

Department for Work and Pensions – Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper
Response from Propertymark
April 2025

Background

1. Propertymark is the UK's leading professional body for estate and letting agents, property inventory service providers, commercial agents, auctioneers and valuers, comprising over 18,500 members representing over 12,800 branches. We are member-led with a Board which is made up of practicing agents and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development.

Overview

2. This consultation sets out plans and proposals to reform health and disability benefits and employment support. This Green Paper is an important staging post on a journey of reform, building on the vision and approach set out in the Get Britain Working White Paper in November 2024. It sets out our vision, strategy and proposals for change.
3. In September 2024, Propertymark published a position paper on, Improving access to the Private Rented Sector for welfare-dependent tenants¹. The policy positions within our paper may improve access to the private rented sector and could support the government's plans to incentive benefits as a route into employment.

Questions

Reforming the structure of the health and disability benefits system

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?

4. Propertymark welcomes the proposed steps to make sure the benefit system supports people to try work without the worry that it may affect their benefit entitlement. We think that these proposals may support vulnerable people renting in the Private Rented Sector (PRS) avoid unnecessary rent arrears and improve access to the PRS. We particularly welcome the call to no longer ask people to demonstrate incapacity to work to receive financial help for a health condition or disability, by scrapping the work capability assessment. Equally, we are supportive of further proposals to remove barriers to trying work.
5. However, we think that housing is a critical mass. Without adequate housing, individuals and their families will experience further barriers to work, they will not have sufficient

¹ [Improving access to the PRS for welfare-dependent tenants | Propertymark](#)

opportunities to engage in training and education and lack of access to housing could be further to the detriment of their health.

6. While we support the UK Government's ambition to use welfare reform as a way of removing barriers to work, we are renewing our call for the UK Government to also consider welfare reform to improve housing options. We further welcome the UK Government's pledge to build 1.5 million mainly affordable and social homes across England.² However, given the chronic shortage of housing, the private rented sector will continue to house many vulnerable people.
7. Accordingly, we think the UK Government should consider the following options to give people further opportunities to engage in work:
 - Set the Local Housing Alliance (LHA) level at the thirtieth percentile and annually top this up to keep up with market rents. When the public finances improve, the UK Government should consider setting rates at the fiftieth percentile.
 - Young people have been especially hard hit from employment opportunities since the pandemic. The Shared Accommodation Rate (SAR) should be suspended to support young people under 35 to secure tenures in the Private Rented Sector.
 - Universal Credit (UC) supports many people seeking work and the low paid. UC should be reformed by removing the five-week waiting time for initial payment, converting advance payments into grants from loans and giving tenants the option of their rent being paid directly to private landlords rather than factors being considered by DWP staff.

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 4 points on one daily living activity?

8. Firstly, we strongly recommend that any claimants that lose their entitlement from Personal Independence Payments (PIP), should receive a phased reduction or temporary continuation of payments for those who would lose eligibility under the new rule. With the continued cost of living crisis impacting many people not to mention the increase in energy costs, to have a sudden loss of income could be critical for a great many people who may need additional time to adjust to the loss of the benefit.
9. Secondly, support should be provided to help individuals understand if they are eligible for any other benefits following the loss or decrease in PIP. There could be a role for the DWP in communicating benefit entitlements to professional property agents and landlords to support them highlight alternatives for their tenants.
10. We think that there is not a level playing field between the support provided for tenants renting in private rented sector housing compared to those who rent from a Registered Social

² [Planning overhaul to reach 1.5 million new homes - GOV.UK](https://www.gov.uk/government/consultations/planning-overhaul-to-reach-1-5-million-new-homes)

Landlord (RSL). Many RSLs are able to support their tenants with additional support such as offering tailored support for those who might be able and want to move towards work, including training, flexible job schemes, budgeting skills or disability employment advisors. Landlords in the private rented sector do not have the capacity or often the skills to support their tenants in this capacity. While there are charities that can support both private and social tenants, relationships between landlords and these organisations have not always been positive. We would advocate that the UK Government supports local authorities in community development initiatives that work collaboratively with both social and private landlords to support their tenants into work.

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?

11. Propertymark thinks that more can be done in collaborative work between local authorities, DWP and housing providers:

- Firstly, if an individual loses their PIP entitlement, the DWP should work in partnership with local authorities to assess if any other social care needs are not being met which could further improve the health and wellbeing as well as move individuals closer to the work place. This could include referrals to occupational health professionals to assess if any improvements to their home is required through Disabled Facility Grant funding or any other local authority grants. We think this is essential as many individuals are not aware of what support is available. For example, according to the Centre for Ageing Better, the number of people aged 50 and over in private rented accommodation doubled from 1 million to 2 million, with a 54% increase between 2011 and 2021³.
- Secondly, as the supply of social homes is far outweighed by demand, more older and disabled people are living in the private rented sector in homes that may not meet their accessibility requirements. We have worked hard to promote grant funding opportunities such as the Disabled Facilities Grant to private landlords and their agents. However, there could be a role from the DWP in raising awareness especially for tenants in most need. We have also called for the Disabled Facility Grant in England to be increased from £31,000 to £36,000 to the rate in Wales, for wider promotion of its availability to landlords and property agents and to improve access to grant funding for private landlords who want to improve accessibility of their property but do not currently have a tenant in the property.
- Thirdly, we would also recommend that the DWP uses the opportunity to improve data sharing between partners, improve joint assessments with clear referral pathways. This could streamline the access to service for people who require support which would save time, revenue and ensure that people are not lost in bureaucratic systems.

