

Work and Pensions Committee

Oral evidence: Universal Credit and Managed Migration, [HC 130](#)

Wednesday 18 May 2022

Ordered by the House of Commons to be published on 18 May 2022.

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Members present: Stephen Timms (Chair); Debbie Abrahams; Shaun Bailey; Siobhan Baillie; Steve McCabe; Nigel Mills; Selaine Saxby; Dr Ben Spencer; Chris Stephens; Sir Desmond Swayne.

Questions 1 to 50

Witnesses

[I](#): Dominic Milne, Parliamentary Co-Chair and Legal Rights Officer, RNIB; Fran Bennett, Associate Fellow, Department of Social Policy and Intervention, University of Oxford and policy adviser to the Women's Budget Group; Rebecca Rennison, Principal Policy Manager for welfare policy at Citizens Advice; and Sophie Corlett, Director of External Relations, MIND.

Examination of witnesses

Dominic Milne, Fran Bennett, Rebecca Rennison and Sophie Corlett.

Chair: Welcome, everybody, to this meeting of the Work and Pensions Select Committee. We are very pleased this morning to welcome our four witnesses to talk to us about the Department for Work and Pensions plans to migrate claimants on existing benefits on to Universal Credit over the next couple of years. If each of the witnesses could very briefly tell us who they are, starting with Rebecca Rennison.

Rebecca Rennison: I am Principal Policy Manager for families' welfare work at Citizens Advice. Five months in and I am still stumbling over my job title, but that is who I am and where I come from.

Sophie Corlett: I am Director of External Relations at MIND, the mental health charity.

Fran Bennett: I am Associate Fellow at the Department of Social Policy and Intervention at the University of Oxford, but I am here in my capacity as a member of the policy advisory group for the Women's Budget Group in particular.

Dominic Milne: I am a legal rights officer with RNIB, but I am here in my capacity as parliamentary co-chair with the Disability Benefits Consortium.

Q1 **Chair:** Thank you very much. Last week MIND co-ordinated a letter, which I think was signed by three of the four organisations that are in front of us this morning, calling for DWP not to go ahead with its new plans for migrating legacy benefit claimants to Universal Credit. Could I ask each of you whether you share the concerns expressed in the letter? If you do, what is it in the DWP's plan that particularly troubles you at the moment?

Sophie Corlett: It is what is not in the plan that concerns us mostly. We are aware that the 700,000 people who have mental health problems, learning disabilities or dementia—particularly that group—who are on legacy benefits struggle with the online process, with the application for Universal Credit. We know that from everybody who has already had to apply for Universal Credit. What we have not seen within the plans for managed migration is a robust plan for supporting those who may struggle with the process of transferring their claims on to Universal Credit.

We have not seen any plans for how those people will be safeguarded to make sure that at that cut-off date, which we have been told is a definite cut-off date at three months, their benefit will not be completely cut off if they are unable to engage with the process. They are given three months to engage and the expectation is that after three months they will be cut off.

We know that people absolutely struggle with the process because it is online, because they may not be well enough to engage and because they may not have the cognitive ability to engage in some circumstances. For those people there does not appear to be any safeguarding process in place proactively to approach them, to support them, to give them longer, to give them whatever help they need to make sure they transfer from one system to the next. There is the possibility therefore of people finding they have no income altogether.

In the cost of living crunch that we are in at the moment it would be bad just to have a reduction in your income, but this is potentially the devastating impact of all your income being cut off.

Q2 **Chair:** I will just make the point that we have had a letter from the Secretary of State about this overnight. You would not have had a chance to see this. We raised some concerns about this with her and she has told me that the Department, in this three-month discovery phase, will not stop benefits. If a claimant fails to apply within the three months they will then get a minimum one-month extension to the deadline in their notice and the Department will contact them to find out why they have not claimed and will try to be a bit proactive. Therefore I think there is a little bit of movement there, responding exactly to the point you have just made.

Sophie Corlett: Shall I respond to that?

Chair: If you would like to, yes.

Sophie Corlett: That is very welcome to hear and it is good to hear there is an extension. That is helpful because some people might be unwell during the first three months, particularly with mental health problems that vary, and maybe in that final month they might be better. It is good to hear there is going to be some proactive offer of support. However, for many people the benefits process is extremely stressful. It would be helpful to get that support earlier so potentially that process itself does not prompt decline because we know that is an issue with the benefit system.

Also it would be good to know what sort of support was going to be offered at that point. If it is another letter from the benefits office and people are not engaging with their post or maybe are in hospital, that is not necessarily going to help. We would like to see a process of initially a letter, then subsequently maybe a safeguarding visit or something more appropriate to make sure nobody gets left behind.

Q3 **Chair:** We will be publishing that letter later today so everybody can see that.

Rebecca Rennison: Thank you. This might be one of those frustrating sessions where we all say very similar things, but I think that is probably what you were expecting.

To come back on the response from the Secretary of State—obviously I do not have the letter in front of me so I may be misinterpreting it—my

understanding is that there is broadly a buffer month, roughly, in which if a person engages with the process they can continue on the migration path. I would be interested to see the detail to see if it is a change or clarification. Like I say, I do not have it in front of me so I might be misinterpreting things.

The shift is also interesting. Earlier on we talked about it being a minimum of three months for people to engage in the process. That seems to be tipping over into there is a three-month window to get your claim in and for migration. Again, that is a subtle shift from, "You have at least three months" to, "You have three months". It is worth being aware of that as we talk about migration.

I will go back to the letter and the initial question. I will try to be succinct because I am aware this could be the entire hearing, why we are concerned about managed migration and particularly the risk to those vulnerable claimants. I am someone who is always reluctant to use the term "vulnerable" because it gets misused and used as a catch-all badge. However, in this scenario the concern is that these are long-term benefit claimants, many of whom are long-term sickness benefit claimants.

I do not think it is unreasonable to assume that there will be quite a large cohort, as my colleague has been saying, within that group who will have quite significant support needs. It is the implication of what it means to those individuals if we do not get it right. We can all remember the early days of the Universal Credit rollout where it was tested with small numbers, looked promising, was scaled up and that is when the problems appeared. It is not letting that happen with this particular cohort.

Where we have sympathies with DWP, and perhaps where we are all looking to meet in the middle, is that we understand the need to test the process. First we had the pilot and now we are into the discovery phase, to get my terminology correct. I am sure there will be further testing and learning processes as we go.

I think the reassurance people are seeking is what the stop/start process is, when DWP is going to share those learnings and when it is going to share the safeguarding it is putting in place. There would then be reassurance that as it scales this up—I think it is an initial 500 who are going to go through this discovery phase—it is going to learn and share with us the safeguards so we have reassurance, and can offer it to the people we work with and support, that the right checks are in place to make sure no one falls through the net. Like I say, I could easily go on and dominate, but I had better let colleagues come in.

Fran Bennett: Thank you very much. I am going to do a slightly different angle because of our focus on gender in the Women's Budget Group. I do not think those issues have come out very clearly in the whole process of the Universal Credit rollout, or at least as much as they should have done.

It is interesting that in the DWP's analysis for completing the move to UC the groups are broken down by benefit rather than by claimant characteristics—for example, women and men, lone parents and two-parent families or couples without children and so on. I do not think we have had a breakdown of the people who will be subject to managed migration in those kind of groups. That of course would include the protected characteristics groups that would usually be subject to an equality impact assessment. The Government have said they are continuing their equality analysis, including managed migration, but they do not propose to publish that. The Minister in the Lords used the phrase "equality analysis" rather than "equality impact assessment".

Another concern is that the pilot in Harrogate did not include many of the people who we would be concerned about. In particular, my role here is not to echo points about people with the protected characteristic of disability because there are clearly people here who can do that better than I can, although of course we would echo that. However, the Harrogate pilot did not include any couples. There were 38 claimants who went on to Universal Credit, as I understand it, in the Harrogate pilot. None of those included couples. In addition, they only got through the first stage of the pilot, the claimants who had something to do with the jobcentre. That would not necessarily include people on tax credits, for example.

They never got to the phases of liaising with the housing association, therefore looking at housing issues, and then people on tax credits. Therefore many of the people who will be affected by managed migration in particular—because tax credits and Employment and Support Allowance are the two big groups we know will be left over, if you like—were not included in the Harrogate pilot and neither were couples whose lives are changed quite a lot when they move from legacy benefits or tax credits to Universal Credit.

Wearing my other hat, I took part in a research project at the Institute for Policy Research in the University of Bath on Universal Credit on couples in particular. That was the first independent research on Universal Credit and couples. It is not a group that has been looked at much.

Lastly, the current situation suggests it is time for a rethink. That is particularly because of something already mentioned, which is the cost of living crisis at the moment, and in particular what will happen to people who are managed migrated before or after April 2023, when it is likely benefits will be going up much more than they did this year. The timing of that will be absolutely critical for people in terms of how long their transitional protection lasts.

Dominic Milne: We have mentioned Harrogate already. I know Harrogate largely came about as a result of the statistics the DWP put together in 2018, where it was found that 24% of people could not register a claim online, only 57% were confident in managing their claims, 53% said they needed more support with a claim and 38% said

they needed more ongoing support. What was also found was that something like 29% of claims did not happen because of a number of things: failing to attend interviews, failing to attend a subsequent interview or not accepting a claimant commitment.

All that boiled down to the fact that Harrogate happened as a pilot. As has already been mentioned, only 38 people took part in Harrogate. One of the big problems the Disability Benefits Consortium has is the fact that those 38 people, a very small group, were all volunteers so they were engaged with the process automatically. They were not people who were going to have the problems that a lot of people will have when it comes to managed migration.

There seems to be a reluctance on the part of the DWP to in any way consider keeping legacy benefits running throughout the process of managed migration. That seems to be a big mistake. The extra month may be helpful, but it is not enough. There will still be people falling off the cliff in that respect. We still very much support the fact that that is very important for people.

