

# UNIVERSAL CREDIT FULL SERVICE ROLL OUT

## WHAT THE EARLY WARNING SYSTEM CASES ARE TELLING US

This briefing will consider what Early Warning System cases tell us about the impact of 'full service' universal credit. It also considers how people planning services or developing policy might take these impacts into account.

The information in this briefing is based on findings from CPAG in Scotland's Early Warning System.



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# UNIVERSAL CREDIT FULL SERVICE ROLL OUT

## What is the Early Warning System?

The Early Warning System was developed by Child Poverty Action Group (CPAG) in Scotland to collect and analyse case evidence about how social security changes are affecting the wellbeing of children, their families and the communities and services that support them.

To date over 3,000 case studies have been gathered from frontline workers, including welfare rights advisers, housing officers and support workers.

### Summary

Evidence gathered by CPAG in Scotland's Early Warning System suggests that the roll out of universal credit full service has left many claimants in financial hardship. Administrative problems experienced by claimants include:

- difficulty making claims for UC, with many online claims seeming to 'disappear;'
- UC being underpaid because 'real time information' provided by HMRC regarding income is not always reliable or accurate;
- claimants being paid the wrong amount of UC for no apparent reason. This appears most common in relation to housing costs and has resulted in some claimants facing eviction;
- difficulty claiming contributory benefits that should be available alongside UC.

New rules and policies relating to the administration of universal credit are also causing difficulties for claimants. For example:

- claimants experiencing financial difficulties due to the six week wait for the first payment;
- DWP's policy of only working with a client's adviser where there is evidence of unequivocal consent from the claimant;
- homeless claimants being left unable to fully meet their temporary accommodation costs because the maximum housing costs they can receive through UC have been capped at the amount they would be entitled to if they were to rent private sector accommodation;
- claimants facing hardship due to the rate of deductions that are applied in relation to rent arrears and other debts;
- increased conditionality and sanctioning rules causing claimants stress, anxiety and undue hardship, particularly where individual characteristics and circumstances are not fully taken into account.

The main purpose of this report is to highlight difficulties experienced by claimants and their families as a result of the roll-out of universal credit. The final section considers the impact on devolved services and the steps that might be taken at local and Scottish national level to prevent and mitigate any unwanted effects.

# UNIVERSAL CREDIT FULL SERVICE ROLL OUT

## Universal credit full service roll out

Universal credit (UC) is a new benefit for people of working age, who are in or out of work. It replaces income-based jobseeker's allowance (JSA), income-related employment and support allowance (ESA), income support (IS), housing benefit (HB), working tax credit (WTC) and child tax credit (CTC).

In most of parts of Scotland (known as gateway areas), people can only claim universal credit if they have certain characteristics. Generally speaking they must be single jobseekers or part of a couple in which both partners are jobseekers.

Gradually, however, 'full service' UC is being rolled out across Scotland. In full services areas UC claims can be taken from anyone of working age. This includes families with children, people with health conditions and people who are in work. It will no longer be possible to claim pre-existing ('legacy') benefits such as income-based JSA, income-related ESA, or IS.

This briefing will consider what Early Warning System cases tell us about the impact of 'full service' UC. It also considers how people planning services or developing policy might take these impacts into account so as to prevent negative outcomes for household in Scotland.

## Full service areas and the roll out of full service universal credit

In some parts of Scotland, full service UC has already been rolled out, meaning that it can be claimed by families with children, people with health conditions and people who are in work as well as job seekers.

Areas that are already 'full service areas' include East Lothian, Highland (Inverness Jobcentre Plus only), East Dunbartonshire, Inverclyde and Midlothian.

