

Response to SSAC consultation: Moving claimants to Universal Credit from other working-age benefits

From mid-2019, the Department for Work and Pensions (DWP) will start to move all remaining, eligible working-age benefit claimants to Universal Credit. The proposals are set out in the draft *Universal Credit (Transitional Provisions) (Managed Migration) Amendment Regulations 2018*. The Social Security Advisory Committee is consulting on these regulations and this is the JRF response to that consultation.

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Recommended actions

DWP should:

1. review the state of Universal Credit (UC) at the end of 2018 and demonstrate that the system is truly ready to start managed migration and re-assess timescales if necessary
2. clarify and resource proposals to support claimants who have complex needs or vulnerabilities with extending the period within which they can claim UC
3. publish a full monitoring and evaluation plan for what it intends to test from 2019, with ongoing updates on what has changed in delivery or policy design
4. clearly set out its plans, and the resources available, for communication with claimants, including the results of its early research on engagement channels.

The overall migration timetable

The department's plans are for tests of managed migration to begin in January 2019, with volumes increasing from mid-2019 and completing by (presumably the end of) 2023. At that point, it is estimated that nearly three million people will have moved over to UC from legacy benefits, especially Tax Credits and ESA.

Completing migration within 4½ years looks ambitious, given that it has taken 5½ years to get to the point of full, Great Britain-wide rollout of the basic service. At full pelt, 95,000 people will be moving onto UC each month, the majority being parents in work and disabled people. While it wouldn't make sense to wait to start migration until UC was agreed to be 'perfect', ongoing delivery and design problems mean that increasing volumes from mid-2019 looks extremely risky. It is not yet clear what effect the mitigations announced in the 2017 Budget have had on delays and the financial difficulties experienced by claimants.

DWP should publish a more detailed set of scenarios for different migration timetables, including an assessment of the effects of a slower or delayed start on the rate of transition that would be required nearer to 2023. If necessary, this proposed end-date should be reviewed to help mitigate the risks of transition for claimants as well as for work coaches and Jobcentres.

Contacting claimants and inviting claims

Current plans are to contact claimants and partners of claimants with a generic letter at least four, and up to six, months in advance of their move onto UC. Following this, a notification will arrive telling claimants and their partners to make a new claim for UC by a specific date with at least one month's, and up to three months', notice. The proposal for additional time beyond three months for some vulnerable claimants is a minimum concession. The links here with Universal Support should be clarified.

The proposals and existing work on improving communications is to be welcomed. The department could usefully publish the results of this testing to show what improvements have been achieved so far. It will be vital that communications are clear and simple whilst stressing the importance of prompt action. Enabling access to different means of engagement, and not relying on just letters, including using a wide range of other languages, will be essential.

The department should set out how many claimants they expect to require more than three months, for what broad reasons and the impacts on overall delivery and capacity, for both the department and the advice sector (and how that is going to be resourced). The department should make clear its principles for whom within households will be communicated with, about what and at what points in the process. The department should also clarify what channels of 'notifications' will be used to contact claimants and assess and mitigate the risks around using only mailed correspondence (if that is what is being proposed).

Making new, and ending legacy, benefit claims

If a new claim is not made by the deadline day, all existing relevant benefits will be stopped. This is one of the biggest areas of risk in the migration process because of the wide range of reasons, including department error, that might lead to the ending of benefits. This risks leaving people destitute.

JRF research has shown that benefit delays and errors are some of the leading causes of destitution in the UK. This is why the proposal that an 'agent' will check for complex needs or vulnerability before benefits are stopped is so critical. **The department will need to fully resource the proposals to arrange home visits to vulnerable claimants, including the training required for agents to do so in an appropriate and effective manner.**

Transitional protection

Transitional protection (TP) is a central part of the proposals for managed migration. Successive Secretaries of State have used it to reassure stakeholders, parliament and the public that people will not lose out when they first move onto UC. Two new features in this policy that provide extra protection for those with fluctuating earnings or child costs are to be applauded.

However, the department should set out its estimates of who is likely to benefit from transitional protection, for what period and the impacts on household incomes and poverty. This would enable the department and stakeholder to better plan for the impacts of TP as well as where claimants are, or become, ineligible for TP.

Impact on specific groups, including those in work

The 'grace' period of six months for self-employed people who migrate before the minimum income floor is applied is a beneficial proposal. **However, the department should use this period to ensure claimants have the right information and signposting to internal and external advice (for instance, local business support for seeking start-up funding or writing a business plan), which would enable their self-employment to become or continue to be viable.**

As mentioned above, claimants who need more time to make their UC claim will genuinely need to be protected by the safeguards put in place. **It will be crucial for the department to be completely sure that there are no vulnerabilities or unmet or complex needs that are preventing a UC application before existing benefits are stopped.**

Monitoring and evaluation

'Test and learn' is referred to (as is typically the case for Universal Credit) in the proposals for starting managed migration from mid-2019. This approach will enable, the department says, processes to be changed where necessary, prior to ramping up migration. It will be important to see this working in the field and DWP should be

explicit about what it is testing and when, what it has learnt and what it is changing as a result.

Too often in the past, 'test and learn' has been referred to in theory but not in practice. A comprehensive review following completion of the rollout of Full Service UC in December 2018 would provide a stronger basis for decisions about the pace of managed migration and whether UC is fit to go onto the next stage of its evolution or not. Test and learn is inherently weak if the tests are not in fact carried out or, when they are, they do not enable learning. Most significantly, if learning is ignored then this undermines the whole approach.

The details in the proposals are too brief and vague and a full monitoring and evaluation plan for the review of rollout to the end of 2018 and for test and learn from 2019 should be published by the department.

Background reading

Fitzpatrick, S et al (2018) Destitution in the UK 2018. York: JRF

Schmuecker, K (2017) Budget briefing: Recommendations for better living standards. York: JRF

About the Joseph Rowntree Foundation

The Joseph Rowntree Foundation is an independent social change organisation working to solve UK poverty. Through research, policy, collaboration and practical solutions, we aim to inspire action and change that will create a prosperous UK without poverty.

We are working with private, public and voluntary sectors, and people with lived experience of poverty, to build on the recommendations in our comprehensive strategy - [We can solve poverty in the UK](#) - and loosen poverty's grip on people who are struggling to get by. It contains analysis and recommendations aimed at the four UK governments.

All research published by JRF, including publications in the references, is available to download from www.jrf.org.uk

To discuss any of the points raised in this consultation response, please contact:
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