Regarding the response from the DWP, we have had meetings with Neil Couling a couple of times. He has suggested that it is a share-and-discovery process where they try to learn as they go along and change as they go along. That seems a very risky strategy, to be taking so many people and basically taking a lot of chances with their income. They are the key points I will say initially.

Chair: Very helpful. Thank you all very much.

Q4 **Sir Desmond Swayne:** Rebecca and Sophie, do you think the Harrogate pilot provides any basis for moving forward with the migration? How transparent has the Department been with the findings of the Harrogate pilot, truncated as it was?

Sophie Corlett: I think your second question answers the first. There has been no transparency about it. We know some bare facts and obviously it was truncated by the pandemic. However, there have been no findings published. We do not know how it went. We do not know how it went from the point of view of the system or from the point of view of individuals. It was not tested on a complete group. There has been no transparency about it and no equality impact assessment using that information to be transferred on to the new discovery phase. I think that answers the question.

Rebecca Rennison: We would present it as a first step. You have to begin somewhere and that is—very much to state the obvious—where they started. However, very low numbers. Obviously the pandemic did come along and change everything but it is very difficult to draw any firm conclusions about the pilot. Colleagues have touched on the very low numbers that migrated over. I think there were only three in transitional protection. It is very difficult to draw any firm conclusions out of that.

Obviously, we have our network of advice services and we are getting a sense of what is coming through. I am sure colleagues here will be looking out for calls in from those experiencing migration. Again, numbers were so small. Talking to our service on the ground in Harrogate, they did not see anyone coming through the door talking to them about managed migration. Therefore it is very difficult at that scale to draw firm conclusions.

The other hesitation is as they test and see and when you start putting in the real-world elements. At this stage there is obviously a lot of support. They set out quite a lot of detail about the appointments individuals have, almost handholding going through the process. That is understandable while they are testing and it is welcome. It is something a lot of us talk about a lot of the time, the need for that support as people apply or migrate to Universal Credit. However, when does that start to tip over into what the real-world model will look like? When do we start to stress test the system before that go-live date and before the lifting of that 10,000 cap they currently have?

Q5 Sir Desmond Swayne: Are you reassured in any way that the Secretary of State has now announced she will launch a much larger study involving 500?

Rebecca Rennison: I touched on that earlier and I think we are all alluding to it. I was talking to colleagues yesterday about how you get across the scaling-up of what is a test that becomes a pilot that becomes a discovery phase. It is welcome that they recognise they are still at the learning stage. Again, it is one of those where you wonder if in some ways there is a shared understanding in that we recognise you have to test and we recognise there has to be a learning process as they go through this. Our hesitation is that it feels like we are going very quickly from learning process into pressing ahead with full migration and the lifting of that 10,000 cap.

I am going to be a broken record with stop/start moments as we go through this session. However, it is the reassurances of once they have done the 500, what happens next? What are the metrics? What are, to use the cliché, their measures of success? What might they go back and test and do differently? It is the process anyone would go through in launching a piece of change management of this scale. When will they be reporting back? When you read the paperwork with SSAC at the moment, looking at the 10,000 cap and regulations, many of the themes that come out there are around the transparency and the reassurances as they go through that process.

Sophie Corlett: I echo that around bringing it back to Parliament. It is concerning to see the potential removal of the cap of 10,000. That would be a good point to come back to Parliament with and say, "This is what has happened. This is how it has been" on a bigger number than 500, where you can handhold. Ten thousand is much more of a number where it does begin to be a bit more real world and where you could have quite

a lot of evidence to be able to make a good assessment of how it was going and how it was likely to be for the remainder.

Fran Bennett: Can I add a few things? One is how the claimants are going to be selected to go through either the first 500 or following on from that. It looks as though it is going to be location. Policy in Practice said Bolton and Medway were the first two areas. I assume that is correct. Different areas will have different concentrations of types of claimant—for example, lone parents on tax credits who will not yet have moved over or indeed disabled people on Employment and Support Allowance, as has been mentioned. Should we be talking about how the claimants are selected either via location or via other factors for the first 500 or indeed on from that?

The other thing is about the learnings from Harrogate. They have said a few fairly general things, as people have mentioned. The DWP seem to think people can choose the date that best suits them to move on to Universal Credit, I think meaning the date within the month in terms of pay cycles and so on. Whether that is going to be the case with managed migration, I am not sure we know. Whether they will be given a choice within a particular date would be worth asking as well.

The Harrogate pilot found that if people were talked to about Universal Credit early, or at least by letter, they got scared, which is not surprising. Therefore the Government are talking about dispelling misperceptions about Universal Credit. Of course that has the danger of what happened with the Advertising Standards Authority and the *Metro* stories earlier, if we are not careful. They also did find that people did not necessarily need the “who knows me” organisation to manage the whole of their going on to Universal Credit.

I think the Department has recognised that there may need to be additional support, both in terms of voluntary migration and managed migration. When tax credits were introduced, there was additional funding for advice agencies. I remember it because I was involved in an advice agency at the time. A good thing to think about is whether, on top of Help to Claim or its equivalent, there is a case—particularly with voluntary and managed migration at the moment—to provide additional support to advice agencies to help claimants through the process.

Q6 **Shaun Bailey:** I want to touch a bit more on the Harrogate pilot. I was not aware the Department had provided any data around gender or household profiles of people. Am I correct they have not provided that data?

Fran Bennett: I think not. I may not know all the facts, but I think no.

Q7 **Shaun Bailey:** That is fine. I am curious about that. What I am trying to understand a bit more is how important that data is in building the agility of the system. That is my first question.

Secondly, is there a balancing act we have to have between ensuring on the one hand, as we migrate people over, it is done in a way that

respects complex needs, but on the other hand we have uniformity within the system that allows a bulk exercise of some 1.6 million people to be transferred over at the same time? How do we strike that balance? How important is that granular data in enabling us to do that?

Dominic Milne: If you come back to that Harrogate process, which was prompted by the fact that there was worry about how the migration of people to Universal Credit was going to be implemented, it did not really happen because of the pandemic.

The fact is we now have the initial Bolton and Medway 500 group and that this is not a pilot. This is just like, "We are going to crack on. We are going to pile on and keep going with it". That is the big worry. There is no real answer from the DWP as to how that is going to manifest itself. How is it going to be viewing this thing; what is it going to do; when will it do it?

What we do have is a fairly arbitrary figure that they are going to have to get everybody across by the end of 2024. That is not that long. They are going to have to work very fast. This is where probably the main doubt that people have is how they are going to produce the kind of support they are going to need. It will be needed for so many people. At the very root of all this there is the fact that there is this cliff edge, even with this extra month, which is welcome. However, it is still a problem. It is going to be a problem for a lot of people.

Somebody mentioned real-life testing, real-world testing, and not just a pilot of volunteers. The picture could be very different. It is very worrying. The DWP has said to us repeatedly that we ought not to worry because it is going to be changing as it goes along. That is not very reassuring. As I say, this is not a pilot. This is the real thing now, they are ploughing on ahead with it and that is what the worry is.

Sophie Corlett: Can I come in on that as well, briefly? It is concerning that we do not have that much information about Harrogate. However, we do have a lot of information about Universal Credit.

The DWP's own research, which Dominic was quoting earlier, was that a quarter of people could not register their claim online and over half said they needed more support. Somebody's research went in and looked at people who had reasonable adjustments. Of the 27 people in that cohort who had mental health problems and needed adjustments, none of them had received them. Therefore we know the system does not support—talking for people with mental health problems—people who need support in order to get through the system.

What we are doing is rolling out a big system to a large number of people, many of whom we already know have long-term health and mental health problems. We are trying to move them in quite a short window through a process that does not appear to be proactively offering people support. Longer time is great. People can ask for support, although we have not been guaranteed that is going to be made obvious

to people. However, if people are not in a position to ask for support because they are too unwell, because they are not engaging with the system, those are the people we are most concerned about.

Rebecca Rennison: Can I come in on the point around balance as well? You have rightly asked how we have a system that moves large numbers of people over while providing tailored support to those who need it. It is the classic safeguarding scenario of, yes, you will have large numbers who will not need those interventions, but what are the points where a red flag goes up on the system to say, "This person needs a bit more support"?

I was trying to think of parallels in other areas of public life. The best I could come up with is that I have just had my first baby and the numbers of checkpoints with that were, "Yes, everything is going fine" so you sail through to the next stage. However, an intervention would have been triggered—a visit or a check—if something had come back. It is the reassurance that those same safeguards are built in every step along the way so if someone has not come back, or someone has come back but in a way that raises concerns, it leads to follow-up and a question on the system as opposed to carrying on business as usual. That is the reassurance we are looking for, that that is being built in before this starts to scale up.

Fran Bennett: The two groups that are going to be particularly affected by managed migration are on tax credits and Employment and Support Allowance, so they have both been on benefits long term. That is likely, anyway. In particular for people on tax credits, it is quite a stable income. We know from research that a stable income is often what helps claimants feel secure and to also feel able to advance.

We do not know enough about the tax credit population. They have done research on the tax credit population, "The Future Cohort Study" and also some qualitative and quantitative research. However, the first one focused on in-work conditionality and the second focused on the process of claiming. I am not sure we know enough about what we should be talking to claimants of tax credits about, particularly because it is DWP, before they transfer to Universal Credit.

One thing in particular is that conditionality changes. That is not known by claimants usually until they have claimed their Universal Credit and they are signing the claimant commitment. For those on tax credits there usually now is no conditionality for the partner. For parents, the change is between conditionality starting at age five and conditionality starting at age three. There are going to be some things that are going to be quite different for tax credits claimants that I am not sure we have factored into the process enough in terms of information or pre-warning, if you like.

Q8 **Shaun Bailey:** The common theme that seems to run through is that, from the Department's perspective, it would appear it has access to this information already in terms of its existing information streams. Is this

somewhat of a risk?

