

Scotland's Citizens Advice Network empowers people in every corner of Scotland through our local bureaux (CAB) and national services by providing free, confidential, and independent advice. We use people's real-life experiences to influence policy and drive positive change. We are on the side of people in Scotland who need help, and we change lives for the better

Summary

The DWP's response to the Coronavirus outbreak has included many welcome changes, benefiting those making a social security claim for the first time, but also those who were already supported by the UK's safety net. Many issues that social security recipients are still facing in accessing support are similar to the issues CAB clients told us about before the outbreak. Our recommendations aim to help DWP address these issues and are based on quantitative and qualitative data from CAB all over Scotland.

Administrative recommendations to address demand on DWP helplines and delays in making a claim.

1. Temporarily suspend the current ID verification process at the start of a UC claim, moving it to a journal task once the claim is up and running
2. Allow 'implicit consent' for CAB advisers assisting people with benefit claims.
3. Allow Universal Credit claims to be backdated to the point of initial contact with the Department as a matter of course.
4. Make all forms for Personal Independence Payment, Attendance Allowance and Disability Living Allowance available for download and return electronically; and extend the deadline for returning a 'How your disability affects you' (PIP2) form.
5. Issue clear advice around how the Coronavirus Job Retention Scheme and the Self-employed Income Support Scheme interacts with the benefit system.
6. Ring-fence resources for crisis communications so that changes around policy and practice can be passed on to stakeholders efficiently.
7. Publish detailed information on how the revised assessment process operates for claimants and advisers.
8. Make available alternative suitably supported telephony options to make *and maintain* claims and active promote them to all claimants.

Recommendations to help more people meet their living costs and prevent destitution during the outbreak

1. Suspend all direct deductions, including third party deductions, to repay debt from Universal Credit.
2. Introduce an additional, non-repayable payment during the first assessment period in a Universal Credit claim.
3. Increase the level of the Benefit Cap to reflect the increases in Universal Credit and Working Tax Credit.

4. Increase the level of the legacy benefits by £20 per week to reflect the increase to Universal Credit.
5. Introduce a Work Allowance for all who do not currently meet the criteria for the existing Work Allowance
6. Reduce the Taper Rate to allow workers to keep more of what they earn
7. A longer-term review of how the assessment period can be reformed to prevent extreme income fluctuation and take account of wages paid on a non-monthly basis.
8. For surplus earnings not to be carried forward throughout the COVID-19 outbreak, with a review of the overall system of surplus earnings.
9. Automatically remove the Minimum Income Floor to ensure that all self-employed people receive the same treatment.
10. Extend entitlement to Universal Credit to students, people subject to immigration control and people with capital exceeding £16,000; as well as increasing the rates people aged under 25 are entitled to.

More detail on these recommendations and the issues we hope they will address is below in response to the committee's specific questions.

Introduction and context of response

Citizens Advice Scotland (CAS) welcomes the opportunity to respond to this timely inquiry. The Coronavirus outbreak and social distancing restrictions have created unprecedented challenges. This is particularly true for the social security system where there have been at least 1.2 million new Universal Credit claims since restrictions began. CAS welcomes the DWP's rapid response to the crisis, and willingness to make changes to policy and practice to better protect people's incomes and cope with the increased demand.

Between 16 March and 12 April, Scotland's CAB network advised 9,621 clients on 19,654 benefits-related issues, representing 60% of advice provided in the period. This included notable increases in advice provided on contributions-based Jobseekers Allowance, Universal Credit and Working Tax Credit.

How well is the Universal Credit system working for the unprecedented numbers of new claimants?

Aspects of the Universal Credit system have coped well with the large influx of new claims. The digital infrastructure has, at the time of writing, been able to cope with the addition of over a million new claims. The DWP has committed all available staff resources towards processing new claims. The Government has also made welcome changes to policy and operational practice to cope with the consequences of the outbreak for individuals, and the knock-on impact on Universal Credit.

