



EARLY WARNING SYSTEM

Top issues update

April 2019



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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. 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 solve poverty – for good. We provide training, advice and information to make sure hard-up families get the financial support they need. We also carry out high-profile legal work to establish and protect families' rights.

About CPAG's Early Warning System

Our Early Warning System helps us get a better understanding of how changes to the social security system, including the introduction of universal credit, are affecting the lives of children and families. We gather information from advisers about the experience of children and families, and identify recurring problems. This intelligence informs much of our policy, research and campaigns work on universal credit, and also feeds into the advice we give frontline staff through our training, publications and advice service. The Early Warning System is made possible by the support of Oak Foundation and Barrow Cadbury Trust.

For further information or to submit cases to the Early Warning System, please visit <http://www.cpag.org.uk/earlywarning-system>.

Introduction

This report sets out the prevailing themes running through the cases that have come to our Early Warning System in the past six months. The Early Warning System had received 973 cases at the time of writing in early 2019, of which the great majority relate to universal credit.

Our latest top issues are:

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1. Poor understanding of universal credit eligibility

A lot of people are being put onto universal credit, even though they are not yet eligible to claim, and many are worse off as a result.

a. People with three or more children

Until 31 January 2019, people with three or more children were not eligible to make a new claim for universal credit. However, many were directed to start a claim.

Family with five children

A mother of five children was advised to claim universal credit when her partner moved in with her. She is not eligible for universal credit, so this advice delayed her claim for the relevant benefits.

Family with three children

A mother of three children was told by her local council that she should claim universal credit, but only provide details of two children in the claim. It said it 'would sort out the rest later'.

b. Claiming employment and support allowance pending an appeal

Income-related employment and support allowance claimants who have had their employment and support allowance stopped after a fit for work decision are entitled to receive employment and support allowance once their appeal has been submitted to the tribunal and until it has been decided. However, we have seen several cases where claimants are being told to claim universal credit instead. This often results in claimants being worse off, especially if they would be entitled to a severe disability premium in their employment and support allowance following a successful appeal. Once they have moved onto universal credit they cannot return to income-related employment and support allowance, even if their appeal is successful.

It is our view that claimants should be able to make an informed choice between claiming employment and support allowance pending their appeal or moving onto universal credit, and DWP staff should not be frustrating people's attempts to claim employment and support allowance if they are entitled to do so. One job centre in Scotland has adopted the practice of recommending that all employment and support allowance claimants in this position contact their local Citizens Advice office before making a decision.

Job centre staff opened a universal credit claim in error

A claimant asked for employment and support allowance to be paid pending an appeal. The job centre staff agreed to help him with this. He then received a text message inviting him to a universal credit appointment. It transpired that the job centre staff had started a universal credit claim for him.

c. Wrongly directed to claim universal credit following unrelated changes

There appears to be widespread ignorance about which changes of circumstance trigger eligibility for universal credit. A person can claim universal credit when s/he would previously have made a new claim for a 'legacy benefit'. Some changes in circumstance mean that people could previously make a new claim for benefit (e.g. if someone loses their job they would previously have been able to claim jobseeker's allowance, or if people move

to a new local authority they would have needed to re-apply for housing benefit), and as of December 2018 any new claims (for most people) have to be to universal credit rather than legacy benefits.

However, both DWP and local authority staff often advise that a new universal credit claim is appropriate whenever there is any change of circumstances, for example people moving house within the same borough. Additionally, it is only when a valid new claim for universal credit is started that any continuing legacy benefits are terminated. Yet we have seen instances of legacy benefits being stopped prematurely. Confusion is also arising between contributory and income-related benefits, and their relationship to universal credit.

Employment and support allowance claimant told to claim universal credit when he became a carer

When an income-related employment and support allowance claimant becomes a carer, his/her employment and support allowance claim should continue and the amount be increased to include a carer premium. In this case, the DWP wrongly stopped the claimant's employment and support allowance claim when he became a carer and told him to claim universal credit instead. He immediately became worse off because he could only receive either the limited capability for work-related activity element or the carer element, not both.

Job centre reviewing employment and support allowance claims and wrongly directing to universal credit

It was reported to our early warning system that a local job centre has been reviewing numerous employment and support allowance claims and advising people that they need to claim universal credit instead. Vulnerable claimants had been caused undue stress and confusion, and some reported having thought about suicide as a result.

Change of address stopped contributory benefit

A homeless man living in a tent was claiming contribution-based jobseeker's allowance, a benefit which is not being replaced by universal credit. He moved his tent from Salford to Bridpoint. However when he moved his tent, the job centre wrongly advised him that his jobseeker's allowance claim would close and he would need to claim universal credit.

CPAG takes action

CPAG has used Early Warning System cases to demonstrate the poor understanding of universal credit eligibility. We have:

- Raised awareness of the problem in EWS eBulletin November 2018.
 - Presented findings to the All-Party Parliamentary Group on Universal Credit meeting on 'natural migration' in January 2019.
 - Called for evidence of natural migration problems in EWS eBulletin February 2019.
 - Discussed findings with the DWP strategy team in February 2019.
 - Given evidence to the Work and Pensions Committee inquiry into universal credit natural migration in February 2019.
 - Hosted 'Universal Credit: (Un)managed migration' seminar in London and Manchester in March 2019.
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2. Claimants becoming worse off when they move onto universal credit

We are seeing many cases of benefit claimants becoming worse off when they claim universal credit. The sudden and unjustified drop in income, in households in which financial means are already very limited, has a marked impact on the health of claimants as well as on their confidence and trust in the system.

a. No permitted work rules for universal credit claimants

The employment and support allowance rules allow claimants to carry out some limited paid work (called 'permitted work') without it affecting their benefit entitlement: claimants can earn up to £131.50 per week for limited periods right from the start of the claim. Permitted work helps to incentivise sick or disabled claimants to build their skills and confidence in order to enter or remain in work.

Instead, universal credit provides a £287 per month 'work allowance' to claimants who have been found to have limited capability for work, which means that the first £287 per month of their earnings is ignored (more for those not claiming housing cost). £287 per month only permits a claimant (or both claimants in a joint claim) to work around 8 hours per week at the national minimum wage before her/his entitlement starts to be reduced, whereas under the permitted work threshold up to 16 hours per week are allowed. Universal credit claimants cannot benefit from the work allowance until they have completed a work capability assessment and been found to have limited capability for work, which does not usually happen in the first three months of the claim.

Employment and support allowance claimants who are currently participating in permitted work and then start to claim universal credit are immediately worse off, even though they are doing everything they can to improve their circumstances despite ill health.

