



The Work and Pensions Select Committee  
House of Commons  
London  
SW1A 0AA

17 March 2026

Dear Members of the Work and Pensions Select Committee,

**Re: Urgent Concerns Regarding Universal Credit Managed Migration and the Impact on Vulnerable Claimants**

We write collectively as the National Association of Welfare Rights Advisers. Through our front-line experience supporting claimants through Universal Credit (UC) Managed Migration, we have observed systemic issues that place vulnerable residents at significant risk of harm, destitution, and homelessness.

The advice organisations we represent work closely with vulnerable residents, including those with mental health problems, cognitive impairments, chaotic lifestyles, homelessness, substance misuse issues, and those with no support networks. Advice organisations within Local Authority (LA) and health settings report seeing particularly concerning cases. It is from this vantage point that we raise serious concerns regarding the current design and delivery of the UC Managed Migration programme.

The Department for Work and Pensions stated their focus is on safeguarding claimants and ensuring a smooth, safe transition with uninterrupted support. The cases we are seeing raise serious concerns around effectiveness of safeguards in the migration process which depend on discretion and administrative practice, rather than as rights that claimants can exercise. The protections for UC migration are unlike protections in previous migrations which provide no pathways to address financial loss where protections for claimants with complex needs or safeguarding needs weren't addressed.

The challenges we outline below are not isolated incidents; they are patterns being observed across multiple authorities and advice agencies nationally. We therefore urge the Committee to review these issues and consider recommending immediate changes to safeguard the most vulnerable.

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## **1. Safeguarding Failures and Lack of Effective Case Conferencing**

Across all participating authorities, a consistent concern is the poor quality and limited effectiveness of DWP safeguarding referrals. Referrals frequently:

- Contain minimal information on health, risk, or financial vulnerability
- Do not reflect the severity of risk created by the termination of legacy benefits (primarily ESA and HB)
- Fail to meet LA Section 42 Care Act thresholds due to insufficient detail
- Result in a “hand-off” rather than a collaborative approach

Local authority safeguarding teams report that DWP referrals often present rent arrears and termination of HB as “financial issues”, rather than risk factors that could lead to eviction, street homelessness, or mental health deterioration. They lack sufficient information on health issues and other complex needs to support the LA to identify when Care Act Duties apply.

Additionally, claims are frequently terminated before first payment, often due to failed ID verification, with no safeguarding referral at all.

Below are examples of very vulnerable claimants not moved across to UC safely who needed a collaborative approach.

**Case study 1:**

- Client has schizophrenia. Client’s ability to engage has been really poor since onset of significant mental health changes.
- HB and ESA stopped in May 2025 due to UC migration and him failing to claim within the required timeframe.
- His sister became aware of this, and she helped him make phone claim for UC. She supported him to call UC and whilst on the call explained why he needed her support to manage the call.
- Despite explaining health needs his UC claim closed for failing to attend JCP interview to complete ID verification appointment. Had UC fully considered his need for disability related easements and his complex needs, a telephone biographical assessment should have been offered, had this been offered in a timely way, this would have likely ensured that his UC claim was successful.
- As no UC claim has been put into payment, his rent hasn’t been paid and he’s now at risk of eviction because of accumulative rent arrears.
- During this period the clients only income is his PIP award and the family noticed he was not buying food.
- His family raised safeguarding concerns with their local authority as they were concerned, he wasn’t eating or paying bills, and would be evicted due to mounting rent arrears, sharing concerns he lacked capacity to manage his finances. They explained that they had offered to become his appointee, but he refused to provide consent needed. He had always been very guarded around sharing information on his financial position but then stopped engaging with the family after they offered to become his appointee.

- A mental capacity assessment (MCA) needs to be completed; however, this is not likely to be completed in the short term due to complexities of determining which services should complete the assessment and difficulties engaging the claimant in the assessment process.
- As the claimant reason for claiming ESA and PIP was severe mental ill health it is concerning DWP did not share any safeguarding concerns with LA or contact the LA for information before terminating his legacy benefits. From his ESA and PIP claims DWP were aware the claimant was known to Mental Health services.