Full service UC will be rolled out across the rest of Scotland on the following dates:

Date	Local authority area	Date	Local authority area
June 2017	Clackmannanshire Stirling	February 2018	Dumfries and Galloway South Ayrshire West Lothian
July 2017	Highland (other Jobcentres)	March 2018	Aberdeenshire Falkirk Scottish Borders
October 2017	East Ayrshire South Lanarkshire	April 2018	North Lanarkshire Perth and Kinross Moray
November 2017	Angus Dundee North Ayrshire	May 2018	Argyll and Bute Eilean Siar Orkney Islands Renfrewshire Shetland Islands
December 2017	Fife	June 2018	Aberdeen City City of Edinburgh East Renfrewshire West Dunbartonshire
		September 2018	Glasgow City

\*Note that the exact area covered is determined by specified postcodes rather than local authority boundaries.

## The impact of full service universal credit

CPAG has previously raised concerns about the significant impact that UC will have on household incomes and rates of poverty<sup>1</sup>. This briefing, however, focuses on practical and administrative problems with the roll-out of universal credit and the impact these problems are having on claimants and their families.

<sup>1</sup>See e.g. <http://www.cpag.org.uk/content/broken-promises-what-has-happened-support-low-income-working-families-under-universal-credit>

# DIFFICULTIES RELATED TO THE ROLL-OUT OF UNIVERSAL CREDIT

## Making a claim for universal credit

A claim for UC must normally be made online, with subsequent contact via online claimant accounts. This means that the majority of contact between the claimant and the DWP in relation to a UC claim will be online. The only exception is where the DWP authorises a telephone claim. Such a claim will, however, still result in an online account being set up for the claimant. There are no paper claim forms for UC.

CPAG has received a small number of cases about online claims that have 'disappeared.'

A client tried to claim UC. After trying to get through on the phone for an hour, an adviser assisted the client to make a claim online as she had no access to the internet. Eight days later the DWP said they had no record of her claim and it had 'probably got lost in the cloud.' #11675

In order to claim UC, claimants are required to have a bank account and provide evidence of their identity. This can prove difficult for some clients and cases suggest there is a lack of support and information for some vulnerable people attempting to access UC.

A client with brain damage and a learning disability, who was due to be discharged from hospital following amputation, received no support from DWP to make a UC claim, despite requesting a hospital visit because he had no bank account, email address or access to internet. He was told instead that he should be able to claim UC online himself. His application has now been closed as there was no one to assist him. #Mii151

A client claimed UC online, but when she got to the section about ID she didn't continue, as she assumed she would need to verify her identification in person. As a result the claim was never processed as the client didn't realise she had not completed it properly. She is very IT literate, but still misunderstood the instructions online. #10946

A group that appears to be having particular difficulty accessing UC online are people leaving prison, who often have no access to IT, no address and no valid forms of identification.

Prisoners in UC full service areas are unable to make timely claims for UC when they are released, because they don't have valid ID and/or proof of address and therefore have difficulty opening a bank account. "Simple payments" (whereby benefits are awarded using a pre-paid card rather than direct payment into a bank account) are not an option for some prisoners as they still require some form of valid ID. #10111

# DIFFICULTIES RELATED TO THE ROLL-OUT OF UNIVERSAL CREDIT

Although claims are made online, claimants still have to attend a Jobcentre Plus office to verify their identity. This is especially problematic for clients in rural areas. One adviser reports



We've always had postal claims and verification, even for JSA. With UC people have to attend the Jobcentre before they will be paid. You can't get there and back in a day on a bus for most of the year. The train involves leaving here at 9.15 and not getting home until 18.15 – assuming the train is running. It costs £20 for an adult and I hate to think how much if someone has to take children with them. The service centres issue appointments that are too early or late to make on public transport too. From here it is a 120 mile round trip and could be impossible for a lot of people. No provision seems to be in place to deal with this.

**Frontline adviser in full-service area #10111**

These difficulties are also reflected in cases received through the Early Warning System.

Client claimed UC and was given an identity verification interview, a two hour train ride away for which the client cannot afford a ticket. She will only be reimbursed if she can get there. The adviser tried to get the interview rearranged, or carried out over the phone but to no avail. The client had a crisis grant but has now run out of money again. #6944

## Misinformation

There is also a concern that many Jobcentre Plus staff do not have access to the support and information they need to process UC claims correctly. This results in clients being given inaccurate information or experiencing difficulty with their claims.