Employment and support allowance claimant doing permitted work becoming much worse off on universal credit

An employment and support allowance claimant had to start a universal credit claim. He was doing permitted work of 16 hours per week (earning approximately £543 per month). Claiming universal credit will make him worse off because it does not include an equivalent to the work-related activity component and also because his earnings will affect his entitlement. He is therefore likely to reduce his hours to a minimum or to stop working altogether.

b. Limit on universal credit elements

Unlike legacy benefits, universal credit only includes one additional element per person, even if s/he qualifies for more than one. For example, a person who is both a carer and has limited capability for work-related activity will only receive the limited capability for work element in her/his universal credit, not the carer element.

A couple claiming universal credit receive the same amount if one or both of them has limited capability for work-related activity, even though the additional cost of living is more if both of them have limited capability for work-related activity.

Only one limited capability for work element for couple

A disabled couple with a child, who were both claiming employment and support allowance, separated but reconciled shortly afterwards. This meant that they had to start a new claim for universal credit. They immediately became £122.13 per month worse off because their universal credit only included one limited capability for work element, rather than the two included in their two employment and support allowance.

c. Loss of severe disability premium not covered by proposed transitional payments

Universal credit does not include certain disability premiums available in legacy benefits. We are waiting for regulations to be passed which will establish transitional payments for claimants who lost a severe disability premium as a result of claiming universal credit before February 2019 (from February 2019, claimants in receipt of the severe disability premium can no longer claim universal credit, but will remain on legacy benefits until they are moved to universal credit as part of the 'managed migration' process). These claimants remain worse off on universal credit until the regulations come in. And even when the transitional payments are in place, it is unlikely that they will fully compensate claimants for the loss incurred. The proposed transitional payments are lower than the losses people have experienced in most scenarios (see Table 1).

Table 1: Transitional payments for severe disability premium recipients compared with actual losses

Components and premiums in legacy benefits	Proposed universal credit transitional payment	Actual loss when moving from legacy benefits to universal credit
Single with limited capability for work-related activity and severe disability premium	£80	£184
Single, no limited capability for work-related activity and severe disability premium	£280	£278
Couple, two severe disability premiums	£360	£557 (no limited capability for work-related activity) £494 (with limited capability for work-related activity)
Couple, one severe disability premium and limited capability for work-related activity	£80	£215
Couple, one severe disability premium and no limited capability for work-related activity	£280	£278

Claimants will also lose eligibility for a transitional payment if their universal credit claim starts more than a month after their legacy benefit stopped, even if they still satisfy the severe disability premium criteria. And claimants who begin to satisfy the conditions for a legacy benefit severe disability premium after a universal credit claim has started will not receive any compensation payments and simply remain worse off.

It is particularly worrying that many of the cases we have seen of people in this position should never have been required to claim universal credit in the first place, as the following case studies show.

Lost severe disability premium after wrongly claimed universal credit

One claimant moved house within her borough. Her housing benefit claim should simply have been changed, but instead it was ended, forcing her to claim universal credit to get help with her rent. She lost the severe disability premium and is now worse off. The promised transitional payments are unlikely to fully compensate her.

Another claimant who moved house within his borough and was wrongly instructed to claim universal credit will lose both the severe disability and the enhanced disability premiums. He has not attended the job centre for his initial interview yet, but the claim process has already started so he is locked into being worse off on universal credit.

A disabled claimant who was in the 'support group' for employment and support allowance was told to start a claim for universal credit by his job centre, even though there was no reason to do so as he had no change of circumstances. He initially refused to claim universal credit, but after repeated instructions from the job centre to do so, he eventually submitted a claim. He lost his severe disability premium and the proposed transitional payment will only partially compensate for this loss.

No severe disability premium despite successful appeal

An employment and support allowance claimant claimed universal credit while she was appealing a decision to stop her employment and support allowance. Even though her appeal was successful, she must now remain on universal credit, meaning that she has lost the severe disability premium. The transitional payments are unlikely to fully compensate for her loss. She may also have problems qualifying for any transitional payments because there was a gap between the end of her employment and support allowance claim and her new claim for universal credit.

Claimant will not qualify for a severe disability premium until her universal credit claim starts, so will not benefit from transitional protection

An employment and support claimant is appealing a decision not to award her personal independence payment. If her appeal is successful, she would then qualify for a severe disability premium in her employment and support allowance. However, as she is about to move to a different local authority, this will not happen as she must claim universal credit instead. She should, in theory, be able to qualify for transitional payments if she wins her appeal, and have her entitlement backdated, but this may be a difficult process and will not fully compensate her for the loss of her severe disability premium.

CPAG takes action

CPAG continues to gather evidence of scenarios where claimants are worse off on universal credit than on legacy benefits. We have:

- Shared these with parliamentarians through the All-Party Parliamentary Group on Universal Credit and a briefing on natural migration.
 - Challenged the lack of transitional protection for claimants moving onto universal credit and losing the disability premiums, or receiving a lower disabled child element, in court.
 - Worked with other charities whose clients have become systematically worse off in the move to universal credit – e.g. the National Children’s Bureau and Carers UK (who support bereaved carers who lose the carer element if they move onto universal credit as a result of their partner’s death).
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3. Problems with the housing costs element, putting homes at risk

CPAG continues to hear about problems with the housing costs element of universal credit, which cause rent arrears and put families at risk of homelessness. The Early Warning System receives at least one submission each week concerning housing costs issues. The cases show a worrying lack of understanding by the DWP of the magnitude of the problems caused to claimants by its actions, and a lack of willingness or urgency to correct errors or address delays.

Housing law means that once a tenant has two months of rent arrears, her/his landlord can evict her/him very easily unless the arrears are addressed promptly (and even then eviction remains possible). Tenants may be evicted for failing to pay their rent consistently when it is due, even if the arrears are paid off in full by the eviction date. For people renting without a tenancy agreement, such as under a licence, the law offers even less protection against eviction. It is therefore vital that the housing costs element is administered correctly and any errors – which may lead to claimants being unable to pay the rent – addressed rapidly.

In all the following examples the claimants had access to a benefits adviser, who was instrumental in identifying problems and getting them resolved, preventing families losing their homes. CPAG remains concerned about the many claimants who cannot easily access advice, or do not realise that it is needed.

a. Poor comprehension of legal liability for paying rent

There are a number of scenarios in which universal credit claimants are legally liable for rent, despite this liability not being set out in a tenancy agreement. In these scenarios, claimants should have the appropriate amount of housing costs included in their universal credit award, but this is not always happening. Instead, amended tenancy agreements are being wrongly required. It is concerning that DWP staff do not appear to have a thorough understanding of the range of situations in which claimants may have legal liability for rent. This may reflect the loss of specialist teams attached to different legacy benefits and the wide range of knowledge now required of universal credit staff (who are expected to deal with issues related to housing, disability, childcare and so on).

