

Institute for Public Policy Research



NO-ONE LEFT BEHIND

SUPPORTING PEOPLE
WITH COMPLEX NEEDS
ON UNIVERSAL CREDIT

Henry Parkes

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1. INTRODUCTION

For the UK social security system to provide an effective social safety net, it must work for everyone.

Navigating the benefits system and the bureaucracy within it can be demanding for those who rely on it. It is not simply a case of ‘signing on’ and receiving a payment; there are significant strings attached. In most cases, the claimant must demonstrate that they are taking steps to improve their chances of finding work (for example, by applying for jobs or undertaking training) in what is referred to as **conditionality**. If the conditions of a person’s benefit are not considered to have been met, this can lead to partial or complete withdrawal of income they rely on through **benefit sanctions**.

The conditions claimants must meet are supposed to be tailored to the circumstances of the individual. This makes sense. People’s lives and circumstances are complex and what may constitute reasonable job search requirements for one person on out-of-work universal credit (UC) could be completely unachievable for another. In some cases, job searches might be entirely inappropriate as there may be much bigger issues affecting that individual which need to be resolved first – such as securing a roof over their head – before turning their attention to looking for or preparing for work. In fact, pressurising such groups to look for work could be entirely counter-productive. Other aspects of a claim can also be tailored to an individual, such as how frequently they are paid, or whether they can access emergency financial support and the conditions on which they will pay it back. But this tailored approach does not always happen in reality.

For a welfare system to be compassionate and supportive of all those who rely on it, this tailoring is key. UK government policy does recognise this in theory – there is considerable flexibility built into the system which *can* be applied to positive effect. In practice, however, the reality for too many people is that the system does not treat them as an individual and they find themselves at the sharp end of an often punitive system of conditionality. The consequences of this can be dire or, in the most severe circumstances, lethal. A tragic string of high-profile suicides by benefit claimants pushed into despair by a system that has failed those who relied on it has attracted extensive media coverage (Butler 2020) and attention from the National Audit Office (NAO 2020). These tragedies underline the potential costs of failure by the department.

Much of the success of a benefit policy depends on effective *delivery*. The benefit system at its heart is administered by people working on the frontline in jobcentres across the country; all of them making decisions which can have a huge impact on the people they serve. In making these decisions, work coaches (alongside other decision-makers and case managers) are required to exercise **discretion**: working within the guidance, but ultimately applying their own judgement about what is an appropriate course of action given the circumstances of the person in front of them. Getting those decisions right is undoubtedly a difficult job, but it is crucial. For claimants with ‘complex needs’ – as the department describes those experiencing difficult personal circumstances and/or life events – the stakes are even higher.

This paper examines the role of discretion as exercised by work coaches at Jobcentre Pluses in the experience of people claiming universal credit who are out of work. It forms part of IPPR's research programme exploring the future of the UK welfare state.

Under universal credit, the current system of work coach discretion is not working. Writing in 2018, the Public Accounts Committee, summarised the situation:

“The Department is failing vulnerable claimants because it places too much reliance on the discretion of its work coaches to identify and manage the needs of people requiring extra support. The department relies on work coaches in Jobcentres to tailor aspects of universal credit to a claimant’s individual needs... But appropriately tailored conditions are not always being set in practice, resulting in claimants being subject to unrealistic expectations, leaving them at risk of sanctions and in some cases exacerbating health issues.”

PAC 2018

Our findings through this research reflect this assessment, which presents a serious challenge for policymakers and practitioners. The pandemic saw a temporary ‘switching off’ of benefit conditionality (House of Commons Library 2021) and the recruitment of a huge number of additional work coaches to cope with the influx of demand (DWP 2021f). As the world returns to something closer to normal after the pandemic, conditionality has returned. This time, however, with a fresh influx of new work coaches, there may be an opportunity to do things better.

This paper maps out where discretion currently exists in the system and draws on relevant evidence on how well different aspects of the system are working. This has been informed by:

- reviewing available literature and published evidence
- qualitative interviews with universal credit claimants with complex needs to understand their experiences of making and maintaining a UC claim, with a focus on the role of discretion
- engaging with **experts** with lived experience of the benefit system and homelessness¹
- engaging with relevant third-sector organisations.

We have also sought to make practical recommendations to improve decisions about when and how discretion is exercised by Jobcentre Plus, with the aim of improving the experience of making and maintaining a claim so as to ensure that no one falls through the cracks. This includes cross-cutting recommendations that could lead to a more compassionate system of income support for people with complex needs.

We have developed these recommendations in consultation with people with direct experience of claiming universal credit in particularly difficult circumstances, as well as with local authorities and with expert third sector stakeholders.² We are grateful for their support and insight provided throughout the research which has strengthened both the findings and recommendation throughout.

1 These conversations were facilitated through Pathway, the homelessness charity.

2 We worked with research participants and the Experts by Experience group convened by the homelessness charity Pathway to develop and test recommendations. Pathway's Experts by Experience group brings together people from across the UK with experience of homelessness and the benefit system.

2. EXAMINING ASPECTS OF THE UNIVERSAL CREDIT CLAIM AND THE ROLE OF DISCRETION

Through this research, we have sought to understand the different aspects of a universal credit claim through the lens of claimants with complex needs, including through multi-stage interviews with people who have claimed universal credit under exceptionally difficult circumstances, such as homelessness or very poor mental health. In this chapter, we outline key findings and present practical recommendations that could better meet the needs of claimants with complex needs.

The claimant commitment is core to accessing universal credit

Although claims to universal credit are typically made online where basic information and personal details are collected, the first personal interaction with staff from the Department for Work and Pensions (DWP) involves a meeting to agree a 'claimant commitment'. An appointment is typically made for an in-personal meeting at the local jobcentre.

Progressing a universal credit claim depends on a claimant commitment being agreed. A standard commitment covers:

- the job search area, the default for which is 90 minutes from a claimant's home, by their "usual method of transport"
- how many hours a claimant is expected to be able to work each week
- how many hours a claimant is expected to spend looking for work each week.

