House of Commons
Work and Pensions Committee

Universal Support

Eighteenth Report of Session 2017–19

Report, together with formal minutes relating to the report

Ordered by the House of Commons
to be printed 24 October 2018
Work and Pensions Committee

The Work and Pensions Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Department for Work and Pensions and its associated public bodies.

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Committee reports are published on the publications page of the Committee’s website and in print by Order of the House.

Evidence relating to this report is published on the inquiry page of the Committee’s website.

Committee staff

The current staff of the Committee are Anne-Marie Griffiths (Clerk), Katy Stout (Second Clerk), Libby McEnhill (Senior Committee Specialist), Kemi Duroshola (Committee Specialist), George Steer (Assistant Policy Analyst), Jessica Bridges Palmer (Senior Media and Policy Officer), Esther Goosey (Senior Committee Assistant), Michelle Garratty (Committee Assistant).

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Universal Credit aims to deliver much more than technical and administrative change to the way benefits are processed and paid. The Department for Work and Pensions (DWP/the Department) has ambitious aspirations for it to transform the way claimants interact with the welfare state, encouraging and supporting them towards greater independence and personal responsibility. Achieving this will require cultural change amongst claimants, DWP staff, and delivery partners alike.

Universal Support should drive this change. It is an offer of support with using a computer to make a claim, and support with personal budgeting. DWP envisaged that Universal Support would include both short-term help for claimants to adjust to the immediate challenges of Universal Credit, as well as longer-term help for vulnerable claimants who would otherwise struggle to adapt. Universal Support does not just have the potential to make the lives of claimants much easier. Done well, it could also play a vital part in ensuring that Universal Credit delivers its wider objectives, including improved employment rates and savings to the public purse. The importance of getting Universal Support right will increase as the Department begins managed migration of 3.95 million legacy benefit claimants—including many of the most vulnerable people—to Universal Credit from 2019.

But in its current form Universal Support is far from “universal”—and all too often offers very little in the way of support. The gap between the Department’s vision for Universal Support in 2013, and the meagre offer it now funds, is vast. Claimants are entitled to a single, two-hour session of personal budgeting and digital skill support within the first three months of their claim. Given the scale of challenges that many claimants face, this is woefully inadequate. The Department should immediately lift the three-month restriction and commit to providing ongoing support to people who need help with maintaining their claim. It should also engage quickly and positively with its new delivery partner, Citizens Advice, to agree arrangements for funding multiple Universal Support sessions where there is evidence of claimant need.

The five week wait built into Universal Credit risks causing debt problems, or making people’s existing debt problems worse. Advance Payments, intended to tide claimants over during the five-week wait for their first Universal Credit payment, are themselves a debt. Many claimants will also have existing Government and third-party debts. Yet the Department does not yet offer debt advice as part of Universal Support. Persistent debt can prevent claimants from finding and staying in work, meaning debt is a barrier to Universal Credit changing the relationship between benefits and work. Advice on managing debt effectively should be a core element of Universal Support, offered to all claimants.

Empowering claimants to manage debts is only one side of the challenge, however. The Department’s approach to collecting debt can leave claimants swimming against a tide of unmanageable repayments. Organisations that support claimants told us that all too often, repayments pile debt upon debt, trapping people in a downward spiral of debt and hardship. This can then extend the time that it takes for debts to be repaid.
In the interests of transparency and understanding how its policies affect claimants, the Government should gather and publish data on Universal Credit debt deductions. It should use this to review its maximum deduction caps and ensure they are set at levels that would be sustainable for most claimants, taking advice from debt experts on the right levels. The Department should introduce a new, flexible, discretionary approach to debt management, drawing on best practice in the retail sector. Crucially, the Department must not proceed with transferring existing claimants onto Universal Credit on a large scale until this approach is in place and functioning effectively. Before proceeding with managed migration it must also assess the contribution that the five week wait makes to claimant debt and provide this assessment to the Committee.

Getting the content of Universal Support right is vital. So too is improving the way that claimants access the service. Both take up and referrals are much lower than expected. Providers received just a third of expected referrals in 2017/18, and only a third of those actually took up support. Jobcentre Plus Work Coaches are responsible for referrals. They should be supported to see Universal Support as a core part of Universal Credit. The Department should introduce a ‘Support conversation’ between Work Coaches and claimants at the outset of each claim, and require Work Coaches to revisit this periodically in case a need emerges later. The Department should also implement nationally a “no wrong door” policy, allowing claimants to be referred directly to providers from whatever support organisation they present to, without having to go via Jobcentre Plus.

The Department’s announcement that the contract for Universal Support will pass to Citizens Advice and Citizens Advice Scotland in 2018/19 and 2019/20 will help take pressure off already-stretched local authorities. The Department must ensure that this change is not merely cosmetic. Improving the support offer itself—and not simply changing the delivery partner—is crucial to ensuring people receive the help they need.

The Department also claims the new contract will ensure that people across the country are able to access Universal Support consistently. The contract finishes in April 2020, and the Department plans to review the support offer towards the end of March 2020. But leaving decisions on the size and shape of the service too late risks creating a gap in support for claimants—at the very time that managed migration is accelerating and the need for support increased. Committing to funding Universal Support throughout the managed migration period would give both providers and claimants some much-needed stability and consistency.

The existing Universal Credit caseload is heavily weighted towards relatively straightforward cases. The start of managed migration will see an influx of more claimants with more complex needs moving onto Universal Credit. They may have been claiming legacy benefits for many years and have little in the way of a financial backstop. Many will require extensive help to prepare for and adjust to the new system. The Department must verify that Universal Support is delivering what people need, when they need it, before it proceeds with managed migration. In agreement with Citizens Advice and other support organisations, it should set clear key performance indicators for Universal Support and publish regular updates on
whether these are being met. They should go beyond take-up, focusing on the effects on claimant outcomes such as debt or digital skills. The Department should not proceed with transferring claimants from legacy benefits to Universal Credit unless these targets are being met.

DWP designed Universal Credit. So it has a duty to ensure that it works for claimants and the local services which support them. Universal Support should be—and could still be—the means of ensuring this is achieved and realising the wider benefits of Universal Credit. As the challenges of managed migration loom, the Department faces a critical decision. Failure to overhaul Universal Support substantially now will place not only the wellbeing of claimants, but the success of the entire Universal Credit project, at risk.
1 Introduction

1. Universal Credit (UC) is a radical departure from the existing welfare system. It subsumes six separate benefits into one, paid as a single, monthly payment in arrears. From this, claimants are expected to manage all of their household living costs and expenses—including housing costs, which were usually paid direct to the landlord for social housing or vulnerable tenants under the system UC replaces (the “legacy system”). The Department for Work and Pensions (DWP/the Department) wants UC to mirror the world of work, to smooth the transition between unemployment and employment. It also aspires for UC to change the way claimants relate to the welfare state, fostering greater individual responsibility and independence.1 Delivering these objectives successfully depends on the Department driving cultural change amongst claimants.

2. UC is also a hugely ambitious IT and administrative project. The Department forecasts that UC will deliver £100 million per year in efficiency savings once it is fully rolled out.2 These savings are in large part dependent on the Department moving away from costly support measures for claimants, such as telephone line and in-person support, towards a digital single claim process and digital channels of communication.3 Delivering Universal Credit successfully relies on DWP designing and implementing systems that claimants and DWP staff can use easily. This is a second substantial departure from the existing system.

3. Universal Credit is being rolled out gradually. The Department told us this enables it to take a “test and learn” approach to implementation, making adjustments in response to claimant and staff feedback.4 These adjustments, and other technical and project management challenges, have been the source of multiple delays to UC’s roll out. The roll out was due to be complete by December 2018. As of September 2018 there were 1.2 million households claiming UC.5 When fully rolled out, DWP estimates that around 7 million households will claim UC. The UC full (digital) service is due to be available in all Jobcentres across the UK from December 2018.6 After this no new claims to the legacy benefits will be possible. As of August 2018, 5.5 million households were still claiming legacy benefits. They will migrate to UC either if their circumstances change (“natural migration”—requiring them to make a new claim), or via “managed migration” due to start in from mid-2019.7 Managed migration is now scheduled to be complete—and UC fully rolled out—by 2023.8

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1 See, for example: Iain Duncan Smith, Welfare for the 21st Century, May 2010
2 National Audit Office, Rolling out Universal Credit, HC 1123, June 2017, p.13
3 Infrastructure and Projects Authority, UC Health Check, September 2016, p.3, para 5.1.2 and para 5.4.2
4 DWP (UCR0267)
5 DWP (UCR0267)
6 Universal Credit full service, which is managed online, is used for all new claims and claims subject to a change of circumstance. It will be available across the UK from January 2019. The Universal Credit live service, which is managed over the phone, is available for single claimants in all areas, together with families of up to two children in some areas.
7 Q36 (Alok Sharma)
8 Q36 (Alok Sharma)
The role of Universal Support

4. Most current UC claimants are single adults with no children, who are unemployed and searching for work. As the roll out progresses and managed migration begins, the characteristics of the UC caseload will change. It will include many more people with complex claims and circumstances. This includes claimants with children, who require help with rent, and who have health conditions and disabilities. These groups are particularly likely to require additional support to adapt to UC. Making Every Adult Matter (MEAM), a coalition of charities, explained that for some claimants, a lack of access to the right support during the transition to UC or at the outset of a new claim time can have serious consequences. They said:

Universal Credit is a significant change to the way that people currently receive benefits. For most people experiencing multiple disadvantages, barriers within Universal Credit prevent them from effectively transitioning from legacy benefits. This can lead to disengagement with the benefits system and extended periods without any income.

5. Universal Support is intended to help claimants adapt to and manage the challenges of UC. Funding for Universal Support services is currently allocated from DWP to local authorities. Allocated funding and actual spend is shown in Table 1, below. On receipt of funding, local authorities can either deliver support to claimants in-house or commission services from other local organisations. The money can be used to deliver two types of support:

- Assisted Digital Support (ADS) for claimants who need help making and maintaining an online claim; and
- Personal Budgeting Support (PBS) support for claimants who need guidance on managing their money.

Table 1: Universal Support funding and actual spend, 2015/16 to 2017/18

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<tr>
<th>Year</th>
<th>Budget</th>
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<tr>
<td>2015/16</td>
<td>£16.5m</td>
<td>£15.8m</td>
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<td>2016/17</td>
<td>£13.1m</td>
<td>£12.5m</td>
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<tr>
<td>2017/18</td>
<td>£13.6m</td>
<td>£11.9m</td>
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<tr>
<td>2018/19</td>
<td>£17.6m</td>
<td>Not available - current year</td>
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Source: Letter from the Minister for Employment to Committee Chair, June 2018

6. In July 2018 the Secretary of State for Work and Pensions, Rt Hon Esther McVey MP (the Secretary of State) said the Department was considering extending Universal Support. She explained that DWP wanted to “develop our Universal Support offer to ensure it supports people through the welfare system” and “will be looking at how we

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9 DWP, Universal Credit statistics: data to September 2018, October 2018
10 S. Kennedy and R. Keen, Universal Credit roll-out 2018/19, House of Commons briefing paper CBP-8299, June 2018
11 Highland Council (UCR0185), Gwent Welfare Reform Partnership (UCR0189)
12 MEAM (UCR0220)
13 DWP, Guidance: Universal Support 2018/19, updated September 2018
can improve Universal Support further”.\textsuperscript{14} She also told the House that the Department was considering wider issues related to Universal Credit and Universal Support, including “debt and how it is repaid”.\textsuperscript{15} The Minister for Employment, Alok Sharma MP (the Minister) re-iterated to us in evidence that the Department is looking to understand how Universal Support might be improved. It hoped to put forward proposals for doing so in Autumn 2018.\textsuperscript{16} The Department confirmed to us in October 2018 that it will “continue to iterate [the Universal Support service] and concentrate our resources and efforts on what works for the most vulnerable” as it moves towards and through its new delivery contract with Citizens Advice.\textsuperscript{17}

7. The Department for Work and Pensions intends Universal Credit to do much more than simply change the way that benefits are processed and paid. DWP aspires for Universal Credit to transform the relationship between claimants and the welfare state, encouraging greater responsibility and independence. Achieving this will require cultural change amongst claimants and DWP staff alike. Universal Support will be a crucial part of that change. The Department must ensure it is funding the right support, at the right time. We welcome the Department’s commitment to reviewing and improving Universal Support. We recommend it sets out the conclusions of this review in response to our Report.