Joint tenants with an absent partner

In some circumstances, single universal credit claimants with joint tenancies can be treated as legally liable for 100 per cent of the rent if their (former) partner is making no contributions to the rent, according to current regulations and guidance (see Box 1). However, we have received many cases in which single claimants in such

circumstances are being treated as only liable for 50 per cent of the rent and, as a result, are only paid half the housing element or are denied the housing element altogether. They are incorrectly told by DWP staff that they need a new tenancy agreement, or even to submit false statements regarding a change of circumstance, in order to be accepted as liable for 100 per cent of the rent and to receive the full help in their universal credit. This can rapidly create arrears and leave families at high risk of losing their home.

Box 1: Regulations setting out when joint tenants should be treated as fully liable for rent

Paragraph 2 of Schedule 2 to the Universal Credit Regulations, 2013, provides for the following:

‘Failure to pay by the person who is liable

2.—(1) A claimant is to be treated as liable to make payments where all of the conditions specified in subparagraph (2) are met.

(2) These are the conditions—

- (a) the person who is liable to make the payments is not doing so;
- (b) the claimant has to make the payments in order to continue occupation of the accommodation;
- (c) the claimant’s circumstances are such that it would be unreasonable to expect them to make other arrangements;
- (d) it is otherwise reasonable in all the circumstances to treat the claimant as liable to make the payments.’

See <https://www.legislation.gov.uk/ukdsi/2013/9780111531938/schedule/2>

Identical wording is also included in the DWP’s *Advice for Decision Makers*, paragraph F2089. See https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778099/admf2.pdf

Lone parent told to change tenancy to get help with rent

A mother on maternity leave following the birth of her second child recently separated from her partner, and remained in the family’s privately rented home with her two children. She had a joint tenancy with her former partner who no longer contributed towards the rent. The rent had always been paid on time until she moved onto universal credit following the separation. It was only when she received her first payment that she saw that no housing costs element had been included. By then, she was already one month in arrears. The DWP refused to include any housing costs in her claim at all because she had stated in her claim that she had to pay all the rent, but her landlord said that the tenancy was a joint one. The job centre staff told her that she would have to change the tenancy agreement into her name only before any housing costs can be paid. A joint tenancy can only be changed with the permission of all the parties (including, in this case, her ex-partner and the landlord) or by a court order, and usually requires the payment of legal fees. The claimant was reluctant to contact her ex-partner after an acrimonious split and was worried that asking her landlord to change the tenancy would put her housing at risk. In any case, she would have been unable to meet the cost of legal fees, and the whole process would have

taken time during which arrears would accrue. An adviser helped her to submit a request in her journal for the decision to be looked at again. She now has two months' rent arrears and the matter remains unresolved.

Domestic abuse victim accruing rent arrears

A mother of two children recently separated from her violent husband. She has stayed in the family home but her husband's name is still on the tenancy agreement, although he does not contribute to the rent. The DWP has calculated her housing costs element on the basis that she is liable for only 50 per cent of the rent, even though the relevant regulations and guidance provide that she should be paid for 100 per cent of the rent in these circumstances. This claimant was advised to notify a change of circumstances, falsely stating that she was the only tenant named on her tenancy agreement, in order to get her housing costs paid. When she declined to lie in her online claim, DWP staff did it for her. However, the change of circumstance was inaccurately recorded and had only taken effect from the date it was entered, rather than from the date of the separation. The claimant had to deal with the consequences of domestic abuse, her children were dealing with the separation of their parents and the family as a whole was coping with the loss of one parent's income. They were also facing the additional strain of rent arrears and the possibility of becoming homeless.

Liability without a tenancy agreement

People who occupy property without a tenancy agreement can be treated as liable for the rent, but in practice they often have trouble getting the housing costs element included in their universal credit award. At the same time, this group is often living in less stable accommodation than those with formal tenancies, meaning that any delay in getting help towards their rent puts them at serious risk of homelessness. The following case studies show that people in vulnerable circumstances, such as care leavers and those recently bereaved, are being affected by such problems.

Care leavers having trouble 'staying put'

'Staying put' placements allow care leavers to continue living with their foster carers after they turn 18, on the understanding that they will pay a small amount of rent under a licence agreement. However, a number of local authorities have told us that the DWP does not always recognise these agreements and therefore does not include a housing costs element in these care leavers' universal credit awards. Social services departments, which are already under strain, are therefore having to dedicate resources to addressing benefit issues for months after the young people have left the care system. The delays put strain on the care leavers' relationships with their former foster carers and put their placements and long-term stability at risk.

Lodger without housing costs

A lodger's universal credit award did not include a housing costs element for four months. Every time he queried this, he was told to wait until a decision maker had looked at the case, but was given no timescale for when this would happen. The resulting rent arrears put him at significant risk of homelessness. Under his licence, he could have been required to leave the property if his landlord gave him just a week's notice.

Use and occupation

A man who had been living with, and caring for, his mother, had the right to succeed to her tenancy on her death. However, instead of granting him a new tenancy at his mother's home, the housing association agreed to grant him a tenancy for a smaller property when one became available. In the meantime, he remained liable for use and

occupation charges on his mother's house. However, housing costs were not included in his universal credit award because he was unable to supply a tenancy agreement. The delay in getting the matter resolved led to the accrual of rent arrears, which put his home and his longer term housing rights at risk.

b. Poor administration affecting awards

Housing costs contributions applied erroneously

A 'housing costs contribution' is a deduction from the housing costs element of universal credit that is applied when a non-dependant (for example an adult daughter or son) lives with a claimant. However, we are seeing many cases of these deductions being wrongly applied (for example to claimants who are exempt), and even when this is rectified the deduction often reappears in following months. DWP staff confirmed to CPAG that the non-dependant deduction has to be manually removed each month if an exemption applies (for example if the claimant or non-dependant receives personal independence payment), which clearly leaves a great deal of room for error. Claimants are being left confused, with no explanation about why they have not received the full housing costs element, and even once this is worked out (often after they have sought advice) they can be left with the burden of contacting DWP every month to ensure that the deductions are removed.

Private tenant with mystery reduction

A lone parent moved to a new home with her 13-year-old daughter, and included rent in her claim for the first time. For some months, she received help with her rent, but it was reduced by £70 each time. The universal credit statements did not explain why the housing costs element did not cover the full amount of her rent. It was only when an adviser helped her to trawl through every single journal entry that the claimant suspected a housing costs contribution was being applied erroneously. When she submitted a journal entry asking for her award to be adjusted, she was told that a challenge was inappropriate. Her adviser had to intervene to insist that the correct process be followed and her award looked at again.