### **Case Study 2:**

- Client has significant history of mental health issues and struggles to maintain engagement with health professionals and other advice services. They have been sectioned on several occasions, most recently in 2022.
- The client has a care package in place that gives assistance regularly twice a week via carers in respect of care and support from physical health needs, unlike the claimant above, they have no family or other informal support.
- Client made two attempts to claim UC however both claims were closed due to ID verification not being completed. It is concerning despite DWP being aware of her mental health support needs no reasonable adjustments were put in place to take account of difficulties she had engaging with DWP. Despite having complex needs the claims were both subsequently closed due to lack of engagement needed to verify ID.
- Client has received no income and is now facing eviction with legal proceedings, due to lack of rent payment linked to her not managing to the move to UC
- Clients whilst being known to a LA welfare rights service is very difficult to engage with support making it very difficult to provide effective support to challenge benefit decisions.

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## **2. Challenges with Corporate Appointeeships**

LA's report since the Move to UC started moving the most vulnerable, they have seen an increase in referrals from DWP requesting that councils become corporate appointees. Often these are cases involving claimants who were able to manage ESA claims, who are now being referred because they, and in some cases their community appointee, are unable to navigate the UC claim process.

LA have concerns some of the DWP referrals are not appropriate, and that DWP are referring to LA claimants who don't meet requirements for corporate appointees. LA's have concerns about the DWP misunderstanding of Mental Capacity Act thresholds, which leads to inappropriate referrals where claimants have managed legacy benefits independently for years. These clients need easements and support, not an appointee. The enhanced support journey ends once a referral is made without the DWP keeping the case open to await a response from the LA. The DWP consider their responsibility "fulfilled" once they refer the case, even when the appointeeship is not viable. This

creates significant pressure on already stretched local authority appointeeship teams and leaves vulnerable claimants without support. This approach creates risks as referring for a corporate appointee can take a considerable period of time.

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### **3. Barriers in the UC Claim Process for Vulnerable Residents**

The requirement for claimants to actively make a digital or phone-based UC claim and satisfy the ID verification stage is a major barrier for many vulnerable individuals. Extensions are refused by complex case coaches for vulnerable residents, even where it is known that they have significant mental health conditions and difficulty engaging with services. It is cited that a client's unwillingness to engage is sufficient reason to terminate a claimant's legacy benefits. This fails to consider whether the client's unwillingness to engage is due to health-related reasons rather than poor decision making.

Key issues raised include:

- No paper-based claim route
- Lack of flexibility for residents with no phone, no digital access, or severe anxiety disorders
- Concerns phone claims are not fit for purpose
- Claims are frequently being terminated due to ID verification issues
- The Enhanced Support journey ending after claimant says they will make a claim, not when the first correct payment is made

Local Authorities and advice agencies report that some clients go weeks or months without income after managed migration because vulnerabilities are not identified or supported by the DWP. This is a significant factor in rent arrears accruing and increasing the chances of vulnerable tenants being evicted and becoming homeless.

The following case studies illustrate the range of challenges being seen. None of the case studies were raised to their local authority as a safeguarding concern.

#### **Case study 3:**

- Client is 62, lives in extra care and has no family support. He has complex physical health needs following a brain injury and subsequent stroke. He requires two carers to visit four times a day and therefore requires disability adjustments. He also requires an interpreter. He does not however lack capacity.
- He was unable to manage either an online or telephone claim on his own, and therefore unable to manage the UC claim process on his own. He therefore failed the verification process. He is and he was offered no reasonable adjustments to support him.
- His legacy benefits were stopped in July 2025 leading to significant rent arrears. Had a home visit been provided to support the application, and support to ensure the client was able to complete the ID verification steps, this could have been avoided.

**Case study 4:**

- The following case study is an example of an extremely vulnerable client, who is yet to migrate to UC, and for who the process is proving to be extremely challenging.
- Very vulnerable client but not engaging with social care – offered but didn't accept rehab or re-enablement following hospital admission or support from addiction services.
- They are frequently admitted to different hospitals due to his poor health, self-neglect, addiction problems, leading to multiple A and E admissions.
- They have risky and highly problematic drinking/not engaging with addictions services - level of alcohol dependence presents very significant risks.
- Client has fluctuating capacity to engage due to level of drug addiction. They are rarely at home, is found ill and in need of emergency assistance on the streets whenever he is admitted to hospital.
- They will need a significant level of support to engage in this process, but no formal support or informal support is currently in place.