Our inquiry

8. We held this phase of our ongoing inquiry into Universal Credit in response to evidence of claimants’ difficulties in adapting to UC.\textsuperscript{18} We aimed to understand whether and how effectively Universal Support alleviates these difficulties, and to feed into the Department’s considerations on how Universal Support might be improved or extended. During the course of our inquiry we also heard evidence on related topics, including personal debt amongst claimants and the challenges posed by managed migration to Universal Credit. We are grateful to everyone who has contributed to our inquiry.

\textsuperscript{14} McVey, E (speech), The way forward: personalisation and digitalisation of benefits and support, July 2019
\textsuperscript{15} HC Deb, Wednesday 11 July col 1002
\textsuperscript{16} Q325 (Alok Sharma)
\textsuperscript{17} Universal Support has been delivered by local authorities since its rollout in 2015/16. In October 2018 the Department announced that the delivery contract would pass to Citizens Advice and Citizens Advice Scotland in full for 2019/20. See DWP, Citizens Advice to provide support to Universal Credit claimants, October 2018
\textsuperscript{18} Our previous reports on Universal Credit are: Work and Pensions Committee, Universal Credit: the six week wait, HC 336, October 2017; Universal Credit for the self-employed, HC 997, May 2018; Universal Credit and domestic abuse, HC 116, August 2018
2 The Universal Support offer

9. Universal Support was launched in 2013. The Department initially envisaged that it would serve two purposes. Firstly, it would “ensure people are supported to make the transition” to Universal Credit by helping them adjust to aspects of its design. These included support with monthly budgeting and using the online service, both to make and maintain a claim. Secondly, the Department said that Universal Support would provide “longer term” support to “the small number of people who find it more difficult to transition” and “ensure they get the local, tailored help they need.” The Department identified a number of factors that such claimants might have in common, including severe debt problems, mental health conditions, or learning difficulties.

10. The Department piloted Universal Support in 2014/15. The pilots focused on the first of the Department’s aspirations: support to help claimants to transition to Universal Credit. Supporting claimants with longer-term needs was not part of the pilots, and did not form part of the subsequent Universal Support offer. The Department initially chose to fund local authorities to deliver Universal Support. They could decide to deliver it themselves or to commission partner organisations. Since its wider launch in 2015/16, Universal Support only funds two types of support: Assisted Digital Support (ADS), for claimants with poor digital skills, and Personal Budgeting Support (PBS) to help claimants manage their UC payments. The Department only provides funding for a single, two hour session. It also restricts delivery to within the first three months of a claim. The Local Government Association (LGA) said that this offer reflects “a predominantly operational focus within DWP”. They suggested Universal Support merely offers a means to an end in getting claimants onto UC, rather than promoting UC’s wider “strategic objective of changing the relationship between work and welfare”. Several witnesses told us that the Department’s approach is unhelpfully restrictive. It means that Universal Support is not consistently offering the type of support that claimants need, at the points that they need it. This is reflected in much lower than expected take up of Universal Support.

11. The Department has no immediate plans to substantially change this approach in its new contract with Citizens Advice and Citizens Advice Scotland. The contract does not allow Citizens Advice to deliver support once the initial claim is complete. Citizens Advice told us, however, that it expects to be able to deliver some, limited, types of support that go beyond the current ADS/PBS framework: for example, it will be able to help claimants gather evidence of costs such as housing or childcare that may be relevant to their application. They explained that the main difference between this and the Department’s previous approach, however, will be consistency for claimants. They should be able to access the same types and standards of support, irrespective of where they live.

19 DWP, Universal Credit local support services update and trialling plan, December 2013, p.3
20 DWP, Universal Credit local support services framework, February 2013, p.24
21 DWP, Universal Credit local support services expression of interest trialling prospectus, May 2014, p.6
22 From 2018/19 Citizens Advice and Citizens Advice Scotland will receive some funding to deliver support, and will take over delivery entirely in 2019/20.
23 DWP, Guidance: Universal Support 2018/19, updated September 2018
24 Rolling out Universal Credit, p.43; Local Government Association (UCR0242)
25 Local Government Association (UCR0242)
26 We return to the issue of take up in Chapter 3.
27 Letter from Minister for Employment to Committee Chair, 11 October 2018
28 Letter from Citizens Advice to Committee Chair, 11 October 2018
29 Letter from Citizens Advice to Committee Chair, 11 October 2018
30 Letter from Citizens Advice to Committee Chair, 11 October 2018
12. The gap between the Department’s original vision for Universal Support, and the meagre offer it now funds, is vast. The Department envisaged providing ongoing help to Universal Credit’s most vulnerable claimants, ensuring they can make the most of the new benefit. In reality it offers a single session of Personal Budgeting and Digital Support, restricted to the first three months of a claim. The current service is almost solely focused on getting new claims up and running. The new contract with Citizens Advice will not substantially diverge from this approach. This may help the Department progress with the roll out, but it is likely to fall far short on helping Universal Credit achieve its wider objectives. In its current form, Universal Support is far from “universal”, and all too often offers only very limited support for both budgeting and digital skills.

**Assisted Digital Support**

13. Universal Credit is intended to be an automated digital service. Claimants make and manage their claims online, and awards are calculated and paid automatically. Universal Credit’s Project Assessment Reviews make clear that UC achieving its objectives is contingent on successful delivery of the digital service. Failure to achieve this on the scale envisaged by the Department would constitute a “major risk” to UC’s success and to achieving good value for money, compared to the legacy system. Successful delivery includes ensuring that “complex cases and vulnerable claimants” are able to use successfully the automated systems, rather than relying on what the National Audit Office referred to as “manual and inefficient” services in Jobcentre Plus. This includes making the claim online, and using the Universal Credit online journal as their primary ongoing means of communicating with DWP—including updating details and communicating with their Work Coach. ADS aims to equip claimants who have poor digital literacy with the confidence and skills they need to carry out these tasks. The Department’s outline minimum standards for ADS provision are listed in Box 1, below.

**Box 1: Assisted Digital Support minimum standards**

Assisted Digital Support is intended to help claimants make and maintain their claims online.

**Making a claim**

- Supporting the claimant to use a PC or their specific device to interact with UC;
- Ensuring claimants keep their log-in credentials safe (security awareness);
- Help with setting up a personal email address if claimant doesn’t already have one, on whatever device they have access to;

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31 The Project Assessment Reviews (PARs) are internal Government reviews of Universal Credit carried out by the Infrastructure and Projects Authority. They consider the programme finances and delivery of UC between 2012 and 2017. The PARs were provided to us on instruction from the House of Commons in December 2017. See Work and Pensions Committee, Universal Credit Project Assessment Reviews, fifth report of Session 2017–19, HC 740, February 2018.
32 Universal Credit Project Assessment Reviews, p.17; Rolling out Universal Credit, p.9
33 DWP, Guidance: Universal Support 2018/19, updated September 2018
• Ensuring the claimant is able to access email account to retrieve the email code;
• Ensuring the claimant enters a telephone number on their application;
• Ensuring the claimant is aware of the details they need to have to hand to safely complete their identity verification;
• Ensuring the claimant understands how to access the “partner code” and the requirements for their partner to complete their online claim.

Maintaining a claim

• Managing the Universal Credit claim via the online Universal Credit account on whatever device they have access to;
• Managing their own email account;
• Navigating and clearing “To Do’s”;
• Making journal entries;
• Uploading documents such as CVs and medical certificates;
• Notifying the Department of changes of circumstances;
• Generating and making inquiries;
• Printing documents.


14. Claimants with low digital literacy can struggle to gain the skills and confidence they need to make and maintain their claim in a single session of Universal Support. London Councils explained that a single session may be enough to set up a new claim. But people often need ongoing support to help them maintain the claim.34 Croydon Council told us that their most vulnerable claimants require monthly sessions of ADS in order to manage this.35 The Department’s research on Universal Credit claimant experiences reflected this evidence. Four in ten claimants told the Department they needed more support than they received in registering their claim. Three in ten said they needed ongoing support to use their online account.36 The research accordingly suggested that for some claimant groups, more “proactive and ongoing support with making and managing a digital claim” would be helpful.37 London Councils recognised it would be “inappropriate” for DWP to fund local authorities to support individual claimants indefinitely. They argued, however, that it was nonetheless important for the Department to “recognise the reality of claimant support needs by allowing [delivery partners] to claim for an appropriate number of support sessions”, and for appropriate duration.38

34 London Councils (UCR0250)
35 See London Councils (UCR0250)
36 DWP, Universal Credit full service claimant survey, June 2018, p.37-38
37 DWP, Universal Credit full service claimant survey, June 2018, p.17
38 London Councils (UCR0250)
15. Universal Credit’s savings depend on claimants using its digital systems successfully: not just at the outset, but throughout their time on the benefit. Some will find this easy. Others will require substantial, possibly ongoing, support. The Department provides an extensive list of tasks that Assisted Digital Support providers should assist claimants with, but it will fund only a single two-hour session of support at the start of a claim. Its own research shows that for many claimants this is woefully inadequate. The digital service saves DWP money: it is in the Department’s interests to invest in helping claimants use it. We recommend the Department lift the three-month limit on providing Assisted Digital Support. We also recommend it engages quickly and positively with local authorities and Citizens Advice to agree arrangements for funding additional Digital Support sessions for claimants with higher needs.

Verify

16. Identity verification is an important element of automation. Legacy system claimants, and those on the UC live service verified their identities face-to-face, in Jobcentre Plus (JCP). The UC full service relies on claimants using the Verify system. Verify is a cross-Government service which enables users to confirm their identity online. It is external to UC. The Department’s intention is for 80% of claimants to use Verify once UC is fully rolled out; a reduction on its initial target of 90%. The National Audit Office has reported that, as of March 2018, just 38% of claimants use Verify successfully (see Figure 1). The remainder have to verify their identities in JCP. The NAO noted that this comes at a substantial cost to the Department: verification could cost in the region of £40 million over the next 10 years. Failure to quickly and efficiently verify identity also has implications for claimants. Neil Couling, Director General for Universal Credit, told us “outstanding verification issues” are a key issue in the 17% of new Universal Credit claims that are not paid on time and in full; a level which the Department does not expect to improve substantially in 2018–19.

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39 DWP, Universal Credit full service claimant survey, June 2018, p.17
40 The Department has taken a twin track approach to delivering UC via two parallel services: the full or digital service, and the live service. The live service introduced UC for some claimant types while the full service was still being developed. See Universal Credit Project Assessment Reviews, p.11
41 Rolling out Universal Credit, p.57
42 Rolling out Universal Credit, p.57
43 Letter from Neil Couling to Committee Chair, 18 July 2018
44 Rolling out Universal Credit, p.8
17. The Department’s claimant research showed that nearly three in ten (30%) claimants try to use Verify and fail. A further 17% do not even try. The research therefore noted that identity verification can be considered one of the most difficult tasks associated with claiming UC. Nearly half of the claimants who had tried to use Verify (successfully or not) said they found the process “difficult”, with over half of those finding it “very difficult”.45 The scale of the challenge the Department faces in this respect is likely to increase as claimants in groups associated with lower levels of digital literacy—such as disabled people—migrate to UC in large numbers.46 Citizens Advice told us that challenges range from accessing and providing passports, driving licences and forms of ID, to difficulties using the online system itself.47 The extent of ADS that providers are required to deliver, however, is ensuring claimants are “aware of the details they need to have to safely complete their identity verification”.48

18. Failure to verify identity online has consequences for claimants: it is a key factor in late or incomplete Universal Credit payments. It also has consequences for Universal Credit’s efficiency, forcing the Department to rely instead on costly and inefficient services in Jobcentre Plus. The Department’s own research starkly illustrates how challenging claimants find this part of the process. The Department intends for 80% of claimants to use Verify successfully when Universal Credit is fully rolled out. But currently almost half of all claimants either try to use Verify and fail, or do not even try. We recommend the Department amend guidance on the content of Assisted Digital Support to include ensuring claimants are able to use the Verify system. We also recommend it set out in response to this Report its strategy and any supporting resources for increasing Verify usage to 80% by 2024-5.