I appreciate why the Harrogate pilot had to take place in the way that it did. However, it does sound as if, from what has been said already, those sorts of flags are already there in the Department's own system, in its own information. While obviously respecting the need to do the pilot, is there a risk the Department puts too much weight on that? Is it fair to say the operational challenge for the Department is to try to sift through the information it has to build those structures already to make that migration as smooth as possible, particularly focusing on those with more complex needs? It sounds as if the Department needs to do things internally and get its own house in order rather than relying solely on the pilots that it is taking. Is that a fair comment, would you say?

Sophie Corlett: I do think it is important to put in a break at some point to check. The 10,000 was a point or another point, so you can check what you are doing is working. Yes, this is a large migration of people, a very large proportion of whom are going to need extra support. The system ought to be set up with the extra support as an assumption and that seems to be what is missing.

Dominic Milne: I would agree. I think there are two major principles. One is the fact that there should be a break, as has been mentioned, in order that data can be looked at and the process can be reviewed where necessary. I keep going back to this cliff-edge thing where the benefits stop. The idea that the word "termination" is in there anywhere, even in this new letter, is still a worry. It is still a major worry. I think there has to be a proper bridge for people, which means they are not going to worry, otherwise they are going to get very scared of the process anyway.

It is an incredibly difficult process for so many people. As we know, Universal Credit has proven that over the years in terms of accessing the system, being able to manage the system, you might be able to get your first claim in, you might be able to handle that first part and you might get online where you can do that, but managing your claim on an ongoing way, making sure you fulfil all the criteria that you need to is not always easy. That ends a lot of claims, unfortunately.

Fran Bennett: Just to emphasise, they do know more about their own claimants than they do about tax credit claimants. For example, I think I am right in saying that the DWP says it does not know about the capital of tax credit claimants because of course it is not relevant to tax credit claims, but it will be relevant when they move on to Universal Credit. The timing of that is important because they get a 12-month grace period moving on to Universal Credit when capital is not taken into account, as I understand it.

Of course, when people are moved will affect what happens to their transitional protection and what happens to their protection in terms of their capital. I don't think the DWP has as much information about that.

Rebecca Rennison: It might be oversimplifying the question, but why can't the DWP just do it now, to have the information and put all the safeguards in place to begin with?

One thing, just learning from my own experience of charities when we develop services, you do not always know again in that real-world scenario how people might respond. You might say, "We think the next intervention is—" It might be a phone call, it might be contact from a trusted professional, it might be the letter drafted this way, the letter drafted that way.

I think from some of the information we have seen come through from DWP it is certainly planning to test some of those. My understanding is there are different versions of correspondence potentially going out, things like that. Again, it is that information point that I think has not been shared more widely. If there was more understanding of, "They are doing this test and see approach because they have identified this cohort they are concerned about. These are the different interventions they want to test and this is how they will evaluate it" there would be that confidence, "That sounds a sensible approach, we appreciate what you are doing" but without that reassurance you are just left worried this picks up at pace without the safeguards in place. You are probably getting the Department itself in at some point and it will be able to give answers on what those test and measures will look like.

Chair: The Secretary of State is due to come and talk to us on 22 June. We will certainly be raising some of these points with her. Dr Ben Spencer.

Q9 **Dr Ben Spencer:** Following on from the points you have just made, what engagement have you had or would you expect to have with DWP in putting your case forward and working with DWP on the migration?

Fran Bennett: I would say we have had good engagement in the research that we were involved with with Universal Credit and couples and we have had engagement with the analysis and policy parts of the DWP. For the managed migration it is having a stakeholders' engagement forum, which is regularly meeting. I would say the engagement is, in my experience, more proactive than previously, but other people who work more closely with claimants would have more to say on this.

Dominic Milne: I would agree. I think there has been a lot of consultation in the last year or two. There are a lot of meetings. They have been getting together and talking with us on Universal Credit meetings and different forums and it is all very welcome. The only worry we have had as we have been going along is that, yes, we are talking to them and they are hopefully listening, but the changes that are being made are only very gradual and very slight compared to the consultation that we have had in many instances. Of course it is welcome though. We are more than willing to do that across the board of stakeholders.

As was mentioned a moment ago, with things like e-PIP forms and emails of reasonable adjustment, the DWP is working with organisations like

ours, RNIB, very regularly and very productively. They are doing processes that involve pilots and trials. They are doing it in short spells, then they are looking at it again and then they are consulting with us, and they are going to move on and maybe spread it out. That is the perfect approach and it makes far more sense. It is far more sensible and less risky for people.

Rebecca Rennison: Likewise, plenty of engagement with DWP. We work very closely with it because Citizens Advice delivers Help to Claim as it stands. We can touch on that a bit further on if we talk about what some of the support might look like. Yes, very open, lots of engagement.

I was talking to one of the officials working on Universal Credit who had just started this week and I just put it, "It gets to that stage, doesn't it, where you just have to respectfully make your separate points?" There is good engagement but our responsibility is still to come here today and say, "Our outstanding concerns are this". We respect the Department has its position and its priorities it has to work to, but obviously we have a duty to stress our concerns.

I think there is a feeling as well that we are probably working, to an extent, on a shared understanding and a shared direction. It is just there is probably still that lack of trust from the initial Universal Credit rollout, which I know goes back quite some time now. I know the benefit has changed a lot in that period and particularly how it performed during the pandemic. There is just that hesitation in the sector, remembering what the initial rollout was and the problems we had and wanting to be absolutely certain that is not going to happen as we press ahead with migration.

Sophie Corlett: I would add that we talk to DWP, as do the others, often. We talked to them yesterday. We have talked to them a number of times about managed migration. We get a good understanding from them in conversations and reassurances from them that they do not want anyone to be without benefit, but we do not see anything then coming back from them that would prevent people from losing benefits. Obviously there is something in this letter overnight, but there is no guarantee that people would not have their benefits cut off, no real action to make sure that there are proactive steps put in place.

The difficulties existing at the moment with Universal Credit, where people still struggle to engage with the process post-claim, are not reassuring in that sense, in that those problems still remain even though the DWP clearly is as aware of them as we are.

Q10 **Dr Ben Spencer:** Would your organisations want formal roles in the rollout?

Sophie Corlett: It would be interesting to think through what those might be. We would be very interested in being more engaged, for instance, in reviewing the information that is coming in and what is working, as we have already done with suggestion of how the process

could be improved or what might be put in place for people. We have certainly offered to work in that way with the DWP if that would be helpful.

Dominic Milne: I do not know whether it would work in a formal capacity as such, but certainly I would definitely agree. That movement toward collaboration, co-operation and working together more is something that has been evident heavily in the last couple of years, which is great.

At the moment there is still a lot of worry. What we are getting a lot, and we had yesterday from the DWP, is that it wants us to trust it. It says, "Just trust us, we will do this, we will change as we go along" but there is no real assurance there, no reassurance of exactly how that is going to work for people.

Q11 **Dr Ben Spencer:** In part, I am trying to understand the psychology as well, because I totally hear what you are saying about people being very scared when they hear things are going to change. Change is scary for many people you are looking after in various vulnerable groups, for one reason or another. What do you do in your advocacy to try to reassure people? What is the message that you put to your members around the move to UC?

Sophie Corlett: We all encourage people to contact us and to get support. We provide various services to help people through that. That would obviously be our first starting point.

Dominic Milne: I completely agree. Of course we do that. We all try to help people as much as we can. One of the things that has been espoused that will make this process better for people will be getting help and getting support and doing benefit checks to make sure they are going to have the same money. But one key issue with tax credits is the fact that it quite often brings residual debt with it that would immediately come off your transitional protection from Universal Credit. Things like that are very difficult to advise on.

Of course we do provide reassurance wherever we can and we provide as much help as we can to make sure that the process is smooth. The fact is we all work with a certain number of people and there are a lot more people who do not see us. There are a lot more claimants out there who do not get the help or are not in a position to access the help that they should. It is not just about our own client groups, it is about all the people out there who cannot get that help.

Rebecca Rennison: It is probably appropriate if I come in about our Help to Claim service at that point as well, if that is okay. We deliver Help to Claim for people currently moving on to Universal Credit. We are commissioned to provide the support as an organisation. That has recently changed in its nature as well, so being predominantly telephone-based and it has lost that face-to-face element. As we move into—I was

about to say “pilot”—discovery phase with the migration now the advice is that people will be referred to Help to Claim.

With that removal of face to face for Help to Claim, the recommendation is that people are referred into work coaches at a jobcentre if they need that face-to-face support. Again, that is a new process and it has not been tested how that is going to work when you get on to managed migration, which is a quite different cohort.

Completely hands up, we have a vested interest in this. We deliver the service, but we also have a vested interest in delivering the service to the best of our abilities. Just a concern as to what that looks like if somebody is saying, “I really want to sit down and discuss this with someone” and if you say, “Well, to do that you have to go into a jobcentre and talk to this person here” and how comfortable somebody might feel about doing that.

Like I say, we have just changed the process, or DWP just changed the process, with the Help to Claim contract. It is a new suggestion that people who want face-to-face support go to a work coach in the jobcentre. We have not had a chance to see how that works in practice. I think that is a question mark as we move to managed migration as to what that means for people that need more support. We see it coming through in our data. We saw this shift in the pandemic when services went remote and the number of issues that people discussed with us if we talked to them face to face.

It is a different relationship if you are sat down talking to someone. It is just the difference today, the amount of information we will share being in person having an exchange, as opposed to in a more formal letter of submission or other things. We pick up far more issues when we see people face to face than if we do it over the telephone. Yes, just a slight concern about what that element of the support package is going to look like as we head into managed migration.

Q12 Chris Stephens: I have some questions for the panel around the equality impact of what the Department is doing now. The overnight letter we received from the Secretary of State suggested the Department did not plan to publish an equality impact assessment. Could each of you tell us if the Department shared with your organisation—or if you are aware of any shareholder colleague—the details of any policy or operational change arising from an equality impact assessment? How important is the production of a formal equality impact assessment before continuing with the managed migration? Dominic, we will start with you.

