

Beneath the trends

A detailed look at the issues facing claimants going through managed migration

May 2024

Introduction

The Department for Work and Pensions (DWP) is in the process of moving legacy benefit claimants onto universal credit (UC) through managed migration. Gradually, claimants are being selected for managed migration and are sent a 'migration notice' informing them that they have three months to claim UC, after which their legacy benefits payments will be terminated.

Alongside the administrative challenge this poses to the DWP, the UC system requires claimants to make significant adjustments to how they manage their day-to-day finances. UC payments are less frequent, UC is primarily claimed and managed online, and claimants have their income assessed each month. Households who are financially worse off claiming UC may be entitled to 'transitional protection' to preserve their income temporarily at its pre-UC level. Some households will still be worse off in practice if higher debt deductions are made from their UC award.

Child Poverty Action Group (CPAG) is undertaking research to identify the key issues affecting claimants going through managed migration, with the objective of helping to improve the process. Since early 2023 we have been gathering case studies and speaking to both welfare rights advisers and claimants to understand how managed migration is affecting households, what is going well and how it can be improved. We are sharing our evidence with the DWP on an ongoing basis. This report is the fifth in a series of public briefings summarising our findings to date (our other reports are available [here](#)).

Since our last report was published, the DWP has brought forward the managed migration of 800,000 employment and support allowance (ESA) claimants who do not get tax credits, which had been delayed until 2028. Under the current plans these claimants will begin receiving their migration notices in autumn 2024, with all notices being sent out by the end of 2025. The DWP has also outlined its intention to place ESA and income support claimants on an 'enhanced support journey' where additional interventions are made before their existing benefit payments are terminated. This report outlines how the managed migration process can be improved to

ensure that those facing the greatest barriers, who will receive their migration notice in the coming months, are able to make and sustain a UC claim.

This report covers:

- Progress to date
- Plans for completion
- Enhanced support journey
- Transitional protection errors
- Flaws in access to a non-digital claim
- Deductions for tax credit overpayments
- Deadline extension denials

Progress to date

In 2023/24, managed migration focused on tax credit-only claimants and the DWP took a geographical approach to roll out, bringing more Jobcentre Plus districts into scope of managed migration month by month until it was operating nationwide by February 2024.¹ The latest data shows that by March 2024, 824,000 legacy benefit claimants had been sent a migration notice.² Figure 1 shows how the DWP rapidly increased the number of migration notices it sent at the end of 2023, exceeding 100,000 a month since October.

To date, 381,000 individual claimants have reached their deadline date, 122,000 of whom did not claim UC before the deadline and had their legacy benefit payments terminated.³ This is a non-move rate of 32 per cent, which is considerably higher than the 26 per cent the DWP predicted of tax-credit only claimants in November 2023.⁴ We have repeatedly raised concerns about the high proportion of people not moving to UC and the lack of evidence explaining why people with a strong financial incentive to claim UC are not doing so. These concerns have been echoed by the National Audit Office⁵ and Public Accounts Committee.⁶ The DWP is currently conducting fieldwork to gather quantitative information about people's reasons for not moving to UC. Given the current plans for roll-out, it is unlikely that the findings will be timely enough to inform the approach to managed migration in the near term.

The proportion of people not moving to UC increased sharply in autumn 2023 when couples receiving tax credits were incorporated into the roll-out. It is not clear why couples would be less likely to respond to the migration notice, but the process of claiming UC is more complex as both members of the couple have to individually complete a UC claim.

One in 10 people sent a migration notice miss their deadline but make a UC claim soon after their tax credits claim is terminated. People who claim within a month of the deadline on their migration notice can still get transitional protection and their UC award will be backdated to the point at which their tax credits were terminated (though the delay will lead to an additional gap in their benefit payments). Nonetheless, once a claimant has passed the deadline on their notice, their tax credits payments are automatically terminated and the DWP does not have the

¹ UK Parliament, *Move to Universal Credit – Managed Migration from April 2024*, Statement made on 25 January 2024, [UIN HCWS213](#)

² Department for Work and Pensions, *Move to Universal Credit statistics, July 2022 to March 2024*, 14 May 2024