45 DWP, Universal Credit full service claimant survey, p.13 and pp.36-37
46 See, for example, Disability Benefits Consortium (FJP0054)
47 Citizens Advice (UCR0238)
48 DWP, Guidance: Universal Support 2018/19, updated September 2018
Personal Budgeting Support

19. UC is a substantial change in the way that benefits are paid. Claimant households, whether in or out of work, receive one, single monthly payment in arrears. From this, households are expected to budget for all of their bills and living expenses, including rent. In comparison, under the legacy system, the six different benefits are paid at different times and varying intervals, with rent paid direct to the landlord for social sector or otherwise vulnerable tenants.49 PBS aims to help claimants adjust to this new way of being paid and to manage their money well.50 The Department’s minimum service standards for PBS are set out in Box 2.

Box 2: <Personal Budgeting Support minimum service standards>

Personal Budgeting Support is intended to help claimants transition to UC and to prioritise essential bills and payments. This support should enable claimants to:

- Understand their Universal Credit award and what they can claim;
- Work out monthly income and outgoings;
- Recognise priority bills, such as rent;
- Identify and cut back on non-essential spending;
- Complete and maintain a budgeting plan;
- Convert from a Post Office card account/Payment Exception Service to more appropriate banking products, including a transactional bank account; and
- Set up or re-organise direct debits for prioritised payments.

20. As with ADS, claimants can only receive PBS within the first three months of a UC claim. This reflects the Department’s intention for Universal Support to help claimants make the transition onto UC, rather than meeting longer-term needs.51 We heard, however, that that claimants frequently find themselves in “acute financial difficulty” after the three month window has expired.52 By the time the need for budgeting support has become apparent—to either the claimant or their Work Coach—it may be too late for Universal Support funding to cover it.53 London Councils told us this is a particular risk for claimants migrating to UC from the legacy system. Their members’ experiences suggested such claimants are “frequently under the impression that they do not require PBS [at the outset] because they feel they have coped well under the legacy system”.54

21. The Department’s research on Universal Credit full service claimants reflected the evidence that we received. It found “signs of [financial situations] deteriorating over time” for some claimants. For example, seven out of ten claimants (71%) who were in rent arrears three months into their claim were still in arrears at eight to nine months. 44% said that

49 Universal Credit and domestic abuse, August 2018
50 DWP, Guidance: Universal Support 2018/19, updated September 2018
51 Rolling out Universal Credit, p.43
52 Local Government Association (UCR0237)
53 London Councils (UCR0250), London Borough of Tower Hamlets (UCR0243), Local Government Association (UCR0242)
54 London Councils (UCR0250)
they amount they owed had become larger, suggesting ongoing difficulties with budgeting and managing expenses.\textsuperscript{55} The Local Government Association accordingly told us that the three-month window is so restrictive that it renders the PBS element of Universal Support “not currently fit for purpose”. They recommended lifting the restriction, allowing providers to deliver PBS at the point in a claim when a support need becomes apparent—irrespective of when that occurs.\textsuperscript{56}

22. Witnesses told us that, as with ADS, one session of PBS is often not enough to give claimants the support that they need. We heard it is important that the Department ensures providers are able to deliver an appropriate amount of budgeting support. The Local Government Association told us that some claimants come onto UC with “entrenched debt and financial problems”.\textsuperscript{57} The Department’s research, for example, found that amongst claimants with rent arrears, 35\% already had them prior to claiming UC.\textsuperscript{58} We heard that the issues leading to these problems are often complex, and can take more than one session of support to resolve.\textsuperscript{59} This is particularly so because it can “take time to build trust with claimants in financial hardship” and to address their needs effectively.\textsuperscript{60} After being awarded the new Universal Credit contract, Citizens Advice reiterated to us that claimants often require longer-term support than Universal Support will fund. They committed to continuing to “use our evidence to identify the problems faced by people receiving Universal Credit and [to] propose solutions”.\textsuperscript{61}

23. \textbf{Universal Credit is a major change in the way that benefits are paid.} Claimants receive one single payment rather than numerous smaller amounts. From this they are expected to budget for all expenses for the entire month. Yet the support that the Department offers to help claimants adjust to this change is severely lacking. Claimants can receive just one session of Personal Budgeting Support at the start of a claim. Those who need more—or who simply misjudge at the outset their ability to cope—risk being without the support they need and facing spiralling financial difficulties. \textit{We recommend the Department lift the three month limit for Personal Budgeting Support and engage with local authorities and Citizens Advice to agree arrangements for funding ongoing support for those claimants who require it.}

\textbf{Debt advice}

24. PBS funding cannot currently be used to provide general advice on managing debt or to help claimants negotiate with creditors—the latter being a service that can only be provided by qualified specialists.\textsuperscript{62} The Department told us that this is because Universal Support is intended specifically to help claimants adjust to the Universal Credit system, rather than funding more holistic support for pre-existing problems.\textsuperscript{63} The Minister also noted that many local authorities already provide debt support. He told us the Department

\textsuperscript{55} DWP, Universal Credit full service claimant survey, p.17
\textsuperscript{56} Local Government Association (UCR0237)
\textsuperscript{57} Local Government Association (UCR0237), Letter from the Minister for Employment to Committee Chair, June 2018
\textsuperscript{58} DWP, Universal Credit full service claimant survey, p.16
\textsuperscript{59} Local Government Association (UCR0237), London Councils (UCR0250)
\textsuperscript{60} Local Government Association (UCR0237)
\textsuperscript{61} Letter from Citizens Advice to Committee Chair, 11 October 2018
\textsuperscript{62} Letter from the Minister for Employment to Committee Chair, June 2018
\textsuperscript{63} Ibid.
16 Universal Support

does not want to duplicate existing provision. The Department explained that if claimants do need debt advice they can be “signposted towards more specialist support services such as the Money Advice Service or Citizens Advice” by their Work Coach. Citizens Advice, however, has found that existing services—including the Money Advice Service—are “already under pressure and struggle to meet the needs of existing clients.” The Minister confirmed to us in October 2018 that the new contract with Citizens Advice and Citizens Advice Scotland would maintain these arrangements. Citizens Advice will not be allowed to use Universal Support funding to deliver debt advice.

25. Witnesses told us that claimants’ ability to manage and alleviate personal debt is central to UC achieving its objectives—including in delivering improved employment rates. Zena Cooke, Corporate Director for Resources at Tower Hamlets Council and a representative of the LGA, told us that unless claimant debt issues are resolved, “the policy objectives—the outcome that we want for our claimants—will not be achieved, because that debt fundamentally undermines all the other policy objectives”. Iain Duncan Smith, former Secretary of State from Work and Pensions from 2010 to 2016, was under the impression that debt advice was already part of Universal Support. He believed that debt acted as a barrier to work; an issue which the legacy system had done little to address. As such, persistent claimant debt was also a barrier to UC changing the relationship between benefits and work. He told us:

Once you identify that somebody has debt problems and it becomes very apparent they have debt problems, under the existing legacy systems not much happens other than they bump along in and out of debt problems. If you have a serious debt problem you are not going to end up stable in work. The first reason that going back to work becomes a nightmare for you is that you immediately have to repay, and there is no structure around that and you do not understand it. So the idea was that having identified somebody who may have particular problems, you then have the ability with the local authority to try to focus a get-well programme around those individuals.

A 2017 DWP review of evidence on disadvantage and life chances backed this perspective. The review suggested that “problem debt”, where debt and arrears absorb an excessive proportion of family income, “can place a heavy burden on families”. Alongside issues such as parental conflict and poor parental mental health, problem debt can “compound other problems, making it harder for parents to return to work and creating more difficult environments for children to grow up in”. The review concluded:

We need to help families tackle the difficult issues […] so that they can get on with their lives. Without help, families who experience major barriers to

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64 Ibid.
65 Ibid.
66 Citizens Advice, Making a Universal Credit claim, July 2018; Letter from Citizens Advice to Committee Chair, 11 October 2018
67 Letter from the Minister for Employment to Committee Chair, October 2018
68 Q653 (Emma Revie), Q642 (Zena Cooke), Q610 (Iain Duncan Smith), Child Poverty Action Group (UCR0202), The Trussell Trust, Left behind: is Universal Credit truly universal? 2018
69 Q642 (Zena Cooke)
70 Q610 (Iain Duncan Smith)
71 DWP, Improving lives, helping workless families, April 2017, p.12
72 DWP, Improving lives, helping workless families, p.11
73 DWP, Improving lives, helping workless families p.14, Zena Cooke (Q642)
work will struggle to overcome the problems they face. Parents will struggle to move back into work and stabilise their lives, children will struggle at school and into the future.

26. We heard that that the structure of UC itself can contribute to debt. UC has a built-in wait for the first payment. If new claims are processed correctly, claimants can expect to wait five weeks (including processing time) for their first UC payment. Multiple witnesses told us this wait can lead directly to rent arrears and other forms of personal debt. The LGA, for example, provided a series of case studies of councils that have seen rent arrears increase as the full service rolls out (see Box 3). The Trussell Trust’s research showed that 70% of people who used their foodbank network between February and March 2018 reporting falling into debt—to organisations, and to their friends and families—as a direct result of the wait for payment. Witnesses argued that this creates an obligation on the Department to help claimants to manage and alleviate debts.

Box 3: Universal Credit and rent arrears

Newcastle City Council: Data supplied by Newcastle City Council demonstrates the differences in rent arrears faced by UC and non-UC claimants. Figures are correct to March 2018. Newcastle City Council has:

- 4,461 Universal Credit cases
- The income collection rate is 94.98 per cent of the rent due from those tenants who are on Universal Credit. By comparison, for tenants not on Universal credit, this figure is 99.81 per cent of the rent owed.
- Tenants on Universal Credit owe a total of £2,097,153.
- Arrears solely as a result of Universal Credit are £1,112,443.
- 3,356 Universal Credit customers are in arrears, with an average balance of £624.90. By comparison, 5,396 non-Universal Credit customers are in arrears, with an average balance of £290.84.

Newcastle City Council has assessed the pre-Universal Credit collection rate for current Universal Credit claimants, versus their current Universal Credit collection rate. This shows a reduction in the collection rate from 97.15 per cent to 94.41 per cent. This illustrates lower rent collection levels and corresponding higher arrears balances once a customer moves onto Universal Credit.

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74 Rolling out Universal Credit, p.72, The Trussell Trust, Left behind: is Universal Credit truly universal?, StepChange (UCR0261), National Association of Welfare Rights Advisers (UCR0262), Scottish Association for Mental Health (UCR0080), London Councils (UCR0250), Local Government Association (UCR0242)

75 Left behind: is Universal Credit truly universal?, p.3

76 StepChange (UCR0261), National Association of Welfare Rights Advisers (UCR0262), Q653 (Emma Revie), Q642 (Zena Cooke)
Wrexham County Borough Council

Wrexham County Borough Council went live with Universal Credit in October 2017. The Council has a relatively small number of cases: currently around 750. The number of cases, and number of instances of rent arrears, is growing.