Claimant commitments can also mandate training or skills interventions, such as IT skills training if deemed appropriate by the claimant's work coach (NAO 2020). Commitments can include both 'mandatory' and 'voluntary' conditions, and guidance stipulates that they should be agreed between the work coach and the claimant based on the claimant's circumstances (SSAC 2019). In the absence of extenuating circumstances, a claimant will be expected to undertake a 'full-time' job search at 35 hours a week as the default expectation (ibid). Around half of claimants are bound by this standard commitment to a full-time job search (ibid).³

If a claimant does not agree that the conditions are reasonable given their personal circumstances, it is possible to ask for another work coach to review the conditions (ibid). However, if an agreement is not reached, there is no entitlement to benefit and the claim for universal credit will be closed. If a claimant wishes to challenge this decision, they will need to pursue the appeals process.

³ This is based on a sampling exercise carried out by the Social Security Advisory Committee (SSAC) – statistics are not collected on a systematic basis as to the extent Claimant Commitments are tailored.

Some claimants feel the claimant commitment process was not personalised or reasonable

We heard from some of our interview participants that they felt that the claimant commitment process did not feel like a “two-way conversation” and that their personal circumstances were “a bit swept to the side”. Others felt that they did not raise any issues in their personal lives at the jobcentre because they were not asked about it and didn’t know that there was any flexibility in the system or that it could be relevant, and there was no awareness that it could be reviewed by another work coach.

“I would definitely have gone into (my mental health issues) if I’d have been asked. It never came into the conversation. I’m very open about what I’ve gone through in the past. I felt like the person was going through just reading it, they must have said it that many times, it wasn’t individualised to the individual person, that’s how it felt anyway.”

The power dynamic between a work coach and a claimant also shaped these interactions. Given the high stakes of the interaction for a claimant in need of money to live on, we found that claimants perceived a risk of jeopardising or delaying the process if they were to raise concerns. As one claimant described:

“I feel like I was in that situation where I haven’t got a penny to my name, I would have agreed to anything. If I challenge it they are gonna question it and it could delay everything.”

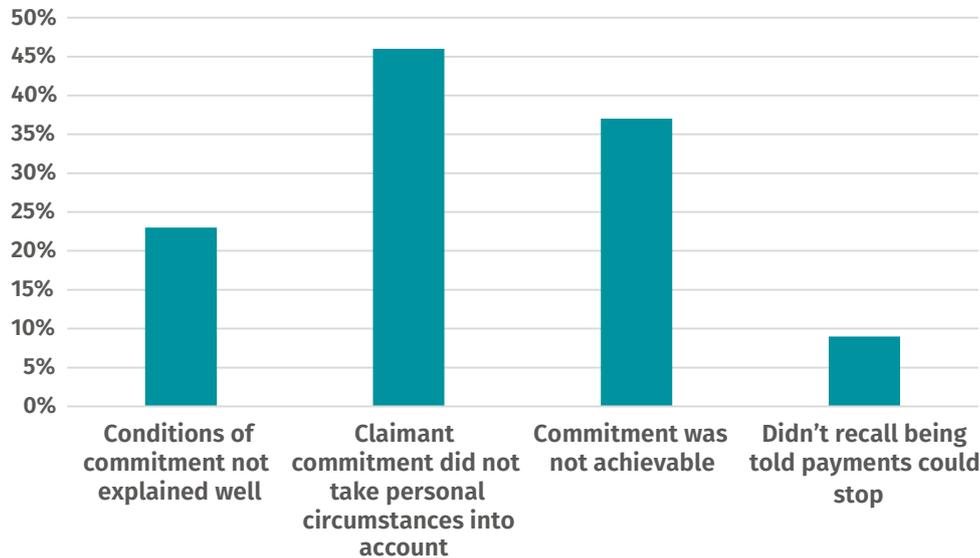
This can lead to agreeing to conditions which are wholly inappropriate. In one such instance, a participant had agreed to a claimant commitment that included full-time job search requirements while they were experiencing homelessness combined with mental health issues.

“It’s impossible... if you’re suffering with mental health problems to start with, you’ve got the pressure of life in general, your living situation, your living circumstances, what’s going on in your life, it’s too much – even trying to keep track of how many hours, how are you meant to prove it? Do people actually believe you’ve done it? I just think there shouldn’t be so much pressure.”

A 2018 universal credit customer service survey suggests these challenges are widespread (DWP 2018). Around one-quarter (23 per cent) felt the conditions of their commitment were not explained well, and around half (46 per cent) felt that their personal circumstances were not taken into account, with four in 10 feeling their commitment was not achievable. The evidence suggests that some claimants feel set up to fail and that their circumstances were not being properly accounted for in the drawing up of claimant commitments.

FIGURE 2.1: UNIVERSAL CREDIT CLAIMANTS OFTEN FEEL THEIR CLAIMANT COMMITMENT IS NOT TAILORED NOR ACHIEVABLE

Proportion of surveyed UC claimants surveyed who agreed



Source: DWP 2018

There can be barriers to the disclosure of relevant information to ensure appropriate conditionality

We heard from interview participants that the open-plan format of jobcentres was not conducive to having open conversations about details of their personal lives with a person they had just met. Participants described being acutely aware that they could overhear other people's conversations, which put them off disclosing information that might affect their claim.

"If people aren't opening up initially about things, it's because of the environment that they're in."

"You're in an open office... that's not private, nothing's private, the desks are so close to each other and you can hear everyone's conversations because it's an open area...there's a lot of people suffering with anxiety or anxious about speaking to someone new, and speaking to someone new in a big public open space."

Participants also noted that the presence of security guards "put them on edge" and that the jobcentre was not a welcoming or *psychologically informed* environment.⁴ There is also typically limited time in the initial meeting which can limit opportunities to gather crucial information. We also heard that claimants often do not know what to expect when going into the jobcentre, and can feel unprepared or even blindsided by the conversation they are expected to have. This leads, in the words of the Social Security Advisory Committee (SSAC) to "some claimants with complex needs, who initially present themselves as able and willing to engage, faced with full conditionality, even though it's unlikely to be appropriate in the circumstances" (SSAC 2018)

⁴ Psychologically informed environments (PIEs) are services where the day-to-day running has been designed to take the psychological and emotional needs of service users into account. It is a way of working that places people and their individual needs at the centre on a day-to-day basis (Mental Health Foundation 2017).

Recommendation 1: The process of claiming universal credit must provide more information to the claimant and better support disclosure of sensitive information.

Specifically, we recommend the following.