Dominic Milne: Sorry, the first part of your question was about what would the—

Chris Stephens: If there has been any discussion that the Department has shared with your organisation or if you are aware of another organisation where they have made a policy or operational change as result of an equality impact assessment.

Dominic Milne: I would say there is nothing that I am aware of that I could give on that. What we do know is that it is a worry that they will not produce any equality impacts. We do need to see, for all the reasons that we have already described, exactly what is happening and what the impact will be on people.

What I do know from my own perspective with my RNIB hat on is that despite the disability employment gap shrinking in the last 10 years, it has not shrunk for people who are blind and partially sighted, where only one in four people are working. We are obviously very concerned from an organisational perspective that three in four of those people are likely to be in the groups who are going to be affected by this. It is a worry that we are not getting enough figures or information on what the impact has been so far and what it might be.

Fran Bennett: I think the last equality impact assessment published for Universal Credit was in 2011. I may be wrong. All of us would like to see transparency and public accessibility for the kinds of assessments that the Government are making and therefore an equality impact assessment of managed migration would be helpful because of that.

We have to think of two different things. One is the impact of Universal Credit and obviously it has changed since 2011 because the scheme has changed. The other is, as I think I mentioned before, the impact of the selection of claimants in terms of the order of managed migration and therefore the impact on the transitional protection of the groups that will be migrated in a different order from others. That is quite an important thing, which is separate from what impact going on to Universal Credit will have on this particular equality group, if you see what I mean.

On the latter, in fact, the DWP cited something I had written with Janet Veitch about the impact on resources, roles and relationships within couples and men and women on Universal Credit as a good principle to look at. As far as I am aware, it has not followed that up, at least in a published document. That was about the impact of Universal Credit and I think in some senses the impact of the order of managed migration is also an issue that we should be thinking about today.

Q13 **Chris Stephens:** To follow up on that, Fran, you have articulated quite well today the concerns you have on the gender impacts of managed migration. Does the fact that the migration is described as managed give you any confidence that gender impacts of Universal Credit migration might be lessened?

Fran Bennett: I do not think the title "managed migration" conveys that. I think the title "managed migration" conveys compulsion at this stage, that people have to move to Universal Credit, whereas previously it was either natural because of a change of circumstances or voluntary. You could argue that it should mean that it is deliberate and therefore that deliberate equality consideration should be included as part of that process, yes. I can see that you could interpret it like that. At the

moment that is not what it is meaning. You could certainly argue that it should be seen like that.

Q14 **Chris Stephens:** Sophie, do you have any comment on engagement around the importance of equality impacts? I know your organisation has emphasised the risk that people with mental health problems will find it difficult to engage with the migration to UC. Could you outline those risks as well?

Sophie Corlett: We heard from the Minister for Welfare Delivery in February that the Department would carry out an equality impact assessment before resuming managed migration, but we have not had any more information about that. We wrote at the end of April and we have not had a response to that. We are unsure where any of that is. I do think an equality impact assessment is important because there are such a large number of people with protected characteristics who are claiming legacy benefits and will be moved over.

To answer the second part of your question, the difficulties for people with mental health problems are varied because mental health problems are not consistent, but for many people there is a high level of anxiety around the benefit system and a very high level of anxiety around the conditionality and the sanctions element, which people are aware of and will be aware of as they shift from one system to the next. That is the starting point for very many people.

For people with mental health problems who become particularly unwell, one thing that would be common to many of them—not universal, but many people—they are less able to engage with the post or with formal processes and less able to concentrate on complicated processes, which the application for Universal Credit truly is. Some people may be in hospital.

There will be a range of difficulties. The process of getting support is different for Universal Credit than it is for legacy benefits, so people might go down one route and then find that it is not appropriate. Obviously, a lot of people do not have access to the internet and so the online aspect of Universal Credit is difficult anyway for people on low incomes. For many people with mental health problems—we found this during the pandemic when people have talked to us about their mental health care going online—that just is not an appropriate route. They find the online world very difficult.

I cannot speak for people without mental health problems, maybe it is the same, but definitely people have told us that the online world is very difficult to negotiate and navigate and so the online nature of the application is also likely to be a difficulty, particularly when people are more unwell. There are a range of things, some of which might apply more to some people than to others, but which will be common to a large number of people and including people with learning disabilities and with dementia.

Q15 **Chris Stephens:** Rebecca, any comments on equality impact assessments? Sophie and Dominic have outlined their concerns, people with visual impairments. Are there any other groups you feel may be most impacted by managed migration?

Rebecca Rennison: We would share the concerns set out around what you would expect to see in an equality impact assessment. I was just going to touch more on what we would expect to see in the assessment. The challenge sometimes of an equality impact assessment—and that sounds like I am not supportive; clearly I am wholly supportive of equality impact assessments—is making sure it looks at all the different scenarios. Sophie is doing a good job there setting out how complex it is.

I was just making notes to myself that there will be some people with managed migration who go through the process, a successful claim and a number of people will be better off once they are migrated to Universal Credit. If DWP officials are watching this now they will be shouting at the screen that people will be better off. Some people will be better off. You could have an impact assessment that just looks at that cohort and can present a very positive picture of the whole process. There are those that will transition, will be financially worse off and will get transitional protection. We touched briefly on what that means and how that will taper off with time and possibly taper off more quickly with the current cost of living crisis and what that is likely to mean for benefits. Then there are those that will not engage with the process and potentially lose their benefits altogether or have a period without benefits and it is what the impact on them will be.

It is those quite different cohorts and how any equality impact assessment engages with that and does not just focus on that group. We like to talk about journeys in these scenarios, don't we? It is the ideal journey through managed migration, as opposed to those scenarios where something goes wrong or does not work out in the claimant's best interest and what happens then, and which groups are most at risk of them being in that scenario.

Fran Bennett: I think it was the Minister who said in a parliamentary answer, "Universal Credit is a different regime". We are not just talking about the difference between amounts of benefit, although those of course are crucial. It is something like conditionality changing, as I have just talked about, but also the distribution of income within the household of a couple changes because Universal Credit is all in one pot.

Also the way in which the benefit interacts with your earnings for those on tax credits changes, because we know from our research on Universal Credit and couples that the volatility of income for people on Universal Credit with earnings that vary, as well as the pay cycles problem, can be very significant. Of course more couples with dual earners are going to be brought into Universal Credit because of the changes in last year's budget. Therefore with two sets of earnings varying, that volatility changes as well.

Those are the kinds of things that are not necessarily going to be set out in what you are meant to be looking at before you either consider voluntarily migrating or you are managed migrated. It is not just the amounts of money.

Q16 **Nigel Mills:** First, I assume you all agree that if somebody is given their letter telling them they are going to be managed migrated the best thing for them to do is to engage with it and start a process, not forget about it and hope it goes away and that it might never happen. That is just going to end in a real mess a few months later, is it not?

Sophie Corlett: I can respond to that perhaps. One of the things we do know about mental health is that for those of us who have mental health problems, when we are not well, engaging with the post is something that we are not doing. It is not that we are deciding not to do something about it or hoping it will go away, that post might not be opened, no post might be opened. Maybe I might be in hospital and the post is not even reaching me.

There are genuine reasons why people might not engage with letters or they read a letter and then their anxiety levels go through the roof and they are just not able to deal with that. Those things are quite different. If you are well and open your post and engage with it, it is quite difficult to imagine yourself in a position of just letting things pile up, but that is the position that a lot of people find themselves in and they are not able to get themselves out of that very easily or indeed do not find the letter.

Q17 **Nigel Mills:** Accepting that some people will struggle to engage with it, the general advice would be if you get the letter you should engage with it unless you are incapable or—

Dominic Milne: Of course it would be. We would never recommend anything other than that. Of course we want people to engage. We would never advise people not to engage. The point is that they might not be able to.

I have done a lot of hearings in my time on overpayments of benefits that have come about because the wrong type of letter has been sent to people who are blind and partially sighted or indeed have mental health problems. I worked in mental health for 10 years. For whatever reason to do with their condition, people might not have access to that letter with the information it in or indeed they might not have the wherewithal to deal with it. I think that is the bottom line. Of course we would recommend people engage.

Fran Bennett: There is also the choosing of the best date to claim, which I raised in relation to Harrogate. When you receive a payment, for example, last payment of earnings or something like that, and when you claim Universal Credit can make a huge difference to how much you are going to get. I do not know what the DWP is going to do about choice of claiming date for people once they have started exploring the claim. If they just claim then it is going to be very different, whether they have

just received their salary payment or whether it is received after they claimed Universal Credit, within the next month.

Rebecca Rennison: That flags up a wider issue as well of flexibility within Universal Credit. We all talk a lot about the process of getting on to Universal Credit and we do not talk so much about life once you are on Universal Credit. I think that issue around rigid pay dates is something—I see nodding here—that we have all come across quite frequently. We would gladly come back on another day to talk further about that.

Q18 **Nigel Mills:** If you start thinking early you could do some research on the internet and try to work out when the best date to apply might be, but that could be quite a complicated assessment to do.

Rebecca, you said earlier that the Department's advice for someone who wants face-to-face support would be to try to see a work coach. This feels slightly unlikely to me for a potential claimant who has not been to the jobcentre, has no work requirement or is in work claiming tax credits and has no reason to go to a jobcentre. How likely is it that someone in that situation is going to try to get themselves to a jobcentre for a face-to-face appointment with a work coach that they would otherwise never see and will probably never see again after they have done their session?

Rebecca Rennison: It is more of a referral process, I suppose to give it its due, than a suggestion. It is people that come to Help to Claim and want that face-to-face support and we have to say, "Look, we have to refer you on. You need to go and talk to a work coach". We have expressed our concerns about how that feels to the individual. I think there has been some quite sensible points raised or very understandable points around it might feel intimidating to go and see a work coach and you might be concerned about the advice you are getting.

