Grand Union Housing Group

Investing in the future

Reforming the UK's welfare system

1 Foreword

As a housing association managing 12,500 homes, we support huge numbers of customers on a daily basis as they seek to plot a route through the benefit system.

We've found that even with the help of our experienced support teams, the system can be almost impossible to understand. The level of benefit that people are then awarded is often not enough to live on.

At one time we were able to work through household budgets line by line until ends would just about meet.

Now we are finding that even after we maximise people's income and minimise their outgoings, they are falling behind every month. Many of these issues are undoubtedly the result of the level of support on offer being insufficient.

But, as we have set out, there are also large numbers of cases where administrative failings and nonsensical rules cause or compound the serious issues that people face.

Of course, I would argue that the level of benefit provided needs to be sufficient for people to meet their very basic outgoings.

The examples in this report show that this is often not the case. But I would also stress that the bare minimum we should expect is a properly functioning system.

More than a decade on from welfare reform, a large number of basic issues have still not been addressed. It is therefore clear that a fundamental review of the welfare system needs to be undertaken.

This report offers a number of recommendations, based on five principles: adequacy, accessibility, fairness, flexibility and collaboration.

Taken collectively, they offer a blueprint for a fairer, more compassionate social security system.

Aileen Evans, Chief Executive,
Grand Union Housing Group

2 Introduction

The pandemic and the current cost-of-living crisis have put vulnerable people and those on the lowest incomes under unprecedented levels of financial pressure.

In circumstances like these, we look to the social security system to provide a safety net, but it is clear significant gaps and weaknesses in provision remain.

It is now over ten years since the last significant changes were made to the system, with the Welfare Reform Act coming into effect in 2012. [1]

It was described by then Prime Minister, David Cameron as, "the most ambitious, fundamental and radical changes to the welfare system since it was created." [2]

Although fiscal restraint was a key driver behind the changes, each provision was also justified in other terms, with the programme seeking to meet the Coalition Agreement's promise to "simplify the benefit system in order to improve incentives to work" and to "encourage responsibility and fairness." [3]

Policy developments have continued in the years since the Welfare Reform Act, with the incoming Conservative Government in 2015 making further changes through a package of measures in its first Budget [4] and the Welfare Reform and Work Act 2016. [5]

A decade on from the flagship legislation, and with the welfare system under the spotlight again, we wanted to look at how these changes affected our customers and those living in social housing more widely.

We also wanted to explore whether further changes should be made to the system moving forward.

To showcase the real-life effects on our customers, we've included some case studies. In some cases, names have been altered to protect the individuals' identities and maintain confidentiality.

Based on our experiences over the last decade, we have also put together a number of recommendations that we feel would significantly improve the benefits system. More fundamentally, we have also suggested a number of principles upon which an improved system should be based.

Recommendation 1

A thorough, independent review of the welfare system needs to be undertaken. As well as examining whether the different elements of the system are delivering against their stated objectives, it should also focus on the experience of claimants and their advocates.

3 Principles

Adequacy

The level of support provided by the welfare system should be sufficient to meet the basic cost of living for individuals and families, including food, shelter, electricity, heating and clothing.

As the examples in this report illustrate, we regularly deal with people for whom the level of support provided by the social security system is manifestly inadequate, causing poverty and deprivation.

An independent assessment should be made looking at the adequacy of benefit payments, considering the system in the round including elements such as Council Tax Reduction.

Accessibility

The welfare system should be easily accessible to all individuals in need, regardless of their background or circumstances.

Social security in the UK is currently extremely complex to navigate. Despite a decade passing since welfare reform, it still spans a number of different administrative bodies.

For many claimants, particularly those who are older, or have physical or mental disabilities, Universal Credit is extremely difficult to navigate without assistance. Meanwhile, support for a range of other benefits is administered separately and is often not signposted to those who are likely to be entitled.

The process of accessing support through the welfare system should be simple and straightforward, minimising the burden on individuals and their advocates.

In a world where online and mobile banking is commonplace, it should not be complicated for individuals to understand their entitlement, access support and change their circumstances in a single location.

Fairness

The same level of support should be available to people in the same circumstances, regardless of where they live.

However, following the devolution of a range of benefits, including Council Tax Reduction, which was accompanied by cuts to council budgets, there is now a postcode lottery for certain elements of the welfare system. Local Housing Allowance levels also effectively restrict access to the private rented sector in many areas.