Exempt couple subject to reduction

A couple receiving personal independence payment lived with two non-dependants. Despite their personal independence payment award meaning that they were exempt from housing costs contributions, deductions were incorrectly made from the couple's universal credit, resulting in an unaffordable shortfall of £144.12 every month. Rent arrears kept increasing to over £2,500 and the couple's tenancy was put at risk. The couple did not realise the cause of the shortfall and it was only after 18 months, thanks to the intervention of a benefits adviser, that the DWP's mistake was rectified and the tenancy saved.

Failing to backdate appropriately

When there is a delay in the universal credit claim process or in getting an error rectified with housing costs, we have seen too many cases where the DWP only corrects entitlement from the date the matter is resolved and fails to pay the entitlement that is owed from the preceding months, as illustrated by the following case.

No housing costs for the first three months

A man moved into his new home and claimed universal credit. It took over three months for the DWP to process the housing costs element of his claim and start paying rent to his landlord. The DWP did not backdate the entitlement at all, so the tenant was left with three months of arrears and was at risk of losing his long-awaited stable accommodation.

c. Structural issues with universal credit design and processes

52 weeks only

Universal credit payments are made on a monthly basis. When rent is charged weekly, the annual rent figure is calculated by multiplying the weekly rent by 52, which leaves one day's rent unaccounted for each year (two days' in leap years). Every five to six years, this amounts to one week's rent.

Social landlords who charge their rent weekly will have some financial years which include 53 weekly rent days. In those years, they charge their tenants for 53 weeks' worth of rent, but universal credit claimants only receive 52 weeks' worth of help.

Universal credit missing a week of rent

Universal credit claimants who are charged rent weekly will find themselves liable for an extra week's rent through no fault of their own. Social landlords will be obliged to carry the debt of one week's rent arrears for every tenant on universal credit who is receiving help towards their housing costs.

Alternative payment arrangements cycle mismatch

Alternative payment arrangements ensure that landlords receive the housing costs element of universal credit directly. However, there is a time lag between the date when a claimant receives her/his universal credit payment and the date a landlord receives such a 'managed' payment, because managed payments are paid to landlords on a four-weekly cycle, rather than on the same monthly cycle as the claimant's award. Because of this, the time lag varies between one and eight weeks over the year and can be very difficult for landlords or tenants to predict.

Social landlords and advisers have reported to the early warning system that this payment pattern can result in substantial strain in the relationship between them and their tenants claiming universal credit. Neither claimants nor landlords are able to predict when the next managed payment will arrive in the rent account. The claimant's universal credit statement will show that housing costs have been paid to her/his landlord, when the landlord may, in fact, not receive the payment for weeks. This mismatch of payment cycles can also mean that landlords who grow accustomed to waiting up to eight weeks for a payment find out too late that a claimant's housing costs element has stopped – eg, if there has been an error. Once the claimant has two months' rent arrears, s/he is at significant risk of losing her/his home, leaving very little time for problems to be addressed.

Even if the housing costs element is paid without interruption, landlords are obliged to carry an additional one month's worth of rent arrears on their accounts for all universal credit claimants (in addition to waiting one month for payment at the end of each assessment period).

Delays in payments to landlords

Social landlords are reporting waiting times of up to ten weeks before the first managed payment is paid to them after their tenants claim universal credit. The resulting deficit in their rent account is multiplying in line with the number of tenants moving onto universal credit. Although the outstanding entitlement will hopefully be paid eventually, local authorities and housing associations have reported that they are encountering immense cash flow problems purely due to the roll-out of universal credit.

Housing costs payments affected by sanctions

When a claimant has been sanctioned, s/he loses an amount of universal credit equivalent to her/his standard allowance. If the only other element they receive is the housing costs element, other deductions from their benefit (such as to repay an advance payment or an overpayment) reduce that element.

In legacy benefits, repayments or deductions are 'paused' until the sanction has run its course. In universal credit, the deductions continue to be applied – often resulting in further debt in the form of rent arrears. Rent arrears accrued in this way compound the issues already faced by social landlords. They also put claimants at increased risk of homelessness.

CPAG takes action

CPAG has used Early Warning System cases to demonstrate the problems with universal credit housing costs. We have:

- *Raised awareness of the problems in EWS eBulletins September and November 2018.*
 - *Liaised with the DWP, resulting in a partial solution to housing costs contribution issues (a reminder system for case managers to apply exemptions each assessment period).*
 - *Developed relationships with housing sector organisations, with a view to working more closely on these issues.*
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4. Poor administration, with serious consequences

Cases illustrating poor administration of universal credit continue to be submitted, often with very serious consequences for claimants.

a. Missing elements

Universal credit claimants are not always receiving their full entitlement, even when they do everything right. Furthermore, it is often not clear from the way that entitlement is displayed in online statements when there is something missing, so claimants often fail to identify that there has been a mistake until they have seen a benefits adviser, after living in hardship for many months. The DWP can then take an inordinate length of time to rectify errors and claimants remain in hardship in the meantime.

Failure to pay appropriate elements from the start of the claim

An employment and support allowance claimant in the support group made a new claim for universal credit. There was no gap between the two claims, so universal credit should have included a limited capability for work-related activity element from the start of the claim. However, this was missed – leaving him £328 worse off than he should have been – and was only included after a benefits adviser helped him to complain.

Another employment and support allowance claimant in the support group had terminal cancer. He moved in with his partner and they made a new claim for universal credit. Again, the limited capability for work-related activity element was not included in the claim for several months and was only included when the couple sought advice about managing with such limited income. A benefits adviser identified the missing element and helped them get it included.

Removing an element arbitrarily before entitlement ended

A universal credit claimant who was receiving the limited capability for work element had it removed, even though there had been no new decision about her fitness for work. When she queried this, she was told that it was removed in order to ‘prevent overpayments’. This makes no sense, as she remained entitled to the element until any future decision finding her fit for work.

Failure to pay child element causing severe hardship

A lone parent claimed universal credit when one of her two part-time jobs ended. When she received her first payment, it was £294 less than it should have been because her 12-year-old daughter had not been taken into account. The family had been struggling to make ends meet in the weeks prior to the first universal credit payment, and continued to struggle on the very low level of universal credit which they received. It was only when an adviser helped that the missing child element was recognised.