However, there have been areas where the UC system has not coped as well with a large number of new claims. The first weeks have seen excessive telephone delays to make a claim – particularly driven by the ID verification process. Whilst changes to practice have been made to attempt to address this, delays caused by verification, and long hold times were also common issues for CAB clients prior to the outbreak, suggesting that this could have been anticipated. Additionally, whilst the DWP is correct to prioritise redeploying staff resources towards new claims, this has notably drawn resources away from other areas and has had a noticeable impact on the timeliness, clarity and detail of communications to

claimants and the services that support them. In other areas, welcome but significant changes – such as the suspension of the collection of debt through UC – appear to have been made due to a shortage of staff.

From our experience of issues people have commonly encountered with Universal Credit since its introduction, there are likely to be a number of challenges that are yet to come with the new cohort of claims. For instance, around the five-week wait for a new claim, repayment of advance payments causing hardship and problems for people who are digitally excluded making and managing their claim.

Based on our experience of advising people on issues with the Universal Credit claims process, Citizens Advice Scotland would recommend a number of changes to policy and practice to allow the Department to better manage and cope with the unprecedented demands on the UC system, as well as protecting people's incomes during the crisis:

- **Temporarily suspending the current ID verification process at the start of a UC claim.** This potentially could be achieved by setting it as a Journal task once the claim is up and running. This would prevent the Verify service and phone lines from becoming overwhelmed and allow the Department to better manage the flow of cases.
- **Allow 'implicit consent' for CAB advisers assisting people with benefit claims.** Due to the current social distancing restrictions, it is not possible for clients to be physically present with an adviser when making inquiries, and given the current pressures on phone lines, this restricts the support that can be provided. Giving 'implicit consent' to trusted independent advisers would enable CAB advisers to better support people to make and manage claims, and would help reduce the volume of calls to the DWP helplines.
- **Allow Universal Credit claims to be backdated to the point of initial contact with the Department as a matter of course.** Whilst the Department does have discretionary powers to do this, a clear policy would allow people who are in a queue, or who require advice and support from a CAB to make their claim, to be reassured that this will not result in their claim being delayed if they return to complete their claim at a later date.
- **Suspend all direct deductions to repay debt from Universal Credit.** The DWP Debt Management line has been closed to prioritise resources elsewhere, suspending the collection of internal DWP/HMRC debt and as a result leaving clients unable to negotiate any changes to third party deductions. This suspension should apply to third-party deductions, as well as repayment of Universal Credit advances. This would also have the effect of ensuring that people can access more of their monthly Universal Credit entitlement to prevent hardship during the crisis.
- **Make all forms for Personal Independence Payment, Attendance Allowance and Disability Living Allowance available for download and return electronically; and extend the deadline for returning a 'How your disability affects you' (PIP2) form.** These measures would allow CAB advisers to support people to make a claim, without requiring the form to be posted out to them and returned, and would help free up the Department's resources at this time. Extending the deadline for return of forms from the current 28 days would enable people to get advice from a CAB in making their claim, remove any difficulties in meeting the deadline due to the impact of COVID-19, and lead to higher quality applications for decision-makers to consider when face-to-face assessments are not possible.

- **Introduce an additional, non-repayable payment during the first assessment period in a Universal Credit claim.** As further detailed in Citizens Advice Scotland's response to the Committee's inquiry on the Five Week Wait, the wait for a first Universal Credit payment, and people struggling to pay for essentials if their payment is reduced to repay an Advance Payment, has long been a concern for CAS based on evidence from local CAB. With the vastly increased Universal Credit claimant group, this is likely to be a considerable issue in the next weeks. A single, non-repayable payment, perhaps set at half the Standard Allowance, would alleviate problems for clients and prevent hardship at this time.
- **Increase the level of the Benefit Cap to reflect the increases in Universal Credit and Working Tax Credit.** As the Benefit Cap has remained unchanged an increased number of people are now affected by the Cap, including many people claiming for the first time. Those already subject to the Cap will not receive any increase to their incomes.
- **Increase the level of the legacy benefits by £20 per week to reflect the increase to Universal Credit.** In addition to ensuring that recipients of JSA, ESA, Income Support, Child Tax Credit and Housing Benefit receive much-needed additional income during the crisis, and ensuring parity with Universal Credit, this will help reduce the number of new UC claims by discouraging people from closing legacy benefit claims to claim UC due to it now being more generous.