Similarly, policies such as the Bedroom Tax and Benefit Cap arbitrarily remove support to which individuals would otherwise be entitled because of circumstances that are beyond their control.

Flexibility

The welfare system should be flexible, giving claimants greater levels of power over how and when they are paid. This would include a simple, tick-box option allowing claimants to opt to have their housing costs paid directly to a landlord.

The system should also allow adjustments to be made as individuals' circumstances change in a simple way, and for the outcome of changes to be immediately clear.

Collaboration

The welfare system should involve collaboration between government, local authorities, housing associations, charities, and other stakeholders to ensure its effectiveness.

Due to their complex needs, many individuals require support and advocacy to access the support to which they are entitled. Despite this being commonplace for a significant number of people, there is an immense and repetitive administrative burden to the bodies that provide this support.

There should also be a greater focus on engagement and collaboration when changes to the system are designed, to ensure that those with expertise about user experience are able to have input at an early stage.

4 Our response

Welfare Reform has presented a wide range of challenges for our customers, with many people still struggling to navigate the complex system that has been created without support.

At Grand Union, we have responded by creating two in-house support teams - Welfare Benefits and Debt Advice.

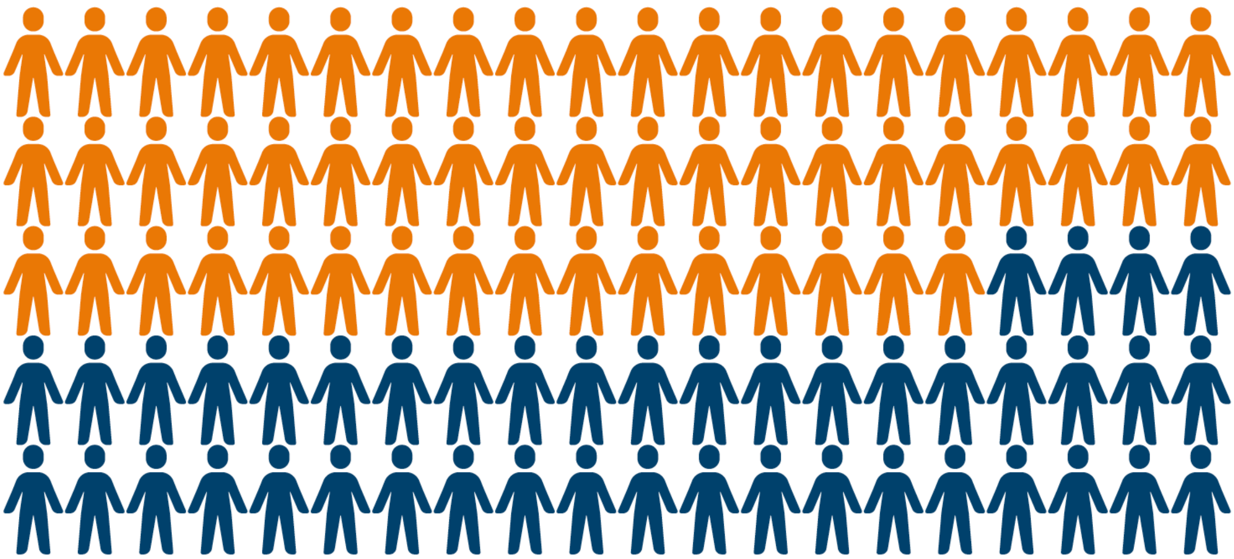
Together, these teams cost the organisation around £600,000 per year including overheads.

Our hugely successful teams have secured at least £2.5m per year in extra income for customers.

This has been achieved by advocating for their rights, helping customers make claims and challenging decisions on their entitlements.

Increasingly, much of their time is spent in challenging complicated decisions based around claimants' health, and on navigating the complex Universal Credit system.

As the cost-of-living crisis intensifies, our teams are working harder than ever to advocate for customers disadvantaged by poor administration practice.



56% of our customers tell us: "I have little or no savings that I can rely on in emergencies."

Sana's story

Sana is a single mum living with her son, Tariq, who is disabled and requires additional care and support.

She receives Universal Credit and Disability Living Allowance (DLA) for her son. She runs a car and has additional costs relating to her son's needs - these are for things like extra educational resources at home.

As you will see from the financial statements below, there are no high or unnecessary expenditures.

This statement also does not include extras such as children's school clothing or children's hobbies, because there just isn't room in her budget for it.

