



Rt Hon Amber Rudd MP
House of Commons
London
SW1A 0AA

14 January 2019

Dear Ms Rudd

Firstly, we would like to welcome you to your new post of Secretary of State for Work and Pensions.

The National Association of Welfare Rights Advisers (NAWRA) was established in 1975 and represents over 200 organisations including local authorities, charitable bodies, trade unions, solicitors and other organisations that provide legal advice on social security issues. Our aim is to help improve welfare rights policy and legislation, alongside identifying and sharing good practice amongst our members.

NAWRA was pleased to note your expressed willingness to address concerns over how universal credit is impacting on claimants, particularly those who are more vulnerable, and your commitment to working with experts in the field.

Our members are providing frontline advice to claimants across the UK and we therefore have a wealth of experience. You may be aware that we have given both written and oral evidence on the realities of universal credit to the Work and Pensions Committee, but we thought it would be helpful if we outlined some of our main areas of concern here:

- The need to make alternative adjustments both for making a claim, and for maintaining a claim, for those who are unable to use the online service;
- The lack of implicit consent as currently operates in the legacy system. Carrying this through would enable advisers to resolve problems more quickly, which would be a benefit to claimants and to DWP staff;
- A need to identify vulnerable claimants and ensure no sanction action is taken against them without contact having been made;
- The need for payments for children to be paid to the main carer. NAWRA is pleased to note your commitment to look at this issue;
- The reduction in financial support under universal credit to both disabled adults and children. The only disabled people who are better off are those who were

in the support group for ESA but were not entitled to the severe disability premium. All other disabled people, including disabled workers, are worse off under universal credit;

- The failure to provide transitional protection to those who naturally migrate, particularly for households where there is a disability, as highlighted above;
- The reduction in work allowances since 2016. NAWRA would like to see work allowances restored to the pre-2016 level; and
- The need to reconsider the operation of the monthly assessment period rules as they create anomalies and unfairness, particularly for those whose earnings or rent does not fit the monthly cycle.

We would be more than happy to meet with you to discuss any of these issues further or to provide further additional clarification and evidence if that would be helpful.

Thank you for giving this letter due consideration and please do not hesitate to get touch.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Alan Markey', with a large, stylized flourish extending downwards and to the right.

Alan Markey
Chair