A young couple with two small children have been left with very little income for five months and substantial rent arrears as they were repeatedly incorrectly advised that they were not entitled to UC. Initially their claims were not accepted and they were advised to claim tax credits, but this was refused as the couple live in a full service area. After three months a claim was accepted but immediately erroneously closed. There are no grounds for backdating UC for the three month period before the claim was accepted. Up until now the clients have relied on family assistance but now have no money. #11329

## Difficulty claiming contributory benefits

Contributory benefits are benefits that people can claim regardless of their income by virtue of having made enough national insurance contributions before their claim. Whilst income-based JSA and income-related ESA have been abolished by UC, contributions-based JSA and contributory ESA have not.

It is still possible to claim contributory benefits in universal credit areas because these benefits continue to exist alongside UC. However, case evidence indicates that the continued existence of contributory benefits and the process for claiming them is not fully understood by claimants and DWP staff.

Unable to return to work due to illness, a client tried to claim contributory ESA in a full service area. Jobcentre Plus staff repeatedly advised the client that ESA had been abolished and she would have to claim UC. The client's first payment of UC was for £11 when she should have been entitled to £316.77 contributory ESA. The client has been living off her personal independence payment (PIP) and has had to cancel the carers she pays to help her out of bed and to get dressed etc. because she could not afford to pay them. It was only after the client's adviser sent the Jobcentre Plus up to date guidance along with a copy of the contributory ESA claim form [ESA1 (UC)] downloaded from the internet, that Jobcentre Plus staff were prepared to concede their error. #Mii187

# DIFFICULTIES RELATED TO THE ROLL-OUT OF UNIVERSAL CREDIT

## Wait for the first universal credit payment

Unlike the benefits it replaces (the 'legacy benefits'), the first payment of UC is not made to a claimant until around six weeks after they initiate the claim. This is causing some claimants extreme financial difficulties.

A client with a young family is being taken to court for eviction because he could not maintain the payment arrangement he had with his housing association for existing rent arrears while he was waiting for the first payment of UC. He had been in short-term weekly employment, so had no savings to fall back on while he was waiting. #Mii165

Clients can ask for an advance payment (known as a short-term advance) during the six week waiting period. However, case evidence suggests that clients are not always made aware of these advances and that requests are not always granted. Furthermore, short-term advances must be repaid - which can lead to future financial difficulties for claimants.

A client waiting for his first payment of UC has been refused a short-term advance and a Scottish Welfare Fund crisis grant. He is unable to move from temporary accommodation into his permanent tenancy because he doesn't have any money to furnish it, get the utilities connected or to buy food. #8343

## Monthly calculation and payment of universal credit

The amount of universal credit a person receives will generally be calculated based on their earnings in the previous calendar month and will be paid seven days after the end of the 'monthly assessment period'. So, for example a UC payment paid on the 22nd of April will have been calculated in relation to income during the period 16th March to 15th April.

Any change of circumstances normally applies retrospectively from the first day of the assessment period in which it occurs. This benefits claimants where the change increases entitlement, but disadvantages claimants whose entitlement reduces or ends. For example:

A client was receiving UC including housing costs for a private tenancy. He moved into supported accommodation on the 28th of the month and the local authority took responsibility for making payments towards his housing costs from this date (because housing benefit rather than UC is paid to people living in supported accommodation). Because the client's assessment period ran from the 8th to the 7th of the month, housing costs ceased to be included in the client's UC from the 8th of the month, leaving him with 20 days where he received no financial contribution to his housing costs for his private tenancy. #6478

Monthly calculation of entitlement to UC is also causing problems for people who earn much more than usual in any given month, or where they have two sets of wages paid in the same month (as might happen in the run up to Christmas when many workers are paid early). This can make income unpredictable and result in serious financial problems for claimants.