Sana cannot work because her child's additional needs require a lot of support from her and the school.

She has been assessed as having the maximum benefit possible, but it just is not enough to make ends meet.

Monthly income

Earnings	£0.00
Benefits and Tax Credits	£1,289.25
Total income	**£1,289.25**

Monthly flexible costs

Communication and leisure	£81.38
Food and housekeeping	£281.67
Personal costs	£13.33
Total flexible costs	**£376.38**

Monthly fixed outgoings

Rent	£118.06
Council Tax	£28.00
Other home and contents	£13.95
Utilities	£76.00
Water	£54.00
Care and health costs	£373.75
Transport	£306.00
School costs	£40.00
Pensions and insurance	£16.36
Total fixed outgoings	**£1,026.12**

On top of this, Sana owes £2,924.22 to the local council and £6,371.61 to other creditors, including a former landlord and college.

Even without paying debts back, at the end of the month Sana is left with -£113.25.

5 Bedroom Tax

The 'Bedroom Tax', also known as 'under occupancy charge,' came into effect on 1 April 2013.

It is a cut to Housing Benefit or the Housing Costs Element in Universal Credit for working-age social housing tenants living in housing that is deemed to be too large for their needs.

Affected tenants face a reduction in their eligible rent for Housing Benefit purposes of 14% for one 'spare' bedroom and 25% where there are two or more 'spare' bedrooms.

As well as seeking to reduce the Housing Benefit bill, the Government also claimed that the policy would "secure behaviour changes amongst social housing tenants" [6] by encouraging them to move into smaller properties if their homes had 'spare' bedrooms.

However, it was clear from the Impact Assessment [7] that the desired savings in Housing Benefit expenditure would only be realised in full if tenants did not move from the properties they were deemed to be under-occupying. [8]

The inescapable contradiction at the heart of this policy means that it was always destined to fail on its own terms. The Government has also lost a number of high-profile legal challenges [9], forcing it into several amendments to the scheme on what constitutes a 'spare' bedroom.

Our research previously found that, while some tenants managed to move or find work to avoid the Bedroom Tax, the vast majority (70%) remain affected by the policy and more have become affected since the policy was introduced [10].

Most remain unable to downsize due to a shortage of smaller homes. However, despite the shortcomings of the policy being evident for a number of years, the Bedroom Tax remains in place and its primary impact is to prevent customers – often vulnerable – from affording their rent.

70% of tenants remain affected by the Bedroom Tax, and more have become affected since it was introduced.

Bedroom Tax conclusion

An estimated £9.1bn in housing support was paid to private renters or directly to private landlords in England in 2020-21 [11], a figure that has escalated in recent years and one that dwarfs the estimated £500m saved by the Bedroom Tax.

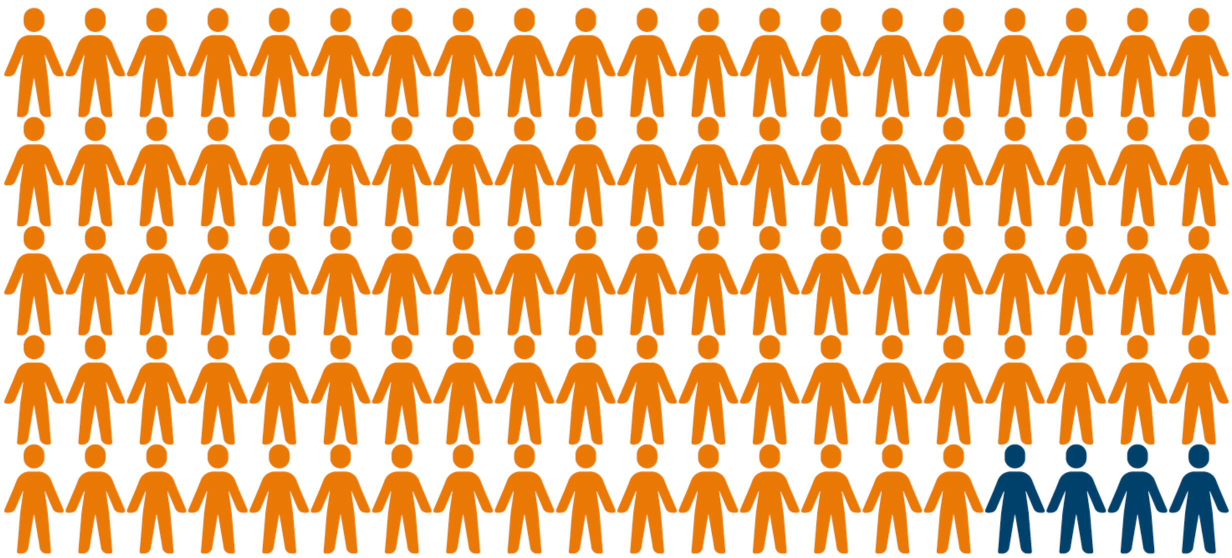
We would argue that saving money on benefits for rent would be better found by investing in social housing and finding a sustainable method of halting the rising cost of private rents.

