

## 15 October 2025 - Social Security Advisory Committee - Oral evidence

Work and Pensions Committee

See the full transcript [here](#)

Witnesses:

- Dr Stephen Brien, Chair at Social Security Advisory Committee
- Carl Emmerson, Member, and Deputy Director at Institute of Fiscal Studies
- Bruce Calderwood, Member, and Trustee at Avenues Group

The Work and Pensions Committee met on 15 October 2025 to take evidence from the **Social Security Advisory Committee (SSAC)**, which provides independent scrutiny and advice on social security regulations. **Dr Stephen Brien**, the Committee's Chair, explained that SSAC, established in 1980, has two key roles: (1) to examine secondary legislation relating to social security and (2) to advise the Secretary of State on policy, either reactively when regulations are referred or proactively on issues identified by the Committee. It meets around ten times a year, in addition to ad hoc sessions for evidence-gathering and engagement with departmental officials.

### Governance and Working Relationships

Brien emphasised that maintaining constructive relationships with Ministers and officials is central to SSAC's effectiveness. Advice must be both independent and heard; trust ensures that candid scrutiny influences policymaking. He noted that while the Committee formally advises the Secretary of State, ongoing dialogue with officials, analysts, and Ministers underpins its practical impact. Brien meets the Secretary of State once or twice annually and relevant Ministers every six to eight weeks, currently engaging frequently with Minister Timms.

### Advisory Work and Current Projects

The Committee often produces its own reports on neglected policy areas. Brien highlighted past work on contributory benefits (ESA and JSA), which had fallen behind the evolution of Universal Credit (UC). The COVID-19 pandemic underscored their importance, prompting SSAC to recommend reforms later echoed in government proposals. The Committee's current work examines how UC supports young people aged 16–18 as they transition from dependent household members into education, apprenticeships, or employment. Brien noted distortions in incentives—such as apprenticeships leading to loss of child benefit—arguing that benefit rules should align with Government policy goals to avoid discouraging socially valuable choices.

### Scrutiny and Operational Insight

Members discussed SSAC's scrutiny remit and how it balances legal and operational oversight. Brien defended the Committee's engagement with frontline delivery staff, explaining that

understanding implementation is vital to assess whether regulations achieve policy intent. The Department now facilitates site visits to Jobcentres and service centres, improving operational awareness. Calderwood explained that while no recent examples have tested the six-month post-legislation review recommendation, strong departmental relations ensure early informal input into emerging secondary legislation.

### **Use of Urgency Procedures**

The witnesses detailed when it is appropriate for the Department for Work and Pensions (DWP) to invoke emergency procedures bypassing SSAC's normal review. Brien said genuine urgency should stem from external events—citing COVID-19, international crises, or treaty obligations. When urgency is used unnecessarily, SSAC has pushed back, reminding DWP that it is always available to expedite reviews without suspending due process. While the Committee cannot overturn Government action, it can publish post hoc scrutiny and compel responses from the Secretary of State, relying on “the power of the pen”.

### **Quality of Scrutiny and Impact Assessments**

A major theme was the **variable quality of DWP's impact assessments**. Brien described a cultural imbalance: officials treat explanatory memoranda as mandatory but equality impact assessments as secondary. Emmerson elaborated that many assessments lack logical analysis or data, sometimes defaulting to “no discrimination found” without evidence. He criticised the Department's work on **winter fuel payment reforms**, noting that it failed to examine differential effects by disability, ethnicity, or digital access. Some claims were factually inaccurate—such as implying all pensioners automatically received payments. Both Brien and Emmerson argued that well-conducted impact assessments are integral to policymaking, not bureaucratic afterthoughts.

### **Improving Analytical Practice**

The witnesses urged DWP to adopt a proactive, hypothesis-testing mindset—assuming potential discrimination exists and then disproving it through reasoning or data. Brien added that defining a clear “base case” for measuring impact and tracing a “golden thread” from stated policy intent to expected outcomes would strengthen policy coherence. The Committee found that some regulations, such as those on **winter fuel payments** and **deductions under Universal Credit**, suffered from rushed implementation and weak cross-departmental coordination, especially between DWP and HMRC, leading to inconsistent application of means-testing principles.

### **Administrative Earnings Threshold (AET) and Evidence-Based Policymaking**

Emmerson and Brien discussed SSAC's concerns about the rising **AET**, which determines when UC claimants in low-paid work must engage with work coaches. They argued that DWP had

increased the threshold without sufficient evaluation of previous changes, ignoring opportunities for experimentation or regional trials. The policy’s rationale oscillated between promoting in-work progression and reassuring taxpayers about fairness. Brien described this as “policy flip-flopping”, which undermines scrutiny and transparency. The witnesses urged the Department to plan long-term policy research programmes, using existing powers to pilot interventions and build an evidence base rather than reacting politically.

### **Work Coach Discretion and Implementation Risks**

The Committee expressed concern over the growing reliance on **work coach discretion** to interpret complex rules. Brien and Emmerson stressed that while discretion can humanise the system, excessive dependence risks inconsistency and unfairness. Work coaches often lack time, training, and data to make nuanced judgments, especially for claimants with health conditions not formally assessed under the Work Capability Assessment (WCA). As future reforms merge UC and PIP assessment systems, ensuring consistent, equitable decision-making by work coaches will be critical.

### **Use and Generation of Evidence**

Brien lamented DWP’s weak connection between policy teams and research divisions, describing a culture of “policy-led evidence making” rather than “policy-driven evidence gathering.” He argued that Ministers should define long-term evidence needs now to inform reforms over the next two years, especially concerning health-related benefit claims. The Treasury’s recent research priorities included areas that should have been DWP’s domain, highlighting the need for departmental leadership in welfare evidence. The Committee called for a more coordinated research strategy linking academia, policy, and operations.

### **Conditionality, Sanctions and Effectiveness**

When questioned on sanctions, Brien noted that much of DWP’s conditionality model still relies on outdated evidence linking frequent Jobcentre attendance with job entry. He urged the Department to build a **consolidated theory of change**—identifying what kinds of support work for different groups rather than relying on one-size-fits-all sanction regimes. Calderwood added that Ministers may always interpret evidence politically, but robust empirical understanding remains essential for credible welfare policy.

### **Independent Research and Future Work**

SSAC’s independent research focuses on areas under-scrutinised by Government but where its access provides unique insight. Ongoing projects include the **16–17-year-old transition study**, which examines how benefit rules affect young people moving from education to work or apprenticeships. The Committee is also considering work on **work coach discretion** and may

examine the Government's proposed **Youth Guarantee**. Past reviews of contributory benefits demonstrated SSAC's ability to influence reform by identifying neglected policy areas.

### **Health and Disability Benefit Reform**

Finally, witnesses addressed the risks of reforming health and disability benefits. Brien warned that linking the UC health element solely to PIP eligibility risks conceptual confusion, as the two benefits serve distinct purposes—PIP compensates for extra costs, while UC provides income replacement for limited work capacity. Calderwood and Emmerson reflected on lessons from the DLA–PIP transition, which failed to reduce spending and damaged claimant trust. They cautioned that poorly executed reforms could repeat these mistakes, undermining both effectiveness and confidence.