³ See note 2, Table 3: Migration Notices sent to individuals by status and migration notice sent

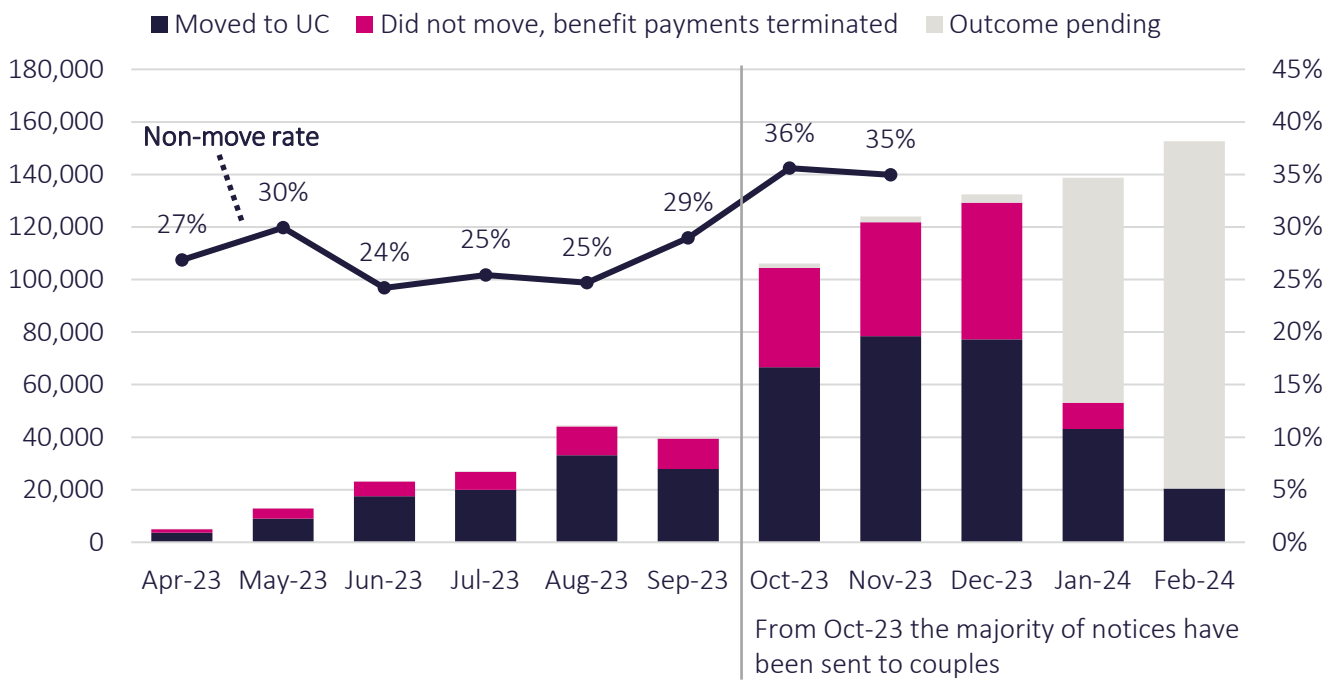
⁴ Public Accounts Committee, *Twenty-Ninth Report of Session 2023–24, Progress in implementing Universal Credit*, 24 April 2024

⁵ National Audit Office, *Progress in implementing Universal Credit*, 27 February 2024

⁶ See note 4

power to retrospectively extend the claimant’s deadline once it has passed. 52,000 tax credit claimants who received their migration notice in December (39 per cent) had their tax credit claim terminated because they did not claim by the deadline; future data will verify how many of them made a claim for UC within the grace period.

Figure 1: Number of individual claimants sent a migration notice by outcome, and non-move rate (%)



Plans for completion

In April 2024, the DWP began scaling managed migration to other legacy benefit claimants starting with those claiming income support and those getting tax credits and housing benefit.⁷ The incorporation of DWP-managed legacy benefits into managed migration means we are venturing into new territory at a much faster pace than we have seen to date. Having completed ‘discovery’⁸ work with just 1,800 DWP-managed legacy benefit claimants, the department planned to send out 79,000 migration notices to income support recipients and tax credit claimants also receiving housing benefit in April 2024.⁹ By comparison, it took seven months to send out the first 70,000 notices to tax credit-only claimants in 2023.