The Council runs a number of reports, which look at rent arrears occurring for claimants before and since transitioning to Universal Credit. The council reports that the overall balance of rent arrears seems to be increasing, but the level of arrears for claimants on Universal Credit is increasing significantly. Around 15 per cent of arrears arising among the Council’s claimants overall are ‘true’ Universal Credit arrears. This means the arrears exist after taking off any arrears that may have been there at the start of the claim, and factoring in any arrears which have accrued since the Universal Credit start date, and assuming that the customer will pay the four weeks due at the end of the assessment period.

Source: Local Government Association (UCR0242)

27. The Department has consistently disputed evidence on the link between UC and rent arrears. It told us it plans to publish its own research on this topic “later this year”. In recognition of the difficulties that the wait for payment can create for claimants, however, a number of mitigating measures were announced in the 2017 Autumn Budget. These are fully in place as of April 2018. They include:

- Allowing claimants to receive up to 100% of their UC award in the form of an Advance Payment. Advance Payments are loans. Claimants pay them back to the Department over a period of up to twelve months;
- Removing the seven “waiting days” at the start of a claim, for which claimants did not receive any UC. This brought the wait down from six to five weeks;
- Allowing anyone in receipt of housing benefit to continue to have their housing benefit paid for the first two weeks of a UC claim.

The Department is confident that the introduction of these measures mean that claimants should not now experience financial difficulty or take on additional debt during the wait for payment. Responding to the NAO’s report on UC, which highlighted financial difficulties experienced by claimants, the Secretary of State told the House that it was “unfortunate that the NAO was unable to take into account the significant changes recently implemented in Universal Credit. Those changes address many of the concerns raised in its report.”

28. The Department could not offer us any data of its own on debt amongst UC claimants to substantiate its claims, beyond the limited data on rent arrears included in its claimant research. It told us that while it has a “detailed understanding” of the debts that claimants owe to it, it “does not monitor debt patterns amongst UC claimants directly” because it has “no legal gateway” to capture this information. It could, however, tell us that take up

77 Letter from Minister for Employment to Committee Chair, June 2018
79 Rolling out Universal Credit, p.33
80 HC Deb, 2 July 2018, col.8
81 Universal Credit full service claimant survey, pp.71-72
of new claim Advance Payments currently stands at 60%. The NAO described this as “an indication that claimants manage over [the waiting period] by taking on additional debt”. Citizens Advice told us that it is “important to acknowledge that Advance Payments are a loan, which can exacerbate people’s debt problems”.

29. **Debt can be a barrier to moving into work and progressing to better paid work.** In turn, it can act as a barrier to Universal Credit achieving its employment aims. Some claimants will come onto Universal Credit already in debt, but the availability of Advance Payments means claimants may fall into more debt. This creates an obligation on the Department to ensure that claimants are able to manage their debts effectively—in addition to day-to-day budgeting. **We recommend the Department extend Universal Support to include a core offer of debt advice and support in negotiating with creditors.**

### Repaying debts

30. Some claimants acquire debt after moving onto UC. Others carry pre-existing Government and personal debt over with them from the legacy systems. The Department estimates that historic Government debt transferring to UC, including debts to HMRC and local authorities, will be “in the region of £10 billion” once all claimants have migrated over. The Minister told us that the Department’s policy is to recover all debt “where it is reasonable and cost effective to do so without causing unacceptable levels of financial stress”. The NAO observed that the Department expects UC will enable it to recover “more debt, more efficiently” than under the legacy system. Its ability to do so will hinge on its effective use of data analytics and further automation to “ensure debt is targeted and managed effectively”.

31. The Department told us it has a good understanding of claimant debt overall, including rates of repayment. This includes for legacy benefit overpayments, UC overpayments and Advances, local authority and tax credit debt. The Department could not break this down, however, to tell us the number and proportion of current UC claimants who have existing debts, or who those debts were owed to. The Minister did, however, tell us that 55% of all current claimants have a “benefit debt, Social Fund Loan or benefit advance being managed by DWP”.

32. UC claimants who have a historic debt to the Government are required to pay it back from their standard UC allowance. The Department has set three repayment caps on the amount that can be deducted for debt each month. It offered the rationale for each:

1. A 15% cap for people out of work. The Department told us this was “carried over from legacy and has been a matter of policy for a number of years”; and

2. A 25% cap for people in work. This reflects that “people and couples in work are expected to be able to afford a larger repayment”; and

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82 Letter from Minister for Employment to Committee Chair, June 2018
83 Rolling out Universal Credit, p.70
84 Citizens Advice (UCR0141)
85 Local Government Association (UCR0237), Universal Credit full service claimant survey, p.16
86 Letter from the Minister for Employment to Committee Chair, June 2018
87 Rolling out Universal Credit p.53
88 Letter from the Secretary of State to Committee Chair, September 2018
89 Letter from the Minister for Employment to Committee Chair, June 2018
90 Letter from the Minister for Employment to Committee Chair, June 2018
(3) A 40% cap for people repaying due to fraud or a hardship payment. The Department said this was agreed in April 2012 by Lord Freud, then Minister for Welfare Reform, with the aim of ensuring that “individuals who commit fraud, felt the full impact of their actions and were not given what in effect was an open-ended period to repay the proceeds of their fraud”.

(4) There is a further 10%–20% range for repayments of rent arrears. These repayments are included in the overall caps above.91

33. StepChange, a specialist debt charity, told us that the UC repayment caps allow the Department to deduct substantially more for existing debts than was the case under the legacy system.92 Under that system, claimants of Income Support, means-tested Jobseeker’s Allowance or Employment and Support Allowance, or Pension Credit, faced standard deduction rates of 5% of the personal allowance portion of each benefit. Rent arrears were also repaid at 5%. Claimant consent was required if total deductions exceeded 25% of the total benefit in payment.93 Not only is the highest deduction cap increased to 40% under UC, but repayments for Advance Payments are not included in the caps. Citizens Advice explained that adding Advance Payment deductions to repayments for third party debts can lead to caps regularly being breached.94

34. The Department told us that the caps reflect the “need to balance the cost of recovery with affordability”. It did not, however, offer any further detail on how it had made this assessment. It emphasised that the caps are maximum amounts, and that staff “will consider reducing the repayment rate or suspending recovery where there is hardship”.95 The Department was unable to provide detail on the average amounts claimants with debt are paying back each month or the proportion of their UC award that this equated to. It told us it does not have “robust data or information” on these topics at present.96 In response to a Parliamentary Question in March 2018, however, it had explained that:

- 6% of UC claimants had a total deduction amount (either to a third party, for an Advance payment, or for a fraud penalty) which equalled 40% of the standard allowance;
- Less than 0.5% had a total deduction amount which exceeded 40% of the standard allowance.

35. Witnesses warned that the Department needs to revisit its approach to balancing debt recovery with ensuring that UC claimants are able to manage their money effectively.98 We heard that, in practice, high and unsustainable rates of deduction are common.99 The National Association of Welfare Rights Advisers (NAWRA), a professional body, told us that “Advances, hardship payments and overpayments are generally recovered at the maximum allowed”. Their members reported in September 2018 that the 40% rate is

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91 National Association of Welfare Rights Advisers (UCR0262)
92 StepChange (UCR0261)
93 DWP Advice for decision-making staff: Chapter D2 Third party deductions
94 Citizens Advice (UCR0141). See also National Association of Welfare Rights Advisers (UCR0262)
95 Letter from the Minister for Employment to Committee Chair, June 2018
96 Ibid.
97 WQ130822. In a subsequent PQ in July 2018, the Department responded that it was unable to provide an update on these figures since the data underpinning them was being quality assured.
98 StepChange (UCR0261), National Association of Welfare Rights Advisers (UCR0262), Citizens Advice (UCR0201), VIVID (UCR0135), Halton Housing Trust (UCR0211), Homeless Link (UCR0091)
99 Christians Against Poverty (UCR0130), Citizens Advice Scotland (UCR0221)
applied “too often without consultation with the claimant about whether they can afford it”. They also reported varied, inconsistent practice amongst DWP Decision Makers in negotiating lower rates and payment breaks on behalf of their clients. NAWRA and StepChange also noted failures on behalf of the Department to tell claimants clearly about what deductions they are facing, for what, and for how long they will be made.

36. Several organisations explained to us the negative impact that this approach was having on individual claimants. NAWRA told us that failure to communicate clearly with claimants about levels and durations of deductions left them struggling to understand how much money they would receive. This exacerbated budgeting difficulties, often at a time when claimants were still adjusting to UC itself. The National Housing Federation told us that the top level of deductions was “too high […] pushing claimants into unnecessary hardship”. This frequently left them “struggling to sustain their tenancy”. StepChange modelled of the effect of deductions on benefit claimants who are in debt. They explained that even a 5% deduction would leave almost half of their clients unable to meet essential expenditure. At 40%, this rose to 70% of clients. StepChange also reported that 40% of their clients had fallen behind on another household bill owing to a deduction from their benefits. One in five had turned to other sources of credit to meet commitments. This meant deductions “could actually be contributing to the cause of the problem they are trying to solve, by pushing people further into debt”. StepChange told us that the Department must “urgently” review its approach to deductions, given than it “does not work for such a high proportion of people in debt “.

37. Citizens Advice cautioned that the consequences of an excessively aggressive approach to debt recovery go beyond putting claimants into financial hardship. They explained that when deductions are too high, debt can “undermine financial work incentives, as people find that any increase in earnings is eaten up with repayments”. This risks undermining UC’s employment impact and “contradicting the basic aims” of the new system. StepChange echoed and expanded on this view. They explained that a flexible approach to collecting debt—including carefully assessing the affordability of repayments—not only alleviates stress on claimants, but can help place them back in control of their finances and enable them to focus on looking for work. They concluded:

Having a more affordable and flexible policy around deductions from benefits could therefore help get people back into work more quickly, increasing the contribution they can then make to repaying their debts, and shortening the time it takes to repay.

38. In its report on Tackling problem debt, the NAO reported that good debt collection practices are associated with higher collection rates. They cited research showing that providing tailored debt advice, support and affordable repayments saved creditors £82 million in a year from 110,000 over-indebted clients: an average saving of £750 per

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100 Claimants who are experiencing hardship can request lower debt repayments, and can ask to defer repayments by up to three months.
101 National Association of Welfare Rights Advisers (UCR0262), StepChange (UCR0261)
102 National Association of Welfare Rights Advisers (UCR0262)
103 National Housing Federation (UCR0218)
104 StepChange (UCR0261)
105 Citizens Advice (UCR0141)
106 StepChange (UCR0261). See also National Association of Welfare Rights Advisers (UCR0262), London Borough of Tower Hamlets (UCR0243)
person. In contrast, the NAO’s own modelling showed that an aggressive approach was “more likely to make debts harder to manage and increase levels of anxiety or depression” amongst debtors. The report accordingly identified and advocated features of good practice, including:

- Assessing financial and other vulnerabilities. This allows creditors to identify vulnerable debtors and to understand objectively their financial and personal circumstances;

- Signposting or referring to debt advice where relevant, helping claimants to take control of their finances;

- Providing helpful, professional communications to ensure debtors clearly understand the nature and extent of their debt and the repayment process; and

- Offering affordable repayment plans that take vulnerabilities into account. Creditors should ensure plans are matched to what the debtor can afford and to other personal circumstances.

39. StepChange supplied us with case studies of organisations that exemplified these principles. We also heard examples of flexible approaches taken by utility companies, offering options such as repayment breaks, the option of negotiating affordable repayments, and financial help with repayments (see Box 4). The NAO’s report recognised that Government has to respond to different pressures, and may be more constrained in the options available to it. It nonetheless suggested that Government “lags behind” the retail lending sector in implementing good debt management practice and could learn from it. It noted, for example, that established best practice in assessing the affordability of repayments is “not used as standard by Government Departments”. Consequentially, “Government bodies’ debt management standards are considered by debt advisers to be frequently worse than other types of creditor.” StepChange and NAWRA recommended that assessing affordability, in particular, should be central to the Department’s own approach. StepChange called for greater clarity from the Department on how affordability is assessed, and how it will ensure that deductions that could harm claimants are not applied. NAWRA advocated providing clear and accessible guidance to decision makers on setting how what to consider when setting repayment levels.