Has there been any improvement in the significant delays that new UC claimants were experiencing in the second half of March?

Although we are unable to make a precise measurement from our statistics, it would appear that delays have somewhat reduced from the extreme waits in the second half of March, when CAB were reporting of clients who had spent several hours on hold, or had been attempting to make a Universal Credit claim for several days without being able to access the system. However, some significant delays were being reported into the second week of April, as this case from 8 April illustrates.

! **Citizens Alert:** A West of Scotland CAB reports of a client with several health conditions who was on hold to the Universal Credit helpline for three consecutive days before being able to get through to ask for a telephone claim as he has no broadband due to lack of money to pay bills. The Universal Credit helpline incorrectly told him they couldn't help him to do a telephone claim and to call Citizens Advice. The last resort was to help him make a claim by doing a conference call - if this wasn't done he would have been left without any money and no way of accessing money.

It is too early to assess the impact of the 'Don't Call Us, We'll Call You' policy announced on 9 April.¹

The hold times have also prevented support for people who are digitally excluded due to a lack of access to the internet, or poor digital skills. As they cannot access face-to-face advice from a CAB, the Jobcentre or public online access, this has meant that their claims have faced long delays, such as this case from 1 April.

¹ <https://www.gov.uk/government/news/don-t-call-us-we-ll-call-you>

Citizens Alert: A North of Scotland CAB reports of a client who has multiple health issues and disabilities to the extent that he had to cease employment and claim UC at the beginning of 2020 having never claimed means-tested benefits in the past. The client's difficulties are exacerbated by dyslexia. DWP recognised extent of difficulties and appear to have accepted and processed his UC claim via phone and home visit to verify identity. Whilst this was helpful at the time, it now gives rise to communication difficulties as client does not have an online UC account that he can log into and review progress of his Work Capability Assessment or raise queries. His only means of communication with DWP re his UC is by phone and due to the Coronavirus outbreak the UC helpline was overwhelmed with enquiries and is virtually impossible to use. As such, a system that was intended to provide benefit to very vulnerable people was virtually inaccessible and, as such, these vulnerable people have less support than ever.

As detailed above, **CAS recommends the DWP should allow Universal Credit claims to be backdated to the point of initial contact with the Department as a matter of course.**

How quickly are people who ask for Advance payments of Universal Credit receiving their payments?

CAS has no particular evidence of people experiencing unusual delays to receive an Advance payment after requesting one. However, we would expect to see some of the impact become clearer over the weeks ahead, as people wait for their first payment.

What lessons can be learned from the changes that have been made to the processes for verifying the identity of UC claimants? Are there any particular changes that should stay in place after the outbreak ends?

Although the Universal Credit identity verification process has faced unprecedented challenges, there were previously reported issues with the process. Changes to improve the speed and efficiency of the process should stay in place after the outbreak ends. In addition, further consideration should be given to people who lack suitable ID documentation, or require to verify their identity in person due to being digitally excluded.

Citizens Alert: A West of Scotland CAB reports of a client who contacted the CAB by telephone, client agreed that we could record details of his enquiry. The client, who lives with his mother and who currently has problems with his back which preclude him working, has been struggling with completing a Universal Credit application which he had commenced online using his smartphone. The client had attempted to verify his ID by calling the number provided, but had been unable to get through - having been told the line was very busy, he would get hung up on.

How do the needs of people claiming UC for the first time now differ from the needs of groups who've claimed UC in the past? How well is Universal Credit working for these new groups of people?