Under current plans, displayed in Figure 2 below, most legacy claimants in the current cohort of managed migration will be sent their migration notice by the end of September 2024. The managed migration of ESA

⁷ Department for Work and Pensions, [Universal credit – Preparing for the commencement of managed migration for housing benefit claimants](#), Letter from Neil Couling, senior responsible owner for universal credit, to local authority delivery partners, 4 December 2023
⁸ ‘Discovery’ is the term the DWP use to describe a phase of managed migration in which small numbers of claimants are sent a migration notice so the department can learn how to the policy can be rolled out successfully.
⁹ See note 5, Figure 11

claimants not receiving tax credits, which was previously deferred until 2028, is now expected to commence in autumn 2024 with all claimants receiving a migration notice by the end of 2025.¹⁰

Figure 2: Planned dates when claimants of DWP-managed legacy benefits will be sent their migration notice¹¹

Benefit received	No. of claimants ¹²	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	→→	Dec-25
Housing benefit and tax credits only	120,000	■	■	■						
Income support	110,000	■	■	■						
Housing benefit only	100,000			■	■	■				
Employment and support allowance and tax credits	90,000			■	■	■	■			
Jobseeker's allowance	20,000						■			
Employment and support allowance without tax credits ¹³	800,000							■	→→	■

The DWP assures us that the plan to proceed with managed migration is subject to ongoing assessment against 'readiness criteria'. Although these criteria have been in use since managed migration resumed in 2022, a high-level summary of what the criteria are has only recently made public following a written request from the Work and Pensions Select Committee chair.¹⁴ The DWP's response described the five 'outcome-based themes that form the readiness criteria', but not what metrics are used to assess that it is safe to proceed.

CPAG has asked for the publication, via a Freedom of Information request, of the specific criteria used to scale up managed migration. Our request has been rejected by the DWP as the requested papers are scheduled to be made public two years after they were originally presented to the Universal Credit Programme Board. We are challenging this decision through the Information Commissioner's Office. Despite both the Social Security Advisory Committee (SSAC)¹⁵ and the chair of the Work and Pensions Select Committee¹⁶ calling for contemporaneous publication of these assessments, to date, the DWP has only published a readiness assessment dating from April 2022. This two-year lag does not allow for the scrutiny that SSAC and the Work and Pensions Select Committee envisaged taking place.

¹⁰ twitter.com/NeilCouling/status/1781280573278863453

¹¹ See note 5, Figure 11

¹² UK Parliament, *Question for Department for Work and Pensions*, [UIN 12821](#), tabled on 2 February 2024

¹³ See note 10

¹⁴ [Letter from Neil Couling, senior responsible owner for universal credit to Sir Stephen Timms, chair of the Work and Pensions Select Committee](#), dated 16 April 2024

¹⁵ Department for Work and Pensions and Social Security Advisory Committee, [The Universal Credit \(Transitional Provisions\) Amendment Regulations 2022](#), 4 July 2022

¹⁶ See note 14

When the legislation for managed migration was originally passed, the DWP was only permitted to migrate 10,000 people to UC before reporting back to parliament. But in 2022, through secondary legislation (which does not need to be debated in parliament), the 10,000 cap was removed allowing the DWP to proceed with the roll out of managed migration without the requirement to report to parliament.¹⁷ The Public Accounts Committee chair recently wrote to the DWP's permanent secretary expressing her disappointment that significant decisions were being made about managed migration without parliament being informed.¹⁸

The Department for Work and Pensions has not informed Parliament nor has it communicated the change in a way that is accessible to the ESA claimants affected or to the organisations that advise them. This is particularly disappointing given that ESA claimants include some of the most vulnerable people due to switch over to Universal Credit... As a consequence of the lack of notification my Committee was unable to consider the implications of this change as part of its scrutiny of this programme which is so significant for so many of our constituents and to the country as a whole... It remains important that the Department learns lessons from its current migration activity before starting to migrate ESA claimants to Universal Credit.

