Frank Field
House of Commons
London
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20 February 2019

Dear Frank

Universal Credit: managed migration

Thank you for your letter of January 2019 inviting our comments on the Committee’s proposed readiness tests for universal credit.

You have certainly put together a pretty comprehensive lists of tests – a few comments and suggestions –

- You ask for data about the number of people paid in part and on time – we think it would be helpful to add paid correctly.
- We are in full agreement that the measurement of the time taken to make a claim should be measured from first registration – where a claim is not accepted eg because there is a question about right to reside – it can be many months before the claim gets accepted.
- We think it would be helpful to have data on the average length of time for journal requests to be actioned – there is a lot of anecdotal evidence that this can be taking weeks or even months.
- We would question whether it is ever going to be realistic to expect 80% of UC claimants to use verify successfully, and that this is not a particularly important target as identity can be verified at the first interview.
- In relation to deductions for debt we would like to see a changed policy whereby the claimant was contacted before deductions are commenced and attempts made to establish a realistic repayment schedule which will not drive them into hardship and destitution – we believe it is vital that this is set up before managed migration forges ahead.
- We would like to see a substantial reduction in sanctions – the latest statistics show that a much higher proportion of UC claimants are being sanctioned compared to legacy benefits and for longer periods -
https://www.gov.uk/government/statistics/benefit-sanctions-statistics-to-october-2018 - this is contributing to the high levels of destitution among UC claimants

- We would like to see universal support extended beyond the point where a claim is set up. With the reliance on digital accounts a much higher ongoing level of support is needed.
- Linked to the above is the need for the Department to have clear guidance about what reasonable adjustments are available and how to request them in order that those claimants that, for example, cannot manage an online account have equality of access.
- Implicit consent needs to be re-established. As has been raised on countless occasions there is no reason by implicit consent cannot operate within UC as it does within legacy benefit. This enables advisers to effectively assist both claimants and the DWP in order to get problems resolved as quickly as possible.
- The proposed two week run-on of IS, JSA and ESA (currently scheduled for July 2020) should be brought forward at least to when the pilot starts. This policy would reduce the five week wait for money in effect to just three weeks, for those that it applies to. This would go some way to avoiding the crisis situations claimants find themselves in before they even receive their first payment, and possibly avoid the need for such large repayable advance payments which then results in ongoing hardship for the next year.

We believe that if managed migration is to work, as the DWP continually assures us is top priority, it is imperative that these issues are resolved before it goes ahead.

Best wishes,

Daphne

Daphne Hall
Vice Chair - National Association of Welfare Rights Advisers