It is likely that many people claiming UC for the first time will have had no, or limited, interaction with the social security system. Large numbers of people have been made redundant despite the initiatives open to employers. Alongside this there is a substantial number of self-employed people now accessing the social security system for the first time.

In many ways the needs of the people now accessing the UC system are the same as people previously accessing social security. People are in need of state support to prevent financial destitution. It is likely that some will experience long-standing issues with UC such as an excessive five week wait for first payment. **CAS recommends the introduction of a standard additional non-repayable Assessment Payment should also be made available to claimants during the initial waiting period.** This could function in a similar way to the Assessment Rate of ESA that is paid prior to a Work Capability Assessment being conducted.

Those who are now claiming UC for the first time should not be assumed to have the digital access or skills required to access UC, although many will. The Department should increase resource and staffing of the telephony service to ensure that people can make and maintain their UC claim as simply as possible. **CAS recommends that alternative suitably supported telephony options to make and maintain claims to be available and actively promoted to all claimants.**

As time passes, how UC is working for these new claimants will become more apparent. We would welcome the opportunity to keep the Committee up-to-date through our reports from local CAB who will be providing invaluable advice to the public throughout the pandemic.

Are there any indications of how well the UC system will work for these claimants as they move into work in the short- to medium-term?

Claimant Conditionality

CAS welcomed the move by the Department to 'switch-off' work related claimant conditionality during the pandemic. **CAS recommends that work search requirements remain suspended whilst the economic impact of COVID-19 is experienced. Any move to restore work search requirements must be done with care.**

Work Allowances

As people move from a period of no employment back in to work, they are likely to experience the issues that CAB clients have been experiencing for some time.

Firstly, cuts to the original Work Allowance in 2015 significantly undermined the policy ambition of making work pay and will be felt by many low-earners as they start to work again and see their UC entitlement reduced immediately. Work Allowances allow a person to earn a certain amount without affecting their UC payment. Originally, all UC claimants had a Work Allowance, now only those with limited capability for work or a child/children are entitled.

Those without a Work Allowance lose 63p of their UC for every £1 they earn, from the first pound they earn. CAB have seen people not entitled to any UC but who would have been entitled to other payments under the legacy system. Under UC a person earning as little as £505 a month can be entitled to no

state support whilst experiencing extreme in-work poverty. Re-instating a Work Allowance for everyone should be a primary focus of the Government. **CAS recommends a Work Allowance is introduced for all who do not currently meet the criteria for the existing Work Allowance**

Taper Rate

The taper rate of 63% also hampers the ability of low-earners to increase their income with any increase in earnings almost offset by the concurrent cut to UC entitlement. For example, someone claiming UC with housing costs, working 16 hours per week on minimum wage would have a take home income of £817.49 per month (including UC payment of £237.60). If this person was to increase their hours to 25 hours per week, their take home income would only rise to £917.73 (including a UC payment of £48.77).² In this scenario someone increasing their working hours by more than 56% would only see a 12% increase in take home income. CAS are concerned the 63% taper rate undermines the ability of UC to make work pay. **CAS recommend the Taper Rate is reduced to allow workers to keep more of what they earn**

Assessment Periods and Fluctuating Incomes

The design of UC assessment periods can cause extreme income fluctuations, which may be exacerbated by a slow economic re-start fuelled by short-term and precarious work. The UC system was built on the premise that most people are paid a monthly salary, but we know proportionately low-paid workers are the least likely to receive their wages like this. Particularly, during the pandemic the nature of any available work is most commonly precarious with this likely to continue as the economy restarts. Those who have had hours cut, but have not been furloughed, could already also be affected by the assessment period design throughout the pandemic.