Box 4: Debt management good practice

<table>
<thead>
<tr>
<th>United Utilities</th>
<th>offers a number of different options to customers that are struggling to pay their bills. These include:</th>
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<tr>
<td>“Payment break”:</td>
<td>an early intervention scheme to prevent customers getting into debt. The scheme is designed to help those customers known as 'Just About</td>
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</tbody>
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107 NAO, Tackling problem debt, HC 1499, September 2018, p.9
108 Ibid.
109 Ibid., p.44
110 StepChange (UCR0261)
111 Tackling problem debt, p.44
112 StepChange (UCR0261)
113 National Association of Welfare Rights Advisers (UCR0262)
Managing' who receive less than £21,000 household income or are in receipt of benefit, by providing some breathing space in their payments when they are faced with an unplanned expense, reduction in income or unexpected life event. The initiative builds on a scheme introduced specifically for customers moving to Universal Credit in 2017, in recognition of the difficulty that the wait for payment can cause claimants in paying bills.

- “Back on Track”: For customers who are behind with their water bill payments and on benefits, United Utilities can discuss and provide an affordable bill depending on their current circumstances.

- “Help to Pay”: For customers receiving Pension Credit and struggling to make payments, Help to Pay scheme caps the customer’s bill at an affordable amount, based on their income and outgoings.

Computershare Loan Services (CLS), a services provider, uses a multi-channel approach to engaging customers with advice on behalf of their creditor clients; using telephone, letter and digital referrals.

Customer-facing staff are trained to identify when and how to signpost customers to free and impartial debt advice providers. There is a robust quality assurance process in place to ensure the correct processes and procedures are being followed. With the customer’s consent, staff can transfer them across to an independent third-party debt advice partner.

In addition to their approach to engaging customers with debt advice, CLS use internal affordability assessments to understand customer circumstances and help achieve the most appropriate outcomes and plans for repayment, on behalf of their clients. CLS have found that investing additional time in customer affordability assessments has led to more sustainable payment arrangements.

The results achieved by one of their clients, UKAR (the holding company for NRAM, Bradford & Bingley and Mortgage Express) evidence how this strategy has been successful. Since UKAR’s formation in 2010, the number of customers three or more months in arrears (including possessions) has reduced by 86%. More than 23,000 customers have been referred to free and impartial Debt Advice and approximately 48,000 successful arrangements have been completed, with the number of those being maintained increasing from 50% to 80% (figures at 30 September 2016).

Source: StepChange, United Utilities

40. The Department reasonably wants to ensure that it collects debts owed to it. But there is compelling evidence that an aggressive approach to recovery hurts more than it helps. Excessively high deductions can pile debt upon debt, pushing claimants into a spiral of hardship and stress. In turn this acts as a barrier to finding employment and progressing in work—and can mean debts take longer to repay.

41. The Department has combined inherited deduction caps from the legacy system with new, higher caps under Universal Credit, and further deductions for Advance Payments. It offered scant detail on how it determined whether these caps and deductions are appropriate. It also seems to understand little about how they are being
used in practice. Organisations working with claimants told us that the Department’s approach all too often leaves claimants struggling. Helping claimants to manage their debts effectively and independently is only part of the challenge.

42. We recommend the Department gather and publish data on deductions for debt from Universal Credit awards. This should include data on deductions as a proportion of the overall award. It should use this, alongside commissioning advice from debt experts, to review its maximum deduction caps and ensure they are set at levels that would be sustainable for most claimants. We also recommend that repayments for Advance Payments are included within the caps. This will help to ensure that the design of Universal Credit does not prevent it from achieving its objectives.

43. Government’s approach to debt collection currently lags behind best practice in the retail debt sector. We recommend the Department introduce a flexible, discretionary approach to debt deductions that learns from the best examples in the retail sector. This should include:

   a) Improved communication with claimants about what deductions are being made, for what purpose, and for how long. This should be issued before the deductions start, giving claimants time to prepare and understand their budget;

   b) Changing guidance to DWP decision makers, setting out clearly how they should go about assessing affordability of debt repayments;

   c) Clear guidance on the circumstances in which deductions should not be applied owing to a risk of harm to the claimant, and on assessing requests for reduced deductions and payment breaks.

The Department should not proceed with managed migration—which will bring many more claimants with pre-existing debt onto UC—until this approach is in place and it can demonstrate that it is functioning effectively. The Department also must not proceed with managed migration until it has assessed the contribution that the five week wait makes to claimant debt and provided this assessment to the Committee.
3 Delivering Universal Support

Referrals and take up

44. Claimants are referred to Universal Support via their Work Coach—either at the claimant’s request, or if the Work Coach recognises that they have a support need that Universal Support could meet.\textsuperscript{114} Both referrals and take up have been much lower than expected. In 2017/18 the Department expected around 170,000 claimants to take up Universal Support. Only around a third of that number were referred to the service, however. Take up was even lower: only around one in three claimants referred to ADS or PBS took up the offer.\textsuperscript{115} The Department could not supply take up or referral rates for 2015/16 and 2016/17. It explained that the number of people on the full service in those years was “very small” and “there was no requirement as part of the funding arrangements for local authorities to collect or supply data”.\textsuperscript{116} The requirement was introduced in 2017/18. The Minister told us that the Department is currently conducting a review of Universal Support to better understand the reasons for low take-up.\textsuperscript{117}

45. London Councils told us that part of the explanation for low take up is that Work Coaches are not consistently identifying and referring claimants who could benefit from Universal Support.\textsuperscript{118} Citizens Advice agreed that “referral mechanisms are often ineffective”. They explained that, in the areas where they are already sub-contracted to deliver support, they had seen overall low numbers: one local CAB in an area with 800 UC claimants reported receiving just two referrals from JCP each month.\textsuperscript{119} Citizens Advice also reported problems with “inappropriate referrals”—where claimants were poorly suited to the support that could be provided, and instances of “people being referred without explanation of the help they would be getting”. This led to claimants missing appointments.\textsuperscript{120} Local authorities and contracted service providers told us this incurred further, potentially wasted costs as they had to chase up claimants.\textsuperscript{121}

46. Witnesses shared a number of suggestions for addressing low take up. Some of these focused on the organisations and bodies that have so far been responsible for delivering and referring to the service: local authorities and Jobcentre Plus. Wakefield Council told us that in their experience, there was a strong business case for councils proactively to seek out claimants experiencing difficulties and offer or refer them to support. They explained that “although resource intensive”.\textsuperscript{122}

Our successes in relation to engagement with UC claimants […] have been built on proactive outreach to impacted tenants in their own homes, rather than waiting for claimants to drop in to centrally located triage services.

Newcastle City Council told our predecessor Committee’s inquiry on The Future of Jobcentre Plus that they had also found a proactive approach to identifying claimant need

\textsuperscript{114} Guidance: Universal Support 2018/19, updated September 2018
\textsuperscript{115} Letter from the Minister for Employment to Committee Chair, June 2018
\textsuperscript{116} Ibid.
\textsuperscript{117} Ibid.
\textsuperscript{118} London Councils (UCR0250). See also Highland Council (UCR0185), Q648 (Allan Gunn)
\textsuperscript{119} Citizens Advice (UCR0141 and UCR0238)
\textsuperscript{120} Citizens Advice (UCR0238)
\textsuperscript{121} Citizens Advice (UCR0141), London Councils (UCR0250), Local Government Association (UCR0242)
\textsuperscript{122} Wakefield District Council (UCR0014)
helpful. They had designed a standardised questionnaire to enable a systematic assessment of claimants’ need for Universal Support, ensuring a consistent approach to referral.\textsuperscript{123} The Trussell Trust favoured formalising such an approach by placing a statutory duty on local authorities to identify need amongst claimants, and to provide PBS and ADS to all who might benefit.\textsuperscript{124} We heard, however, that this approach would depend on the Department sharing information on vulnerable claimants with local authorities—and ensuring they have the resources fully to support all of those claimants who might benefit. At present, the Department’s approach to resourcing Universal Support provision does not cover all of the costs incurred by providers.\textsuperscript{125}

47. Other witnesses told us that Jobcentre Plus Work Coaches had an equally important role to play, as they are at present the main referral route onto Universal Support. Allan Gunn, Head of Revenues and Customer Service at the Highland Council, explained that without Work Coaches playing their part, delivery partners will struggle to support UC claimants effectively. He told us that their ability to do so is “very much dependent on the number of referrals you get from the Work Coaches”.\textsuperscript{126} We heard Work Coaches could be required to take a more consistent approach to informing claimants about Universal Support: for example, confirming that they have told claimants about Universal Support at their initial interview, and offered them access to it.\textsuperscript{127} London Councils suggested that even if the claimant turns down support at this stage, Work Coaches should be required to revisit the issue periodically as their claim progresses, in case a support need emerges later.\textsuperscript{128}

48. The Department’s evaluation of the Universal Support pilots considered the role of Work Coaches in triaging claimants. It noted that the initial interview with the Work Coach might not be optimal to discuss Universal Support “due to the already lengthy nature of the interview”.\textsuperscript{129} The Department told us that this “First commitments” interview, in which the Claimant Commitment is agreed, can take up to 50 minutes.\textsuperscript{130} The trial concluded that “a follow-up conversation” may be a more appropriate place for the support discussion.\textsuperscript{131} The evaluation found that engaging claimants with support formally via their interactions with Jobcentre Plus worked well, and that “framing this as part of a wider set of commitments appeared to increase initial engagement”.\textsuperscript{132} It reported further that some Work Coaches had found this a beneficial way to better understand claimants’ needs, helping them to agree a more realistic Claimant Commitment for the individual and to get a sense of their individual circumstances.\textsuperscript{133}

49. Both referrals to and take up of Universal Support are much lower than the Department expected. In part, this may reflect the content of the offer: Universal Support is not consistently offering claimants the support they need, at the point they need it. But there are also clear improvements to be made to the mechanisms

\begin{itemize}
\item \textsuperscript{123} Newcastle City Council (FJP0042)
\item \textsuperscript{124} The Trussell Trust, Left behind: is Universal Credit truly universal?
\item \textsuperscript{125} Local Government Association (UCR0242), London Borough of Tower Hamlets (UCR0243), National Audit Office, Rolling out Universal Credit, p.42
\item \textsuperscript{126} Q648 (Allan Gunn)
\item \textsuperscript{127} MEAM (UCR0220), London Councils (UCR0250)
\item \textsuperscript{128} London Councils (UCR0250)
\item \textsuperscript{129} DWP, Evaluation of the Universal Support delivered locally trials, July 2016, p.81
\item \textsuperscript{130} Letter from the Minister for Employment to Committee Chair, September 2018
\item \textsuperscript{131} DWP, Evaluation of the Universal Support delivered locally trials, p.82
\item \textsuperscript{132} DWP, Evaluation of the Universal Support delivered locally trials, pp.46-47
\item \textsuperscript{133} DWP, Evaluation of the Universal Support delivered locally trials, p.83
\end{itemize}
for accessing Universal Support. At present these position Universal Support as an optional add-on to Universal Credit, rather than a core component of its success. The Department must reinforce the centrality of Universal Support to Universal Credit to both Work Coaches and claimants. We recommend introducing a new ‘Support conversation’ between Work Coaches and claimants at the start of every Universal Credit claim. Work Coaches should then be required to revisit support needs at periodic intervals, in case a new need emerges.

