



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

20 June 2019

Dear Ms Rudd

Re: Date of claim for universal credit

Thank you for the reply from Robert Watling on 13 June 2019.

NAWRA is extremely disappointed with the response for the following reasons –

1. It states that the DWP has ‘not contracted but rather grant funded Citizens Advice’ to provide Help to Claim. However, the ‘grant agreement’¹ has all the hallmarks of a contract – offer, acceptance, consideration and intent to create legal relations. NAWRA would argue that you have contracted Citizens Advice to provide the Help to Claim Service.
2. Previous contracts with the local authority enabled the local authority to protect the date of claim under regulation 10(1)(b)².
3. It states ‘it is difficult to understand what a potentially unverifiable and more widespread system of backdating to first contact through third parties might look like’. NAWRA is not asking for the date of claim to be backdated to first contact with any third party – only with the Help to Claim service that you have contracted for Citizens Advice to provide.
4. It states the personalised support from Citizens Advice ‘helps to ensure that there is no need for a claimant to have their claim backdated to the point of contact, because instead they are able to access immediate support to make their claim in a timely manner’. This is not correct - claimants seeking help through Help to Claim are often not able to submit their claim on the first date of contact.

¹<https://www.whatdotheyknow.com/request/523455/response/1262092/attach/2/Grant%20Agreement%20CA000.pdf>

² as confirmed in evidence to the Scottish Social Security Committee on 16 May 2019
<http://www.parliament.scot/parliamentarybusiness/report.aspx?r=12106&i=109513>

As the letter states, the Help to Claim service is 'specifically designed to provide support to the most vulnerable'. Depriving those claimants of their first few days of benefit will only lead to further destitution.

NAWRA asks that you reconsider your approach as a matter of urgency.

Daphne

Daphne Hall
Vice Chair, NAWRA