5. ‘Real-time information’ problems causing hardship

When universal credit claimants are employed, earnings are usually automatically reported to DWP from HMRC via the ‘real-time information’ (RTI) system, and this information is used to calculate how much money should be deducted from their universal credit award. In recent months, however, CPAG has received more and more cases in which claimants are receiving less money than they should be because their earnings have not been correctly reported through the RTI system. When earnings appear higher than they in fact are, this leads to heavy reductions in people’s universal credit awards and can leave them with very little – or nothing – to live on.

It is particularly worrying that even when claimants have shown payslips or bank statements demonstrating that the RTI feed is wrong, this evidence is being disregarded. The law permits the DWP to use other evidence to establish a claimant’s actual income where the real-time details are considered unlikely to be accurate (see Box 2), specifically providing an alternative to ensure claimants do not lose out, but the cases we have received suggest that staff are extremely reluctant to take other evidence into account. DWP has confirmed to CPAG in a meeting that it is the department’s policy to follow the real-time information feed, even when claimants can show evidence of their lower earnings. Instead claimants have to wait while the official dispute resolution procedure between DWP and HMRC is followed, which can take months. In the meantime claimants are forced into hardship and may be left in debt or reliant on food banks to meet basic needs.

Universal credit claimant destitute due to real-time information discrepancy

A man claimed universal credit about three months after his last job ended. When his first universal credit payment was due, he did not receive anything. It transpired that the DWP believed he was still working and receiving £800 per month (his previous wage was just £118). It appears that HM Revenue and Customs had received incorrect reports from the man's previous employer. The claimant submitted his payslips, P45 and bank statements, but was told that his universal credit will not be corrected until the DWP has resolved the discrepancy. In the meantime, the claimant had no income at all. He had no money for rent and was reliant on food banks to sustain himself.

Family in hardship due to real-time information error

A working couple with three children have lost out on £560 per month of universal credit entitlement because the real-time information shows their earnings as being at least £1,000 per month more than they are. They have submitted payslips and bank statements, but their universal credit will not be corrected until the internal 'real-time information dispute' process has been completed, which is taking around three months on average. The family is in severe hardship. Rent arrears have accrued, putting their accommodation at risk, and other debts are now accruing as they struggle to meet the cost of household bills. They have been forced to visit food banks as a matter of course. The couple became increasingly distressed and anxious, particularly as they were struggling to meet their children's basic needs. The family would have been better off if they were not working at all.

Mother cannot feed or house her child due to real-time information mistakes

A lone parent who was working part time did not receive any universal credit because her earnings were reported as being £2,077 per month when she was, in fact, only receiving £109 per month. She submitted payslips and bank statements, but her universal credit award remained unchanged. She was unable to pay the rent or meet the costs of heating and food for herself and her child. She sent her son to live with his grandmother for the time being so that he could be fed and kept warm, but she could not afford his bus fares to and from school (in a rural area). Her mental health suffered and her GP prescribed her anti-anxiety medication as direct result of the universal credit problems. She rents privately, so she and her son were put at substantial risk of homelessness.

Box 2: Regulations permitting the DWP to use other evidence to determine earnings

The Universal Credit Regulations 2013 (as amended in 2014) state that (emphasis added):

Information for calculating earned income - real time information etc.

61.—(1) Unless paragraph (2) applies, a person must provide such information for the purposes of calculating their earned income at such times as the Secretary of State may require.

(2) Where a person is, or has been, engaged in an employment in respect of which their employer is a Real Time Information employer—

(a) the amount of the person's employed earnings from that employment for each assessment period is to be based on the information which is reported to HMRC under the PAYE Regulations and is received by the Secretary of State from HMRC in that assessment period(a); and

(b) for an assessment period in which no information is received from HMRC, the amount of employed earnings in

relation to that employment is to be taken to be nil,

(3) The Secretary of State may determine that paragraph (2) does not apply–

(a) in respect of a particular employment, where the Secretary of State considers that the information from the employer is unlikely to be sufficiently accurate or timely; or

(b) in respect of a particular assessment period where–

(i) no information is received from HMRC and the Secretary of State considers that this is likely to be because of a failure to report information (which includes the failure of a computer system operated by HMRC, the employer or any other person); or

(ii) the Secretary of State considers that the information received from HMRC is incorrect, or fails to reflect the definition of employed earnings in regulation 55, in some material respect.

(4) Where the Secretary of State determines that paragraph (2) does not apply, the Secretary of State must make a decision as to the amount of the person's employed earnings for the assessment period in accordance with regulation 55 (employed earnings) using such information or evidence as the Secretary of State thinks fit.

(5) Where the Secretary of State makes a decision in accordance with paragraph (4) the Secretary of State may–

(a) treat a payment of employed earnings received by the person in one assessment period as received in a later assessment period (for example where the Secretary of State has received the information in that later period or would, if paragraph (2) applied, have expected to receive information about that payment from HMRC in that later period); or

(b) where a payment of employed earnings has been taken into account in that decision, disregard information about the same payment which is received from HMRC.

See https://www.legislation.gov.uk/ukxi/2013/376/pdfs/ukxi_20130376_301118_en.pdf

6. Delaying resolution and frustrating appeal rights

We have received many cases where there is a prolonged delay in resolving even straightforward errors, and also of failures to process formal challenges to decisions promptly. Where an error has been made in a claim, particularly one which leaves claimants worse off or subject to inappropriate conditionality, it would be reasonable to expect it to be acknowledged and rectified in a timely manner. However, we are hearing about a worrying number of cases where queries from claimants are ignored, challenges have to be chased repeatedly to yield any response, and delays are incessant. In too many cases, the law seems to be ignored in favour of informal procedures. Claimants are disempowered, experience increased anxiety and lose confidence that the system works effectively or fairly, or even that it meets its own service standards.

a. Understanding and challenging universal credit claim closures

When an online universal credit claim is closed, claimants can no longer access their journal. This means that they cannot view the reason for the closure, an adviser trying to help them cannot see the claim history to help them understand the closure, and they cannot submit a challenge online, so any challenge has to be raised once a new claim has been opened online or via the more unreliable telephone or postal routes. Altogether, this means there are significant hurdles for claimants trying to understand why their claim has been closed and to resolve the situation.

Unwell claimant could not access closed claim

A 21-year-old's universal credit claim was closed on the basis that he did not have an adequate right to reside. He tried to challenge the decision on the basis that he was dependent on a European Economic Area national who *did* have the appropriate right to reside. However, he did not receive a response to the challenge because he could not access his journal after the claim was closed. When he spoke to the DWP, it advised him that he could not claim universal credit until he was working. He was not able to work for some months due to pulmonary artesia. When he was able to start working part time, he had to start a new claim, having never received a written explanation for the closure of his previous claim and potentially losing out on months of entitlement.