The inflexibility of the monthly assessment period can have severe financial implications. People receiving wages four-weekly, fortnightly or weekly can lose their UC entitlement, despite not actually earning any more from their employment.^{3,4} This issue, which can also be caused by employers changing pay frequencies has led to income shocks for low-paid workers through no fault of their own. In 2019, the High Court found that the way income is assessed through assessment periods is unlawful and could lead to 'nonsensical' situations.⁵ CAS believe that a person should not be financially worse-off by receiving their wages more frequently than someone paid on a monthly basis.

Assessment periods lead to fluctuating, unpredictable incomes, making it extremely difficult for workers to manage their finances, particularly those working part-time, seasonally or on zero-hour contracts. For example, a person working a zero-hours contact who is paid fortnightly might receive three wages in one assessment period. Their UC payment may be reduced to zero. The following month the person might receive only ten hours work across the whole month, but be left without additional income from UC. This person is left in severe financial hardship until their next UC payment and has extreme difficulty budgeting with both fluctuating wages and UC payments. The fluctuating nature of UC payments and the difficulties this creates for financial planning is likely to increase as the economy starts to open up

² Calculated using the Policy in Practice Benefit and Budget calculator available online at <https://www.betteroffcalculator.co.uk/#/free>

³ DWP, Universal Credit Different Earning Patterns and Your Payments (2019)

⁴ CPAG, Rough Justice (2019)

⁵ See CPAG, High Court finds DWP Universal Credit assessments unlawful (January 2019)

again. The case below is from prior to the coronavirus outbreak but demonstrates how the interaction between precarious earnings and UC can lead to significant financial hardship.

Citizens Alert: An East of Scotland CAB report of a client who worked for three weeks but had his earnings reported over two separate assessment periods. This has left the client without any UC income for two full assessment periods, meaning three weeks work has had an impact on eight weeks' worth of UC payments. The client had no alternative but to request foodbank assistance.

This is also an issue for people who want to take on work that is not secure. One CAB reported a person taking on a job for three weeks, but with earnings across two assessment periods. This meant the person had no UC for two months, for three weeks work and required foodbank support to feed themselves. **CAS recommends a longer-term review of how the assessment period can be reformed to prevent extreme income fluctuation.**

Support managing claim

CAS is currently funded by the DWP to deliver the Help to Claim service in Scotland through the Citizens Advice Bureaux (CAB). This service helps guide people through the Universal Credit initial claim process. Whilst Help to Claim supports a person to make their initial UC claim, it cannot support a person with claim maintenance. However, CAB across Scotland are visited by clients who are struggling to cope with the digital by default nature of UC. There should not be a false perception that those who are new to the social security system and who have been in work will all have the digital skills or access required to maintain their UC claim.

CAS are understanding of the high volume of calls the DWP has received, with a reported almost six-million in one-week, and the challenges faced in meeting this demand. We cautiously suggest that the significant demand placed on the helpline is likely indicative of the numerous issues people experiencing whilst making their claim. The Department should review what systems must be put in place for those who do not have digital access or skills to maintain their UC claim. **CAS recommends that alternative suitably supported telephony options to make and maintain claims to be available and actively promoted to all claimants.**

Re-starting Claims

CAB have also reported the issue of workers with fluctuating earnings – who drop in and out of being eligible for UC – having to make a new claim each time they become eligible. In a digital system with the objective of simplicity this adds an additional layer of complications for workers who might find themselves making repeat applications to UC.

Surplus Earnings

Surplus earnings are earnings £2500 over the amount where a person loses UC entitlement. Surplus earnings are carried over to the following month, where they count towards a person's earnings. If earnings (including surplus earnings) are still over the amount where payment stops, no UC payment is

received. If earnings fall below the amount where payment stopped, the total surplus earnings will decrease. Once the surplus is gone, UC payments resume. Surplus earnings are in place for six months. A SSAC report (January 2018) noted three main problems with surplus earnings. Firstly, to chip away at surplus earnings, people will have to reapply knowing they will not get a payment. Secondly, some will be better off if they don't apply every month (for example a seasonal worker could potentially come off UC for June, July and August and reapply in September with no surplus earnings). Finally, the SSAC note that the system was far too complicated.

