical basis to expect recovery in the way that the PIP reassessment process assumes; instead support needs are present and stable throughout their life, meaning the underlying basis of PIP eligibility is consistent.

On average, **798** people with a learning disability undergo PIP reassessment every month.¹⁸ At reassessment, their award is unlikely to change: **87%** of people with a learning disability who already received a PIP Daily Living Award and who got reassessed did not have their award changed, the highest of the top 50 health conditions in DWP data.¹⁹



¹⁷ GOV.UK, Office for Health Improvement and Disparities, Guidance Learning Disability - Applying All Our Health, (Jan 2025) <https://www.gov.uk/government/publications/learning-disability-applying-all-our-health/learning-disabilities-applying-all-our-health>
¹⁸ Mencap analysis of Stat-Xplore PIP Award Review Clearances, latest 12 months available (July 2026)
¹⁹ Mencap analysis of Stat-Xplore data, PIP Award Review Clearances, previous 12 months. Top 50 based on volume of reassessments in the past 12 months.

PEN PORTRAIT: AMIR



Amir is 28 years old and has Down syndrome. He has significant physical health needs, requires support with all aspects of daily living, and needs continuous supervision to keep him safe. He is supported by his mother Maryam to wash, dress, prepare food, manage medication, and communicate with others. Amir’s condition is lifelong and his support needs have remained unchanged throughout adulthood.

Despite this, Amir receives PIP on a fixed-term award and is regularly required to undergo award reviews. Each time a review is due, Maryam receives forms asking her to explain once again the barriers Amir’s experiences. She must repeatedly describe the most challenging aspects of his life.

Maryam finds the process emotionally exhausting. She struggles to understand why she is repeatedly asked to prove something that has already been established many times before. The process leaves her feeling as though the system does not trust the extensive evidence that already exists. From Maryam’s perspective, common sense suggests that Amir’s circumstances are unlikely to change. Yet each review creates uncertainty about the continuation of support that is essential to his daily life. Instead of providing reassurance, the process places an additional burden on a family already managing significant caring responsibilities.

The repeated reassessment of people with a learning disability applies a model designed to assess changes in functional need, to a group whose underlying condition is lifelong and stable and for whom significant change is not expected.

Where support needs are permanent and well-evidenced, repeated reassessments simply confirm existing eligibility rather than identifying reduced need which raises important questions about their proportionality.

The consequences of repeated unnecessary reassessments can also lead to significant personal costs for people with a learning disability and their families. The DWP's own research notes the significant '*anticipatory anxiety*' that claimants experience as they '*await what they consider to be a judgement*'.²¹ This anxiety can be compounded for people with a learning disability many of whom have to navigate a system which is inaccessible to them. Crucially, people with a learning disability and their families do not experience award reviews as a neutral check or a simple administrative process; instead they tell us that the cumulative burden of repeated reassessments is perceived as a challenge or interrogation from DWP. People with a learning disability and their families also share that award reviews are tiresome, repetitious, anxiety-inducing and in the worst cases, harmful; 84.8% of our Policy Shaper respondents said they felt worried by reassessments.

Furthermore the continuation of routine reassessments for people with a learning disability appears increasingly at odds with the DWP's commitment to becoming a more trauma-informed organisation.²² A trauma-informed approach recognises the importance of minimising unnecessary distress, avoiding practices that can retraumatise individuals, and designing systems around principles of trust, choice and psychological safety. However, requiring people with a lifelong learning disability to repeatedly recount their support needs and prove their eligibility can undermine these principles.

Mencap Policy Shapers:

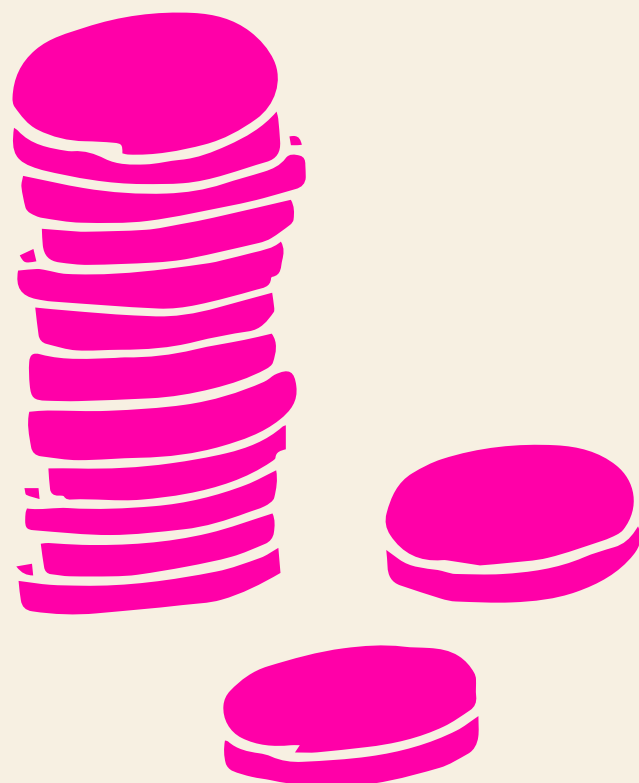
"Makes you feel like you are on trial."