Universal credit claimant forced to submit a mandatory reconsideration request by post

One claimant got help from an adviser to draft a challenge to a right to reside decision. When the adviser tried to help put the request into his online journal, he discovered that, as his claim had been closed, he could not add anything to the journal and had to submit the mandatory reconsideration request to a Freepost address. The claimant was worried that he would not receive a response for months because it takes so long for the DWP to acknowledge, process and properly post letters on their system. In the meantime, he had no income at all.

Young parent's challenge cut short by claim closure

A pregnant 17-year-old, who was estranged from her parents and lived with her 17-year-old boyfriend and his parents, tried to claim universal credit. She was told that she should make the claim with her partner, but this was incorrect: he was at college and lived with his parents, so he was still counted as a child for benefit purposes. She submitted a mandatory reconsideration request online, but then her claim was closed and she could no longer access the journal. Her adviser helped her to resend the request by post to make sure she got a response.

b. Impeding the submission of universal credit challenges

Even when claimants are able to access their journals, they too often encounter further obstacles to challenging mistakes or wrong decisions. We see instances of claimants being told that they cannot submit a mandatory reconsideration request online, in direct contradiction to the DWP's own guidance. It appears that this is due simply to an internal process which requires a verbal conversation with the claimant, or an attempt to resolve problems through a parallel informal system. However, no verbal conversation is required by regulations. The requirement for a conversation is not conducive to a 'digital-first' policy and, most importantly, is an impediment to claimants exercising their rights, particularly when phone calls take a long time to be answered.

When claimants have to fight to have their right to challenge a decision recognised, many become disheartened and simply resign themselves to accepting the wrong decision rather than spending lots of time trying to fight the system and putting their mental health at risk.

Claimant told no challenge without phone call

A claimant was found fit for work and became subject to increased conditionality, which he and his adviser believed put his health at risk. He submitted a mandatory reconsideration request in his online journal. The response directed him to phone the DWP to do so. Claimants should be able to challenge a decision using any route, whether that be by post, phone or through the online journal.

Claimant questioned about her need to challenge decision

A single mother's universal credit was wrongly reduced by £70 per month (the DWP had incorrectly counted her brother and his family as part of her household because she was residing in their house). She submitted a mandatory reconsideration request in her online journal. She received responses asking why she wanted a reconsideration, and advising her incorrectly that reconsideration was inappropriate because this information should be entered as a change in circumstances. An adviser had to intervene to ensure the request was processed.

Refusal of right to challenge decision

A single man lived with a female friend. His universal credit claim was closed because the DWP decided that he and the woman were cohabiting as a couple so should make a joint claim. He tried to challenge the decision, but the response in his journal was that a cohabitation decision was not appealable. A benefits adviser had to persist just to get the claimant's request for a mandatory reconsideration of the closure of the claim considered. In the meantime, the claimant has had no universal credit at all.

c. Failure to process challenges promptly – or at all

CPAG continues to hear about long-running delays in having decisions looked at again following a challenge. In the meantime, claimants remain unclear about their entitlement, and may be left worse off than they should be or subject to inappropriate conditions. Our cases show that the delay in having their challenges considered can have serious consequences, including increased rent arrears (putting tenancies at risk), accrual of other debts (making claimants worse off in the future even once problems are resolved), reliance on food banks and deterioration in health (making work less accessible), particularly when claimants are sanctioned because they have been given inappropriate work-related requirements. These problems are seen across a range of benefits, including universal credit, employment and support allowance and personal independence payment.

Many claimants rely heavily on support provided by advisers to resolve problems with their universal credit, because of the stress involved alongside other difficulties people may be experiencing, the confusion caused by a complex system or the frustration of dealing with universal credit staff who prioritise procedure over legal rules and guidance. However, advisers report that too often the DWP refuses to accept that an adviser is authorised to act on the claimant's behalf. Where a dispute is long-running due to delays on the DWP's part, advisers are frequently told that consent has 'expired'. Current guidance provides that consent lasts *until the specific request is completed* or the end of the assessment period, yet the first part of this guidance is not always followed.

Delays and obstacles having mandatory reconsideration acknowledged

A joint tenant whose partner had left the property several years ago tried to challenge the decision to include only 50 per cent of the rent liability in her universal credit calculation. She was advised to send an email to request a mandatory reconsideration, but was later told the email had been lost. She then submitted a second request, only to be told that this was 'not a reconsideration issue'. She was told that her award would nonetheless be corrected, but this has still not happened.

An employment and support allowance claimant was found fit for work and is subject to full conditionality while she challenges the decision. Her health means that she struggles to comply with the conditions applied to her, and is at constant risk of being sanctioned. She has been waiting 25 months for a response to her mandatory

reconsideration request.

A disabled man tried to challenge a decision not to award him personal independence payment. He submitted Form DS1500 demonstrating he has a terminal illness with his challenge. The DWP started a new claim, but ignored his initial challenge. He is reliant on a benefits adviser to help him recoup the entitlement he should have had in preceding months, as well as to help him go through the claim process again.

A universal credit claimant is challenging a fit for work decision. She does not manage her claim online yet, and has sent her mandatory reconsideration request by post several times. Every time she calls to chase it up, she is told that the DWP has not yet received the letter, or that it has not yet been posted or flagged, and is advised to send it in again. It has been many months since she first posted a reconsideration request. In the meantime, she has to comply with job-seeking conditions and she is experiencing growing anxiety.

d. Failure to notify of right to challenge or appeal

Adequate notification of appeal rights is an important aspect of our social security system. Claimants who know their rights can ensure that errors are rectified, which in turn permits the DWP to identify places where things are going wrong, raise awareness about common misconceptions and make systemic changes where necessary to reduce errors. However, we are hearing about too many cases where claimants are not being informed of their rights, or are even being misled.

No notification of appeal rights

Employment and support allowance was overpaid to a universal credit claimant, even though he had claimed in advance to prevent this. The employment and support allowance termination letter included no notification of his appeal rights, and there was no letter advising him that he had been overpaid. The claimant first knew about the overpayment when a deduction for the overpayment was applied to his universal credit award.

A disabled universal credit claimant was waiting to be assessed for his fitness to work. He received a sanction for failing to attend an appointment, even though he had gone to the job centre for it. The claimant was not told that he could challenge the sanction decision.

A universal credit claimant had the limited capability for work element removed from her award without any notice, despite the fact that no new decision had been made about her fitness for work. When she questioned the removal of the element, she was told that it this was to prevent an overpayment of the element. She was not told that she could challenge the decision to remove the element.