Precarious work has been increasing for some time and is likely to persist due to the economic impact of COVID-19. The rules around surplus earnings could have significant financial and economic consequences. Where a person has the opportunity to earn more in one month, knowing this could have lasting financial ramifications for their UC payment but not knowing whether a consistent increase in work is guaranteed, a person could face a difficult financial choice over which they have little control. This will also have economic consequences. **CAS recommends that surplus earnings are not carried forward throughout the COVID-19 outbreak with a review of the overall system of surplus earnings.**

How well is the benefits system working for self-employed people who aren't able to access the Government's Self-employment Income Support Scheme? Is there a case for temporarily suspending the capital limits in UC during this period?

CAS welcomed the news that the Minimum Income Floor that functions in the UC system for self-employed people will be temporarily removed.

The Minimum Income Floor is based on the assumption that someone who is self-employed will earn at least what is equivalent to 35 hours per week at the National Minimum Wage (£287.35 per week). The only exceptions to this where a person is not expected to work for 35 hours per week – for instance, a person with a young child might only be expected to work 25 hours per week. It is not yet clear how the removal of the Minimum Income Floor will be done in practice and if this process is automatic or requires actioned by a Work Coach. **CAS recommends that to ensure that all self-employed people receive the same treatment, the Minimum Income Floor is automatically removed.**

Further to this, CAS have had long standing concerns over how the Minimum Income Floor affects some self-employed people, particularly those only able to part-time hours or with seasonal businesses. **CAS recommends that the Minimum Income Floor is removed permanently with actual rather than expected earnings used to calculate the UC entitlement of someone in self-employment.**

Interaction between the Self-employment Income Support Scheme and the benefits system

CAS note that currently there is a lack of clarity around how the scheme will interact with the benefits system. For example, there is a common perception that if a person applies for Universal Credit now then this will either be taken off the amount they would receive from the scheme or that they will be left with the requirement to repay the benefits received. There is no evidence to suggest this is the case. CAS understand that when someone receives their payment from the Self-employment Income Support Scheme, in most cases, this will raise their income to a level where they lose their eligibility to UC. As far as CAS understand there will be no retrospective dispersion and calculation of this payment over the months a person is receiving UC. **CAS recommends the Government issue clear advice around how the scheme interacts with the benefit system.**

CAS recommends that advice is also produced for those able to access the Coronavirus Job Retention Scheme, making clear that many people in-work on a low income will also be eligible for some element of Universal Credit support.

Clear and concise communication from the Department will be vital when scheme starts in June and people's UC claims end. CAS note that depending on the health and economic situation in June the scheme may need to be extending beyond three months. **CAS recommends the Government make clear that support for both the self-employed and employed will continue as long as necessary to prevent profound financial and social consequences for people across the UK.**

How effective have DWP's communications with the public been during this period?

Whilst acknowledging that the DWP has prioritised all available resources towards processing new claims, in a crisis situation we believe that good communications are critical. It has been difficult during the crisis to access timely and detailed sufficiently information on changes to policy and practice as a result of the crisis. For instance, the suspension of collection of overpayments was reported on a recorded message on the DWP Debt Management line several days before it was publicly announced, and there is still limited information available about the revised paper-based assessment process for Work Capability Assessments and Personal Independence Payment. It has also been difficult to access information beyond what is contained on the Understanding Universal Credit website⁶ or the Touchbase email⁷.

CAB around the country are working hard to support the Government's objectives and make sure people can access vital funds to prevent destitution and hardship. We would ask the government to help us help them by providing accurate, detailed and timely information for our advisers.

Whilst appreciating the pressures on DWP resources at this time, **CAS recommends that the Department ring-fences resources for crisis communications so that changes around policy and practice can be passed on to stakeholders efficiently**, including a facility for queries about changes in policy and practice from advisers to be resolved which would improve our ability to support DWP by providing accurate advice.