Recommendation 2

A single digital platform should be created, allowing individuals to make and manage claims for Universal Credit and all other benefits. This system should also allow claimants to manage the frequency of their payments, the destination of the housing costs element and to appoint advocates or advisors to act on their behalf. Once appointed, advocates and advisors would also be able to access the system.

Recommendation 3

A review should be undertaken into the Discretionary Housing Payment system to ensure that there is a consistent approach across the country, and that adequate funding is provided.



Among our most vulnerable segment of customers, 96% told us: "I feel anxious most of the time."

6 Universal Credit

Introduced by the 2012 Act, Universal Credit (UC) is a payment to help with living costs that replaced the following benefits:

- Child Tax Credit
- Housing Benefit
- Income Support
- Income-based Jobseeker's Allowance (JSA)
- Income-related Employment and Support Allowance (ESA)
- Working Tax Credit

There was cross-party support for the core principle of UC [12] as a method of benefits administration.

We also believe that the basic idea is sound as it fits around many changes of circumstances, whereas the legacy benefit systems would have seen claims end.

In practice however, UC suffered from a "seriously bungled start" and has developed a terrible reputation [13].

Our view is that the rollout of UC has been an administrative nightmare with many extremely negative – but preventable – outcomes for vulnerable people.

At the beginning of the pandemic the number of UC claims increased massively. For in and out of work UC claims [14], between February and May 2020, the number of claims doubled, driving an almost £2.2m increase in total benefit recipients.

This massively accelerated the roll-out of this benefit. Around 25% of all benefit claimants nationally now have some element of UC in their claim, and for Grand Union customers this is in line with the average at 29% [15].

Despite intending to simplify the process, it has proven hugely complicated.

The whole raft of issues our advisors have seen over the years are far too numerous to list in this report, but some of the most common ones are listed on the following pages.

It should be noted that many are problems with the implementation of the scheme that could easily be solved in a way that would be cost-neutral to the taxpayer.

Almost one in three Grand Union customers now have Universal Credit in their claim.

Universal Credit

Common issues

Rent is included

Under the legacy Housing Benefit system, rent was paid directly to the landlord. Many new UC claimants don't realise that their benefit now includes money for their rent. This regularly results in customers inadvertently getting into significant rent arrears which can take years to clear, or on occasion they are never cleared.

Alternative Payment Arrangements (APAs)

APAs are for claimants who cannot manage their single monthly payment and there is a risk of financial harm. APAs can involve paying housing costs of UC as a Managed Payment direct to the landlord. They were originally intended for a very small number of claimants, but in reality, they are in place for over a quarter of our UC claiming customers, most of whom are in rent arrears.

Ending APAs and deductions

Whilst there is now a very good process for requesting APAs and third-party deductions for rent arrears, ending them is much more challenging. Our team has to call the Department for Work and Pensions (DWP) general enquiry line which regularly sees wait times of an hour per call. We're then told that this change cannot be made on the call and are directed to the landlord portal online where there is also no option. Attempts to resolve this through established escalation lists have also failed - it seems no-one at DWP knows how to handle this issue.

Third-party deduction rates

A third-party deduction is an amount that is taken from an individual's UC and paid direct to a person or organisation that they owe money to. However, third-party deduction rates are far too high, especially for rent arrears. Courts making an order on arrears will typically agree around £15-20 per month, yet in a similar case we may receive £64 per month from UC.

As a socially responsible landlord, we recognise that whilst this reduces rent arrears more quickly, it impoverishes the customer and ultimately can make their tenancy unsustainable.

Universal Credit

Common issues

A lack of clarity and understanding

UC has a 'self-service model,' but this is not explained to customers and for many vulnerable people this is unrealistic. As a result, numerous errors are made on claims because large parts of the process are automated. They rely on customers understanding what they are being asked for, despite there never being an explanation for why a particular piece of information is needed.