³ [Homes | The State of Ageing 2023-24 | Centre for Ageing Better](#)

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?

12. We are potentially supportive of the DWP's concept behind employment insurance, which would replace New Style Employment and Support Allowance (NS ESA) and New Style Jobseeker's Allowance (NS JSA) applied at a rate set at the current higher rate of NS ESA. However, we would welcome further engagement or information on the financial impact this would have on claimants. Fundamentally, claimants should be encouraged to try and end claims as quickly as possible and to return to work. However, we believe that the proposed employment insurance should be available for as long as the claimant requires and that they should receive support to help them re-enter the job market as quickly as possible. We also think that the employment insurance should be used to ensure that individuals and families can maintain essentials such as housing costs and we would further recommend that the DWP considers direct payments of an element of the employment insurance to be paid directly to private and social landlords to ensure the longevity of housing for the claimant.

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

13. We strongly recommend that the DWP should work with private landlords and their property agents to support the most vulnerable people who access the private rented sector, providing of course their consent has been given to do so. This could include DWP allowing Propertymark registered agents with specific training, the ability to discuss their tenant's claim with a work coach if there is a problem. For example, if rent has not been paid or how they can support their tenants' specific needs.
14. Given the lack of support for private tenants compared to the social sector, we would recommend that the DWP must adopt multi-agency groups to identify and support the most vulnerable as quickly as possible before problems escalate. This should include partnership working and data sharing between local authorities support services and where appropriate private landlords and their agents to support tenants' individual needs such as mental health, social care and housing needs. Furthermore, the DWP must improve their partnership work with the third sector and local authority homelessness prevention teams to create wraparound support when benefits are taken away or delayed.

Supporting people to thrive

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

15. Following a successful campaign from Propertymark, we were pleased that the DWP PRS Engagement Forum was reestablished in November 2023 following its close during the Covid-19 pandemic. When the DWP have engaged with membership bodies that represent landlords and property agents, there have been notable improvements in systems that support claimants such as the digitalisation of the UC 47 form and improvements to managed payments systems to landlords. Given that landlords and property agents are likely to support many claimants who will be impacted by the proposed changes, we would strongly advocate that the DWP establishes bespoke engagement events for membership bodies for landlords, property agents and other housing providers.

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

16. We would recommend engaging with local authorities, tenant organisations and other third sector organisations such as the Citizens Advice Bureau. However, given the increasing number of vulnerable people who are accessing the private rented sector, we would be happy to act as a conduit in improving communication and information between the DWP and our membership.

A new baseline expectation of engagement

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?

17. Propertymark thinks that the DWP should consider individual needs, health conditions and other circumstances such as support networks and vulnerabilities before assigning an individual to an intensive job search regime. We recognise the benefits of work, and the positive impact work can have on individuals' health. However, for some this has to be developed at a pace that does not further undermine any barriers and further restrict them to work.

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?

18. Propertymark thinks that rather than making support conversations mandatory as a condition of receipt of individuals full benefit award or of their health element of Universal Credit, the DWP should adopt a more flexible approach that supports the needs of individuals. In order to not exclude groups that might be disadvantaged by mandatory support conversations such as care leavers, elderly people, people with learning disabilities and those at the highest risk of homelessness, the DWP should consider alternatives such as written resources, help lines, or peer support networks. Fundamentally, we further recognise that conversation on updates is

essential for the DWP to assess continued suitability. However, this should be delivered in a way that is compatible with the needs of certain individuals.

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

19. We would recommend that the DWP engages with medical professionals and third sector organisation that specialise in mental health and disability.

Delaying payment of the health element of Universal Credit

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

20. Propertymark recognises the disproportionate impact the Covid-19 pandemic and the continued cost of living crisis is having on young people especially in terms of housing and employment options. Accordingly, this was why we are supportive of abolishing the Shared Accommodation Rate. Equally, we recognise that a great many young people are disadvantaged by disability before the age of twenty-two due to long-term mental and physical illnesses, accidents or congenital conditions. We think that delaying access to the health element of Universal Credit until the age of twenty-two compromises the government's aims of reducing barriers to work as the current entitlement supports young people under the age of twenty-two live independent lives, access education and ultimately remove barriers to the workplace. There is also a danger that by delaying support, young individuals will be more dependent on families, could have their conditions worsened with further costs to the NHS and are increasingly vulnerable to homelessness.

Raising the age at which young people start claiming adult disability benefits

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?

21. Propertymark agrees that eighteen is the right age for young people to start claiming adult disability benefits and Personal Independence Payments. When young people transition from adolescence to adults, often their support can fall off a cliff edge which can be extremely detrimental for the most vulnerable especially those with limited support networks. By allowing claims at age eighteen, we believe this would allow a smoother transition into adulthood at a time when many young people face increased costs such as accommodation.

Supporting employers and making work accessible

22. Propertymark recognises that this is an important area of the government's welfare reforms. However, it is an area outside of our expertise.

Conclusion

23. We would like to take this final opportunity to thank the DWP for listening to our views. Overall, we hope that the housing needs of claimants continues to be understood and catered for to ensure longevity of accommodation. This is especially important as we maintain that other individual needs such as access to employment will not be met without adequate housing. We would be delighted to continue to engage with the DWP on the points that we have raised or if you require clarity.