Given the significant impact that managed migration to UC will have on the lives of vulnerable people across the country, we are deeply concerned about the lack of parliamentary scrutiny of the DWP's new plan to issue all legacy benefit claimants with migration notices by December 2025 and the lack of public information about the criteria against which the DWP is assessing its own readiness to do so.

Enhanced support journey

Some claimants will be offered more support with managed migration in 2024/25, because these cohorts are more likely to experience barriers to claiming UC. What the DWP is calling the 'enhanced support journey' will be offered to all ESA and income support claimants. Based on the limited information that has been published about the enhanced support journey, this is what we know:

- If a claimant has not made a claim for UC by week 12 of the three-month notice period, they will receive a text message saying that the DWP will be contacting them by phone. The DWP will attempt to call the claimant three times on different days.
- If there is no response to those calls, all ESA and *some* income support claimants (if the DWP's information system indicates that they have an additional need) will receive a letter arranging a home visit.
- If home visits are not successful in reaching the claimant, further escalations are considered on a case-by-case basis.
- Deadline extensions will be automatically granted to allow these activities to take place before the deadline date.

Additional support and flexibility for claimants going through managed migration is hugely welcome. The enhanced support journey has three strengths in particular: (1) it is available to all ESA claimants and income support claimants, (2) it incorporates multiple communication methods (texts, letters, phone calls and home visits), and (3) in certain cases, if none of these yield a contact, a case conference will be held before benefit

¹⁷ House of Lords, Secondary Legislation Scrutiny Committee, [10th Report of Session 2022–23](#), 21 July 2022

¹⁸ [Letter from Dame Meg Hillier, chair of the Committee of Public Accounts to Peter Schofield, permanent secretary at the Department for Work and Pensions](#), 26 April 2024

termination is considered. These aspects of the enhanced support journey align with our earlier calls for additional safeguards for vulnerable claimants. Despite this, we have the following concerns:

- We know through our work with front line advice services that direct contact from the DWP will make many claimants anxious. Claimants may fear that the DWP is trying to ‘catch them out’ and stop their benefit payments rather than offer support. Claimants in need of support may tell the DWP that they do not need help because they do not trust the DWP.
- If a claimant answers the phone on week 12, says that they intend to claim UC and do not need support, no further contact attempts will be made before their deadline. If they do not claim UC before their deadline, the DWP will make additional calls in *some* cases. In other cases, the DWP will undertake routine system checks but not attempt further contact before proceeding to terminate a claimant's legacy benefit(s).
- If an income support claimant does not answer the phone in week 12, they will only be referred for a home visit if the DWP's information systems indicate they have an additional need. We do not understand why the DWP plans to put claimants in the ‘enhanced support journey’ only to take them off it if they do not answer the phone, given that the DWP will have no new information about the claimant's support needs.
- We know that a subset of tax credit-only claimants needed additional help with managed migration in 2023/24 and are concerned that the enhanced support journey is only available to a narrow cohort of claimants. It does not extend to housing benefit-only claimants who were the least likely to move to UC during the 2023 discovery work.
- The final intervention for some claimants who do not engage in the move to UC process is a ‘case conference’. The DWP has not published any information about what a case conference involves, the evidence that is considered and the possible outcomes.

The support journey could be improved if the DWP were to:

- Make three additional calls to any claimant who says they do not need support but does not proceed to make a claim for UC before their deadline. The fact that they did not claim should be seen as sufficient grounds to check the claimant is okay and they understand the financial consequences of not claiming UC before their benefits are terminated. Given that these claimants have already responded to a phone call or home visit from the DWP, arranging a final check is unlikely to require much additional resource.
- Work with local authorities and registered landlords to develop an enhanced support journey specifically for housing benefit-only claimants who have their benefit paid directly to their landlord.
- Extend the enhanced support journey to all claimants of jobseeker's allowance (JSA). Most JSA claimants will seek help through the job centre where they will have to attend frequent appointments as part of their JSA claim, but direct calls should be made to those who have not engaged with the process by week 11 to check if they need additional support.
- Refer for a home visit any claimant who does not answer the phone and does not claim.

- Send migration notices out at a slower pace than currently planned to stagger the demand on visiting officers. This would reduce the intensity of their workload and allow them to offer comprehensive support to claimants who need it.