I am not saying the work coaches would not intend to give the best advice, but just from the individual's perspective, as you say, they might not have that relationship with the jobcentre and it might not be something they are familiar with. There have been issues around the advice that people have sometimes received from jobcentre staff and the accuracy of that. It just feels quite a different offer to come in—obviously I am biased, as Citizens Advice; I am sure colleagues in the panel would recommend their own organisations—and how that works in practice is yet to be seen.

Again, I think we can all understand the reasons why somebody seeking face-to-face support might be that very person that has higher support needs and therefore you would perhaps most want to be getting that independent advice. It is worth flagging that.

It was touched on earlier around commissioning support specifically for managed migration. There is budget set aside for that, I think to the tune of £113 million, and that has not yet been committed. I am assuming that as the Department progresses with its discovery phase and starts to get a clear idea of what support needs there are, it will move forward and look to commission some of that independent advice. Again, vested

interests: that is something obviously we would be keen to deliver, but again, I am sure other colleagues would also. Yes, so just concerns about what that looks like in practice for the individual.

For policy in general, it is always very easy to design in the abstract and to try to put ourselves there in the individual's position. We have been talking about it a lot today, that letter comes in the post, you have not heard anything from the Department for years and last time you applied it was hugely stressful and you went for an assessment with someone who perhaps challenged you on your disability and other things.

The whole process is something you want to forget. You get a letter in the post and that is hugely stressful in itself. You want some support, you contact the organisation you are told to contact to get support and they say, "I can't see you face to face", almost sending you back to the place that is probably making you feel anxious in the first place by saying, "You can go to the jobcentre to get that". Yes, just thinking through what it feels like to the individuals at the heart of the process as they go through it.

Q19 Nigel Mills: If you were advising the Department on how to move tax credit claimants on to Universal Credit, is this the process you would have chosen? I am going to renew my tax credits in the summer and then three days later I get a letter from a slightly different Government Department with "credit" in the name at the top asking me to now apply to something. I am going to be a bit confused, I am thinking I have sent this form back to you last week and it will actually be a different Department. It will all go horribly wrong.

Wouldn't you just be better one summer, when you do the tax credit renewal, just sending out Universal Credit forms and just moving people so they do not have to do it twice in quick succession? Wouldn't that just feel a more natural way of doing this for a cohort that is used to filling in forms and making a claim?

Dominic Milne: It would certainly make sense. Operationally, it would make far more sense in terms of what we have been talking about, in terms of taking things slowly and not necessarily just taking them from geographical areas. If you were to manage it properly and review it as you go along and then perhaps, yes, take different groups at a time, that is sensible and will confuse people less and cause least stress. That would probably make sense.

Fran Bennett: If you are talking about tax credits renewals being the time at which you would do that, then they have just missed that, so the next time would be April. It would be interesting if they did that because that would mean that people would have probably just had quite a high benefit uprating in their tax credits and then they would move to Universal Credit with that transitional protection. That would be an interesting time at which to put your proposal into effect.

Q20 Nigel Mills: We have kicked this around before, but should the Department, for the most vulnerable claimants at least, send out a

prepopulated application form for UC, based on the data the Department has, and say, "Can you confirm this is correct? If you don't, this is what we will use"? Is that a better system than thinking they should start completely clean with nothing filled in?

Fran Bennett: The Department says it has considered that and decided not to do it. Just to set out what its reasons are, I think it tried to do that with Employment and Support Allowance and it caused some problems. It is talking about two things: one is the danger of importing errors from the previous benefit system into Universal Credit and the other one is what I said before, that Universal Credit is a different regime. It wants people to consent to claim that rather than just automatically migrating them. There is a reason for that, because it is a different regime, as I have just been talking about. I am not arguing against it, but I am just giving you what the DWP has said are its arguments against doing what you are suggesting.

Q21 **Nigel Mills:** But for the most vulnerable claimants who will struggle to engage with this, would it at least give them a prompt as to what the answers might be?

Fran Bennett: I think other people are better qualified to answer that than I am.

Sophie Corlett: I do think there should be a responsibility on the Department. It is called managed migration and it would be good if it was more managed by the Department, but all the onus seems to be on individuals.

There is quite a lot of information that the Department does hold. Yes, there are concerns about whether that is the right information for Universal Credit or whether it needs to be checked again, but maybe that could be done further into the process, I don't know, but is there not more certainly that the Department could do in advance to support people? I don't know whether there are elements that could be prepopulated or whether there is just a more proactive way of offering support and making sure that people get the support that they need.

At the moment people have to ask for support. We are told it is not necessarily going to be offered, they will have to approach and say, "Is there support?" For people who haven't had much engagement, they might not know that there is support to be had. A more proactive role, in whatever way, would definitely be helpful because they do have quite a lot of information about people, so it is not unreasonable to expect them to act on the basis of the information they do have.

Rebecca Rennison: Again, it goes back to that question of design and who the system is designed around, doesn't it? I think if you are designing a system solely around the individuals, you would make a very strong case for automation and that you would just transfer people over to Universal Credit and as people hit natural renewal dates, yes, at that point you reassess and you check the Universal Credit rules apply and so forth. That is not the approach the Department is choosing to take.

It is an interesting question that has been touched on by colleagues around the role of automation potentially as a backstop: what do you do with individuals that aren't engaging? It feels a better offer to look at automation than the current proposal of effectively your benefits could stop if you have not engaged in the defined timeframe.

Dominic Milne: Just to say the information is there for the DWP to be able to identify the most vulnerable. I agree entirely with what colleagues have said. It would make perfect sense to find some other system that supports them. I think the bottom line, the fundamental point for me is that the way you take the fear out of this and the worry in the first place is not to remove legacy benefits—don't have a termination date, just allow that degree of leeway to make sure that a claim is fully determined, fully settled and ready to go, so they can be used to the new regime without having to worry about the money coming in.

Q22 **Debbie Abrahams:** I am going to pick up from both my colleagues, Chris Stephens and Nigel Mills. My first question is in relation to public sector equality duty. We know that of 900,000 people, over a third of those will be moved across to UC and will be worse off. We have heard from you that we don't really know who they are, though we have a pretty good idea, but out of that 900,000 we don't know what proportion will be sick and disabled people, lone parents and so on.

From what you said, there is no analysis, either from yourselves or the Government, or the intention to do this or make it public. In relation to the public sector equality duty, isn't this unlawful?

Fran Bennett: My understanding is the Government have to do an analysis. I don't know that they have to publish it. They say they are doing an equality analysis.

Q23 **Debbie Abrahams:** Anybody else?

Sophie Corlett: As to whether it is unlawful, that sounds like it is potentially a moot point, but I would love to know the answer. I do think this is a very non-transparent process and has been for many years. It is a process that very many people struggle with. It is a very important public service and it does not appear to be answerable to anybody. The lack of a regulator that is able to sort of step in and require stuff to be—

Q24 **Debbie Abrahams:** We have a regulator, don't we, in terms of the Equality and Human Rights Commission, in relation to the PSED?

Sophie Corlett: But maybe a regulator for the benefits system that could go in and ask any question and check out anything and expect transparency. I just think it is a very obvious omission in the whole structure.

Q25 **Debbie Abrahams:** That is a very important point, thank you. We have touched on the transitional protections and so on and you have raised some concerns about this, for example, in terms of deductions that might be made around that, but we also know from various High Court cases through natural migration that the Department has been taken back to

court for not paying the transitional protections. Do you have concerns about that?

Dominic Milne: Given that that has been the case, the cases that have gone back, the very fact that there is transitional protection here at all and there was transitional protection for the Severe Disability Premium shows that that is the right thing to do.

For me, and certainly from the Disability Benefits Consortium, it is odd that there isn't transitional protection for natural migrants and voluntary migrants as well, although I know it is difficult to administer because you have to work out legacy entitlement in a change of circumstances for a natural migrant, which would be difficult to then carry that across. I appreciate that, but none the less, for me it is a concern.

The fact that the transitional protection erodes so quickly and easily I think is not being fully taken into account. We have to be very careful, certainly as advisers, and we have to make sure that people are fully aware of that. On one level it does look good, it looks better that you have this transitional protection, but it is not going to stay with you very long probably. It will not take much to remove it.

Q26 **Debbie Abrahams:** Thank you, Dominic. Anyone else on that?

Fran Bennett: Just to say that transitional protection is household-based, not individual-based.

Debbie Abrahams: Good point.

Fran Bennett: As I said, the distribution of income within the household may change as a result of Universal Credit because it is all paid into one account. That is not taken into account in transitional protection. It is also of course static. In terms of the changes of circumstances, that may remove it or erode it.

Sophie Corlett: I would just add it is not available to new claimants. It is a transitional protection for people that move from legacy benefits to Universal Credit. If we think that transitional protection is because people need an income, then people who are claiming for the first time also need that income, so the levels of benefits overall, particularly for disabled people, are very low.

Debbie Abrahams: Yes, they are indeed.

Rebecca Rennison: Just three things on that particularly. Around the transitional protection, it does come back to that accuracy of the initial claim and the advice and support function within that to make sure that people are getting the right advice as they transition over. I will let colleagues come in and tell me if I have this wrong from reading through my rules on migration, but my understanding is there is sort of a window left open where if you have missed your three-month window, you can apply. I think you then have the further month that has been referenced

in the letter. I think it then stays open, but if you apply at that point, you lose your transitional protection.

Fran Bennett: I think it is if there is a gap between one benefit finishing and Universal Credit starting. That is how I understand it.

Rebecca Rennison: Yes, and I think that is worth flagging today because we are talking about those we are worried are not engaging in the process. If transitional protection really is there to deliver, we want it working for those most at risk in this process and that is potentially an issue.