- There should be part of the process which explains that a claimant commitment typically requires job search for 35 hours a week, and if they don't think this will be possible they can explain to the work coach the reasons at the meeting why they will be unable to do this.
- If the claimant would like this conversation to be in private, they can check a box to request a private room and can explain in 'free text' why this might be, which can then be picked up in more detail by the work coach. At this point they should also be able to notify if they would like to bring someone with them for support.
- If they are not happy with the conditions the work coach proposes they should be informed they can ask a second, experienced work coach to look at what has been agreed.

If for whatever reason it is not possible for a private room to be arranged, it should be possible to conduct the meeting privately in some other form, such as by telephone or video call or potentially through a home visit. In the longer-term, DWP should consider boosting their capacity in order to be able to conduct private conversations in the jobcentre where there is a shortage of rooms.

Work coaches may need support to have the right conversations

Although work coaches are provided with guidance and training on how to help identify people with complex needs (DWP no date), this is unlikely to be failsafe. We found evidence that claimants often do not experience best practice, and that work coaches could benefit from a better understanding and recognition of particular 'triggers', where claims with certain characteristics should lead to a more enquiring approach from the work coach.

We heard that this could make a particular difference when it comes to discussion of a claimant's housing circumstances which can be missed out or misunderstood, leading to inappropriate work search conditions being applied.

Recommendation 2: If claimants are without housing costs, this should trigger a conversation to understand their housing situation.

If a claimant has said in their claim to UC that they have no housing costs, the work coach should seek to understand the claimant's housing circumstances properly as part of the standard first meeting with a work coach. This could be straightforwardly explained (they might be living with parents, for example) or it could be a sign the person's housing situation is precarious and should be explored further. Work coaches should be supported in this conversation with a specific tool, such as the Homelessness Conversation Tool developed between Crisis and DWP to ensure it is properly investigated (Crisis 2021). We understand this tool is currently available for work coaches to use, but we recommend that it is employed more systematically. This would help identify homelessness and ensure that appropriate conditionality can be applied – which, in the case of homelessness, would amount to a complete suspension of any conditions (DWP 2021g), and referrals made to the right local support services.

Although we heard that some of the best work coaches may already take this approach and enquire about housing costs where they appear to be unaccounted for, this recommendation would ensure this approach was applied more consistently. We heard from our Experts by Experience group that it should be clear that disclosing this sort of information would not negatively affect their

benefit entitlement, but could allow for suspension of work search conditions whilst the housing situation is resolved.

We will now consider what happens once the claimant commitment has been agreed.

The five-week wait causes hardship and not everyone is aware they can ask for an advance

Once a claim to universal credit has been made and the claimant commitment signed, there is typically a five-week wait before the first payment is made (DWP 2021a). Claimants can request an advance payment from their work coach if they explain why they need it, which will then be typically considered and agreed on the same day – with the payment for the first month repaid from later benefits over 24 months, having been extended from 12 months previously (DWP 2021b).

Many people we spoke to for this research told us they were not aware they could ask for an advance straight away, but instead found out later from other family and friends, often when it was too late for them to request one. We heard that others had made a request, but it had been denied despite not having access to savings. In the interim, claimants were without money to live on and found it very hard to get by day to day, let alone search or prepare for work.

“I didn’t know you could get an advance, so I was obviously in the hostel... it wasn’t very accommodating, so I just had to go with what I had, I just had to struggle. One of the lasses told us that we could get an advance and I applied for it and I did get it but I wasn’t aware of it and wasn’t told I could get it by them (the jobcentre). I think I was about three weeks until I found out.”

A recent TUC survey of universal credit claimants found that one in five said they could only “just about cope”, and only one in 10 felt they “could cope” during the five-week wait period for their first payment. Many said it had impacted their mental health through stress and anxiety and that they felt degraded by the process (TUC 2020) – none of which is likely to be conducive to a successful job search.

Generally, when people knew to request an advance, they were able to explain why they needed one effectively and this was granted by Jobcentre Plus. However, the lack of awareness of the option of an advance payment remains a problem for claimants, and this may be more common among those with complex needs. Given that when a claimant applies for universal credit, information is already automatically collected on whether they have access to savings, it should be relatively straight-forward for work coaches to identify where an advance may be appropriate, and to be more pro-active in communicating the option of an advance payment for claimants without savings.

Recommendation 3: Automatically offer budgeting advances to those without savings

We recommend where a claimant to universal credit declares that they have no savings in their application, this should automatically trigger a conversation around an advance payment by the work coach. This fail-safe approach will help identify everyone who needs a budgeting advance and prevent people falling through the cracks, whilst supporting job search (where appropriate) in the earliest phase of the claim. Over the longer term, DWP should develop the ability to pay out advances through weekly payments to support people who would benefit from weekly budgeting.

We were pleased to learn that the 24-month repayment period introduced through the pandemic will be retained, but it should be pro-actively offered to all who could benefit.

Claimants can benefit from alternative payment arrangements

UC applicants can request alternative payment arrangements (APA) when making a claim to universal credit, or in the middle of a claim as circumstances may change (DWP 2020b). The alternative arrangements currently available are as follows.

- **More frequent payments:** by default, universal credit is paid on a single monthly basis – but it can be paid more frequently in line with the legacy benefit system “in instances where a claimant is finding it difficult to budget monthly”.
- **Split payments:** by default, the payment is made to a nominated recipient, but it can be split between two people in a household where it becomes apparent there is domestic violence, financial abuse or “where one partner mismanages the universal credit payment”.
- **Payments direct to landlords:** by default, universal credit paid directly to the claimant who is expected to use it to pay for rent. Under the legacy system, housing benefit was paid direct to landlords. This option is relevant where a claimant is behind on rent for two months or more or where the **alternative payment arrangement (APA) factors** apply.⁵