How easy is it for people to understand what they're entitled to claim? For example:

- Is it clear enough how the benefits system interacts with other forms of Government support during this period, such as the Coronavirus Job Retention Scheme?

- Is it clear enough how public health guidance interacts with the benefits system?

The interaction between the Job Support Scheme and the Self Employment Income Support Scheme and the social security system could be made clearer. A common query since the schemes' inception has been whether people who claim Universal Credit or 'New-Style' JSA would have to repay the payments they received, once payments begin to be made from the schemes. Similarly, a number of clients and advisers have queried if the payments from the schemes will be counted as income in the same assessment period, which would (temporarily) close many people's UC claims if a lump sum payment

⁶ <https://www.understandinguniversalcredit.gov.uk/employment-and-benefits-support/>

⁷ <https://www.gov.uk/government/publications/touchbase-dwp-news-about-work-working-age-benefits-and-services>

came in. **CAS recommends clear guidance on the interaction between the schemes and the benefits system is published.**

How is the assessment process for Employment Support Allowance working? Have there been any difficulties with obtaining medical evidence to support claims?

Evidence on how the revised paper-based Work Capability Assessment process, or the process for Personal Independence Payment has been limited, and it is unclear how many assessments have taken place since the announcement of the policy. There is also very limited information available about the revised process – for instance whether they are conducted by the DWP decision-maker or by the contracted assessment providers.

! **Citizens Alert:** An East of Scotland CAB reports of a client whose Work Capability Assessment was cancelled due to COVID-19. When it was cancelled via the phone he was given no explanation, though he assumed it was COVID-19 related. The CAB adviser confirmed with the client that was the case and the assessment provider would be in contact. The client has also been waiting six weeks on a PIP2 ('How your disability affects you') form arriving. He feels this is an unreasonable amount of time for a form to be posted.

CAS recommends detailed information on how the revised assessment process operates is published for claimants and advisers.

What impact has the outbreak had on people who were waiting for a Mandatory Reconsideration of a decision, or who were going through the appeals process?

It is not clear what the impact of the outbreak is on people making a Mandatory Reconsideration request, although decisions on these appears to have been de-prioritised. Tribunal cases going ahead without in-person hearing as shown by the case below.

! **Citizens Alert:** A North of Scotland CAB reports of a client who wished to appeal a decision not to award her PIP. The CAB helped her to complete the appeals forms. The client requested an oral hearing, but due to the Coronavirus outbreak, it was likely that this would have to be done by conference call.

Have people who were already claiming benefits when the outbreak began seen any changes to the support they receive from DWP?

Existing Universal Credit clients have experienced some delays in trying to report a change of circumstances, enquire after a delayed payment, or who do not have the digital skills or access to manage their UC claim online due to the lengthy hold times to call the Universal Credit service centre.

Citizens Alert: A North of Scotland CAB reports of a client who called the helpline to inform the CAB that he was trying to set up a UC account with his partner in order to claim Universal Credit. He required a code to link the two accounts but was unable to obtain one and he was unable to gain access to the UC help line. The CAB had advised three clients so far, that have had the same problem in trying to obtain link codes for UC accounts, including couples who had moved in together to provide mutual support during the lockdown. As UC claims require clients living together to link their accounts, this is quite a major obstacle to getting the benefits they are entitled to. The UC helpline is constantly overloaded making further advice impossible to access. The CAB could only suggest that the client kept trying.

Citizens Alert: A West of Scotland CAB reports of a client who does not have access to a computer or internet at home to be able to access his online Universal Credit account. The client normally attends a digital access project run by the CAB for assistance getting access online. The client needs to report the change in his housing costs to UC due to his rent having increased at the start of April, but will now have to call himself due to COVID-19.

Citizens Alert: A West of Scotland CAB reports of a client who was expecting a UC payment at the end of last month - the client receives payments twice monthly and last got a payment more than three weeks ago. The client has no other means of income and lived with his partner and their 10 week old child. They have been trying to contact the UC helpline but have been unable to get through, or have been disconnected when they have done.