Challenges for those not paid monthly

Low paid work on UC only works when claimants are paid monthly. Many low paid workers are paid in other frequencies, which means their monthly entitlement varies artificially, making budgeting nearly impossible.

Relationship breakdowns

We often see the headache of 'untidy tenancies' - where one of the customers has left the home and is not paying towards the rent but has not removed themselves from the tenancy. The DWP is yet to develop a way of checking whether this issue exists.

It is left to the claimant to discover it is a problem when they only receive half the rent on the assumption the other tenant lives there and is paying. This is especially surprising, as it seems to demonstrate that it would be relatively easy for a couple to fraudulently claim separately, as no checks are done.

Customers missing out on what they're owed

Our advisors frequently see claimants miss out on money they are owed for a multitude of reasons. These include claiming UC when they did not need to, losing out due to claiming the wrong benefit and restrictive backdating rules. Often if the DWP make a mistake, the claimant misses out on backdating, requests for which fall on deaf ears.

Mixed-age couples

Mixed-age couples, where one is old enough to claim a pension and one is not, is a minefield to navigate even for trained and experienced advisors. The timing of actions is crucially important to ensure claimants do not lose out on entitlement.

Often if the DWP make a mistake, the claimant misses out on backdating, requests for which fall on deaf ears.

Universal Credit

Conclusion

However well intentioned the introduction of Universal Credit was, the failure to resolve what are often simple administrative issues continues to cause huge issues for some of the most vulnerable people in the country.

Grand Union customers who claim UC are more likely to be in arrears with us, and therefore also more likely to be in debt with other organisations.

Furthermore, where they are in arrears, the level of arrears is likely to be larger.

Recommendation 4

Third party deductions for rent arrears should be limited to 5% of the standard allowance, and total third-party deductions should be kept to 20% in total.

Recommendation 5

Advances should be payable at a maximum rate of 10% of the standard allowance, rather than being set by the amount taken divided by 24 months.

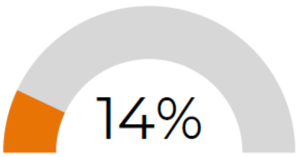
Recommendation 6

A review of the rules around mixed-age couples needs to be taken, to make this life change much easier to navigate and to ensure incomes are protected. Our suggestion would be trained DWP advisors take couples through this process to ensure they are given the right entitlements.

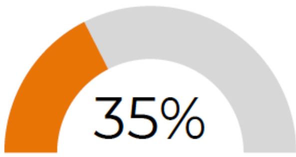
Recommendation 7

An independent review should be undertaken into the administration of the Universal Credit system, with a view to significantly improving navigability and the user experience.

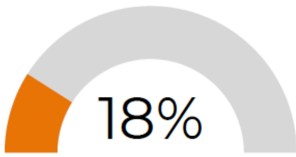
Universal Credit claimants are more likely to tell us: “I am in debt and struggling to pay it off.”



Non-UC claimants



UC claimants



Total for all claimants

Ian’s story

Not having the money to pay the bills can be stressful, especially when you only have one source of income.

It can be even worse when you’re caring for your adult son who has severe disabilities and struggling with your own health. Ian and his wife Carol found themselves in just this position after they had issues with claiming Universal Credit.

Their son, Andy, 32, has cerebral palsy and severe learning disabilities.

Up until two years ago, Ian worked as an industrial cleaner which would sometimes be seven days a week.

Unfortunately, he started to develop arthritis and other conditions meaning he couldn’t work. That’s when he decided to apply for Universal Credit.

Unfortunately, they came across issues almost as soon as they’d applied.

Ian's story

Discussing his case, Ian said:

"Because of Carol's role as Andy's full-time carer, she was entitled to be paid for it. She's paid every four weeks rather than monthly, which the Universal Credit people saw as an issue. It meant that, in their eyes, she would be getting paid double in a month sometimes. As a result, they'd stop my payments.

"My money covered the bills and without that it put loads of pressure on us. I called as I thought it was a mistake. It put us in a really tricky situation, and we were struggling like hell for a few months."

All of this put a real strain on Ian and the rest of the family. "I hate owing money and have always kept up with paying things on time. It drove me to distraction. I couldn't sleep or concentrate as it was on my mind 24-7.