Then it is just the timescale of how long transitional protection is going to last. With the CPI, where it is currently at, I think it is hard to predict at this stage what level benefits will be updated by next year, but a significant figure. That will eat into transitional protection very quickly and it would be useful to have some forecast from the Department about how long it foresees transitional protection lasting for some of these claims. I suppose it is how transitional is intended to smooth, but is it going to deliver that in practice?

Fran Bennett: Sorry, just to say it is quite interesting to know how the Department will be doing the calculation. At the moment if you have voluntary migration, it suggests people go to independent benefit calculators, because the DWP does not do that, because it does not want to take responsibility for that. The DWP will be calculating transitional protection, which in a sense is the comparison between what you have now and what you get on Universal Credit. It would be quite interesting to know how that is going to be done and who might be checking that or challenging that.

Q27 **Debbie Abrahams:** On safeguarding, we know that over the last 10 years there have been a number of deaths of vulnerable claimants, some in terms of taking their own lives or others just dying in appalling circumstances.

One such case springs to mind because he just completely did not engage and was written to. It is your point, Sophie, in terms of he just ignored the mail, so his benefit was stopped. I am talking about Errol Graham, who had schizophrenia and who died weighing five stone.

My real concern is that there will be other cases if we don't have a proper safeguarding policy. At Errol's inquest the Department said that it was doing more to improve its safeguarding policies and approaches. What is your understanding of how those have improved and do you think they are adequate for what we are going to see over the next few months to prevent similar such cases?

Sophie Corlett: Absolutely, this concern is what prompted us to write last week because we are concerned. It may be a very small number, but there may be people who slip through any sort of process.

Debbie Abrahams: Somebody's father, mother, daughter, son, they are people's loved ones, yes.

Sophie Corlett: These are real people who are struggling with their lives and who will struggle with the process and who may have their benefits cut off. In that case the Department was found not to have neglected its responsibility, which means that legally it seems that it does not have to pursue someone and find out what the issues are and make sure that somebody is supported. If it doesn't put that process in in advance, it doesn't look like it is going to put it in afterwards. Who is going to be finding who these people are and making sure that they are supported? What we don't want to see is this sort of situation replicated because there is no up front safeguarding in place.

Q28 **Debbie Abrahams:** The coroner from that case said they were not issuing a prevention of future deaths report because the Department was committed to improve its safeguarding policy. It has failed, as I understand it, to do that. What are the practical things the Government could do to ensure that people are better protected so that there is an understanding and knowledge of the most vulnerable claimants?

Sophie Corlett: We would like to see after the first month receiving another letter offering the support and pointing out what the support was, maybe after the second month getting a phone call, maybe in month 3 finding out if there is some sort of contact, a social worker or somebody that is appropriate that might go around and find out what the circumstances are, but a proactive scheduled ramping up of activity to be in touch with the person and find out what their circumstances are. It will be those people who are hardest to get in touch with who are most in need of support.

Q29 **Debbie Abrahams:** Absolutely, and no withdrawal of benefit until that contact has been made?

Sophie Corlett: Until that contact has been made.

Q30 **Steve McCabe:** Good morning. If I have it right, just under half—30 out of 80—of the Harrogate cases were deemed to be a success. On numbers like that, do you understand the Secretary of State's rationale for scrapping the 10,000 cap?

Fran Bennett: I didn't understand what happened at Harrogate in that way. I think because of the timing, they engaged with about 80 people and 38 had completed their claim to Universal Credit by the time the pilot was ended.

Q31 **Steve McCabe:** So it deemed that a success?

Fran Bennett: It is just a timing issue, I think. It would have engaged with people progressively over time. That is my understanding.

Dominic Milne: I think also Harrogate was voluntary. The people were engaging because they were voluntary. It wasn't a process where you were trying to contact people and get them to do this thing. In a way, it is very difficult to see how Harrogate was representative in an informative way because it was short-lived, obviously, and not the DWP's

fault, it was the pandemic, but it did not do enough and it did not explore enough to be useful.

Q32 **Steve McCabe:** It may be the Secretary of State knows something that I don't—I would think that is quite likely—but in her letter she talks about the experience of the last two years being her justification for moving to the discovery phase and no longer having to persist with the 10,000 cap, which she refers to as "the threshold".

I have no idea what that experience has been over the last two years, so I am assuming that the evidence she has other than that, whatever she has gleaned from the last two years, must be based on the Harrogate pilot. In those circumstances, do you feel reassured that she is on the right track and we do not need to worry about this 10,000 figure? I assume that was originally introduced as a safeguard to make sure we didn't get too far down this road with too many problems. Do you feel reassured that she is on the right track?

Sophie Corlett: I would say that one of the things that we have learnt from Harrogate and from the last two years is that systems need constant adjusting and therefore to stop at 10,000 and have a look at how you have done and whether adjustments need to be made would be very wise. My learning from the last two years would be that the 10,000 cap is more necessary rather than less necessary so that we can check what has happened and what else might need to be done. Yes, the lifting of a cap is not reassuring to us.

Fran Bennett: I suppose the other thing you could say is not lifting the cap, but also some success measures and some transparent and independent monitoring.

Steve McCabe: She says, "Given the experience of the last two years, we are now taking a different approach" and she goes on to explain why she is moving to the discovery phase. Do you think it would be helpful if she were to spell out what the experience of the last two years is that she is drawing on?

Dominic Milne: It would be very helpful, yes, because that is part of the problem here. The crux of the problem is the fact that there is very little information that we can see that would justify what the Department is doing now on the basis of what it found out from Harrogate. Yes, since Universal Credit came in, over the years there have been tweaks as it has gone along, and under pressure there have been tweaks in terms of how people can access the system and how they can make a claim, which the DWP was very reluctant about, but there have been some changes.

There isn't anything though that I would say has happened in the last two or three years that would mean that now all of sudden the Department is in this position where it can launch into a discovery phase with no accountability, it would appear, as it is going along or at least no promise of any accountability.

Fran Bennett: I think the Department would say the experience of the last two years is the experience of the surge in Universal Credit claims during the pandemic and of course the Department suggests that the system has coped very well. It was a different system during Covid because of the various easements that were made to both conditionality and other aspects of Universal Credit, so in a sense it is not quite the same animal as will be being experimented with with managed migration now.

Rebecca Rennison: Potentially quite a different cohort during the pandemic as well. I think this comes down the tension we have been coming back to throughout this session. I can understand at this stage the Department's enthusiasm to press ahead and complete migration to Universal Credit. It is just wanting to see what those stop/starts are, what its indicators are. You have touched on it, that we have the initial work in Harrogate, which is a small number of people.

Again, I was trying to think of different terms: proof of concept, would that be where you do a small number and you start to build up? The research colleagues around the table here will be able to describe it better.

We have the discovery phase now and it is just wanting to see what that ladder looks like. What is the plan for what comes next? There are 500. Will the Department share with us what the plan is? Is it going to be further regions brought in; is it going to be looking at different client groups? When is the Department going to say, "We are happy that we have looked at these different scenarios, these different cohorts. We have tested out face to face, all of this is in place. We can now offer reassurances that will go beyond the 10,000 and that safeguards are in place"? That is what we keep coming back to, that we want to see that information coming through from the Department.

Q33 **Steve McCabe:** We know there are about 2.6 million people on legacy benefits who are going to have to transfer. We have just heard about 900,000 of those will lose out and about two-thirds are people who are unlikely to naturally come off benefits. Apart from the risks that they lose out financially or it has a damaging impact on their health, are there any other obvious risks associated with the migration strategy the Secretary of State now plans to pursue?

Fran Bennett: What migration will do, as we have said, is move people to a different regime. Certainly in the research that the Institute for Policy Research did on Universal Credit and couples, one of the big issues was the administrative burden that Universal Credit is for people, particularly in relation to the cohort that is coming off tax credits, where there isn't really that administrative burden. I think it will expose more people to that kind of thing. In our experience, it was more women that did that administrative burden of managing both the Universal Credit claim and the household budget.

The other thing was this volatility of income, which was very hard for people to manage, particularly those people coming off tax credits with earnings and particularly those dual earners. People said, "It isn't budgeting advice that we need, it is an adequate income and an income that doesn't fluctuate all the time, making budgeting more difficult than it was before". I think the importance of a stable and secure income for people, rather than the super-responsiveness of Universal Credit, is a good message to carry forward, if you like.

Sophie Corlett: There were some additional difficulties with Universal Credit that people have raised with us: the digital by default element of it, which many people struggle with, and the monthly payments. You can get alternative payment arrangements, but you just don't necessarily know that those exist, they are discretionary. There are a number of difficulties with the process, some of which are available to be changed, but people don't necessarily know that that is the case.

Q34 **Steve McCabe:** Do you think we should stick to the target of trying to get everyone transferred by 2024? I was listening to the news this morning about the Foreign Secretary suggesting we might be heading for a recession. Do you think it is a good idea to be trying to press ahead with the 2024 target at the moment?

Dominic Milne: Definitely not, because there is a perfect storm of cost of living crisis with a very uncertain two years coming up, and this is the time when they are doing it. The idea of having that target, I am not sure what the point of that target is. All it does is it puts more pressure on the fact that the Department is not going to be able to keep an eye on the process properly as it goes along, which we have been talking about in terms of perhaps having some kind of break, have a gap, use it as a pilot rather than a process that is just going to spill on until the end of 2020. I think having that date is not helpful because it puts a lot of pressure on the DWP and it puts a lot of pressure on the claimants.

Rebecca Rennison: I think it is wanting the reassurance around getting it right. If the Department can get it absolutely right and deliver it to schedule, then credit and respect where it is due if it delivers that, but a priority is getting it right, because as we touched on, these are people's lives; it is people's incomes. The risk of doing it too quickly without the necessary learnings is huge. Again, it is a circular conversation, but coming back to wanting to see what those learnings are and what the safeguards are in place so that, yes, if they do want to scale it up, we know they can do that without risking anyone finding themselves in the middle of a cost of living crisis without an income.