A client received two payments of statutory maternity pay (SMP) during one assessment period which meant both were taken into account as income and she was only paid £12 UC. This means she will be in arrears with her monthly bills, causing her distress. #9905

## Real time information

Employees are not normally required to notify the DWP of changes in their earnings as this is done automatically via 'real-time' PAYE data provided by HMRC. However, Early Warning System cases suggest that the information provided by employers to HMRC, or by HMRC to DWP, is not always accurate.

A client claimed UC as he has not been paid by his employer for three months. He has been told that he is not entitled because real time information (RTI) provided by HMRC states that he has in fact been paid. The client denies this and presented information that would appear to corroborate his position. The DWP have confirmed their intention to continue relying on HMRC records in this cases despite the fact they have the power not to use HMRC's RTI if they have reason to believe that it is not accurate. #11229

# DIFFICULTIES RELATED TO THE ROLL-OUT OF UNIVERSAL CREDIT

In some cases the behaviour of employers (and their understanding of the universal credit system) can make a significant difference to the claimant's award.

A client claimed UC after he stopped working. Three months later his employer paid him £600 compensation for leaving the company pension but mistakenly put the payment through as wages, so it was treated as income resulting in the client not receiving any UC that month, whereas if it had been put through correctly it could have been treated as capital with no impact in UC. #10864

## Accuracy of payments

A number of cases gathered through the Early Warning System highlight that claimants' UC payments are sometimes for the wrong amount.

A lone parent with three children is having ongoing problems with her UC due to assumed administrative errors:

- she did not receive the help with her housing costs that she was entitled to for three months
- following the birth of her third child she was not awarded the extra amount of UC from the right date
- the bedroom tax continued to be applied after she notified the birth of her third child despite the home no longer being under occupied
- she has had wildly varying deductions (£16-£96) applied to her award with no explanation as to why. #Mii175

A client received a 'nil award' of UC because she received a one off lump sum payment out of her occupational pension pot the month before. The DWP misapplied its own rules and erroneously treated the payment as income instead of capital. #11209

The amount of UC a student received was £110 too low because the DWP had failed to apply a 'student income disregard'. #10626

## Problems with implicit consent

In the past, the DWP's policy was to work with claimants' representatives wherever express consent had been provided or where implicit consent could be established (i.e. where it was clear to DWP staff that a representative was legitimately working on a client's behalf despite the absence of that client, or of a clear written or verbal statement).

Under universal credit, DWP staff will only work with clients' representatives where unequivocal consent has been given on a specific matter.

This is causing particular concern in rural areas where clients may not be able to attend their advice provider's office. It may also cause difficulties for advice providers who may not be able to spend long waiting to get through on the phone to the UC helpline with a client.

A client was over 100 miles from home supporting her husband while he was having a brain tumour removed in hospital. She was unable to notify DWP that she was being overpaid UC because she did not have her UC account login details with her. The client's adviser was not able to resolve the issue with the DWP until the client could return home and access her sign in details. In this case implicit consent would have assisted both DWP and the client. #Mii173

# DIFFICULTIES RELATED TO THE ROLL-OUT OF UNIVERSAL CREDIT

## The claimant commitment and sanctions

Under universal credit (as with certain legacy benefits) claimants must meet certain conditions (collectively known as their claimant commitment) in order to be receive their benefit payment. If it is decided that they have not met those conditions, they can be sanctioned, meaning their UC payment can be significantly reduced.

The degree of work-related activity that claimants were expected to undertake was more regulated under legacy benefits, whereas work coaches now have much more discretion about the degree of work-related activity that should be included in someone's claimant commitment.

Cases gathered through the Early Warning System suggest that the needs and circumstances of some claimants are not being adequately taken into account when the conditions attached to their universal credit are being established and applied.