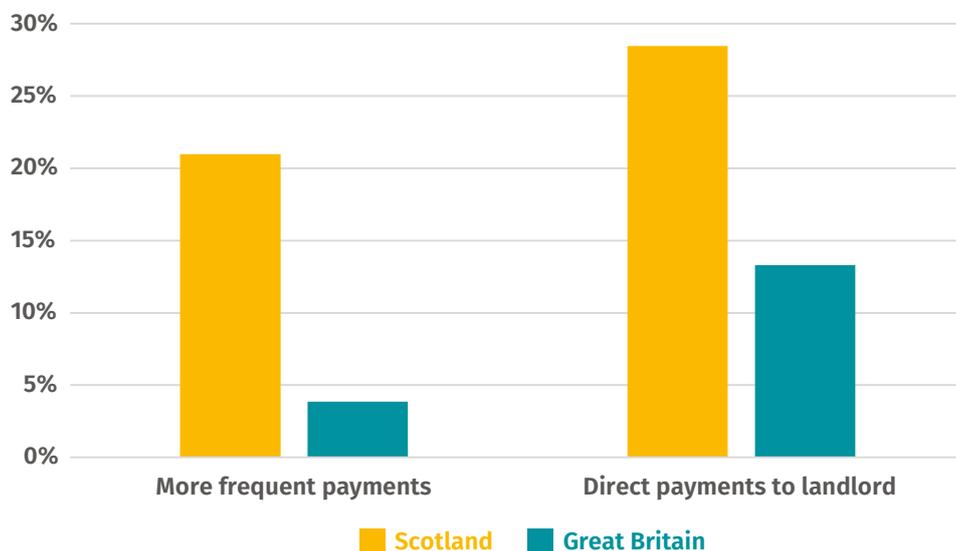
Alternative payment arrangement factors include: mental ill health, severe and multiple debt problems, or experiencing domestic abuse (ibid). In most of the UK, the decision of whether to offer APAs, or grant them if requested, is at the discretion of Jobcentre Plus and dependent on a claimant’s circumstances as above.

However, in Scotland, where some elements of social security provision are devolved to the new Scotland Social Security Agency, the Scottish government has introduced Scottish Choices. Under this policy design, claimants are automatically offered (from the second assessment period) more frequent payments or direct payments to landlords if they choose, open to all with no ‘gatekeeper’ criteria such as whether the work coach thinks the APA factors apply (Scottish Government 2021). Although split payments are currently not offered by default in Scotland, legislation has been passed to enable this which is yet to be implemented (WPSC 2018b). Analysis of available DWP data suggests that the uptake of alternative payment arrangements is much higher in Scotland, suggesting potentially unmet need in the rest of the UK.

⁵ The availability of such payments to landlords mirrors the position in legacy housing benefit since 2008 for those who reside in the private rented sector.

FIGURE 2.2: ALTERNATIVE PAYMENT ARRANGEMENTS ARE MUCH MORE COMMON IN SCOTLAND THROUGH SCOTTISH CHOICES, SUGGESTING THERE MAY BE UNMET NEED IN THE REST OF THE UK

Proportion of UC claimants receiving alternative payment arrangements



Source: IPPR analysis of DWP 2021e

More broadly, in our interviews, awareness of alternative payment arrangements were low and all agreed that direct and more frequent payments would have been helpful to have been offered, with people telling us they would help them to manage their money more easily.

“I just didn’t know it [alternative payment arrangements] was an option... I think that it’s good because it does help your budget... If I had been able to do that, to split what I had between two payments and my rent coming out every month, I think I would managed better that way.”

Recommendation 4: Offer alternative payment arrangements to all automatically

We would argue that instead of DWP relying on individual work coaches to identify when APA criteria may apply, they should be offered automatically to claimants when making a claim, in line with Scottish Choices. This should be made available from the first assessment period.

Work search conditions can be reduced through easements

Work coaches can ‘switch off’ conditionality – in effect replacing any work search requirements if a claimant faces temporary difficulties with searching for work. This is referred to as a conditionality **easement**. There are a number of prescribed situations which could trigger an easement, which are set out in legislation alongside the durations depending on a claimant’s circumstances (see table 2.1) (DWP 2021g).

TABLE 2.1: STATUTORY EASEMENTS TO CONDITIONALITY ON UNIVERSAL CREDIT

Circumstances	Duration of easement
Bereavement of a partner or child	6 months
Carrying out a public duty, such as Jury Service	Duration of the public duty
Child distress – support for a child following death of a carer or a child witnessing or victim of domestic violence	1 month (can be requested every 6 months for up to 2 years)
Domestic violence	3 months, or 6 months for lead carer of a child
Drug or alcohol dependency	Up to 6 months
Temporary absence abroad to receive medical treatment or accompanying child or partner	Up to 6 months
Caring for 35 hours a week or more for someone in receipt of disability benefits	Duration of the caring

Source: DWP 20201g

However, since 2014, DWP has introduced ‘discretionary easements’ which are much less clearly defined as those outlined above. These apply “where it would be unreasonable to impose work-related requirements. These cover domestic emergencies, homelessness and temporary childcare” (DWP 2021g). Whether these criteria apply is at the discretion of the work coach, including when something does or does not constitute a ‘domestic emergency’, and the appropriate length of time for which the easement should apply.

There is currently no data available to help us understand how frequently easements (whether discretionary or otherwise) are applied, for whom, or how this might vary across jobcentres or claimant groups. This lack of data hinders our understanding of how effectively easements are applied,

Previous evidence has suggested that the application of easements can be ‘patchy’ and ‘inconsistent’ (Fitzpatrick et al 2017) and that work coaches can lack confidence in their application (SSAC 2019). We heard from the Experts by Experience group that people were being expected to carry out full-time job search while being legally homeless.

But there is evidence that where work coaches are offered specific training, it can bring about a cultural shift which can lead to them becoming much more widely applied. The **Newcastle Homelessness prevention trailblazer, a DWP programme of trialled interventions geared at reducing homeless in the city**, included specific training for work coaches which brought about much greater use of easements amongst people at risk of homelessness. A homelessness support worker in Newcastle summarised as follows in the evaluation report for the trailblazer:

“[Easements] were very, very rare, people saw them as very exceptional whereas since the Trailblazer, that was part of the training that we did with staff... ‘these are the easements that you can use, this is what they look like, this is how you should use them’. So now... those easements have become much more widely used and much more appropriately used.”

(Watts et al 2019)

That same report recognises that this approach could be used to help people with issues beyond homelessness. The authors found that “easements initially put in place because of homelessness reportedly now enabled a better understanding of claimants’ circumstances, including the background factors precipitating their homelessness (eg addiction issues or domestic violence), meaning that further easements for these domestic emergencies could then be used to support the claimant further”.

The findings of this report suggest there is huge potential for improvement in the application of easements more widely across Jobcentre Plus. Our interviews found that in some cases people who were currently homeless were being subject to full work search requirements, despite that being wholly inappropriate given their circumstances.