Inadequate notification

CPAG has concerns about the way claimants are notified of their rights to challenge a decision about a universal credit award. The standard wording in universal credit statements does not clearly set out the timescales for challenging or appealing a decision, and does not set out how appeal deadlines may be extended.

CPAG takes action

CPAG has used Early Warning System cases to demonstrate poor administration and the frustration of appeal rights in the benefits system, particularly in universal credit. We have:

- Raised awareness among advisers in a 'Computer says No' seminar in November 2018.
 - Discussed this issue with the Secretary of State for Work and Pensions in January 2019.
 - Developed a series of upcoming reports on information and challenge rights.
 - Provided information on the effectiveness of escalation routes to assist MPs with their casework.
 - Produced template judicial review letters for advisers - for example to challenge late mandatory reconsideration responses.
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7. Support needs unmet by the digital system

CPAG has seen a recent increase in cases concerning universal credit claimants who are struggling to manage the digital aspects of a universal credit claim. The Good Things Foundation identified that social class (low income) and disability are characteristics which correlate with a lack of internet use, due to lack of either digital skills or internet access (or both).¹ It is therefore fair to assume that a significant proportion of universal credit claimants may encounter the digital nature of universal credit as a barrier to accessing their entitlement, and indeed DWP's most recent claimant experience survey found that 15 per cent of universal credit claimants do not have access to the internet at home.²

a. Safeguarding

Advisers are telling us about vulnerable claimants who lose out on universal credit because the digital process and the backdating rules are ill-suited to supporting them.

Flagging vulnerability

Citizens Advice has said that when it starts the Universal Support contract in April 2019, it will assist claimants to start an online claim and may assist with claims by phone or in paper form if it finds that the DWP has not adequately flagged the claimant's need for support. There is some concern that an online claim may be inappropriate in the first instance and that ongoing support may also be required to manage the claim.

It is unclear whether the DWP's process for identifying vulnerable claimants is effective, and what allowances are then being made to cater for them. Advisers tell us that claimants are being inappropriately told that they need an appointee, when in fact they are perfectly capable of managing their own affairs and the only barrier to accessing entitlement is the digital claim process. This is worrying, as having an appointee means handing over legal responsibility for your money to another party.

¹ Good Things Foundation and Professor Simeon Yates, *The Real Digital Divide? Understanding the demographics of non-users and limited users of the internet: an analysis of Ofcom data, 2017*, available at: https://www.goodthingsfoundation.org/sites/default/files/research-publications/ofcom_report_v4_links.pdf

² <https://www.gov.uk/government/publications/dwp-claimant-service-and-experience-survey-2017-to-2018>

Vulnerable claimants sanctioned

A claimant was sanctioned for failing to attend an appointment, even though he has mental health issues.

A claimant with epilepsy and an inoperable shoulder injury was sanctioned for failing to attend an appointment. He was still waiting for a work capability assessment (which was overdue) and his claimant commitment had not been tailored to his health needs in the meantime.

A woman with physical health problems asked for her job centre appointment to be arranged on a Tuesday because of the demands of managing her health, but it was nonetheless arranged for a Monday. She managed to get there, but was a little late and her work coach refused to see her. She was sanctioned and then refused a hardship payment.

Inappropriate advice about appointees

A disabled claimant with poor literacy and mental health problems recently had a stroke. He can manage his money but cannot manage the online universal credit claim without help, and he does not have anyone who can help him with this on an ongoing basis. When he explained this to the DWP, he was advised to get an appointee to manage his claim for him. Appointeeship would be inappropriate as it would mean handing over legal responsibility and the money to another party; this should only be considered when a claimant lacks capacity to manage her/his own affairs.

Limited backdating

Legacy benefits can be backdated for up to three months. Universal credit can be backdated for a maximum of one month, and only in certain circumstances. This rule is causing vulnerable claimants to lose out. Advisers tell us that they often encounter claimants who delay starting a benefit claim for one of the following reasons:

- It is too much for them to cope with at that time.
- They have no idea what they are entitled to.
- They are daunted or overwhelmed by the process.
- They rely on support to complete the claim process and cannot access this support immediately.

The legacy benefit backdating provisions safeguard the most vulnerable claimants who may take time to make a claim from insurmountable debts which put their housing and quality of life at risk. The one-month backdating limit in universal credit, at a time when the benefits system is being radically transformed and there is a widespread shortage of advice and support services to help people with the transition, means that the most vulnerable claimants can be plunged into debt, and even destitution, from which they may not be able to recover.

Vulnerable claimant's universal credit delayed due to reliance on support

After a man's employment and support allowance claim ended, it took three months for him to make a claim for universal credit. He did not understand why his employment and support allowance had stopped, so sought an adviser who could help him. He then had to wait for an appointment with the adviser and schedule this for a day when he was not too unwell. In the meantime, he accrued rent arrears and other debts. In legacy benefits, his claims could have been backdated for three months, allowing him to pay these debts off when he received his payment. In universal credit, however, at least two months will go uncovered. In addition, deductions from his future award to repay these debts will further reduce his entitlement, meaning that he is unlikely to be able to pay

off his rent arrears and will remain at risk of homelessness.

b. Internet access

Universal credit claimants who cannot afford broadband or mobile data charges, or who do not have a smartphone, tablet or computer, struggle to manage the online claim process and subsequently to manage their claim on an ongoing basis. Visiting a local library to use a computer is not always feasible, given travel costs and the limitations of public transport (especially in rural areas), limited mobility of disabled or unwell claimants, and lack of confidentiality when using a shared computer. These issues are often compounded by a lack of digital skills.

The Universal Support programme to be implemented by Citizens Advice from April 2019 may partially address these issues, but is unlikely to address them fully.

No internet access

A very sick claimant lived on a caravan site in a remote rural location with no internet access. He had lung cancer and pneumonia meaning his mobility was very limited and he struggled to attend even hospital and GP appointments. Further travel to see an adviser or visit the library is out of the question. This man was unable to start his universal credit claim until he could schedule a home visit from a benefits adviser. The next step of the claim process is an ID verification interview, for which a home visit was requested. He is now reliant on the DWP to contact his adviser to arrange the appointment, as he cannot access his online journal.

No digital skills

A claimant with vascular dementia, COPD/asthma and depression started his universal credit claim over the phone. He found the claim process arduous, as it required a two-hour telephone call and three job centre appointments, and travel exhausts him. He cannot manage the universal credit claim online at all and relies on someone else to receive texts and correspondence on his behalf. It is not clear what would happen to his claim if that person became ill, or for any reason failed to help him take action when required in the claim.