A client with severe mental health problems has been sanctioned for failing to attend Jobcentre Plus on two separate occasions. His medication was changed triggering a severe mental health crisis. The second failure to attend occurred during a period for which the client had submitted a fit note. He is still subject to full conditionality despite submitting fit notes pending a work capability assessment. #11329

A client's UC stopped because she refused to sign an amended claimant commitment which included an obligation to attend an open recruitment day with a debt recovery agency. The client could not have worked for the agency on religious grounds as it would have involved facilitating the charging of interest. She has not received a written decision and was told the only thing she could do would be to submit a new claim. #11170

A work coach mandated a client to do 13 weeks unpaid full time work despite him explaining that his wife suffers from severe post-natal depression and is unable to care for their four month old baby and two year old alone. She has claimed PIP but has not yet had a decision. His work search requirement could have been amended because he had temporary childcare responsibilities. #11678

Cases also suggest that not all claimants are being told when they have failed to meet one of the conditions attached to their UC. This is causing problems because in some cases sanctions are applied from the point of the apparent failure until the claimant 'complies' (i.e. returns to fulfilling all the conditions attached to their benefit). If a claimant doesn't realise they have failed to meet a condition, often they cannot then correct their behaviour and their sanction runs for longer than it would otherwise have done.

The client was sanctioned for six months (201 days) for failing to attend an interview with his work coach. The length of the sanction relates to the period between the client failing to attend the interview and when DWP say he engaged with them. The form asking why he did not attend the interview was not sent out until three months after the failure and DWP say they did not receive the completed form. Had DWP acted closer to the time of the sanction, the sanction could have been much shorter i.e. one week. #11209

# DIFFICULTIES RELATED TO THE ROLL-OUT OF UNIVERSAL CREDIT

## Impact on housing /rent arrears

UC can include housing costs for both renters and owner occupiers.

Cases highlight where people are struggling to pay their housing costs, simply because the DWP has failed to include the housing costs in the client's UC award.

A lone parent claimed UC and received a payment. It did not, however, include her housing costs. This is despite the fact that both she and the local authority have provided the DWP with all the information they have been asked for in relation to the tenancy. She has phoned Jobcentre Plus numerous times but is unable to get through or when she does, she is told they can't help her. #10807

A client was threatened with eviction because housing costs were not included in her UC award for over three months after she moved from a full service area to a live service area. The DWP kept saying that they were trying to establish whether or not her new postcode could be included in their system, but that they could not pay housing costs in the meantime. Housing costs were eventually included in her award but she is still waiting for payment for the months when it was not. #8652

When a client tried to claim housing costs in UC, she was advised that DWP would only accept a lease that was three years old or less as evidence of her tenancy. She had signed her tenancy agreement in 1999 and it had continued to renew itself in accordance with housing law (tacit relocation) ever since without the need for a further agreement. There is nothing in the DWP's advice for decision makers to suggest that there is a limit to how recent the tenancy agreement must be. #8735

Where landlords do issue new tenancies, there is a danger that the terms of a tenancy could be altered and security of tenure reduced. In Scotland a new tenancy regime is being introduced shortly and this policy could lead to tenants being migrated to the new regime unintentionally.

## Payments to landlords

Universal credit is paid directly to the claimant, including the housing costs element, which is a big change for many tenants who are accustomed to having their housing benefit paid directly to their landlord. Arrangements can be made to have the housing costs element paid directly to landlords but this does not always work smoothly.

When a client applied for UC, his adviser requested that he be noted as vulnerable. He received his first payment six weeks later. The next two months' payments included the housing element, despite alternative payment arrangements being in place to ensure the housing element was paid direct to the landlord (as there were pre-existing rent arrears). The client had no understanding of the housing costs element being included in the award and did not pass the money onto his landlord. He was evicted and became homeless. #9619

A housing association was incorrectly advised that they could not set up an alternative payment arrangement for a tenant who has rent arrears and is at risk of eviction because she has some income from earnings. There is nothing in the legislation to support this reasoning. #11354

# DIFFICULTIES RELATED TO THE ROLL-OUT OF UNIVERSAL CREDIT

## Claimants in temporary accommodation

UC claimants in 'temporary accommodation' (e.g. due to homelessness) are facing large shortfalls between the rent they are charged and the maximum housing costs that can be included in their UC award. This is because UC housing costs for temporary accommodation are subject to the local housing allowance which caps the maximum amount someone can be paid towards their rent.