Referral process

50. Some witnesses told us that referral processes and structures for Universal Support would benefit from more fundamental reform. Iain Duncan Smith emphasised that closer working between JCP and some support services—especially local Citizens Advice Bureaux—could enable Universal Support to be delivered much more effectively. This would entail building a “much stronger and better connection” between JCP and support services.134 Other witnesses agreed, telling us that foodbanks and other local support services have an important role to play in directing people towards support intended to help them adjust to UC—and potentially in delivering Universal Support directly.135 These arguments are reflected in the Department’s October 2018 announcement that responsibility for delivering Universal Support would pass from local authorities to Citizens Advice and Citizens Advice Scotland in 2019/20.136

51. Citizens Advice and MEAM observed that the extent of effective partnership working between JCP, local authorities and local support services varies by area. MEAM explained that this affects the service that claimants receive:137

Although we are aware of some Jobcentre Plus offices working with homelessness agencies and other organisations to share knowledge with potential claimants, this does not appear to be the norm.

Citizens Advice observed that “with no central list of support, or guidelines on how this support should be advertised” it can be difficult for local support organisations to “find details of the level of funding or the scope of local services”.138 This creates inconsistency in referrals and provision between different areas. Citizens Advice, and others, explained that a lack of published minimum standards for referral to Universal Support means that mechanisms also vary, with “some areas only allowing Jobcentres to refer” and “no standardised referral mechanisms in place”. This means those identified by other agencies as potentially benefiting from Universal Support can either miss out, or have to go back to the Jobcentre to request it—introducing a further barrier.139 Accordingly, Citizens Advice recommended DWP implement a “no wrong door” principle for referrals, allowing claimants to be referred directly to providers from whichever organisation identifies their need for support, irrespective of the different contracting arrangements that local authorities might choose for delivery.140

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134 Q615 (Iain Duncan Smith)
135 The Trussell Trust, Left behind: is Universal Credit truly universal?, Citizens Advice (UCR0141)
136 DWP, Citizens Advice to provide support to Universal Credit claimants
137 MEAM (UCR0200), Citizens Advice (UCR0141), South London and Maudsley NHS Trust (UCR0188)
138 Citizens Advice (UCR0238). See also Local Government Association (UCR0237), Citizens Advice (UCR0201), Q648 (Allan Gunn)
139 Citizens Advice (UCR0238)
140 Citizens Advice (UCR0141 and UCR0238)
52. In October 2018 the Department announced that the contract for delivering Universal Support would pass to Citizens Advice and Citizens Advice Scotland. The Department explained that Citizens Advice would begin delivering the service immediately alongside local authorities. It will take over full responsibility for delivery from April 2019/20. The Secretary of State claimed that this development would “ensure everyone, and in particular the most vulnerable claimants” gets “the best possible support with their claim that is consistently administered throughout the country”. The Department said it is currently working with Citizens Advice to “develop a service that will ensure that everyone gets the help they need to make and manage their Universal Credit claim”. The Minister implied in correspondence, however, that both the broad features of the service Citizens Advice will deliver and the funding allocated to it remain unchanged.\textsuperscript{141} Citizens Advice also confirmed that their contract only runs until March 2020.\textsuperscript{142} The Department told us that “towards the end of March 2020” it would conduct a review of Universal Support to “evaluate provision and to determine whether changes need to be made”, including to its choice of provider.\textsuperscript{143}

53. Local flexibility and effective partnership working are central to Universal Support’s success. Local authorities and local support agencies such as Citizens Advice are often closer to the people they support and well-placed to identify people who are vulnerable and in need. They should retain a significant degree of autonomy in designing and delivering provision. But the Department needs to balance this autonomy with consistency for claimants. We recommend the Department work with Citizens Advice to agree and define minimum standards for publicising Universal Support and referring claimants to support. This should include implementing a ‘no wrong door’ approach whereby claimants can be referred directly to providers from whichever organisations they present to; rather than having to go via Jobcentre Plus.

54. The Department’s decision to contract Citizens Advice to deliver Universal Support up to 2020 will take pressure off already-stretched local authorities. But the Department must ensure that this change is not merely cosmetic. Improving the support offer itself—and not simply changing the delivery partner—is crucial to ensuring people receive the help they need.

55. The Department claims its new contract with Citizens Advice will ensure Universal Support is delivered more consistently across the country. The contract finishes in April 2020. The Department plans to review the support offer towards the end of March 2020. But leaving decisions on the size and shape of the service too late risks creating a gap in support for claimants—at the very time that managed migration is expected to accelerate. We recommend the Department commit now to funding Universal Support throughout the managed migration period.

**Co-location**

56. Changes announced in the 2015 Spending Review have meant that JCP offices are increasingly co-located with other services, such as council benefit teams or health

\textsuperscript{141} Letter from Minister for Employment to Committee Chair, October 2018
\textsuperscript{142} Letter from Citizens Advice to Committee Chair, October 2018
\textsuperscript{143} Letter from Minister for Employment to Committee Chair, October 2018
services. During our inquiry into *The Future of Jobcentre Plus*, the Department told us that this co-location can help produce better and more cost-effective outcomes, especially for claimants with complex needs. Many organisations, including local authorities, were supportive of this approach. We heard that extending co-location of JCP and support organisations could improve the efficiency and effective delivery of Universal Support. The Department told us that this is a realistic prospect: Neil Couling, Director General for Universal Credit, said that up to March 2018, the Department had been “tied into a 20-year [estates] deal [ … ] which constrained our ability to make changes”. He explained, however, that “we are in a new contract now with new flexibilities”. Although the Department “cannot end a contract next week [ … ] we have break points in the contract on various locations where we can do things differently.”

57. London Councils told us that there is an association between co-located services, referral volumes, and take up. Local authorities receive more referrals where Universal Support and JCP services are co-located. Moreover, those referrals are “more likely to result in actual service provision”—claimants taking the support up. The Department’s evaluation of the Universal Support trials reflected these claims. Co-located sites reported benefits including:

a) Greater take up of support, especially amongst harder to reach claimants. Islington JCP reported that 91% of those referred to ADS and 80% referred to PBS took up the support. Trials without co-location saw much lower take-up; in Blaenau Gwent JCP, for example, just 36% of claimants took up ADS and 12% took up PB;

b) The ability to offer claimants a wider range of services and to “treat UC barriers holistically”; and

c) Greater efficiency in building up wider support services beyond Universal Support, including with new organisations.

58. We heard that co-location could take a range of forms, allowing JCP and Universal Support providers to tailor their models to the specifics of their geography and claimant base. London Councils and the Highland Council told us about different approaches they had seen and implemented, while the Department’s evaluation report noted other, innovative models. The models included:

- Fully integrated “one stop shops”, where Universal Support providers are present in a dedicated hub;

- Stationing providers within a wider, multipurpose hub in JCP for a few days per week;

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145 Ibid.
146 The Future of Jobcentre Plus, p.20
147 DWP (UCR0186), Highland Council (UCR0185), IPSE (UCR0174)
148 Q343 (Neil Couling)
149 London Councils (UCR0250)
150 DWP, Evaluation of the Universal Support delivered locally trials
151 Ibid., pp.85-87
152 Ibid., p.86
153 London Councils (UCR0250), Highland Council (UCR0185)
• In areas where full co-location or centralising was not possible (for example, in rural areas such as West Lincolnshire), some local authorities adopted “hub and spoke” models of co-location, placing smaller, easier to reach co-located hubs across the area;

• Local authorities including Islington, Lambeth, Lewisham and Southwark experimented with using their hubs to carry out triage for claimants, potentially lifting some of the burden and responsibility for identifying need from Work Coaches.154

The evaluation reported promising results associated with each model, although the association with higher take up was particularly marked where JCPs used “one stop shop” models. The trial evaluation concluded that although successful delivery is influenced by a range of factors besides co-location, “the ambition should be to co-locate support services within a single ‘hub’ wherever it is possible to do so”. It continued:155

In particular, this should mean co-locating Jobcentre Plus support alongside local authority services. Fuller co-location of other support services would also often be desirable. Co-location is not a substitute for good identification, triage, referral and management processes—but effective co-location should improve all aspects of service delivery.156

59. **Co-locating Universal Support providers with Jobcentre Plus Work Coaches has clear benefits for claimants.** Co-location is associated with improved referral rates and take up of support that can be vital in easing the transition onto Universal Credit. In turn, this benefits providers and the Department. Providers’ ability to identify and support claimants is improved. Some of the burdens on Work Coaches can be lifted. And the chances of claimants interacting with Universal Credit as the Department needs them to are increased. **We recommend that the Department commits to improving co-location of Universal Support providers and Jobcentre Plus. It should co-ordinate this exercise with the roll-out of managed migration. As a first step, it should set out key milestones and targets for co-location in response to this report.**

154 DWP, Evaluation of the Universal Support delivered locally trials, pp.50-52
155 DWP, Evaluation of the Universal Support delivered locally trials, p.21
156 DWP, Evaluation of the Universal Support delivered locally trials, p.87
4 Managed migration

60. Migration is the process of transferring legacy benefit claimants onto UC. Migration can happen in two ways:157

   i) ‘Natural’ migration. This is when a claimant’s circumstances change and they try to make a new claim for a legacy benefit. They discover they can only claim UC instead.

   ii) ‘Managed’ migration, whereby claimants will move from legacy benefits to UC without a change in circumstances.

The Department is due to pilot managed migration from mid-2019. It will start transferring claimants in larger numbers from 2020.158 It claims this embodies UC’s “test and learn” approach, and will allow it to “change the process, where necessary, before larger volumes of claimants are managed migrated to UC”. The Department estimates it will eventually migrate 3.95 million claimants—1.9 million households—via managed migration.159 Managed migration is due to be complete—and UC fully rolled out—by the end of 2023. The Office for Budget Responsibility reports that the vast majority (90%) of claimants transferred via managed migration will be either income-related ESA claimants, or families with children who receive tax credits.160 In its June 2018 report on UC, the NAO highlighted that the Department’s preparedness for managed migration is one of the critical issues it will face in the coming years. It recommended the Department should not progress with managed migration until it can be confident that its “business-as-usual” operations can cope with the higher volumes of claimants that it will bring.161

61. The Department submitted draft Regulations on managed migration for scrutiny by the Social Security Advisory Committee (SSAC) in June 2018.162 SSAC’s subsequent consultation on the regulations closed in August 2018.163 The regulations and accompanying note set out the Department’s proposed high-level approach to managed migration:164

   i) All legacy benefit claimants will undergo a four to six-month ‘preparation period’ before migration. During this period they will receive generic communications preparing them for the change to their benefits;

   ii) In the same “warming up” period claimants will receive information on support they can access and any actions they might need to take to prepare for UC (such as opening a bank account or ensuring they have appropriate identification);

157 See Child Poverty Action Group, Universal Credit and “natural migration”, October 2016 and Social Security Advisory Committee, Government proposal to move claimants on “legacy” benefits to Universal Credit: consultation announced, June 2018
158 Q36 (Alok Sharma)
159 National Audit Office, Rolling out Universal Credit, p.21; Office for Budget Responsibility, Welfare trends report, January 2018, p.68
161 National Audit Office, Rolling out Universal Credit, p.11
162 Universal Credit (Transitional protection) (Managed migration) Amendment Regulations 2018
163 SSAC, Consultation: moving claimants to Universal Credit from other working age benefits, updated August 2018
164 DWP, Explanatory memorandum and letter to the SSAC Secretary, June 2018
iii) Claimants will then receive a notification informing them that they need to make a UC claim within a specified timescale;

iv) If they still have not made a claim, claimants will receive reminders two weeks and one week before their notification period expires;

v) Claimants who do make a claim within the notification period will go through the standard UC application process. If their application is successful and processed on time they will wait five weeks between their last payment of legacy benefits, and their first UC payment. During this time they will be eligible for the Department’s measures to offset hardship—i.e. Advance Payments, housing benefit run on etc. Claimants who fail to make a claim will see their benefits stop.