Recommendation 5: Support the better and more robust application of easements through a package of reforms

This includes the following.

- Collect data on the application of easements, starting with a small sample of jobcentres, including Newcastle as a benchmark of best practice, to understand the frequency of which easements are being applied and to whom.
- Consider how learning from the Newcastle trailblazer could be applied more widely across the Jobcentre Plus estate to ensure easements can be applied more consistently. This may be particularly important given the inflow of new, less experienced work coaches.
- Include information on available easements to claimants in the universal credit application process.
- Placing more easements on a statutory footing with well-defined easement periods, namely with respect to homelessness. If a claimant is without permanent accommodation, they should receive an easement which lasts until they are permanently housed, recognising that the first priority for anyone in such circumstances should be to support them to find settled housing before being asked to undertake a job search or other steps into paid work.

Next, we consider what happens when a work coach considers that a claimant commitment has not been met, referred to as a ‘labour market sanction’. Sanctions remain a core part of the jobcentre regime despite limited evidence on their effectiveness in supporting people to find good quality, long term employment, and extensive evidence of the hardship they can cause – particularly for those with complex needs (WPSC 2018a; Pettaro et al 2022). While the weight of this evidence presents a clear case for ending the sanctions regime, we also recognise that the Department is unlikely to remove sanctions entirely in the short term. We therefore make recommendations for minimising the chance of miscommunication and serious harm resulting from sanctions, alongside a recommendation that the current sanctions regime is urgently reviewed in light of this evidence.

Sanctions are a two-stage process, with the decision-maker far-removed from the claimant

The process of receiving a sanction is a two-stage process which can result in a loss of payment of up to £10.60 a week for up to 6 months (Turn2Us 2021). Even more severe sanctions lasting up to three years were abolished at the end of 2019 after the then secretary of state found them to be “counter-productive and [to] ultimately undermine (the government’s) goal of supporting people into work” (UK Parliament 2019). However, the financial penalties in the system remain a source of significant hardship for claimants and particularly for those with complex needs.

The process is also highly contingent on the judgements of Jobcentre Plus staff. If a work coach believes that the claimant commitment conditions have not been met and there was not a ‘good reason’ for this, they can raise a **labour market doubt** – this means that the claimant is referred for a sanction to a separate labour market decision-maker (LMDM), a separate DWP official who typically works in a centralised hub, removed from the jobcentre. The decision to then apply a sanction is then made by the LMDM based on the evidence provided (WPSC 2018). Around 70 per cent of decisions referred to the LMDM result in an adverse sanction being applied (IPPR analysis of DWP 2021h).⁶

As such, outcomes on sanctions are a joint responsibility between work coaches and ‘independent’ decision-makers who both exercise discretion. Arguably, the latter are very far removed from this process having no contact or involvement with the claimant which could affect their ability to make good-quality decisions as they do not know the claimant or their wider circumstances beyond the information recorded in the claimant’s journal (WPSC 2018). It is also worth noting the role of the decision-maker here is only to determine if there was good reason for non-compliance, but it is *not* to determine whether the application of a sanction would lead to disproportionate hardship or distress, which is much more likely where claimants have complex needs.

Recommendation 6: Decision-makers should have the discretion to cancel a sanction if there is a risk of harm for the claimant

This could be flagged by the initial work coach – even if the decision-maker does not find good reason for the breach a sanction could still not be applied. In cases where a concern is flagged by the decision-maker, the decision-maker should have a phone call with the work coach to establish the appropriate details.

It is not well understood if some claimant groups are at greater risk of sanction than others

There are no systematic data available to show if claimants with complex needs were more likely to receive a sanction in the benefit system, and since the introduction of UC the use of ‘markers’ to identify people with complex needs (such as being care leavers or with a disability) are no longer used. Information relating to complex needs is ‘pinned’ to the claimant’s UC journal but cannot be systematically analysed to understand how different groups fare in the system (WPSC 2018). This is a significant data gap which prevents the DWP from understanding if vulnerable groups are more affected by sanctioning than others on UC.

Recommendation 7: Re-implement complex needs flags

We recommend that DWP re-implement complex needs flags to understand if certain claimants are at greater risk of sanction. This information should help shape its future sanctions and conditionality policy for people with complex needs, and to understand variations in practice across job centres. These flags should be regularly reviewed and easy to remove where circumstances change. We understand these have been introduced for some groups already, such as care leavers. We recommend that these should be extended to other groups who may have complex needs, led by available evidence.

Claimants should be given a ‘second chance’ and not sanctioned immediately

Where a claimant was at risk of being sanctioned, DWP had previously trialled an ‘early warning’ system for claimants on jobseeker’s allowance, where written letters were issued to claimants to give them an opportunity to provide further

⁶ Data for UC live service. Excluding reserved or cancelled decisions, i.e the proportion of adverse decisions to those either classified as adverse or non-adverse. Data are not available on UC Full Service, the successor to the Live Service, but likely give an indication.

evidence which could help prevent a sanctioning decision being made (DWP 2018). The evaluation of this scheme found very low proportions of people provided evidence (13 per cent) and, among those that did, sanction decisions were only changed around 50 per cent of the time (ibid). This led the department to conclude this did not represent 'good value for money'.

This trial has been informally referred to as a 'yellow card' sanctions system, but this analogy is misleading in that such a system does not allow for people to make even "honest mistakes", it only provides a second chance to provide evidence. If the sanctions regime is to be maintained, we recommend a case for introducing a system in which, even if the claimant is not found to have a 'good reason' or where a claimant is unable to provide appropriate evidence, they should not have their benefits affected in the first instance, but instead have a meeting to understand what has happened and why.

Recommendation 8: Replace the first sanction with an intervention meeting without financial penalties

We recommend that in the first instance where someone would currently be sanctioned, instead they should attend a dedicated 'intervention meeting' to discuss their claimant commitment and to review whether it is or remains appropriate. As one research participant explained:

"There should be more stages before it comes to that [being sanctioned], maybe like query why people aren't engaging, there's obviously some sort of issue, why people aren't engaging, they shouldn't just get their money stopped."

This would be something closer to what Citizens Advice had previously called a "genuine yellow card system" (Citizens Advice 2015), which would give UC claimants the opportunity to make honest mistakes in what can often be a complex and bureaucratic system.