**Case study 5:**

- The following case study is an example of an extremely vulnerable client who is housebound and is experiencing a complex life situation which is further impacting their mental health, and ability to manage their affairs.
- They are yet to migrate to UC, and their final deadline day is fast approaching. They receive support with their care and various social care teams are involved.
- Their case was referred to a complex case coach who has had contact with the client and the social care teams.
- However, the complex case coach has refused to provide any further extensions as they are of the belief that the client has capacity to make the claim themselves but has failed to do so due to disengagement with the DWP and other services.
- Whilst it is still possible to avoid a gap in their benefits, the DWP have ended their enhanced support journey. Formal support has been offered through the LA, but the client must engage with the process. Had the DWP implemented an automatic migration process this could have been avoided.

**Case Study 6:**

- A vulnerable client who is housebound and in receipt of a care package from the local authority received support from the Home Visiting team to submit a UC claim.
- The Home visiting officer was unable to complete the claim as they required further evidence in relation to the client's banking details.
- The care agency manager forwarded these details within a few days of the Home Visit.
- The above parties were under the impression that the claim was submitted.
- The client appeared on a list of residents who had failed to claim UC by their deadline day. The client's legacy benefits had been terminated.

- Through our DWP contacts we discovered that the claim was not submitted.
- The claim was eventually “submitted” and the payment was processed.
- The above issue was not identified by the complex case coach during the enhanced support journey.

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#### **4. Housing Costs, Rent Arrears and Alternative Payment Arrangement (APA) Failures**

Housing teams across local authorities and supported living providers are reporting increasing rent arrears cases linked directly to managed migration.

We have concerns work coaches are failing to raise essential topics such as housing costs or APAs even when client’s complex needs identify need for this or when paying arrears of housing element where there have been delays in assessing the housing element so DWP are aware the claimant has accrued months of rent arrears.

The issues include:

- Failure to apply or maintain APAs
- Work coaches not initiating APA discussions
- DWP insisting that landlords request APAs, contrary to guidance
- Long delays before arrears are flagged—often only once possession proceedings begin

These failures are likely to lead to a significant increase in evictions over the coming year.

#### **Case study 7:**

- Client has complex mental health conditions, crack cocaine addiction, and history of lack of engagement with services.
- Upon moving to UC, claim originally processed without housing costs in payment due to her difficulties in correctly declaring her housing costs.
- The claimant was then issued with 5 months arrears payment of housing element.
- Her landlord requested an APA for rent to be paid directly to landlord.
- At this point, client had been sectioned and was in hospital.
- Her landlord was advised a discrepancy in rent amount between what landlord and client had reported prevented an APA being agreed, and this could only be resolved with client engaging with UC to confirm Landlord had correctly confirmed rent, which was not possible due to her being sectioned.
- LA records show that her mental health significantly deteriorated further at the same time the lump sum payment was received, as well as increased drug use. The payment was never used to clear the outstanding rent arrears, and providing increased funds allowing her to purchase more drugs may be linked to her deteriorating mental health.

- She now has £6000 rent arrears placing her at risk of eviction whilst she is too unwell to engage with services.

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## 5. Recommendations

We respectfully request that the Committee consider the following recommendations:

1. **Introduce an automatic migration process** for ESA claimants with ongoing awards, given the significantly reduced caseload and their high vulnerability.
2. **Extend the enhanced support journey** to the first correct UC payment, not simply claim submission.
3. **Improve safeguarding processes** to ensure meaningful, detailed referrals and mandatory case conferencing.
4. **Review the telephone claim route** for vulnerable individuals as it currently not fit for purpose.
5. **Review appointeeship referral practices** and strengthen DWP understanding of MCA thresholds.
6. **Resolve APA and housing cost failures**, including mandatory inquiry into housing needs at claim stage.
7. **Require DWP to report migration outcomes**, including:
  - Number of failed ESA-to-UC claim attempts
  - Rates of claim termination
  - Cases with no benefit in payment following migration

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## Conclusion

The issues raised above demonstrate that the UC Managed Migration process is **not currently safe for vulnerable claimants**. Without urgent action, we expect to see rising homelessness, worsening mental health, and long-term financial harm. We are also concerned that the case studies highlight DWP's failure to put in place required safeguarding protections for most vulnerable.

None of the case studies highlighted in this letter were raised to their local authority as a safeguarding concern.

NAWRA and Local Authorities stand ready to support the Committee with case studies, data, and further evidence.

We urge the Committee to intervene to prevent further detriment.

Thank you for your attention to this important matter. We would welcome the opportunity to provide oral evidence if helpful.

**Yours sincerely,**

National Association of Welfare Rights Advisers