"Needing to prove everything all the time...looking back, it's kind of a low level of trauma."

"It's repeating what has already been done and is a waste of time for everyone."

"I've given my life over to care for my son. Why should we live under the constant threat that a reassessment could upend all our lives?"

Reassessing this group also creates mistrust; 46% of Mencap Policy Shaper respondents believe that the DWP is trying to 'catch them out'. The rationale for repeated reassessment is unclear to families and claimants because a learning disability is lifelong. This can reinforce the belief that reviews are primarily about reducing awards rather than understanding support needs, which makes it harder to challenge mistrust and build confidence in the system.



Mencap Policy Shapers:

"A person with Down Syndrome for example is always going to have Down Syndrome, so there is zero value in reassessing"

"My daughter is palliative with a severe learning disability. Nothing is going to change. Bureaucratic nightmare"

"My son will not 'recover' from his learning disability. He will always need the level of support he needs now."

"Because their learning disability isn't going to be cured or go away; they are always going to need support."

"Pointless, time consuming & not cost effective...If nothing has changed then why should people need to go through such a drawn out stressful process, where you just repeat everything you've said before. Often the supporting letters are the same so you just submit them again & again"

Reassessments also create real risk to the financial security of disabled people. Research by Trussell indicated that for the disabled people supported by food banks in the Trussell community, the outcome of a PIP assessment is often what determines whether they can continue to afford essentials like rent, food and utilities.²³ This is echoed by people with a learning disability as incorrect reassessment decisions can lead to loss of support, interruptions to care, and knock-on impacts on housing, employment and health.

"DWP assessments give me so much anxiety. I can't sleep before. [...] I have anxiety and the assessments are very stressful for me. If I say one wrong thing, if they misunderstand me, I lose my money. Money, I need for my food and life."

"I'm concerned about reassessments. Not just for me but for others with a learning disability too. When we hear on the news about frequent reassessments for people who have PIP it's concerning... Without my parents I wouldn't know where to go, I would absolutely struggle."

- Person with a learning disability



²² DWP, Additional Support for DWP customers, (March 2024) <https://assets.publishing.service.gov.uk/media/65f2f3d3fa1851001a011727/additional-support-for-DWP-customers.pdf>

²³ Trussell, Making PIP work; Six reforms to build security, remove fear and reduce hardship. (May 2026) https://cms.trussell.org.uk/sites/default/files/2026-07/making_pip_work.pdf

WHAT NEEDS TO CHANGE?

The Timms Review is an important opportunity to address these issues through meaningful, co-produced reforms to the reassessment process

ASK: Introduce genuinely indefinite awards for people with a learning disability aligned with the ADP model. At the very least, claimants whose primary disabling condition is a learning disability should receive an ongoing PIP award instead of fixed-term.

Social Security Scotland (SSS) has committed to introducing indefinite ADP awards for disabled people whose condition is unlikely to change and who receive the enhanced rate of both the daily living and mobility components of ADP. This means that their award will not be reviewed in the future unless they say something has changed. SSS guidance also provides a non-exhaustive list of conditions which (when combined with a holistic consideration of the person’s circumstances) indicate that an indefinite award should be awarded; Fragile X syndrome, Down syndrome, and ‘Learning disability other’ are included in this list. ²⁴

The Timms Review should recommend that DWP implement a similar approach. DWP could utilise existing records of claimant’s main disabling condition which is already recorded in DWP data for statistical and administrative purposes. This information could be used to flag cases where an indefinite PIP award should typically be awarded, prompting decision makers to justify any departure from the presumption rather than requiring claimants to effectively have to demonstrate why they should not be reassessed regularly.

This would give claimants greater certainty about how lifelong conditions like learning disability will be treated within the PIP system, when there is no reasonable prospect of support needs reducing to the extent that PIP entitlement would change. It would also align with the DWP’s commitment to trauma-informed services and would reduce the volume of routine award reviews that result in no change to entitlement, improving DWP administrative efficiency.

Failing this, at the very least the Timms Review should recommend that DWP introduce a clearer basis for making ongoing PIP awards for people with a learning disability which uses a similar approach.

ASK: DWP should use a light-touch form which focuses on the extent to which the claimant’s needs have changed since the previous assessment.

Any award reviews that do occur should be proportionate and focus on whether a claimant’s needs have changed since their previous assessment, rather than requiring entitlement to be reconsidered in full each time. Review forms should ask claimants to identify any changes in their condition, daily living needs, mobility, support arrangements or relevant circumstances. This would allow the review process to concentrate on new information rather than requiring claimants to repeat evidence that has already been provided and accepted. By focusing attention on what has changed, rather than reconsidering all aspects of entitlement from the beginning, decision makers would be better able to identify genuine changes in functional need. This would reduce the risk of inconsistent decisions arising simply because a different assessor or decision maker has interpreted the same circumstances differently. It would also make more effective use of the information already held by DWP, rather than repeatedly collecting and reassessing evidence that has not materially changed.