"It affected me day to day, and I felt like my blood pressure was going through the roof and that my head would blow."

Thankfully Ian's eldest son then recommended they call Grand Union's Welfare Benefits team.

Not long after the call, Debbie, the Welfare Benefits Team Leader, noticed that Universal Credit hadn't been paying a carer's premium, leaving Ian and Carol £162 per month short.

Thanks to the support of Grand Union's Welfare Benefits team, the family is now over £500 per month better off, along with a back-dated lump sum of over £3,000.

But this took over a year due to the administrative mistakes made by DWP.

Had Ian been better advised by them in the first instance, a lot of the anguish and stress they went through could have been avoided. "Even now with the so-called double payments that can cause problems, we have enough to pay the bills, which is something that always concerned me. Thanks to Grand Union's help, we have more security now, and we feel happier."

Thanks to the support of our Welfare Benefits team, Ian's family is now over £500 per month better off.

7 Personal Independence Payments

Personal Independence Payments (PIP) were introduced to replace the Disability Living Allowance (DLA) to help with extra living costs for those with both:

- A long-term physical or mental health condition or disability.
- Difficulty doing certain everyday tasks or getting around because of their condition.

In its structure and levels of payment, PIP does not look radically different to DLA. However, the Coalition Government had concerns that the assessment process for DLA was failing to identify genuine need and that the costs were too high. [16]

Because of this drive to reduce costs, the introduction of PIP has added complexity, distress and confusion to the disability benefits system.

The assessment process, which most claimants go through, results in widely varying outcomes as they are far too subjective and too reliant on one snapshot view of the claimant. The claim process also takes far too long, typically about six months.

Our Welfare Benefits advisors spend a significant proportion of their time supporting our customers with claims, challenges and appeals for PIP claims, including successful representation at first-tier tribunal hearings. 18% of the income we secure for customers is via PIP alone.

Nationally PIP claims have increased substantially – from 1.7m claimants in February 2013, to 3m in July 2022. [17] Increasingly PIP claims have intersected with other benefits, especially, since 2018, with Universal Credit.

Recommendation 8

The assessment process for PIP and Work Capability Assessments (WCA) need to be overhauled. There should be much greater reliance on medical evidence, and less on inaccurate and contentious snapshot assessments.

New fit notes should be developed to cover more about what restrictions on work and personal life patients have as a result of their ill health or disability.

8 Two child limit

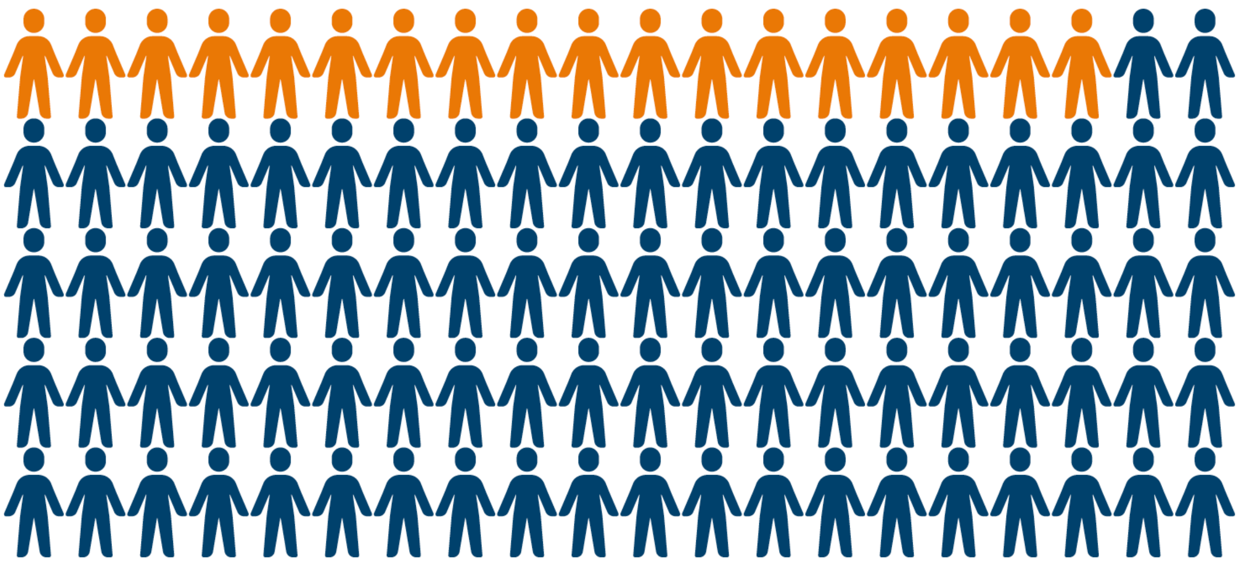
Universal Credit will no longer pay an additional amount for a third or subsequent child born on or after 6 April 2017, unless special circumstances apply. The impact of the two-child limit is still not fully known.