In this instance, instead of applying a financial sanction in the first instance, a meeting should be arranged with the claimant, alongside someone to support them if needed, to review the claimant commitment in which:

- it should be explained to the claimant in what ways the claimant commitment was not met
- the claimant should be given the opportunity to explain why they didn't comply or clear up any misunderstandings
- whether the claimant commitment is appropriate and/or whether an easement should be applied should be reviewed
- it should be made clear that a sanction could apply if the claimant commitment is not met a second time, and what this would mean in cash terms for the claimant.

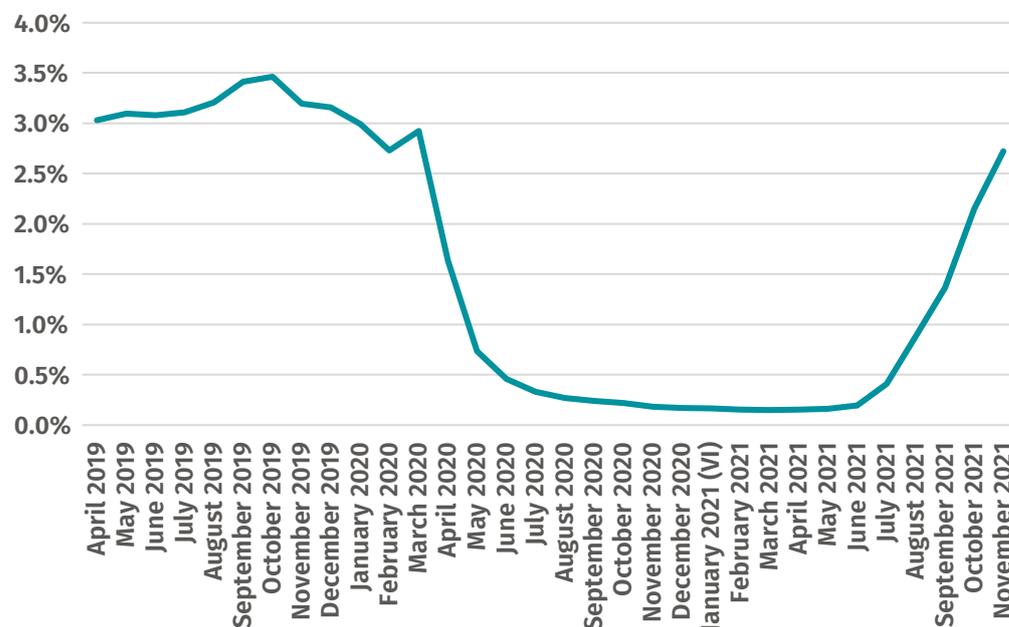
Building this process into the sanctions regime would help build trust, help identify where conditionality may be unreasonable or wholly inappropriate, and give people an opportunity to understand the system better. This early intervention approach would disproportionately benefit people with complex needs who may have difficulties meeting conditions or articulating the problems they may have meeting any conditions they have been set.

Sanctions are resuming as we emerge from the pandemic

Through the Covid-19 pandemic, sanctions have been largely suspended due to the exceptional circumstances relating to the pandemic. This has led to a huge drop in the rate of claimants subject to sanctions, however these have now returned close to pre-pandemic levels in the latest available data (see figure 3).

FIGURE 2.3: UNIVERSAL CREDIT SANCTION RATES FELL DRAMATICALLY THROUGH THE PANDEMIC BUT ARE NOW BEGINNING TO RISE AGAIN

Proportion of claimants in the work search group subject to sanction over time



Source: IPPR analysis of DWP 2021i

As sanctions resume, there is an opportunity to reset the dial of how conditionality is applied. To deliver a more compassionate welfare system through a fairer sanctions regime, reforms should seek to build understanding before penalising claimants in a way which may irrevocably damage their relationship with their work coach and the Department for Work and Pensions. Claimants with complex needs are at a higher risk of catastrophic consequences where sanctions are applied, particularly where sanctions occur without adequate warning or understanding on the part of the claimant or the jobcentre (Wright et al 2019).

Recommendation 9: Review the overall case for benefit sanctions

In the longer term, the DWP should formally evaluate whether the alleged benefits potentially brought about by a sanctions regime, such as increased adherence to work search and work-related activity, are worth the costs to the individuals, the DWP and our society as a whole. These costs range from the administrative and fiscal burden of costly appeals, decision-making processes, and administration, to declining trust in the system among claimants and the risks of future non-compliance, as well as the costs to local government from additional use of hardship funds (NAO 2016). And the personal consequences for individuals and families affected can be catastrophic – in the form of worsening mental or physical health and acute financial hardship, all of which put additional strain on claimants’ personal lives and can push them further away from the labour market. These costs are also borne collectively: policymakers ought to consider the increased burden of healthcare spending from poor physical and mental health resulting from sanctions and the threat of them (Mind no date).

If DWP remains committed to the sanctions approach in principal, it could consider instead reducing the level of sanctions or reducing their duration in order to minimise these societal costs.

Finally, we consider the role of budgeting loans and deductions.

Claimants can also access loans for other household emergencies but deductions on future payments can have a major impact

Claimants on UC can request a budgeting advance⁷ for an ongoing claim, to pay for:

- emergency household costs, such as replacing a broken cooker
- costs associated with getting a job or staying in work, for example transport costs for a job interview
- funeral costs.⁸

Budgeting advances are governed by rigid rules. There are maximum sums for different groups: £348 for a single person, £464 for a couple, and £812 in families with children. They must usually be repaid within 12 months. How much you can get depends on “whether you can pay the loan back” and require that a claimant has less than £1,000 in savings.

They are also subject to various eligibility criteria. To receive a budgeting advance, claimants must:

- have been in receipt of or a combination of UC and legacy benefits for six months (unless the advance is to support a movement into work)
- have had earnings less than £2,600 in the last six months (or £3,600 for couples)
- have paid off any previous budgeting advances in full.

However, issues can arise whereby this borrowing needs to be repaid alongside other potential deductions (such as repayment of the UC advance payment to cope with the five-week wait), which can leave claimants with significantly less than their entitlement month by month. Although there is a cap on deductions set at 25 per cent of the UC payment in guidance (Citizens Advice 2018), we were told of instances where deductions had gone over this (as a result of the need to re-pay a court fine, for example, which is typically time sensitive) leaving claimants with less than-three quarters of their monthly entitlement potentially for months at a time.