The DWP should also publish more details about what the enhanced support journey involves and how decisions about a claimant's journey progress are made.

Transitional protection errors

Transitional protection's stated purpose is to leave claimants no worse off on UC than they were on their legacy benefits – at least for a temporary transition period.

The most complex form of transitional protection is the 'transitional element', a top-up to a claimant's UC award. The DWP determines the transitional element by, first, calculating the claimant's total legacy benefit income, and second, calculating the amount of UC they would get on their 'migration day'. This is called their 'indicative UC amount'. If a claimant's legacy benefit income is higher than their indicative UC amount, a transitional element is included in their UC award to top-up the claimant's UC to the value of their legacy benefit income.

CPAG has seen cases where the transitional element calculation has been incorrect, leaving claimants out of pocket. For example, we've seen two cases where the claimant's earnings were not taken into account when they should have been. The calculations were defended by multiple DWP staff members at different levels of seniority before CPAG helped to get them corrected.

A lone parent who was working moved to UC under managed migration and was left £246.20 worse off per month as a result of DWP error (their indicative UC amount didn't take their earnings into account). The mistake was upheld by the DWP at mandatory reconsideration stage (the first stage of the appeal process) and the claimant was looking at a wait of several months before her appeal would get before the independent Tribunal. After CPAG contacted the DWP it was accepted that there had been an error and the issue has now been resolved.

Just a few days later, we followed the same procedure in a second, nearly identical case and the DWP confirmed they had underpaid a lone parent of two by £1,800 because of an error in calculating the indicative UC amount.

The DWP does not provide claimants with information about how their entitlement to transitional protection has been calculated in their UC statement. This means that claimants cannot check that the right information has been used to calculate their transitional element and many claimants will simply assume it is correct. When it is incorrect, claimants will be out-of-pocket (as in the cases above) or accrue large overpayments which the DWP has the right to claim back even if the claimant is not at fault.

If a claimant is concerned that their UC award is incorrect, they have to request more information. Of the five cases we have seen where a claimant requested more information about their transitional protection calculation, the details provided by the DWP confirmed that incorrect information was used in the calculation leading to the claimant being paid the wrong amount of UC.

So far 276,000 households have moved to UC, all of which will have had a transitional element calculation. 167,000 have been awarded some form of transitional protection.¹⁹ Claimants are not given any information to allow them to check for underpayments or overpayments before they mount up. The DWP should amend the UC award statement to show claimants what information has been used to calculate their transitional protection. While this is being developed, the DWP must make it clear that this information is available on request and provide an easy way of accessing it.

Flaws in access to a non-digital claim

The option to claim UC over the phone is vital to ensure that UC is accessible to everyone who needs it. Demand for non-digital claims will increase as managed migration progresses. Overall, 14 per cent of the claimants who migrated as part of the DWP's 2022 discovery cohort made a telephone claim,²⁰ which is considerably higher than the UC average.²¹ The DWP acknowledges that, for managed migration in 2024/25 to be successful, changes are needed to ensure claimants can access a non-digital claim.²²

The DWP has already improved the migration notice by clarifying that people can claim UC by phone should they wish to. However, the DWP's internal guidance on managed migration still describes telephone claims as only being available in 'exceptional circumstances'²³ and we have seen evidence that claimants requesting a non-digital claim are being discouraged from proceeding. For example, one adviser told us:

One of my clients, who has disabilities and finds it hard to use the internet/computers, received a migration notice and asked me to assist her with making a telephone application [for UC]. I called the number contained in the migration notice and the lady said they cannot make phone applications via that line, the client had to call the general helpline. The general helpline was called, and an agent spoke with such negativity about phone applications that the client felt pressured and relented to an online claim.

The case below, of someone who claimed UC but not through managed migration, shows how claimants can be sanctioned if they have a digital UC claim that they cannot manage because they are not aware of what they need to do to maintain their claim.

A claimant with a learning disability, who cannot use a computer, got help to claim UC online because he believed this was the only way he could apply. He later received two separate indefinite sanctions for failing to attend work-focused interviews for UC when the only notification he received about these appointments was through the online account.