A client on UC has built up substantial arrears in temporary accommodation. This is because his UC housing costs element was £283 pm, but his rent was £1600pm. #11496

Claimants in 'specified' accommodation (i.e., provided by a local authority, housing association, charity or voluntary organisation which provides care, support or supervision) such as refuges, or homeless hostels that provide support, will continue to receive their housing costs through housing benefit. However claimants in 'temporary accommodation' (e.g. because they are homeless) are entitled to UC housing costs and are subject to local housing allowance rates which limit the maximum amount they can be paid towards their rent.

## The interaction between universal credit and legacy benefits

Cases highlight that the roll-out of universal credit is causing problems for certain people in receipt of employment and support allowance (ESA).

Difficulties arise where people already in receipt of ESA are asked to go through work capability assessments to establish if they are still entitled to ESA. If you 'fail' that assessment, or are unhappy with the outcome, you can ask for the decision to be reviewed by way of a 'mandatory reconsideration.' ESA cannot be paid pending the outcome of a mandatory reconsideration and if you wish to claim a means-tested benefit in a full service area in the meantime, you must claim UC. The effect of claiming UC during this period is that even if the outcome of the mandatory reconsideration, or subsequent appeal, is successful, you will remain on (become 'migrated' to) UC rather than income-related ESA, with the relevant limited capability for work/work-related activity element included in your award. If you do not claim UC pending the outcome of the

mandatory reconsideration, ESA should be paid if the outcome is successful or pending an appeal.

People who get stuck on UC in these circumstances often find themselves worse off than they would have been had they been awarded ESA. This is because there are no additional amounts for disability (premiums) payable in UC.

A client in a full service area claimed UC while waiting for a mandatory reconsideration of his ESA claim. He was found to have limited capability for work-related activity but now cannot return to ESA. He contacted UC many times to ask for the limited capability for work-related activity element to be added to his award but has repeatedly been told that they don't know how to, or that they will but then don't, so he is currently being underpaid £315 a month. As he is receiving UC and not ESA, the enhanced disability premium is not included in his award, which means he is £68 a month worse off on UC than he would have been on ESA. #9527

## Deductions

Several cases highlight that DWP are recovering arrears, overpayments and advances at the higher maximum amounts from UC, which is causing many claimants financial hardship. Because deductions have to be applied manually, they do not appear on the parts of the UC system that are available to the UC helpline or that appear in decision letters. As a result, clients are having deductions applied, but are unable to confirm why, for how much, or how to request that they be reduced.

A client who has cognitive difficulties and who recently lost his wife, is having deductions taken from his UC award with no explanation. It is suspected that they may relate to the joint ESA claim that he had with his wife, but no one can confirm this despite numerous contacts with the UC helpline and DWP debt management team. #Mii174

# RECOMMENDATIONS

## For UK Government, DWP and Jobcentre Plus

Policy recommendations on restoring Universal Credit's poverty reducing potential can be found in CPAG's Policy Briefing Broken promises: What has happened to support for low income working families under universal credit?<sup>2</sup>

In the meantime UK Government, DWP and Jobcentre Plus must also reconsider aspects of the administration of UC if its wider roll-out is to progress without causing unnecessary difficulty or hardship for claimants.

In particular Early Warning System cases reveal an urgent need for more thorough training of Jobcentre Plus staff in relation to UC both in terms of processing a claim and assessing entitlement. This will be necessary in order to minimise errors relating to the process of claiming UC and also help to ensure that all claimants are accessing the correct entitlement.

Cases also suggest that delays and errors in the administration of UC are resulting in households experiencing sharp falls in income. For this reason CPAG would urge the DWP to mandate work coaches to make all claimants aware of short-term advances and how to access them.