Once again, ADP provides a useful example of how a better review process can operate in practice. Their award reviews often use information that is already held by SSS, reducing the reassessment burden on claimants. Analysis by the Resolution Foundation found that as of Summer 2025 there was only a 2% gap in the proportion of ADP and PIP awards reduced or removed following review, suggesting that comparable award outcomes are achievable with this significantly less burden on disabled people and the assessment system.²⁵

²⁴ Social Security Scotland, Adult Disability Payment decision-making guide, <https://www.socialsecurity.gov.scot/publications/2017/02/adult-disability-payment-decision-making-guide/pages/choosing-an-appropriate-review-period-for-adult-disability-payment/specific-conditions-and-indefinite-awards>

²⁵ Murphy, L. et al. Delivering Dignity? Early Lessons from the Introduction of Adult Disability Payment in Scotland. Resolution Foundation, December 2025. Resolution Foundation, (2005) <https://www.resolutionfoundation.org/publications/delivering-dignity/> **NOTHING IS GOING TO CHANGE** 15

ASK: DWP should review the decision to differentiate the policy for under-25s and should publish a more comprehensive Equality Impact Assessment.

Mencap welcomes the decision to extend award lengths for new PIP Claimants aged 25 and over, recognising that longer awards can reduce unnecessary reassessments and provide greater financial security for disabled people with long-term conditions. However, we are concerned that claimants under the age of 25 have been excluded from these changes.

People under 25 with a learning disability do not face fewer barriers than older counterparts and should be treated equally in the benefits system. Many face substantial and lifelong barriers to employment, independent living and social participation that do not diminish simply because of their age. In many cases, their support needs are well-established and unlikely to change significantly over time. Excluding younger claimants from longer awards risks creating an arbitrary distinction between people with similar levels of need and raises concerns about fairness and consistency within the benefits system.

We are also concerned by questions raised regarding the adequacy of the Equality Impact Assessment accompanying this policy. In a letter to Minister Timms the Social Security Advisory Committee noted that it *‘reads as a justification of the policy’* and *‘falls short of the standard by some considerable margin.’*²⁷ It is essential that Equality Impact Assessments are transparent, evidence-based and capable of informing meaningful scrutiny. DWP should publish a revised and more comprehensive assessment that clearly sets out the evidence underpinning the decision to introduce an age threshold for this policy.

ASK: Any reviews and eligibility decisions involving claimants who have a learning disability should be done by staff who have received specialist training on learning disability.

Evidence from people with a learning disability and their families suggests that many incorrect PIP decisions arise from a lack of understanding of how learning disability affects an individual’s day-to-day life. Assessments and reviews often fail to take account of a person’s lifelong support needs, reliance on prompts, supervision, and assistance, or the barriers they face in communicating their needs.

Many people with a learning disability may need support to understand complex questions, provide detailed examples, or challenge inaccuracies in assessment reports. Without appropriate understanding, decision-makers may incorrectly interpret limited responses as evidence of independence, leading to poor-quality decisions following reassessment. Staff responsible for assessments and any reviews should receive learning disability specific training, such as the Oliver McGowan Mandatory Training to help them better understand what a learning disability is and the barriers that may impact how claimants communicate their support needs.

This would also improve the accuracy and consistency of decisions, reduce the number of avoidable appeals and mandatory reconsiderations, and help build trust in the benefits system among people with a learning disability and their families. It would also support a more person-centred approach, ensuring that entitlement decisions are based on a full understanding of an individual’s needs and circumstances.



CONCLUSION

The Timms Review’s commitment to co-production provides an opportunity to ensure that the voices of people with a learning disability are at the centre of decisions about any reform to the reassessment process.

Despite learning disability being a permanent condition with stable and enduring support needs, most claimants still receive fixed-term awards and are required to undergo repeated reviews that are unlikely to identify any meaningful reduction in need. This creates unnecessary stress for claimants and families and diverts DWP resources.

The changes outlined in this paper would represent a bold but practical reform. It would not require a fundamental redesign of PIP or the removal of existing safeguards. Instead, it would build on information that DWP already holds and better align the system with the realities of lifelong

disability, whilst reducing variation in award lengths and provide claimants with greater certainty about how their needs will be treated within the PIP system.

Ultimately, a social security system that repeatedly asks people with lifelong conditions to prove needs that are unlikely to change risks undermining trust and confidence. A more proportionate approach, designed with people with a learning disability, would help create a significantly improved PIP system that is far more dignified.



²⁶ Independent, DWP criticised for PIP changes excluding young people under 25, (May 2026) <https://www.independent.co.uk/news/uk/home-news/dwp-pip-changes-award-reviews-assessments-25-b2977489.html>

²⁷ Social Security Advisory Committee, Minutes of the meeting held on 4th March 2026, <https://www.gov.uk/government/publications/social-security-advisory-committee-minutes-of-meetings-in-2026/minutes-of-the-meeting-held-on-4-march>



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