While DWP staff can switch a claimant to a non-digital account,²⁴ this option was not offered to the claimant above even though staff were aware of his IT access difficulties.

¹⁹ See note 2

²⁰ Department for Work and Pensions, [Completing the move to Universal Credit: Learning from the Discovery Phase](#), 10 January 2023

²¹ Work and Pensions Select Committee, [Oral evidence: DWP's Annual Report and Accounts 2022-23](#), question 29, 10 January 2024

²² Neil Couling, senior responsible owner for universal credit, told the Work and Pensions Select Committee: 'We need to adapt our processes to cope with that [the increased demand for non-digital claims].' Public Accounts Committee, [Oral evidence: Progress in implementing Universal Credit, HC 458](#), 11 March 2024.

²³ What do they know, [Updated guidance for teams working on managed migration](#), 16 February 2024

²⁴ We are aware that a new UC agent To-do was introduced around January 2023 about switching a claimant from an online to a non-digital account.

Claimants with a telephone claim must be able to do everything that is required to make and manage a UC claim via the UC helpline. However, claimants with a telephone claim are not able to accept their claimant commitment via the helpline.

A vulnerable claimant with a telephone claim received a text alert asking him to call UC helpline. When he made the call, with a benefits adviser helping him, he was told that he needed to accept his claimant commitment²⁵ but that he could not do so via a telephony agent. The adviser was subsequently told by the local DWP partnership manager that: "Teleperformance cannot accept the commitment because they are not DWP. The commitment should be accepted by the customer, if the customer has vulnerabilities/phone claim as stated, a handover will be sent to the owning Service Centre who would need to call the customer back or they could go into their local Job Centre for support."

If a claimant is delayed in accepting their claimant commitment, their UC payment will be delayed, even when there are no work-related requirements (as in the case above). If the claimant commitment is not accepted within a set time they will not be entitled to UC.

While claimants are unable to accept their claimant commitment via the UC helpline, the DWP is failing to provide an effective reasonable adjustment for vulnerable claimants which puts them at risk of payment delays or termination. If DWP staff and outsourced telephony agents discourage callers from pursuing a non-digital claim, barriers will remain for some vulnerable claimants. Claimants who feel forced to make a digital claim which they cannot manage may find themselves sanctioned.

The non-digital claim process must be urgently improved to support people going through managed migration. The DWP should:

- Amend the managed migration helpline guidance so that callers asking about a non-digital claim are informed that you do not have to demonstrate that you are unable to manage a digital claim in order to access a non-digital claim. This should be made clear before the benefits of a digital claim are explained.
- Permit teleperformance agents to accept a claimant commitment over the phone (with the option to escalate to DWP staff if the claimant has questions or concerns about the claimant commitment and/or does not wish to accept it).

Deductions for tax credit overpayments

Even with transitional protection, some people will be worse off on UC because they will have deductions made from their UC award to pay back a tax credit overpayment. These often arise from previous financial years, but tax credit debts can also occur because of managed migration itself. Claimants going through managed migration will often leave tax credits with an overpayment or underpayment, depending on when in their earnings cycle they submit a UC claim.

For claimants to prepare for and manage the transition to UC, it is important that they are informed about the total debt that they have from benefits overpayments and how this will be recouped through UC. But this information is not available on the online journal and is very difficult to get. A former working tax credit claimant

²⁵ Although the claimant has no work-related requirements for health/disability reasons, he must still accept a commitment periodically under the UC rules.

who recently migrated to UC described the lengths she had to go to find out how much tax credit debt she had carried over to UC:

I thought I would persevere with finding out how much my debt for [working tax credit] was/is. The normal enquiry line can't do that – it tells you this in the main recorded message and then gives you a separate phone number which is for all aspects of debt. I rang that number and after a 45-minute wait I eventually spoke to a very helpful woman who gave me the figures. Added up, the debt I took with me to UC was £957.42. Nowhere had I seen that figure. The only way for me to have worked that out was to go back to letters from 2020/21 onward, add up the debt and deduct any payments I had made in the last 3 years. A simple letter [on moving to UC] stating that 'over the years you have accrued £... debt' would have been very useful, or if that information was written somewhere on the UC account.