Problems accessing universal credit account

A claimant's poor health means that he is unable to attend the job centre. He therefore had to wait for his personal security number to be posted to him in order to log into his universal credit online account. While the claimant was waiting for the letter to arrive, however, the claim was set to be closed due to inaction by the claimant. This was only discovered because an adviser retrieved an update on the claim, and asked for the letter to be resent. The letter still had not arrived, five months after the claim was started and the claimant was still unable to access his claim. He became increasingly distraught about managing a universal credit claim that he could not access.

c. Accessing support

CPAG is hearing about claimants who need support to get their universal credit claim started, but are not receiving it. It is hoped that the upcoming Universal Support programme will go some way to addressing these problems.

CPAG is also hearing about cases where claimants need ongoing support to manage their claim, but there is nothing available.

Difficulty accessing claims online also means that claimants who have problems with their benefit are not able to easily update their advisers. In legacy benefits, they would simply show their adviser a letter. Now, they can only show their adviser in person if they have access to a computer and internet and they remember their login details. Otherwise, advisers are left working with claimants over the phone, asking them to email numerous screenshots in order to establish the issues. This is a difficult, time-consuming, stressful and often fruitless task for claimants who lack digital skills.

Claimants in vulnerable circumstances refused help

A claimant with a learning disability and literacy problems was refused help to claim universal credit in his local job centre because he was seen reading a text message and was therefore deemed to be capable of starting his own claim. His local authority refused to assist because its service was not available to people who would never be able to manage their claims on their own without ongoing support. His claim was delayed by two weeks until he was able to find someone to help him – his housing provider stepped in after raising concerns about increasing rent arrears.

A claimant who had experienced domestic violence could not get help to start a universal credit claim. Her adviser helped her to contact DWP Hive, which directed her to the local authority. However the local authority which was extremely reluctant to book an appointment because the claimant already had an email address.

Ongoing support beyond making a claim

A woman was managing her son's universal credit claim because he has autism. She was stressed and confused by the whole process and found the DWP very unhelpful: she often found that there was no one for her to speak to, and no timescales for getting things sorted out when problems arose. She worries that she will never be able to pass responsibility for the claim onto her son.

CPAG takes action

CPAG has used Early Warning System cases to demonstrate the problems with a digital-first policy. We have:

- Attended the Citizens Advice roundtable event, 'Universal Support: help to claim', in December 2018.
 - Maintained awareness of the potential for judicial review challenges where reasonable adjustments have not been made for disability.
 - Raised concerns with DWP strategy staff in February 2019.
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Appendix: Policy issues by number of cases flagged

Policy issue (These categories are not mutually exclusive; each case may be flagged with up to three policy issues)	Total number of submissions	Proportion of total submissions (973 in total)	Number of submissions in the last 6 months	Proportion of submissions made in the last six months (400 in total)
Transition from legacy benefits	173	17.8%	91	20.7%
Administrative error	257	26.4%	83	18.9%
Universal credit less generous than previous benefits	166	17.1%	76	17.3%
Housing costs	137	14.1%	64	14.5%
Immigration	114	11.7%	60	13.6%
Eviction/rent arrears/ homelessness	68	7.0%	51	11.6%
Poor/wrong advice	149	15.3%	49	11.1%
Establishing a claim	102	10.5%	48	10.9%
Limited capability for work/work-related activity	62	6.4%	30	6.8%
Rejection of appeal/mandatory reconsideration rights	47	4.8%	27	6.1%
Missing elements	38	3.9%	19	4.3%
Lost elements	21	2.2%	16	3.6%
Support needs	16	1.6%	16	3.6%
Backdating	20	2.1%	15	3.4%
Closed case	23	2.4%	15	3.4%
Deductions	33	3.4%	15	3.4%
Delay	56	5.8%	15	3.4%
Assessment periods	35	3.6%	12	2.7%
Benefit cap	20	2.1%	10	2.3%
Housing costs contribution	22	2.3%	9	2.0%
Appeal/mandatory reconsideration	30	3.1%	8	1.8%
Medical assessment	17	1.7%	8	1.8%
Overpayment	21	2.2%	8	1.8%
Conditionality	10	1.0%	7	1.6%
Real-time information	14	1.4%	7	1.6%
Two-child limit	13	1.3%	7	1.6%
Minimum income floor	12	1.2%	6	1.4%
Work capability assessment	20	2.1%	6	1.4%
Bereavement	5	0.5%	5	1.1%
Claimant commitment	10	1.0%	5	1.1%
Payments	10	1.0%	5	1.1%

'Bedroom tax'	8	0.8%	4	0.9%
Capital	7	0.7%	4	0.9%
Definition of child	6	0.6%	4	0.9%
Older people	4	0.4%	4	0.9%
Advanced payments	11	1.1%	3	0.7%
Childcare	8	0.8%	3	0.7%
Employment and support allowance pending appeal	13	1.3%	3	0.7%
License/liability for rent issue	3	0.3%	3	0.7%
Sanctions/conditionality	35	3.6%	3	0.7%
Supported accommodation	3	0.3%	3	0.7%
Appointeeships	6	0.6%	2	0.5%
Prescriptions	2	0.2%	2	0.5%
Withdrawing a claim	19	2.0%	2	0.5%
Communication with DWP	33	3.4%	1	0.2%
Contribution-based benefits	8	0.8%	1	0.2%
Council tax reduction	1	0.1%	1	0.2%
Implicit consent	8	0.8%	1	0.2%
National insurance numbers	5	0.5%	1	0.2%
Self-employment	15	1.5%	1	0.2%
Tech barrier (new label)	1	0.1%	1	0.2%
Terminally ill/DS1500	2	0.2%	1	0.2%
Verification	3	0.3%	1	0.2%
Work-related requirements	3	0.3%	1	0.2%
Alternative payment arrangements	11	1.1%	0	0.0%
Complaints	7	0.7%	0	0.0%
Discretionary housing payments	3	0.3%	0	0.0%
Education	9	0.9%	0	0.0%
Fraud investigation	3	0.3%	0	0.0%
Gateway conditions	7	0.7%	0	0.0%
Hardship payments	4	0.4%	0	0.0%
Information sharing	1	0.1%	0	0.0%
Live service area	2	0.2%	0	0.0%
Maternity	2	0.2%	0	0.0%
Mortgage support	2	0.2%	0	0.0%
Poor/wrong advice (HMRC)	8	0.8%	0	0.0%
DWP loans for mortgage interest	1	0.1%	0	0.0%
Support in job centre	3	0.3%	0	0.0%
Waiting days	1	0.1%	0	0.0%
Work allowances	4	0.4%	0	0.0%