The Department stated that this approach will allow it to control the “flow” of migrating claimants onto UC, and should allow it the “capacity to deal with certain claimants in alternative ways”—if, for example, they are part of a vulnerable group.165

62. Witnesses told us that the start of managed migration will make it all the more important that DWP’s systems to help claimants adjust to UC—including Universal Support—are fully effective.166 Papworth Trust, a disability charity, pointed out that many claimants transferring via managed migration will have been claiming legacy benefits for substantial periods of time. They will be used to managing their money in the legacy system. They are likely to have little in the way of a financial safety net, and may require substantial support to adjust.167 Mind further explained that the Department’s plans place significant responsibilities on claimants to navigate their way through applying for UC and managing a new claim—something that vulnerable claimants may struggle with without the correct support.168 Rob Holland, Public Affairs and Parliamentary Manager at Mencap, suggested Work Coaches already feel overwhelmed by the complex circumstances of claimants they need to support—most of them single, non-disabled people without dependents. Pressure on them is only likely to increase as managed migration progresses.169 In turn, local authorities and other support organisations could also expect to experience additional pressures.

63. We heard that preparedness and co-ordination between JCP and local support services will be key to smooth transitions between the legacy benefits and UC.170 Policy in Practice told us that DWP and local authorities must ensure they have the right support in place to help claimants interpret the notifications they will receive and to act on them. They said this will be particularly important for vulnerable claimants, who will need “good telephone back up and expert help from well-trained DWP staff”.171 They also noted that local authorities and councils need clear guidance from the Department on what to expect and deliver, and excellent communication with affected residents.172 The Department agreed that it will need to provide substantial support to claimants during migration.

165 Explanatory memorandum and letter to the SSAC Secretary, p.12
166 See, for example, Mind (UCR0253), London Councils (UCR0250), Local Government Association (UCR0237), Citizens Advice (UCR0238 and UCR0141)
167 Mind (UCR0253)
168 Q686 (Rob Holland)
169 The Children’s Society (UCR0094)
170 Policy in Practice, Response to SSAC consultation: managed migration onto Universal Credit, August 2018, p.5
171 Policy in Practice, Response to SSAC consultation: managed migration onto Universal Credit, p.4
We asked specifically whether claimants in the managed migration “preparation period” would be eligible for support, given the difficulties they might experience understanding and applying for Universal Credit.\(^{173}\) The Department told us that Universal Support would be “part of the overall support package”, but that it is still “looking at how [ … ] we might use it to support claimants during migration.”\(^{174}\)

64. The Department told us that it intends to continue its current approach to communicating with local organisations and authorities as managed migration commences. It said that JCP service leaders and Work Coaches “work very closely” with these organisations “to understand and sign-post to local services” for claimants in need of support. It did, however, commit to continuing to “gather insight from our stakeholders” and “engage with organisations at a local level” regarding its approach as managed migration commences.\(^{175}\)

65. We heard that the quality of communication between DWP and local organisations varies. Tower Hamlets Council told us that the Department has so far struggled to get communication with claimants about the UC roll-out right.\(^{176}\) If this persists it could mean that many would-be UC claimants will not understand how migration would be triggered, and will struggle to understand when and how they are likely to be required to claim the benefit. Tower Hamlets suggested that a targeted advertising campaign prior to and during managed migration would help to ensure “less confusion and more people being UC ready”.\(^{177}\) Policy in Practice further suggested that the Department revises its approach to communicating directly with claimants. Alongside a personalised, extended Universal Support offer, the Department should provide “targeted and tailored communications to every household before they are asked to migrate”, rather than the generic communications that are currently planned.\(^{178}\)

66. The people claiming Universal Credit at the moment are, for the most part, people with relatively straightforward needs. Even this group has had difficulties in adjusting to Universal Credit. The start of managed migration will see an influx of people whose needs are much more complex moving onto Universal Credit. They may have been claiming legacy benefits for many years. They are likely to have little in the way of a financial backstop. Many will require additional help to adapt to the new system. Universal Support should be the Department’s key vehicle for providing that personalised help before, during, and after migration. The Department must accept that a “one size fits all” approach to managed migration—either to the process or the support for it—will not work for many vulnerable claimants.

67. We recommend the Department set out in response to this report how it will go about communicating managed migration plans to all involved, broken down by group: claimants, Jobcentre Plus, local authorities and local support services. This

\(^{173}\) Letter from Committee Chair to the Secretary of State, August 2018
\(^{174}\) Letter from Secretary of State to Committee Chair, September 2018
\(^{175}\) Letter from Minister for Employment to Committee Chair, October 2018; Letter from Secretary of State to Committee Chair, September 2018
\(^{176}\) London Borough of Tower Hamlets (UCR0243)
\(^{177}\) London Borough of Tower Hamlets (UCR0243)
\(^{178}\) Policy in Practice, Response to SSAC consultation: managed migration onto Universal Credit, p.1, Explanatory memorandum and letter to the SSAC Secretary, p.11
should include setting out plans for additional, targeted, personalised communications with vulnerable groups and the organisations supporting them, beyond the generic communications it already has planned.

Evaluating Universal Support and managed migration

68. We asked the Department what evaluation it intended to carry out of Universal Support. It told us about its ongoing review of Universal Support, comprising a “range of activities” including visits to UC service centres, discussions with claimants, Jobcentres, local authority and service centre staff, and third-party providers.¹⁷⁹ It has also held a workshop with support organisations and housing associations considering how take up might be improved. The Department did not offer any further detail on how it will evaluate Universal Support provision—including whether it will seek to understand the impact that Universal Support is having on claimants’ outcomes.¹⁸⁰

69. Our predecessor Committee recommended that, in any kind of joint working it undertakes, the Department must ensure it is clear how it will judge success.¹⁸¹ Tony Wilson, Director of Policy and Research at the Learning and Work Institute, emphasised that there is a difference between process and outcomes: simply providing a service does not necessarily lead to improved outcomes for claimant.¹⁸² Witnesses to this inquiry re-iterated the need for a clear performance and evaluation framework for Universal Support—the successful delivery of which will be a key test of joint working. We heard this should go beyond looking at take-up, seeking to understand better the relationship between support provided and how claimants are adapting to UC.¹⁸³ This might include, for example, looking at factors such as the relationship between receipt of budgeting support and levels of rent arrears or personal debt, or seeking to understand how ADS contributes to claimants’ ongoing development of digital skills and ability to maintain their Universal Credit claim.¹⁸⁴

70. The Department’s explanatory memorandum on managed migration commits to monitoring and evaluating the process, beginning with the pilot from mid-2019. It says that the Department’s “test and learn” approach will allow it to “evaluate the managed migration process robustly to ensure it supports claimants effectively”.¹⁸⁵ The memorandum did not set out in detail how evaluation would proceed. When pressed for further detail, the Secretary of State told us that the Department is in conversation with local organisations regarding arrangements for managed migration. It intends to “continue that dialogue” throughout the testing phases, “sharing what we learn before we reach final conclusions about how we will deliver the best possible service to make the migration process a success”.¹⁸⁶

71. The Department’s proposed approach appears to fall short of the request made of it by the Government’s Major Projects Review Group (MPRG) in May 2018. The MPRG

¹⁷⁹ Letter from Minister for Employment to Committee Chair, June 2018, Letter from Minister for Employment to Committee Chair, October 2018
¹⁸⁰ Letter from Minister for Employment to Committee Chair, October 2018
¹⁸¹ The Future of Jobcentre Plus, p.23
¹⁸² Ibid.
¹⁸³ See, for example, London Borough of Tower Hamlets (UCR0243), Local Government Association (UCR0237),
¹⁸⁴ The Future of Jobcentre Plus, p.23, Local Government Association (UCR0237),
¹⁸⁵ Explanatory memorandum and letter to the SSAC Secretary, p.34
¹⁸⁶ Letter from Secretary of State to Committee Chair, September 2018
asked that in preparation for managed migration the Department “agree a set of success criteria with stakeholders, which enables progress against [managed migration plans] plan to be monitored regularly”. The NAO recommended in its report on UC that in preparation for migration, the Department “needs to ensure that delivery partners’ feedback on both implementation issues and the impact on claimants is considered”. It said this should involve systematically collecting, analysing and publishing data and evidence from delivery partners to “produce a shared understanding of what is happening on the ground and how it is addressing any issues” that emerge.

72. The Department has correctly identified that the existing iteration of Universal Support is not meeting claimants’ needs. Its improvement plans currently focus on encouraging more people to take up the offer of support and on improving consistency across the country. This is welcome. The Department must be more ambitious, however, and clearer about what outcomes it expects Universal Support provision to produce. As it offers a wider range of support to a more diverse group of claimants, the Department must consistently ensure and revisit whether it is allocating funding effectively, getting the results it wants, and giving claimants the support that they need.

73. Managed migration is the next great challenge the Department will face. Ongoing, open, transparent engagement with organisations supporting claimants on the frontline will be vital to its success. Dialogue with these organisations is helpful and will inform the Department’s understanding of emerging issues. But it must also see the bigger picture. Clear, comprehensive and measurable indicators of progress and readiness for migration will be vital in ensuring the Department makes the right decisions on when and how to move forward.

74. We recommend the Department agree with stakeholders, including Citizens Advice and Citizens Advice Scotland, clear key performance indicators (KPIs) for Universal Support, and share these in draft with this Committee before they are adopted. These should go beyond referrals and take-up and should focus on outcomes for claimants. The Department should commit to publishing regular updates on whether the KPIs are being met, and should make meeting them a condition of proceeding with managed migration. We will return to managed migration in greater detail in our future work.
Conclusions and recommendations

Introduction

1. The Department for Work and Pensions intends Universal Credit to do much more than simply change the way that benefits are processed and paid. DWP aspires for Universal Credit to transform the relationship between claimants and the welfare state, encouraging greater responsibility and independence. Achieving this will require cultural change amongst claimants and DWP staff alike. Universal Support will be a crucial part of that change. The Department must ensure it is funding the right support, at the right time. (Paragraph 7)

2. We welcome the Department’s commitment to reviewing and improving Universal Support. We recommend it sets out the conclusions of this review in response to our Report. (Paragraph 7)

The Universal Support Offer

3. The gap between the Department’s original vision for Universal Support, and the meagre offer it now funds, is vast. The Department envisaged providing ongoing help Universal Credit’s most vulnerable claimants, ensuring they can make the most of the new benefit. In reality it offers a single session of Personal Budgeting and Digital Support, restricted to the first three months of a claim. The current service is almost solely focused on getting new claims up and running. The new contract with Citizens Advice will not substantially diverge from this approach. This may help the Department progress with the roll out, but it is likely to fall far short on helping Universal Credit achieve its wider objectives. In its current form, Universal Support is far from “universal”, and all too often offers only very limited support both budgeting and digital skills. (Paragraph 12)

4. Universal Credit’s savings depend on claimants using its digital systems successfully: not just at the outset, but throughout their time on the benefit. Some will find this easy. Others will require substantial, possibly ongoing, support. The Department provides an extensive list of tasks that Assisted Digital Support providers should assist claimants with, but it will fund only a single two hour session of support at the start of a claim. Its own research shows that for many claimants this is woefully inadequate. The digital service saves DWP money: it is in the Department’s interests to invest in helping claimants use it. (Paragraph 15)

5. We recommend the Department lift the three-month limit on providing Assisted Digital Support. We also recommend it engages quickly and positively with local authorities and Citizens Advice to agree arrangements for funding additional Digital Support sessions for claimants with higher needs. (Paragraph 15)

6. Failure to verify identity online has consequences for claimants: it is a key factor in late or incomplete Universal Credit payments. It also has consequences for Universal Credit’s efficiency, forcing the Department to rely instead on costly and inefficient services in Jobcentre Plus. The Department’s own research starkly illustrates how challenging claimants find this part of the process.
The Department intends for 80% of claimants to use Verify successfully when Universal Credit is fully rolled out. But currently almost half of all claimants either try to use Verify and fail, or do not even try. (Paragraph 18)