Among the other claimants we have interviewed who reported having a debt deduction from their UC award, none knew what their finalised tax credit debt was, how it had been calculated or when the deductions would end. This lack of transparency on overpayment debts is part of a wider issue with UC, and we have seen many cases of the DWP recovering overpayments without being able to provide any details of how they were calculated. One adviser told us how common these cases are:

I am advising a number of claimants who have had letters which inform them they have a debt which will be repaid through deductions from ongoing benefit, but the letters give no further information on how and when the debt was incurred. The process of finding out usually involves multiple calls to various departments because the available information is separated out between the debt management enquiry line, and whichever benefit department the debts was from. The burden on advice agencies is huge because the DWP does not issue any sort of statement to explain the origin of the debt.

The lack of information about benefit overpayment debts is likely to be causing stress, confusion and financial hardship for some people moving to UC. Only the most determined claimants and advisers have been successful in uncovering complete information about their benefit overpayments and, in some cases, the information provided is patchy or non-existent. As more people move to UC through managed migration they should at least be provided with finalised information about the debts they are carrying with them into the new system.

It is CPAG's position that historic tax credit debts should be written off. Alongside this, the DWP could make small changes that would vastly improve the transition to UC, align with the government's Debt Fairness Charter²⁶ and reduce administrative demands on claimants, advisers and the department itself. The DWP should:

- Provide claimants with a written statement of the total debt they have carried over from tax credits to UC, with brief details of how each debt arose.
- When it begins deductions from UC for an overpayment, provide claimants with a journal or postal notification on the total overpayment, how it occurred and how the claimants can find out more information about it.
- On the UC journal, provide claimants with information about the current level of their debt to the DWP, what these debts relate to and at what point in time these debts will be cleared (if the claimant's

²⁶ Government Finance Function and HM Treasury, [Debt Fairness Charter](#), Updated 11 March 2024

deductions remain the same). We understand that the DWP has been making efforts to modernise its debt management service and we see this as an essential part of this development.

Deadline extension denials

When a claimant is sent their migration notice they have three months to claim UC before their legacy benefits are terminated. It is inevitable that some claimants will need an extension of this deadline, for example if their life is in flux, if they haven't grasped the implications of the migration notice and/or if they need more time to access support.

The migration notice invites claimants to call the UC helpline if they 'need more time', and DWP decision makers can use their discretion to extend a claimant's deadline date. The guidance states that deadlines can be extended by a month if the claimant gives a good reason, alongside several examples of what a good reason might be. Unfortunately, we continue to see evidence of DWP staff refusing to grant an extension despite guidance stating that it would be appropriate to do so. CPAG's Early Warning System received the following example of a family which was refused an extension despite the list of good reasons in the guidance including 'not engaging in the Move to Universal Credit process until [the] deadline date was already very close'.²⁷

A couple with three children were juggling work, ill-health and childcare, and did not open their migration notice until shortly before the deadline. They were unable to get the documentation they needed to claim in time and contacted the helpline to ask for urgent help. The DWP has the power to extend a deadline where there is 'good reason' to do so, but this couple's request for more time was repeatedly refused. An extension was only granted after a welfare rights adviser intervened.

Once a deadline is missed, the DWP says that it cannot retrospectively extend it. This means that everything rests on what does or does not happen prior to the final deadline. The person in the case study below found this out the hard way. The claimant was admitted to hospital during the notice period, a deadline extension was requested and verbally granted but not implemented, and his legacy benefit payments were terminated.

A tax credits claimant with a learning disability got a migration notice. He was admitted to hospital during the three-month notice period. A support worker contacted the DWP about this and was told that the migration notice would be cancelled but it wasn't. The claimant's legacy benefit payments ended and he missed his 'final deadline' for claiming UC. If he claims now, the managed migration rules state that it is too late for him to be entitled to transitional protection, and he won't get full back pay.