Recommendation 10: Reform the rules around repayment of debts so that claimants keep a greater share of their payment each month

We would argue that the 25 per cent cap, even if applied correctly, is too high given the overall low level of benefit payments. We recommend that DWP should seek to lower this to a cap of 10 per cent as a more reasonable maximum. To make this achievable, work coaches should be given flexibility to proactively:

- extend the default repayment period for budgeting loans from 12 to 24 months,⁹ in order to reduce the level of repayment in any one month
- allow repayments to be ‘paused’ or re-sequenced, with greater priority given to external mandated payments, such as court fines, with DWP recoveries being made afterwards.

Having examined specific aspects of a UC claim and made a series of recommendations, we next consider cross-cutting issues to address to better support claimants with complex needs.

7 Not to be confused with an **advance payment**, a payment which covers the five-week wait period at the start of the claim.

8 Claimants can also receive support in the form of Funeral Expense Payments, which do not need to be repaid.

9 In line with the repayment period now standard for budgeting advances, which cover the period of the five-week wait.

3.

CROSS-CUTTING ISSUES AND RECOMMENDATIONS

Having examined the various aspects of the UC claims process, this chapter examines some ideas which cut across different aspects of a claim. Our recommendations in this chapter could help support claimants with complex needs and support work coaches to exercise discretion more effectively and make better decisions.

DWP must do more to facilitate digital access

The digital-by-default nature of universal credit presents a significant improvement to benefit delivery for many people. It allows a reliable, secure, and recorded line of communication between claimants and their work coach and for many people will support them to manage their claim and job search in a similar way to how online banking has revolutionised how people access and use banking services. However, this arrangement does not work for a significant minority of claimants. Through our research, we heard of significant problems arising from IT access and use of the UC journal. If channels of communication are not working, it is difficult for work coaches to know what is going on and this can affect their decision-making and ability to exercise discretion and support claimants effectively.

Through our interviews with participants, we found that some people did not have access to the internet at home, and had to rely on public wi-fi networks in commercial spaces such as cafes where they are expected to spend money, or on sporadic borrowed access from family and friends.

Equally problematic is access to appropriate devices with which to fill in the journal or complete job tasks such as writing a CV. This was compounded by very poor IT availability at the jobcentre and lack of availability elsewhere including public libraries, where there are often time limits on use, with it regularly being restricted to an hour at a time.

Job searches also increasingly need to take place online and so meeting full work search conditions (35 hours a week) without internet access and appropriate digital devices to get online also constitutes a significant barrier. As one participant explained:

“I was thinking on my way back from the hostel [after agreeing the claimant commitment], how am I going to get on a computer? To try and look for jobs and borrow a smartphone, I don’t even have wi-fi on my phone. To look for a job sitting on your phone, it’s so hard. I think it would help if they’d asked me if I’d got access to things.

Where I was staying they had no computers whatsoever. I even tried to get in at the library, you know there’s so many people it was virtually impossible.”

Following a trial in the north west of England, the DWP is introducing free home broadband access for jobseekers for up to six months via the flexible support fund (FSF) (TalkTalk Group 2021). This is a very welcome development which could help tackle digital exclusion for vulnerable groups and support work search, however

there are potential pitfalls. The DWP remains responsible for identifying and referring claimants based on need (ibid) and so identifying the people who need it will remain crucial to the success of the policy. Furthermore, the policy did not come with an announcement of additional funding for the FSF, which could lead to excessive gatekeeping or rationing of other forms of support for jobseekers.

It also does not address issues with access to appropriate devices with which to use the internet, which was raised in our interviews and conversations with the Experts by Experience group. We know that some groups are less likely to have a PC, laptop, or tablet: previous research shows that 36 per cent of disabled people don't have access to a computer at home compared to 15 per cent of non-disabled people (Ofcom 2019).

Recommendation 11: DWP must facilitate better access to the internet and devices to meet work search requirements

To deliver this, we recommend the following.

- Specific FSF funding is provided to support the rollout of the free broadband offer. To give an indication of cost, £40 million would support 10 per cent of the current out of work UC caseload to access free broadband for six months at a cost of £120 per person. Although pressure on the fund may have been lower at the introduction of the policy during the pandemic, there will be growing pressure on the FSF as more in-person interactions are required (such as in-person job interviews) and so ringfenced funding should be required.
- Claimants in the process of claiming should be asked as standard if they have access to a PC, laptop, or tablet, and whether they have a stable internet connection at home to trigger a conversation at the jobcentre about access to the internet and devices.
- DWP should use their considerable purchasing power to facilitate access to affordable netbooks or tablets at cost for claimants, which can be paid for by interest-free budgeting advances over 24 months. For example, a £120 netbook could be repaid over 24 months at just over £5 monthly deduction from the UC claim. Costs could be further reduced by DWP part-subsidising the costs. We heard that through the Covid-19 pandemic DWP had been providing laptops on a discretionary basis in some locations, but this must continue and be expanded in future.

Identifying those without access to the internet and an appropriate digital device at the start of the claim would have made a significant difference for the people we spoke to for this project, both in supporting their job search and allowing them to meet their conditionality requirements.

We also heard of people who were being 'locked out' of the UC system, having forgotten their passwords or losing their phone meaning they couldn't log in using two-factor authentication. Contacting DWP in an attempt to get access back led to being 'bounced around' with no one seemingly owning the problem or suggesting a way forward, meaning they couldn't record job search activity and were at risk of sanction or not being able to respond to messages placed on the portal. Therefore, we also recommend a dedicated telephone line service for unlocking accounts in these circumstances to ensure people can always get back into their journal within a reasonable time period.

DWP should investigate the greater use of 'complex need alerts'

As there are often challenges with identifying complex needs in the jobcentre, approaches which allow work coaches to identify these more systematically would improve decision-making and allow for improved discretion for example in whether to apply a sanction or in the setting of work search conditions.