Jobcentre Plus staff should ensure that claimants are aware of the consequences of claiming UC pending mandatory reconsideration of an ESA decision.

More should be done to notify claimants of any deductions from their UC award and what to do if those deductions are causing financial hardship

Early Warning System cases also suggest that more specific rules relating to administration of universal credit should be revisited in order to avoid disproportionately negative outcomes for claimants. In particular:

- CPAG urge DWP to review the consent requirements that allow representatives (such as advice workers) to act on claimants' behalf. Cases suggest this is causing unnecessary difficulty for claimants – particularly those who are vulnerable and/or live in remote or rural areas.
- CPAG recommend DWP remove the local housing allowance restriction on housing costs for those in temporary accommodation so that full support can be provided.
- Cases also suggest that immediate steps are required to ensure the wider discretion that work coaches have in relation to conditionality under UC is being used appropriately and that the needs and characteristics of claimants are being taken into account. The DWP should make internal guidance on work coaches' discretion readily available so that claimants and advisers are more aware of the parameters that work coaches are working within.
- The cases also suggest that there is a need for the DWP and Jobcentre Plus to be more proactive about ensuring that claimants have access to independent sources of information and advice in relation to their UC claim and wider sources of interim support such as short term benefit advances, hardship payments and the Scottish Welfare Fund.

<sup>2</sup>at <http://www.cpag.org.uk/content/broken-promises-what-has-happened-support-low-income-working-families-under-universal-credit>

# RECOMMENDATIONS

## For Scottish Government

Universal credit is a reserved benefit and the Scottish Government has very limited control over its operation and roll-out. The Scottish Government does, however, have control over policy levers which could be used to mitigate some of the negative effects of UC - building on welcome commitments to use new devolved UC flexibility powers to address problems associated with direct and monthly payments.

These include, for example:

- using new powers to top-up reserved benefits to augment the income of households at risk of being negatively affected by the roll-out of UC. This would help to maintain the resilience of households in the event of a sudden fall in their income. In particular new powers should be used to 'top-up' child benefit by £5 per week. Such an approach might be particularly useful given that child benefit is entirely separate from UC and will not be affected by any administrative problems, suspension, sanctions or delays;
- using the power to create new benefits to make an interim payment to households during the six week waiting period before receipt of their first UC payment;
- ensuring households experiencing income crisis as a result of difficulties with the roll-out of UC can access alternative sources of support. In particular, the Scottish Government and local authorities could do more to raise awareness of the Scottish Welfare Fund. Pathways should be put in place to ensure that people experiencing income crisis are directed to the Scottish Welfare Fund in the first instance rather than the local food bank. There is also an ongoing need to ensure that investment in the Scottish Welfare Fund is adequate to allow all eligible applicants receive an adequate award;
- ensuring access to high quality, independent advice in relation to the UC claim. It is essential that the Scottish Government and local authorities continue to invest to ensure that all those in need of advice and support can access it in a timely way;
- taking action to address the detrimental impact that UC will have on many claimants' ability to cover their housing costs. In particular, Early Warning System cases highlight the negative impact that UC will have on tenants in temporary accommodation. The Scottish Government should consider how investing in DHP might alleviate some of these difficulties and whether such additional investment might be required until a longer term solution can be arrived at.

# RECOMMENDATIONS

## **For local authorities and their planning partners**

As noted above, one of the most important steps that local authorities and their planning partners can take will be to continue investing in the provision of accessible and high quality income maximisation and welfare rights advice. This will be essential in ensuring that claimants can overcome administrative problems with their UC claim and that they can challenge decisions in relation to their entitlement and/or claimant commitment.

Cases suggest that local authorities should work with Scottish Welfare Fund decision makers to ensure there is widespread awareness that - in some circumstances - it may be appropriate to award a crisis grant or a community care grant during the six week waiting period. This could help some households avoid reliance on emergency food provision.