However, if it was intended to prevent families from having more than two children in case they fall on hard times, it has manifestly failed.

In many cases, the first that parents know of the policy is when they seek to claim UC for their third child. The only practical effect of the policy that we have encountered is that it serves to further limit the budget of families, putting children into poverty.

Recommendation 9

The two-child limit should be abolished. Alternatively, the same exemptions that apply to Benefit Cap should be extended to the two-child limit, with both additionally providing an exemption for customers who have been found to have 'limited capability for work'.



18% of our customers tell us: "I often buy items I need via 'buy now, pay later' services."

9 Council Tax Support

Council Tax Support - also known as Council Tax Reduction - is a benefit to help those on a low income or claiming certain benefits to pay their Council Tax bill. [17]

It was introduced in 2013, when the national Council Tax Benefit was abolished. Instead, the administration of the support was devolved to local authorities.

A 10% cut in the budget was made at the same time - meaning that many people would not be required to pay an element of their Council Tax. A significant and continual cut in the funding provided for local authorities has turned Council Tax into an expensive bill that even those who should be eligible for support cannot afford.

There is also an added postcode lottery given that councils' policies vary widely. In practice, variations suit councils' budgets rather than the needs of local people.

Some of our customers get support with the whole bill if they are on a low income, others still have to pay 25% of it from their minimum benefits.

This inevitably leads to Council Tax arrears, which can quickly escalate to enforcement agents attempting to remove goods the customer does not have, to pay a bill they cannot afford. Anyone our Debt Advice Team works with typically has Council Tax debt.

Recommendation 10

Council Tax Support should again be considered against 100% liability across the country. Savings could instead be found by limiting support for higher council tax band properties and increasing the rates those bands pay – which some councils have managed to do, for example, Bedford Borough Council.

Geoff's story

Geoff lives alone and has a mild learning disability. Regardless of this, he is not able to get Personal Independence Payment (PIP) as he is considered 'too high functioning'.

He has no additional, high, or unnecessary expenditure and receives Jobseeker's Allowance. He travels to the Job Centre once a fortnight in pursuit of work. He likes to keep his hair tidy, so has it hair cut every six weeks - this is his only 'luxury.'

Just paying basic bills is overstretching him, leaving him without any disposable income. He rang our Debt Advisor last week in a panic because his gas and electricity have gone up. We looked at his budget and it won't cover it.

He asked whether it was okay to stop attending the Job Centre to save money on transport, but this could see them sanctioning his money if he doesn't attend.

Monthly income

Earnings	£0.00
Benefits and Tax Credits	£677.82
Total income	**£677.82**

Monthly flexible costs

Communication and leisure	£10.00
Food and housekeeping	£130.00
Personal costs	£20.00
Total flexible costs	**£160.00**

Monthly fixed outgoings

Rent	£370.73
Council Tax	£22.27
Other home and contents	£13.00
Utilities	£86.66
Water	£6.00*
Transport	£21.67
Total fixed outgoings	**£519.97**

*Water cost currently unknown

On top of this, Geoff also owes £1,073.79 to the local council for unpaid council tax, and has additional debt with other creditors or £2,670.98.

Even without paying debts back, at the end of the month Geoff is left with -£2.15.

10 Benefit rate freeze

The benefits freeze - announced in the 2015 Budget - saw most working-age benefits and tax credits frozen for four years, rather than increasing in line with inflation.

This policy, which amounted to a huge cut in benefit rates in real terms over the four years, means that applicable amounts no longer reflect the reality of what is needed to cover basic costs.

While the recent uprating of benefits in line with CPI inflation was welcome, the cost of essentials including basic food items and energy bills has risen even faster in many cases.

It is inevitable that claimants on basic rates of benefit will get into debt just trying to afford the very essential costs of living.

Where food banks were previously a niche, they are now widespread and embedded parts of local communities, often being supplemented by community larders and other schemes, because benefits do not meet basic need.