One such approach which should be explored further is a system of ‘safeguarding alerts’ between jobcentres and relevant local authorities. When a claimant comes into contact with, for example, housing support services through a local authority – and a claimant is identified as having complex needs – they should be offered a ‘complex needs alert’ which would be completed on their behalf, which will be sent to the relevant jobcentre. This alert could flag the nature of any complex needs, outline relevant information, and provide emergency contact details. If the claimant then makes contact with the jobcentre, then the work coach already has key information and context which could be pinned to the UC journal and help shape the UC process in a way to better support the claimant.

A similar approach this has been developed between Greenwich Council and Woolwich Jobcentre (Greenwich Council no date) ,

Anecdotally, this approach has been useful in helping Jobcentre Plus to more consistently identify claimants with complex needs and ensure their needs can be better met and that relevant safeguarding steps are applied.

A similar safeguarding approach is now being trialled in Glasgow specifically geared towards identifying and supporting people experiencing homelessness, with early indications suggesting it is a valuable approach to prevent people falling between the cracks and preventing crises from building up.

This approach shows considerable promise and should be explored further. While we recognise that such arrangements depend on the relationships between the local jobcentre and local authorities and requires will on both sides, these early successes show signs of an effective approach to identifying complex needs, drawing on the wider eco-system of support networks in a local area, which should be scaled up across the country.

Recommendation 12: The government pilot ‘complex needs alerts’ right across the UK

- Initially, there should be five pilot areas with differing demography, with specific funding provided to support the delivery of the pilot.
- Different areas should trial different referral routes and could include for example: hostels, domestic violence refuges, and hospitals.
- The pilots should be informed by learning from the safeguarding approach at Greenwich and the Glasgow pilot.
- These pilots should be formally evaluated both quantitatively and qualitatively, with an emphasis on learning to instruct a national rollout.

DWP should ensure greater continuity between work coaches

We heard through our interviews and Experts by Experience group that people are often passed between work coaches throughout the life of their claim. It was explained that this experience does not help build trust and understanding between work coaches and the claimant, and instead could limit the ability of DWP staff to apply discretion effectively. This is particularly important for those with complex needs where an understanding of the person as an individual is particularly important.

The advantages of keeping the same work coach we discussed with the Experts by Experience group were:

- it helps to build a rapport, and makes it easier to disclose information and have high quality conversations
- it helps the work coach to identify if the claimant is behaving unusually or has physically declined from when they have seen them previously, which

could act as a cue to investigate their circumstances, pause conditionality, or signpost to services that could help them

- it means claimants do not have to re-live or re-tell their trauma to new people and reduces anxiety around meetings
- it reduces the chance of inappropriate sanctioning and conditionality as wider circumstances were more likely to be known/understood by the work coach.

We heard of cases where people were being moved from work coach to work coach very frequently, creating a sense of distance between claimants and DWP and limiting the opportunity to build mutual trust and understanding, which is particularly important for those with complex needs. Although we heard this may have become worse in the pandemic, we heard from people we spoke to there were issues prior to this.

Recommendation 13: DWP should seek to ensure continuity of work coaches for claimants across a claim, pro-actively monitoring and targeting the proportion of claims who keep the same work coach across their claim

Taken together, improving digital access, introducing 'complex needs' alerts and ensuring greater continuity of work coaches could significantly improve the experience of people accessing the system with complex needs and prevent them from falling between the cracks.

4.

SUMMARY OF RECOMMENDATIONS

This chapter summarises the recommendations in this report, which together we believe would lead to a transformation in the delivery of universal credit if implemented, leading to a more humane welfare system which better supports claimants with complex needs.

Our recommendations can be understood to fall under four categories.

1. INCREASE AWARENESS AND UNDERSTANDING OF EXISTING FLEXIBILITIES IN UNIVERSAL CREDIT

- If a claimant has no savings, they should automatically be offered a UC advance to avoid going without money for five weeks.
- Claimants should automatically be offered more frequent payments or a payment direct to landlords as standard practice in line with what happens in Scotland.
- Specific training across Jobcentre Plus should be provided around the application of easements to conditionality for people with complex needs, particularly to raise awareness of the more recently introduced discretionary easements.

The first two recommendations above give work coaches less discretion as it gives people automatic entitlement, whereas the third encourages better use of existing discretion.

2. EXTEND FLEXIBILITIES

- Provide specific financial support for the flexible support fund to ensure the recent free broadband offer for jobseekers reaches everyone it needs to, and provide affordable financial support to purchase low cost netbooks and tablets to claimants without access to devices.
- Labour market decision-makers who decide whether to apply a sanction should have the discretion to cancel a sanction if there is a risk of harm for the claimant, even in cases where the claimant commitment was breached.
- Give work coaches the ability to pause, extend or reschedule deductions for repayments as to prevent deductions exceeding 10 per cent of payments in any one month.

These recommendations generally give work coaches greater discretion to support claimants.

3. FACILITATE BETTER INFORMATION SHARING AND BUILD UNDERSTANDING AND TRUST BETWEEN WORK COACHES AND CLAIMANTS

- The initial process of claiming universal credit should provide more information to the claimant about what to expect from the first meeting and better support disclosure of sensitive information, including through pro-actively offering the use of private rooms.
- If a claimant has no housing costs, work coaches should seek to understand the claimant's housing circumstances, properly informed by a Homelessness Conversation Tool to inform any work search conditions which are applied.
- Building on the success of the Glasgow pilots, pilot a system of 'complex needs alerts' across the UK, where support services can send a complex need alert to Jobcentre Plus with the permission of the claimant, to help Jobcentre Plus better identify complex needs and ensure appropriate conditionality is applied and prevent inappropriate sanctions.
- Replace the first sanction with a meeting with the work coach to: explain how conditionality was not met, clear up any misunderstandings, and adjust or suspend work search conditions if appropriate. In the longer term, the DWP should formally evaluate whether any benefits potentially brought about by a sanctions regime are outweighed by the costs.
- DWP should seek to ensure continuity of work coaches for claimants across the life of a claim to build rapport and trust.

All of the above should help improve DWP staff's ability to effectively exercise discretion.

4. BETTER UNDERSTAND HOW DISCRETION IS APPLIED

- Collect data on the application of easements, starting with a small sample of jobcentres, including Newcastle as a benchmark of best practice, to understand the frequency of which easements are being applied and to whom.
- Re-implement complex needs flags to understand if certain claimants are at greater risk of sanction. This information should help shape future sanctions and conditionality policy for people with complex needs, and to understand variation in practice across jobcentres.

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