Local authorities should also review their housing practices so as to avoid causing people to be moved from housing benefit to universal credit unnecessarily. This could be particularly helpful where the client would be adversely affected by the rules relating to temporary accommodation. A move from a council or housing association tenancy to a private tenancy (or vice versa) within the same local authority area, for example, can be treated as a change of circumstances rather than a new claim for benefit. This could avoid the claimant having to make a claim for UC rather than remaining on housing benefit.

## **For services working with and providing support to families**

Frontline services working with members of the public need to be well-equipped to make an active referral to a high quality welfare rights advice service when they come across a person who is having difficulty with their benefits. Midwives, nursery assistants and teachers being able to refer a family for information and advice could help many households to avert difficulties related to UC.

Services that rely on income from members of the public (such as childcare providers) should be aware of the six week wait for the first payment of UC and consider ways to assist families to ensure families do not lose access to their service if they are unable to make payments during that period. Service providers should also be aware that sanctions may impact on families' ability to access and pay for services and where possible, should have contingency plans in place to avoid having to deny access to services.

Frontline services might also consider providing access to their resources (such as computers and/or phones) to allow clients to access information and advice or even make and maintain claims for UC.

# FURTHER INFORMATION

## GET INVOLVED WITH THE EARLY WARNING SYSTEM

Whilst we have collected over 3,000 cases we need to collect more from frontline workers who have face to face contact with families and a real understanding of the impacts of welfare reform on the ground. In return you will receive regular updates about our findings.

If you would be interested in submitting case studies or have any queries about the Early Warning System please get in touch with: Kirsty McKechnie (Welfare Rights Officer) at [kmckechnie@cpagscotland.org.uk](mailto:kmckechnie@cpagscotland.org.uk).

If you would like to discuss policy issues arising from the Early Warning System, please contact: Jenny Duncan (Policy and Parliamentary Officer) at [jduncan@cpagscotland.org.uk](mailto:jduncan@cpagscotland.org.uk).

## UNIVERSAL CREDIT RESOURCES

### Training

We are running the following training courses set at different levels of experience to help you get to grips with universal credit.

- Universal credit – full service
- Universal credit – supporting clients
- Universal credit – refresher
- Universal credit for people with ill health and disabilities

For further information and to book a place please visit our website: [www.cpag.org.uk/scotland/universalcredit](http://www.cpag.org.uk/scotland/universalcredit)

### Elearning

Our free universal credit elearning course has been designed for frontline workers who do not work in welfare rights but want to get to grips with important changes in the benefits system. Through interactive quizzes and activities you will look at how universal credit works.

You can create an elearning account for free at <http://elearning.cpag.org.uk>.

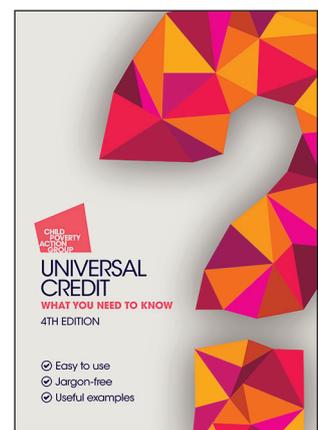
Our courses take on average one hour to complete. Once you have completed the course and submitted your evaluation, you can then print off your certificate.

### Information

We have a wide range of factsheets, which include several on different aspects of universal credit which you can view on our website at: [www.cpag.org.uk/scotland/factsheets](http://www.cpag.org.uk/scotland/factsheets)

The 4th edition of CPAG's **Universal credit – what you need to know** will be published in summer 2017. Learn what you need to know about universal credit with this new edition of our quick, easy-to-follow guide. The guide is £15 and £12.75 for CAB customers and CPAG members.

You can pre-order your copy by contacting CPAG book orders on: 020 7812 5236 with your credit card details or email [bookorders@cpag.org.uk](mailto:bookorders@cpag.org.uk).



## CONTACT DETAILS

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