Q35 **Selaine Saxby:** Good morning. I am going back to transitional protection. This is very much things that we might not have touched on, so if we have already covered it, we don't need to repeat. We are looking into understanding what you see as the barriers to identify and communicate with those who have a lower entitlement under UC than their previous level of support or no entitlement at all. Who would like to go first?

Rebecca Rennison: Just to clarify that, you said “barriers to communicating”?

Selaine Saxby: Yes, barriers to identifying and communicating.

Dominic Milne: They are all the ones that we encounter with our client groups all the time, either people with mental health issues or sensory impairment.

Selaine Saxby: Are there any specific ones around this group who are likely to perhaps get less or not qualify?

Dominic Milne: It is difficult to say if there is any specific group that would get less as opposed to another that I am aware of.

Rebecca Rennison: This is probably where we are each going to go back to our respective areas. For me, it is about the personalised conversation, getting advice, be it from ourselves or elsewhere, and being able to look at each individual set of circumstances so you can take into account everything, from what their savings are to any deductions.

We have touched on the fact that Universal Credit is a very different regime; it is paid differently and it is not always straightforward to draw generalisations on that. Therefore it is about that appropriate referral pathway so that when people get the letter in the post, for those who do engage straight out without necessarily needing any additional support at that stage, they recognise that this is potentially a big change in their lives and that there are benefits to seeking independent advice as they enter into it.

Dominic Milne: Yes. Just very quickly, within the client groups that we deal with there are people who engage, which is great—they engage, they come and talk to you and you can do something about it—then there are people who engage to a degree, but you then struggle to deal with them for whatever reason, and then there are people who just do not engage, who will fall between the gaps. They are the ones who are going to have the biggest problem.

Q36 **Selaine Saxby:** Fran, did you want to come in?

Fran Bennett: Yes, just to raise something that I have not raised yet, which is financial coercion within couples, which of course Women’s Budget Group and others are concerned about and which some people would argue Universal Credit can facilitate in terms of there being just one payment to the couple. It goes into an account of the couple’s choosing and it may be individual or it may be a joint account. There are the arrangements for split payments, as you know, which are discretionary and temporary.

I do not know whether the DWP has considered if there is any way in which they can identify a risk of financial coercion being exacerbated by moving couples to Universal Credit. I suspect not.

The split payments rely on claimants coming forward to ask for split payments, and then of course they have to show evidence that that is required and so on. It can be financial mismanagement or it can be domestic abuse, including financial coercion. It is an issue that I think is worth raising. I do not have answers to it, but it could be an at-risk group with whom it would be very difficult to communicate.

Our research on Universal Credit with couples had some people who had split up. This is small, qualitative research. I am not saying it is representative, but there were several for whom the finances of the Universal Credit system seemed to have been a contributing factor to the split because of the way in which finances were organised within the couple and the pressure that had given these people, who were now lone parents.

Q37 Selaine Saxby: The IFS identified an inequality for those who migrate before April 2023, when there is a substantial benefits uprating to account for the uprating in 2021 and 2022. These claimants will have their UC transitional protection, if there is any, calculated on a much lower figure than someone who is transitioned later in the year. Do you have any concerns or solutions around that particular observation from the IFS?

Sophie Corlett: Yes, that is a concern, and it is the same concern that relates to all benefits uprating, but obviously the transitional protection is there on a longer basis. Their main benefit will increase along with the whole system in 2023, but their transitional protection will remain at that lower level from this year. It will, by next year, not actually be that much protection. It will not be that much protection this year because obviously inflation is already above that rate, but it will be even less comparatively by next year. That is a concern.

Dominic Milne: I can see that feeding into a tactical advice point for stakeholder organisations, in as much as advising people on the timing of their claims if they get offered the chance to claim and whether they can delay it or hold off until the transitional protection is more generous.

Fran Bennett: I have already spoken about this and I completely agree with that point. Just very briefly, it is very pleasing to see that childcare costs changing will not affect transitional protection, as I understand it. That I think is a protection that should be appreciated.

Rebecca Rennison: There are two. You have touched on, "What can the Department do about it?" Within managed migration there is the need to look at what transitional protection means, particularly in this period of high inflation and particularly to stop unintended behaviours that the Department would not want to see in terms of claim patterns.

The broader question is something that I know certainly some of the other organisations here—I suspect all of them—have been raising. It is the fact that we uprate benefits yearly with a lag, we know, from September CPI. In times of low inflation that is not a problem. Right now

it is causing huge problems and a lot of people are struggling. The bigger fix is that they could have a better system for uprating benefits that more accurately reflected real-life costs. That is a whole other session.

Q38 **Steve McCabe:** Fran, I just wanted to ask this because you have referred a couple of times to how we select groups to migrate. The experience up until now has been geographical, as far as I know. Do you think we should do it another way? Two obvious ways would be by claimant group or by benefit profile. Do you think that would be a smarter move, in the sense that it would give us a better understanding of what is actually going on?

Fran Bennett: I have not considered that sufficiently to give you a very thought through answer. We did talk about the tax credit claimants being contacted at the time of their April 2023 renewal so that they might get the benefit of the uprating in April 2023. That is one idea.

It is quite hard to see practically how it might happen on other than a geographical basis, but I suppose my main point is to say be very conscious with a geographical basis that you may well have equality considerations within that. You may have an area which has lots of Employment and Support Allowance claimants or tax credit claimants, for example. The others may have better ideas on how you might phase it instead.

Q39 **Steve McCabe:** I am conscious of time. I will ask a couple more points and if anyone wants to chip in on that, fine. Just on the back of what Selaine asked there about protections in transition, do you think we should have some kind of phased protection within three or four months of a significant uprating to avoid this problem that you were describing earlier of migrating at the wrong time?

Dominic Milne: That would definitely be better, yes. If the transitional protection was not so rigid and subject to erosion so quickly and if there was some mechanism in there that allowed it to follow a slightly less ungenerous route, then it would be helpful, especially given the cost of living situation that we are in.

Rebecca Rennison: I think that comes back to wanting to see more mapping from the Department about what transitional protection might look like for different cohorts so that you get a sense of the timescale and how much of a smoothing process it will be. Yes, anything to mitigate against that. It is definitely not going to be a smooth process for benefit uprating next year on the current forecast rates. Anything that helps with that.

Fran Bennett: It is worth remembering that apart from childcare costs, changes in circumstances can also erode transitional protection. You might want to do something about that. I think it would be difficult to do something about it, but that is another consideration in terms of who is going to be affected and lose transitional protection.

Dominic Milne: If you rank yours up, you will lose a lot of that transitional protection very quickly.

Q40 **Steve McCabe:** Absolutely, yes. Let me ask you one last thing; I am conscious of time, Chair. We heard earlier from you that a lot of this rests on how sharp the work coach is going to be about understanding whether a person is worse off and what they need. If you were giving advice to the Secretary of State, what one bit of extra training does a work coach need to be able to give a better service to the people we are worried about?

Rebecca Rennison: We might all have different answers. It is probably a step before that. I think it is the question of whether the work coach is the right person to deliver that face to face.

Q41 **Steve McCabe:** Who would it be if it was not?

Rebecca Rennison: For example, otherwise we are the commissioned Help to Claim providers. People get sent to Citizens Advice to talk to them about their Universal Credit claim. If they want face to face, the expectation is that we refer to a work coach in the jobcentre. It is that cohort who need face to face—

Steve McCabe: That is a bit circular.

Rebecca Rennison: That element has been taken out of the service that Citizens Advice are contracted to provide and has been referred to the work coach. Our starting point is that we are not convinced that the work coach is the best-placed person. If the Department is committed to that model, I think the reassurance you are seeking is benchmarking it against the level of training that our advisers and others will have. Benefits can be incredibly complex. Getting the advice right and tailored to the individual is very important.

Q42 **Steve McCabe:** The reason why I put it that way is that all the discretionary decisions will rest with a work coach: for example, whether or not you are subject to any suspension and whether or not you are advised about Flexible Support. That is not something Citizens Advice could necessarily directly do, could it?

Rebecca Rennison: That is moving into, if you like, life on Universal Credit as opposed to the claiming process with managed migration. Yes, that would sit with the work coach. I am sure everyone here will have things to say; I can see colleagues are ready to come in. There are challenges around consistency in decision-making, as well as helping work coaches understand what they have the power to do. Childcare costs come up a lot, some of the flexibility they have there and local funds that they could be using. I will let colleagues come in.

Sophie Corlett: One of the things that we find over and over is that work coaches misunderstand the nature of disability and the impact that it has. I would suggest more training but also more contact with people, learning from people or being trained directly by people who have a range of different conditions and different life experiences, to explain that

while they might spruce themselves up and come in for the meeting, but that does not necessarily mean that eight hours a day they are capable of working.

Those misunderstandings come up again and again, where people have been tailored up by the work coach and put into conditionality when that is just not appropriate. There are all of those little micro-decisions made along the way by work coaches that are based often, we find, on incorrect assumptions about people and people's capabilities and a misunderstanding of the changing nature of people's conditions, particularly with mental health, where how you are today is not necessarily a predictor of how you will be tomorrow.

Fran Bennett: Two quick points. One is that I do not think work coaches sufficiently understand or convey to claimants the effect of one partner's earnings and conditionality on the other in couples. You have an individual conditionality, you have an individual earnings threshold, but you also have one partner's conditionality affecting the other and one partner's earnings threshold affecting the other because there is a joint earnings threshold as well. There needs to be more training on how to deal with couples.

Secondly, there was a very good scheme that Oxfam ran in Wales to train jobcentre staff in exactly what you are talking about, in terms of being trained by real people, if you like, having a participatory training by people with experience of poverty and claiming benefits. That would be fantastic to be rolled out throughout the UK rather than just staying in Wales.