However, people who receive Universal Credit have also experienced a number of positive changes to the support they receive – in particular the £20 per week increase to the Standard Allowance, and the suspension of strict work-related conditionality. We would recommend the DWP considers whether some of the changes made during the outbreak should become permanent if there they are successful.

Are people who are claiming benefits receiving enough money to cover their basic living costs during this period?

Citizens Advice Scotland welcomes the increase in the Standard Allowance of Universal Credit by £20 per week which will help to reduce destitution and debt accrued by CAB clients who receive it. In the long term, consideration should be given to the relative adequacy of the benefits system as a whole, but CAS would also recommend a number of short-term changes to boost people's incomes as a consequence of the increase in the Standard Allowance:

- **Introduce an additional, non-repayable payment during the first assessment period in a Universal Credit claim.** As detailed in our separate response to the Committee's inquiry on the Five Week Wait, the wait for a first Universal Credit payment, and people struggling to pay for essentials if their payment is reduced to repay an Advance Payment, has long been a concern for CAS based on evidence from local CAB. With the vastly increased Universal Credit claimant group, this is likely to be a considerable issue in the next weeks. A single, non-repayable payment, perhaps set at half the Standard Allowance, would alleviate problems for clients and prevent hardship at this time.

- **Increase the level of the Benefit Cap to reflect the increases in Universal Credit and Working Tax Credit.** As the Benefit Cap has remained unchanged an increased number of people are now affected by the Cap, including many people claiming for the first time. Those already subject to the Cap will not receive any increase to their incomes.
- **Increase the level of the legacy benefits by £20 per week to reflect the increase to Universal Credit.** In addition to ensuring that recipients of JSA, ESA, Income Support, Child Tax Credit and Housing Benefit receive much-needed additional income during the crisis, and ensuring parity with Universal Credit, this will help reduce the number of new UC claims by discouraging people from closing legacy benefit claims to claim UC due to it now being more generous.

Are there groups of people who need support but aren't able to access it through the benefits system? What should DWP be doing to support those people?

A number of groups have found themselves in need of support due to a loss of employment as a consequence of the pandemic, but are not entitled to support from the benefits system. This includes students, people with no recourse to public funds, and people with capital exceeding £16,000. In addition, people under the age of 25 are entitled to a reduced amount.

! **Citizens Alert:** An East of Scotland CAB reports of a client who was in contact before the Self Employment Income Support Scheme announcement, but he has only been self-employed for a short time so would struggle to get assistance even if that had been announced when speaking to him. The client and his partner were self-isolating, but as one was a student and one had recently become self-employed through a food delivery company has left them with no assistance whilst self-isolating due to coronavirus. It might have been helpful for the restriction on students to be lifted for UC claims as many students supplement their income with work and are now unable to. There is also the ongoing issue of food delivery companies forcing their employees to operate in a self-employed system has left them with reduced access to assistance when ill.

CAS recommends that the DWP consider extending entitlement to Universal Credit to students, people subject to immigration control and people with capital exceeding £16,000; as well as increasing the rates people aged under 25 are entitled to.

Are support organisations and charities able to access the resources they need from DWP to support vulnerable people? What more could DWP be doing to facilitate that support?

As detailed above, CAS would recommend the Department ring-fences resources for crisis communications so that changes around policy and practice can be passed on to stakeholders efficiently, including a facility for queries about changes in policy and practice from advisers to be resolve. This would improve our ability to support DWP by providing accurate advice.

The DWP has recently provided funding to Citizens Advice and Citizens Advice Scotland to continue to deliver the Universal Credit 'Help to Claim' service in 2020-21. This funding will allow CAB across Great Britain to provide free, confidential and impartial support to make a Universal Credit claim,

including gathering the required evidence, filling in the application or preparing for their first jobcentre appointment - with support available until the first full correct payment of universal credit is in place.

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