The benefit rate freeze and the subsequent rises below or in-line with inflation have entrenched poverty among many of our customers. A significant 'catch up' payment is required if the basic principle of adequacy is to be met.

Recommendation 11

Benefit rates should be determined by current costs of living relevant to claimants – based on costs for basic food, energy prices, communication and transport, with future rates linked to inflation for these types of expenditure specifically.

This policy has entrenched poverty among many of our customers.

11 Conclusion

Simply put, the UK welfare system currently fails to meet the five principles that we set out at the beginning of this report: adequacy, accessibility, fairness, flexibility and collaboration.

Before Welfare Reform, benefits were generally based on need. They were supplemented by some benefits funded by claimants' past national insurance contributions.

Now, the policies that we have discussed throughout, and the many administrative issues with Universal Credit, have resulted in a situation where the means-tested benefit system no longer covers basic needs or even considers them.

Instead, we increasingly see that most claimants are facing impossible budgeting decisions - a situation that continues to get worse.

A decade on from Welfare Reform we believe that it is once again time for a review of our benefits system.

The recommendations in this report offer an opportunity for a new and fair settlement for claimants, value for money for the taxpayer and an administrative system that is fit for purpose.

12 Recommendations

1. A thorough, independent review of the welfare system needs to be undertaken. As well as examining whether the different elements of the system are delivering against their stated objectives, it should also focus on the experience of claimants and their advocates.

2. A single digital platform should be created, allowing individuals to make and manage claims for Universal Credit and all other benefits. This system should also allow claimants to manage the frequency of their payments, the destination of the housing costs element and to appoint advocates or advisors to act on their behalf. Once appointed, advocates and advisors would also be able to access the system.

3. A review should be undertaken into the Discretionary Housing Payment system to ensure that there is a consistent approach across the country, and that adequate funding is provided.

4. Third-party deductions for rent arrears should be limited to 5% of the standard allowance, and total third-party deductions should be kept to 20% in total.

5. Advances should be payable at a maximum rate of 10% of standard allowance, rather than being set by the amount taken divided by 24 months.

6. A review of the rules around mixed-age couples needs to be taken, to make this life change much easier to navigate and to ensure incomes are protected. Our suggestion would be trained DWP advisors take couples through this process to ensure they are given the right entitlements.

7. An independent review should be undertaken into the administration of the Universal Credit system, with a view to significantly improving navigability and the user experience.

8. The assessment process for PIP and Work Capability Assessments (WCA) need to be overhauled. There should be much greater reliance on medical evidence, and less on inaccurate and contentious snapshot assessments. New fit notes should be developed to cover more about what restrictions on work and personal life patients have as a result of their ill health or disability.

9. The two-child limit should be abolished. Alternatively, the same exemptions that apply to Benefit Cap should be extended to the two-child limit, with both additionally providing an exemption for customers who have been found to have 'limited capability for work'.

10. Council Tax Support should again be considered against 100% liability across the country. Savings could instead be found by limiting support for higher council tax band properties and increasing the rates those bands pay – which some councils have managed to do, for example, Bedford Borough Council.

11. Benefit rates should be determined by current costs of living relevant to claimants – based on costs for basic food, energy prices, communication and transport, with future rates linked to inflation for these types of expenditure specifically.

13 References

[1] Welfare Reform Act 2012 (legislation.gov.uk)

[2] PM's speech on Welfare Reform Bill - GOV.UK (www.gov.uk)

[3] The Coalition documentation - GOV.UK (www.gov.uk)

[4] Summer Budget 2015 - GOV.UK (www.gov.uk)

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[6] Under-occupying social housing: Housing Benefit entitlement (parliament.uk)

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[14] Universal Credit statistics, 29 April 2013 to 14 July 2022 - GOV.UK (www.gov.uk)

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[16] The aims of ten years of welfare reform (2010-2020) (parliament.uk)

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We've been in business for over 25 years and provide 12,500 homes for more than 27,000 people across Bedfordshire, Buckinghamshire, Northamptonshire and Hertfordshire. We're an £85 million turnover social business with 400 staff.

Our mission is more homes, stronger communities, better lives. We build affordable homes, provide personal support, and help people to learn, work and be healthy.

We're a financially stable and innovative not-for-profit organisation that believes in partnership and collaboration. We plan to build 1,959 more new homes in the coming years to play our part in ending the housing crisis.

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