Dominic Milne: I agree with everything that has been said. I do have some sympathy for job coaches because they might have a very good or decent relationship with the claimant, but they are thrust into a position often where they have quite a lot of power and they will be asked questions that they might not know the answers to. We do find cases quite frequently where, for example, a job coach has advised somebody not to bother with a mandatory reconsideration of their limited capability for work because they would not win at appeal and it would not be very nice. Things like that are obviously very frustrating.

With job coaches, if there was going to be a mechanism or something that would help it would be, for me, that a job coach would have some kind of access and would be able to farm that back somewhere else. They would be able to say, "Look, I'm not in a position to give you advice on this particular point. Go back to Citizens Advice", for example. They would have some kind of awareness of what is available in terms of support in the area and be able to link in to that. That way, their roles would be more defined and they would be separated from technical advice that they would not have the knowledge of.

Steve McCabe: That is great. Thank you.

Chair: Thank you very much. We are now a bit up against the clock so I

just ask everybody to bear that in mind. We have two more things we would like to raise with you. Chris Stephens first.

Q43 **Chris Stephens:** Thanks, Chair. I am going to refer the Committee to my entry in the register of members' interests, but specifically my role as Chair of the PCS Parliamentary Group.

My colleague, Steve McCabe, has just asked questions around work coaches, so Fran, can I ask you first? There was a recent IPPR report on supporting people with complex needs, discussing the crucial role of jobcentre work coaches in creating a more humane welfare system for such people. What is your organisation's view on the IPPR's proposed automatic prompts to claimants, for example, if a claimant has no savings, offering them an advance or making a rent payment direct to landlords standard practice?

Fran Bennett: I do not think I am the right person to ask about that. I think my colleagues are better placed to talk to you about that because they deal more directly with claimants and I am not familiar with the IPPR research. Those sound like useful prompts.

One of the things that we perhaps have not discussed in managed migration is the 12-month grace period for capital. When you say talking to people about savings, advances and so on, we need to remember that after the 12-month grace period for capital, people on tax credits now may not be able to qualify for Universal Credit because of that.

In terms of the support for claimants, I would prefer to leave it to my colleagues.

Q44 **Chair:** Can I just make sure that I have understood this properly? If you are on tax credits, there is no capital limit. You go on to Universal Credit. You are saying that after a year, if you have above £16,000 in savings, your Universal Credit would stop entirely, would it, or would there be some continuing transitional protection for you beyond the 12 months?

Fran Bennett: That is a good question.

Chair: Not to worry; we can—

Fran Bennett: What I mean is that people with capital are protected for 12 months. I think it says normal eligibility rules apply after that.

Q45 **Chair:** You would lose it entirely?

Fran Bennett: That is what it sounds like.

Q46 **Chris Stephens:** Sophie, there are various recommendations in this report from IPPR on work coach discretion. Is there a general view in your organisation whether there should be an increase in discretionary powers at work coach level or a decrease? For example, should work coaches be empowered to cancel a sanction if there is a risk of harm to the claimant?

Sophie Corlett: Our view is that anybody should be in a position to cancel a sanction if it is likely to bring harm to the claimant, certainly work coaches. I agree with Dominic that work coaches are in a very difficult position. They have a lot to deal with and they have not necessarily all had as much training as we would wish. We do find that their discretionary powers are not always used in the way that they might be.

The tailoring up that I have just mentioned is a good example. People could be tailored up into sanctions where it is not appropriate. Definitely, more freedom for them to remove sanctions or to support people would be good, but some of their discretionary powers at the moment, which can ramp up conditionality, are not helpful. We would like to see more safeguards go in before sanctions are made.

Q47 **Chris Stephens:** Dominic, the IPPR suggests replacing any first sanction with a meeting with a work coach to explain how conditionality has not been met and to clear up any misunderstandings. Is that something that your organisation would support?

Dominic Milne: Yes, I would support anything that improves the communication between the work coach—involving their manager as well, preferably—and the claimant, especially if the claimant also has the opportunity to get some kind of advice.

We frequently come across instances at RNIB where we produce letters for people to explain their situation for one of the reasons that was given earlier, which is that unfortunately, especially when you make a new claim and you still have not had your Work Capability Assessment, you are given more conditionality than you probably need. At that point it is not very fair on a work coach, I do not think, to have to understand the full impact of sight loss and how it might realistically prevent you from either looking for work or doing any work on a daily basis. Any form of communication that would allow that to happen would be welcome.

Yes, if they were in a position to remove sanctions that would have to be a good thing, although it would not be a good thing if, by extension, they were able to impose them.

Q48 **Chris Stephens:** My final question is to you, Rebecca, and that is on the proposed 91,000 civil service redundancies. I am thinking specifically of the impact that could have on Citizens Advice. There have been some damning comments, particularly from the Institute for Employment Studies, on the ability of the civil service to develop policy. Does Citizens Advice have any views on the effects these cuts could have on the policy issues we have been discussing today?

Rebecca Rennison: I think it is both working out resource for policy development and managed migration, but also we are seeing backlogs occurring with other benefit applications.

For example, when you are looking at health assessments we are seeing quite significant backlogs there at the moment. It is not for me to come

in on top level Government policy around redundancies, but what we would feed in in terms of what DWP is delivering is to make sure—again, we have talked a lot about the impact on individuals—that it has the appropriate staffing and resources in place. Whether that is delivering health assessments for people seeking to access benefits, whether that is people on managed migration, whether that is people going in to access a work coach, make sure the right person is there at the time that the individual needs them.

Because of the impact on the individual and how it feels to someone navigating the system to find significant delays or that they are not able to get the advice and support they need, it has to be at the centre of all of DWP's planning around migration and its benefit application and assessment process in general. The scale is such that we can too often forget how it feels to that one person as they go through the process.

Q49 Siobhan Baillie: We have touched on this already a few times; we can probably be brief. Do you want to say any more about the Department's commitment to internal review and external scrutiny, including data collection of any form?

Fran Bennett: The Social Security Advisory Committee is very aware of this and talking about it quite a lot, and I hope you might have a meeting with it as well. As I understand it, the Secretary of State or the Department suggested that a Minister should meet with the Social Security Advisory Committee once a quarter to discuss progress on managed migration with them and the Social Security Advisory Committee—rightly, in my view—has suggested that that is not sufficient for internal review and external independent scrutiny. Because of SSAC's function within Government, it needs to be thinking about a better alternative to that. It is possible that the Secretary of State has said that in her letter, but I have not had the opportunity to read it while I have been at the meeting.

I certainly think that more needs to be done about it. We have talked about some of the things, like a cap and pause before you go on to evaluate what has been done so far, which would be done by the DWP. I think the Select Committee is excellent at holding the DWP to account. The Social Security Advisory Committee should also be involved. I am not sure we have time to go into any more detail on that but I certainly think that at the moment that appears to be lacking somewhat.

Dominic Milne: The way to make the whole process something that people can trust, both claimants and stakeholders, is to be as transparent as possible. I have mentioned that in the last couple of years we have had a lot of consultation with the DWP and one of the key things I have been trying to do is to break down the barrier between claimant and DWP. There does seem to be a genuine willingness there for them to do that. They want to try to make that happen.

The only way that is going to happen here, I think, is if this process is carried out very carefully and, as Fran says, if there is a gap, there is a

break, and they look at what they are doing and make sure that everything is working properly, people are not falling through the net and people who are vulnerable are getting the support they need. In order to do that, they are going to have to be very transparent, I think.

Why would there be anything to hide? Why would they not let everybody see what was happening? If something is wrong in there, they can say, "Right, we are addressing this; we can see this is wrong". That would produce a far more practical and functional basis of trust and support for everyone concerned, I think.

Sophie Corlett: Yes, I could not agree more. The Department is really keen. It has said at every meeting that it wants to increase trust levels between claimants and the Department and the system. Transparency would be the first step along that way. It is difficult to know whether the reviews that are needed are in place where there is no transparency.

I go back to what I mentioned before about potentially a regulator being a very good way of doing it. For areas where they cannot be transparent proactively, a regulator can potentially come in, ask for things, have a root around in the system and just check out what is going on on behalf of the public.

Rebecca Rennison: Again, it is something that we are all very much agreed on. Transparency and data are important and very much welcome. I would just add that data, and timely data, are extremely helpful. It is very important in terms of transparency. Taking on board some of the Department's comments that it feels confident that it can deliver this and deliver this well, getting that data out in a timely fashion will offer that reassurance to organisations like ourselves and again we can put that out that more widely. It would be a welcome thing.

Q50 **Chair:** The old plan was to migrate 10,000, stop, review and then proceed. We are now not going to have the stop to review. How long a pause do you envisage there would have been if the old plan had been implemented? Are we talking about a couple of weeks or do you think it would have been a year? Do you have suggestions for very specific things that the Department could have done during the pause that you think would have been valuable, which we are not now going to have?

Sophie Corlett: I suppose it depends what they found out from the 10,000. If they found out from the 10,000 that everything was proceeding very smoothly and the processes and safeguarding they had put in place were working—10,000 being a goodly number to make that judgment on—to proceed to a fuller rollout presumably could be just as quick as they could set that up. However, if they found that people were falling through the net or that there were particular difficulties for particular cohorts, then obviously setting up some changes to safeguard those groups might take a little bit longer.

Alternatively, maybe they would roll out but develop as they went, excluding the particular groups that they found they were having

difficulty with and bringing those people on later. I can imagine that—so long as the data were good enough either to say that everything was good or to really pinpoint where it was not good—potentially you could move on quite quickly because potentially you could exclude the group where it was difficult in the initial rollout and bring them on later. Yes, it would depend on the findings.

Chair: That is very interesting. Thank you all very much indeed, you have given us very interesting evidence. There are lots of things that we can raise with the Secretary of State when she comes to speak to us on 22 June. If there is anything else that occurs to you after the session, please do email further comments in. I would be interested to see those. We are very grateful to all of you. That concludes our meeting for this morning.