

There is no evidence to support today's benefits cuts

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As The Guardian notes in an email news alert this morning:

Keir Starmer [will unveil drastic cuts to disability benefits on Tuesday](#), despite deep opposition from Labour MPs and poverty campaigners, and warnings from economists against making kneejerk savings to hit fiscal targets. The changes are expected to affect some of the UK's most severely disabled people.

In another email this morning, from [Roy Lilley in his daily NHS commentary](#), he notes:

When governments make substantial policy changes it is good practice to subject the plans to an impact analysis.

In fact, HM Treasury's Green Book sets out how policies, programmes and projects should be assessed. It recommends a cost-benefit analysis and a distributional impact assessment...

... but does not mandate them.

And as Roy adds:

The Department for Work and Pensions Best Practice tells us major welfare changes will typically include an impact assessment, especially when they affect vulnerable groups.

No formal impact assessment of their PIP changes has been published.

HMG may have conducted internal assessments, but not making them publicly available is an error.

He also notes:

By way of contrast;

** The transition from Disability Living Allowance to PIP under the Welfare Reform Act*

2012, were accompanied by detailed impact assessments.

* The Department for Work and Pensions published an impact assessment in May 2012, outlining the expected effects of the DLA reform and the introduction of PIP.

By not publishing an impact assessment HMG faces Judicial Review and the courts may well block or delay the policy.

And then he rightly suggests:

Without understanding the impact, the public will become unsure which side of the argument to land. Who to believe... adding fuel to controversy...

... and HMG will have to deal with ...

... the unintended consequences that may increase costs elsewhere. For instance more strain on the NHS, homelessness, or reliance on other welfare.

I agree with Roy. I trust he will forgive me for plugging what he has to say: we are a bit of a mutual fan club, and on this he is spot on.

The overwhelming impression left by all this is that the DWP is making a change not justified by evidence to support a demand for cuts from HM Treasury that cannot be supported by estimated beneficial evidence of gains resulting from the action.

This is austerity, in other words, imposed by choice on - as The Guardian describes them - some of the UK's most severely disabled people.

I hope that judicial review is brought. I'll be chipping in towards the costs if it happens. Bullies picking on the most vulnerable deserve to be challenged.