7. **We recommend the Department amend guidance on the content of Assisted Digital Support to include ensuring claimants are able to use the Verify system. We also recommend it set out in response to this Report its strategy and any supporting resources for increasing Verify usage to 80% by 2024-5.** (Paragraph 18)

8. Universal Credit is a major change in the way that benefits are paid. Claimants receive one single payment rather than numerous smaller amounts. From this they are expected to budget for all expenses for the entire month. Yet the support that the Department offers to help claimants adjust to this change is severely lacking. Claimants can receive just one session of Personal Budgeting Support at the start of a claim. Those who need more—or who simply misjudge at the outset their ability to cope—risk being without the support they need and facing spiralling financial difficulties. (Paragraph 23)

9. **We recommend the Department lift the three month limit for Personal Budgeting Support and engage with local authorities and Citizens Advice to agree arrangements for funding ongoing support for those claimants who require it.** (Paragraph 23)

10. Debt can be a barrier to moving into work and progressing to better paid work. In turn, it can act as a barrier to Universal Credit achieving its employment aims. Some claimants will come onto Universal Credit already in debt, but the availability of Advance Payments means claimants may fall into more debt. This creates an obligation on the Department to ensure that claimants are able to manage their debts effectively—in addition to day-to-day budgeting. **We recommend the Department extend Universal Support to include a core offer of debt advice and support in negotiating with creditors.** (Paragraph 29)

11. The Department reasonably wants to ensure that it collects debts owed to it. But there is compelling evidence that an aggressive approach to recovery hurts more than it helps. Excessively high deductions can pile debt upon debt, pushing claimants into a spiral of hardship and stress. In turn this acts as a barrier to finding employment and progressing in work—and can mean debts take longer to repay. (Paragraph 40)

12. The Department has combined inherited deduction caps from the legacy system with new, higher caps under Universal Credit, and further deductions for Advance Payments. It offered scant detail on how it determined whether these caps and deductions are appropriate. It also seems to understand little about how they are being used in practice. Organisations working with claimants told us that the Department’s approach all too often leaves claimants struggling. Helping claimants to manage their debts effectively and independently is only part of the challenge. (Paragraph 41)

13. **We recommend the Department gather and publish data on deductions for debt from Universal Credit awards. This should include data on deductions as a proportion of the overall award. It should use this, alongside commissioning**
advice from debt experts, to review its maximum deduction caps and ensure they are set at levels that would be sustainable for most claimants. We also recommend that repayments for Advance Payments are included within the caps. This will help to ensure that the design of Universal Credit does not prevent it from achieving its objectives. (Paragraph 42)

14. Government’s approach to debt collection currently lags behind best practice in the retail debt sector. We recommend the Department introduce a flexible, discretionary approach to debt deductions that learns from the best examples in the retail sector. This should include:

- Improved communication with claimants about what deductions are being made, for what purpose, and for how long. This should be issued before the deductions start, giving claimants time to prepare and understand their budget;

- Changing guidance to DWP decision makers, setting out clearly how they should go about assessing affordability of debt repayments;

- Clear guidance on the circumstances in which deductions should not be applied owing to a risk of harm to the claimant, and on assessing requests for reduced deductions and payment breaks.

The Department should not proceed with managed migration—which will bring many more claimants with pre-existing debt onto UC—until this approach is in place and it can demonstrate that it is functioning effectively. The Department also must not proceed with managed migration until it has assessed the contribution that the five week wait makes to claimant debt and provided this assessment to the Committee. (Paragraph 43)

Delivering Universal Support

15. Both referrals to and take up of Universal Support are much lower than the Department expected. In part, this may reflect the content of the offer: Universal Support is not consistently offering claimants the support they need, at the point they need it. But there are also clear improvements to be made to the mechanisms for accessing Universal Support. At present these position Universal Support as an optional add-on to Universal Credit, rather than a core component of its success. The Department must reinforce the centrality of Universal Support to Universal Credit to both Work Coaches and claimants. (Paragraph 49)

16. We recommend introducing a new ‘Support conversation’ between Work Coaches and claimants at the start of every Universal Credit claim. Work Coaches should then be required to revisit support needs at periodic intervals, in case a new need emerges. (Paragraph 49)

17. Local flexibility and effective partnership working are central to Universal Support’s success. Local authorities and local support agencies such as Citizens Advice are often closer to the people they support and well-placed to identify
people who are vulnerable and in need. They should retain a significant degree of autonomy in designing and delivering provision. But the Department needs to balance this autonomy with consistency for claimants. (Paragraph 53)

18. We recommend the Department work with Citizens Advice to agree and define minimum standards for publicising Universal Support and referring claimants to support. This should include implementing a ‘no wrong door’ approach whereby claimants can be referred directly to providers from whichever organisations they present to; rather than having to go via Jobcentre Plus. (Paragraph 53)

19. The Department’s decision to contract Citizens Advice to deliver Universal Support up to 2020 will take pressure off already-stretched local authorities. But the Department must ensure that this change is not merely cosmetic. Improving the support offer itself—and not simply changing the delivery partner—is crucial to ensuring people receive the help they need. (Paragraph 54)

20. The Department claims its new contract with Citizens Advice will ensure Universal Support is delivered more consistently across the country. The contract finishes in April 2020. The Department plans to review the support offer towards the end of March 2020. But leaving decisions on the size and shape of the service too late risks creating a gap in support for claimants—at the very time that managed migration is expected to accelerate. We recommend the Department commit now to funding Universal Support throughout the managed migration period. (Paragraph 55)

21. Co-locating Universal Support providers with Jobcentre Plus Work Coaches has clear benefits for claimants. Co-location is associated with improved referral rates and take up of support that can be vital in easing the transition onto Universal Credit. In turn, this benefits providers and the Department. Providers’ ability to identify and support claimants is improved. Some of the burdens on Work Coaches can be lifted. And the chances of claimants interacting with Universal Credit as the Department needs them to are increased. We recommend that the Department commits to improving co-location of Universal Support providers and Jobcentre Plus. It should co-ordinate this exercise with the roll-out of managed migration. As a first step, it should set out key milestones and targets for co-location in response to this report. (Paragraph 59)

Managed migration

22. The people claiming Universal Credit at the moment are, for the most part, people with relatively straightforward needs. Even this group has had difficulties in adjusting to Universal Credit. The start of managed migration will see an influx of people whose needs are much more complex moving onto Universal Credit. They may have been claiming legacy benefits for many years. They are likely to have little in the way of a financial backstop. Many will require additional help to adapt to the new system. Universal Support should be the Department’s key vehicle for providing that personalised help before, during, and after migration. The Department must accept that a “one size fits all” approach to managed migration—either to the process or the support for it—will not work for many vulnerable claimants. (Paragraph 66)
23. **We recommend the Department set out in response to this report how it will go about communicating managed migration plans to all involved, broken down by group: claimants, Jobcentre Plus, local authorities and local support services. This should include setting out plans for additional, targeted, personalised communications with vulnerable groups and the organisations supporting them, beyond the generic communications it already has planned.** (Paragraph 67)

24. **The Department has correctly identified that the existing iteration of Universal Support is not meeting claimants’ needs. Its improvement plans currently focus on encouraging more people to take up the offer of support and on improving consistency across the country. This is welcome. The Department must be more ambitious, however, and clearer about what outcomes it expects Universal Support provision to produce. As it offers a wider range of support to a more diverse group of claimants, the Department must consistently ensure and revisit whether it is allocating funding effectively, getting the results it wants, and giving claimants the support that they need.** (Paragraph 72)

25. **Managed migration is the next great challenge the Department will face. Ongoing, open, transparent engagement with organisations supporting claimants on the frontline will be vital to its success. Dialogue with these organisations is helpful and will inform the Department’s understanding of emerging issues. But it must also see the bigger picture. Clear, comprehensive and measurable indicators of progress and readiness for migration will be vital in ensuring the Department makes the right decisions on when and how to move forward.** (Paragraph 73)

26. **We recommend the Department agree with stakeholders, including Citizens Advice and Citizens Advice Scotland, clear key performance indicators (KPIs) for Universal Support, and share these in draft with this Committee before they are adopted. These should go beyond referrals and take-up and should focus on outcomes for claimants. The Department should commit to publishing regular updates on whether the KPIs are being met, and should make meeting them a condition of proceeding with managed migration. We will return to managed migration in greater detail in our future work.** (Paragraph 74)
Draft report (*Universal Support*), proposed by the Chair, brought up and read.

*Ordered*, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 74 read and agreed to.

Summary agreed to.

*Resolved*, That the Report be the Eighteenth Report of the Committee to the House.

*Ordered*, That the Chair make the Report to the House.

*Ordered*, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

[Adjourned till Wednesday 31 October at 9.15am]
Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the inquiry publications page of the Committee’s website.

Wednesday 23 May 2018

Rt Hon Iain Duncan Smith MP

Allan Gunn, Head of Revenues and Customer Service, Highland Council, Emma Revie, Chief Executive, Trussell Trust, and Zena Cooke, Corporate Director, Resources, London Borough of Tower Hamlets.

Wednesday 27 June 2018

Alok Sharma MP, Minister of State for Employment, Neil Couling CBE, Director, Universal Credit Programme, Iain Walsh, Director of Labour Market Strategy & International Affairs and Colin Stewart, Area Director (North), Department for Work and Pensions.
Published written evidence

The following written evidence was received and can be viewed on the inquiry publications page of the Committee’s website.

UCR numbers are generated by the evidence processing system and so may not be complete.

1. Accord (UCR0021)
2. Administrator Nicholas Berry (UCR0213)
3. Aiden Cameron (UCR0064)
4. Albyn Housing Society (UCR0009)
5. Albyn Housing Society (UCR0056)
6. Alex Sheffield (UCR0159)
7. Assn of British Insurers (UCR0206)
8. Asylum Matters (UCR0125)
9. BCHA Preston (UCR0027)
10. Birmingham City Council (UCR0132)
11. Bradford University (UCR0006)
12. Bright Blue (UCR0194)
13. Bristol University / Women’s Budget Group (UCR0215)
14. British Association of Social Workers (UCR0108)
15. Centre for Social Justice (UCR0133)
16. Centre for Social Justice (UCR0266)
17. Centrepoint (UCR0011)
18. Chesterfield Borough Council (UCR0012)
20. Child Poverty Action Group (UCR0096)
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23. Child Poverty Action Group (UCR0233)
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27. Citizens Advice (UCR0141)
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32. Citizens Advice Derbyshire Districts (UCR0088)
33. Citizens Advice Scotland (UCR0029)
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45  Coventry Citizens Advice (UCR0090)
46  Davido Ltd (UCR0162)
47  Deaf Connections (UCR0001)
48  Department for Work and Pensions (UCR0186)
49  Department for Work and Pensions (UCR0216)
50  Department for Work and Pensions (UCR0240)
51  Department for Work and Pensions (UCR0267)
52  Disability Rights UK (UCR0249)
53  Donna (UCR0060)
54  Dr Christine Davies (UCR0062)
55  Dr Christine Davies (UCR0193)
56  Dr J. Gene Gristock (UCR0195)
57  East Lothian Housing Assn (UCR0003)
58  Eastern Landlords (UCR0031)
59  Engender and Scottish Women’s Aid (UCR0224)
60  Equality and Human Rights Commission (UCR0231)
61  Equity (UCR0128)
62  Equity Tax and Welfare Rights Team (UCR0191)
63  Equity Trade Union (UCR0046)
64  ERSA (UCR0166)
65  Families Need Fathers (UCR0061)
66  Feeding Britain (UCR0111)
67  Financial Mutual (UCR0208)
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