When asked about safety valves in the managed migration process, the DWP has repeatedly pointed to its power to extend deadlines.²⁸ Less than 1 per cent of claimants sent a migration notice are granted an extension²⁹ and 11 per cent of people who move to UC make the claim *after* their deadline.³⁰ Claimants are selected for managed migration at random with no assessment about the claimant's individual readiness for the transition.³¹ To avoid

²⁷ What do they know, [Claimant makes contact to ask for more time to claim: Move to Universal Credit \(managed migration\)](#)

²⁸ See note 22. For example, when asked about the DWP's plans for the roll out of managed migration at the Public Accounts Committee, Peter Schofield permanent secretary at the DWP, said: "At the end of the day... we can always extend a migration notice if we have not been able to provide the support."

²⁹ Question for Department for Work and Pensions, UIN 15120, tabled on 21 February 2024, questions-statements.parliament.uk/written-questions/detail/2024-02-21/15120

³⁰ See note 2

³¹ While a claimant's specific circumstances are not considered, some groups of claimants have been subject to deferrals and have not been included in managed migration to date (claimants with a terminal illness are one example of a deferred group).

families falling through the cracks, it's crucial that claimants who have a good reason for needing an extension know how they can request one and that decision makers are empowered through guidance to grant and implement them. Better still, the guidance should be strengthened so at least one four-week extension is granted to any claimant who requests it – no questions asked.

Conclusion


Too much is unknown for us to be confident that managed migration is robust enough to support a new, more vulnerable cohort of claimants scheduled to go through the process. The strongest safeguards (such as deadline extensions and case conferences) are matters of discretion. The DWP's refusal to publicly report on the metrics it is using to assess its own readiness to proceed with managed migration adds to our concerns.

We appreciate that the department regularly updates stakeholders about its plans and invites us to raise concerns, but this is not public scrutiny and nor does it translate into genuine accountability. The delivery of managed migration is a substantial piece of work for the DWP to deliver with inherent risks for claimants, and the stakes are too high for there not to be greater scrutiny of the process. As the chair of the Public Accounts Committee highlights 'if the transition from legacy benefits to UC fails even an apparently small proportion of people, it will lead to real world misery for thousands'.³² Continuing with the status quo, as the DWP plans, leaves thousands of vulnerable people at risk.

Recommendations in full

- Improve the enhanced support journey:
 - Make three additional calls to any claimant who says they do not need support but does not proceed to make a claim for UC before their deadline.
 - Work with local authorities and registered landlords to develop an enhanced support journey specifically for housing benefit-only claimants who have their benefit paid directly to their landlord.
 - Extend the enhanced support journey to claimants of JSA.
 - Refer any claimant who does not answer the phone and does not claim UC for a home visit.
- Amend the UC award statement to show claimants what information has been used to calculate their transitional protection. While this is being developed, make it clear via the UC journal that this information is available on request and provide claimants with an easy way of accessing it.
- Amend the managed migration helpline guidance so that callers asking about a non-digital claim are told that they do not have to demonstrate they are unable to manage a digital claim in order to access a non-digital claim.
- Permit teleperformance agents to accept a claimant commitment over the phone.
- Provide claimants with a written statement of the total debt they have carried over from tax credits to UC.
- When the DWP begins deductions from UC for an overpayment, provide claimants with a journal or postal notification on the total overpayment, how it occurred and how the claimants can find out more information about it.

³² Public Accounts Committee, [Universal Credit: PAC raises alarm over risk of vulnerable claimants losing benefits](#), 26 April 2024

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- Grant at least one four-week extension to any claimant who requests it.
 - Slow down the pace of roll-out to create capacity within the department for the above changes to be implemented. Pause, evaluate and publicly report on the impact of the current phase of managed migration in advance of any ESA claimants being sent their migration notice.
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Do you have evidence to share?

If you are a benefit claimant, welfare rights adviser or third sector stakeholder affected by managed migration, please get in touch. We want to hear about your experience (good and bad) of managed migration to help us understand what's going well and issues the DWP needs to address. More information is available at cpag.org.uk/managed-migration-project.

About Child Poverty Action Group

Child Poverty Action Group works on behalf of the more than one in four children in the UK growing up in poverty. It doesn't have to be like this. Our vision is of a society free of child poverty, where all children can enjoy a childhood free of financial hardship and have a fair chance in life to reach their full potential. We use our understanding of what causes poverty and the impact it has on children's lives to campaign for policies that will prevent and end poverty – for good. We provide training, advice and information to make sure hard-up families get the financial support they need.

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