

UNIVERSAL CREDIT AND DISABLED LONDONERS

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Dr Dalia Ben-Galim
daliabengalim@gmail.com

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UNIVERSAL CREDIT AND DISABLED LONDONERS

Executive summary

Disabled Londoners have been disproportionately impacted by changes to the tax and benefits system since 2010. And the introduction of Universal Credit (UC) has caused hardship for many disabled Londoners as well as the voluntary and community sector (VCS).

This work adds further evidence to the design and implementation challenges that made the process of claiming UC for disabled Londoners difficult pre-Covid19. Cuts to the VCS as well as Local Authority (LA) budgets had hollowed out support for disabled Londoners. The Mayor was already calling on the Government to pause the roll out of Universal Credit and focus attention on fixing areas such as the 5-week wait and persistent digital faults that were causing financial stress for too many.

None of the challenges identified in this research are likely to recede; if anything, they will be amplified by Covid-19 with more Londoners living with disabilities becoming more vulnerable or at greater risk of vulnerability.

Although there is much uncertainty, there is also a potential window of opportunity to renew rather than simply fix what was already broken. Existing challenges combined with a surge of new claimants has further exposed the gaps in UC and a VCS struggling to cope with high demand for its services.

The GLA has a role to advocate for change and take direct action. These recommendations are generated from research with the VCS supporting disabled Londoners on UC:

- Advocate for change to UC and wider welfare reform to better support disabled Londoners, by leading and joining calls from other organisations urging the Government (in the short term) to scrap the 5-week wait, pause both natural and managed migration and suspend requirements for medical evidence on UC. The GLA should also lead calls insisting that some temporary Government measures become permanent for example, the increase to the basic rate of UC and Local Housing Allowance and suspend unnecessary deductions like sanctions to protect those who may be vulnerable. This is the minimum required to progress genuine reform.
- The GLA can also play a more direct role in supporting the VCS to support disabled Londoners by boosting specialist support and advice for disabled Londoners; working with smaller VCS organisations to raise awareness of funding opportunities; funding training and high quality advice provision; and effectively supporting network and partnership building through funding and co-ordinating to build genuine capacity across the sector. Working directly with the sector to ensure voices of disabled Londoners are shaping and leading change is essential for sustainable reform.

When conceived, this work was of vital significance in supporting the VCS who support disabled Londoners on UC. Very few challenges have disappeared, and Covid-19 will undoubtedly add hardship for individuals, families, communities, and organisations. There is no quick fix, nor easy solutions, but the proposals here – generated from front-line organisations who work with disabled Londoners every day – can and should set the direction for fundamental change.

1.0 THE ORIGINAL BRIEF AND KEY FINDINGS

1.1 This work was originally commissioned:

- to map voluntary and community sector (VCS) provision in London of organisations supporting disabled Londoners as the roll-out onto Universal Credit (UC) progresses
- with an understanding of the main challenges and opportunities, to make recommendations of how the GLA could better support the sector to support disabled Londoners related to UC.

1.2 The GLA's own cumulative impact assessment highlights that disabled Londoners have been disproportionately impacted by changes to the tax and benefits system since 2010.¹ Together with significant design and implementation challenges of UC, Local Authorities (LA) operating with massively reduced budgets, and many VCS organisations struggling, the context for delivering services to disabled Londoners was already bleak.

1.3 Covid-19 is amplifying vulnerability for many disabled Londoners and creating new vulnerability and risk for many more (see section 2.1). Not all the implications are clear yet.

1.4 The methodology for this work included:²

- identifying and reviewing existing resources – reports and information
- a survey disseminated through the GLA and other networks that generated 91 responses
- a range of interviews with 29 stakeholders across the VCS, LAs, JCP and CAB
- continuous iteration and revision with the team.

1.5 The findings highlight significant shortcomings in UC for disabled Londoners. Insights from this research combined with published literature³ emphasise **existing design and implementation flaws** that make accessing specialist support more difficult.

- **Financial vulnerability is common when moving onto UC** because of the 5-week wait, UC being paid monthly and other potential debt. An advance payment is a loan offered by DWP to support claimants through the waiting period; payments are deducted from subsequent UC payments.⁴ For many households this simply delays the financial pressure. In this context, financial vulnerability may mean going without, needing support from a foodbank, and / or falling into poverty.
- **Errors made by DWP and from incorrect advice** are common and often cause financial and emotional distress. These include: over and under payments by DWP that can be slow to correct; people being incorrectly required to undergo a new work capability assessment (WCA)⁵; people entitled to or in receipt of the Severe Disability Premium⁶ being moved to UC when they shouldn't; and errors in advice on whether to

¹ GLA (2019) Cumulative Impact Assessment of Welfare Reform in London. <https://data.london.gov.uk/dataset/welfare-reform-2019>

² Appendices provide more information about the participating organisations and voices from the front-line.

³ For example reports and campaign asks from organisations that include: [Disability Rights UK](#), [Child Poverty Action Group](#) (CPAG), [Resolution Foundation](#), [Gingerbread](#), [Inclusion London](#), [JRF](#) and the [Trussell Trust](#).

⁴ For more information published by the Government <https://www.gov.uk/guidance/universal-credit-advances>

⁵ For example Rightsnet <https://www.rightsnet.org.uk/forums/viewthread/11307>

⁶ Severe Disability Premium (SDP) is a payment added to existing income related benefits that recognises the increased cost of living with a disability. As there is no SDP replacement on UC, those eligible for SDP are not meant to be moved onto UC and should instead claim existing benefits. SDP is currently set at £66.95 a week for a single person and £133.90 for a couple if both members of the couple are eligible <https://www.gov.uk/disability-premiums>

claim UC. A VCS survey respondent reflected that “helping people really explore if UC is right for them and encouraging them to take time to think it through rather than rushing into a claim” is support currently lacking.

- Current systems are **inadequate for those with complex needs** that almost always includes a disability / long term health condition. When asked about what was needed, a CAB respondent said: “Further support for managing the UC claim for vulnerable people”. There is a lack of intensive casework support available; benefits are sometimes terminated without adequate information; and people may need to engage with multiple agencies to align welfare, health and care needs.
- **The design of UC does not reflect the lived experience** of many of its claimants. This is evident through a ‘digital first’ by default approach that often creates additional barriers to making and maintaining a claim.
- **Mental health vulnerability** has been exposed as poverty levels rise and services dwindle for disabled people. The poverty rate of those with a mental health disability now stands at “39%, 9 percentage points higher than those who have a physical disability.”⁷
- The **labour market is more precarious** than when UC was first introduced – with an increase in zero-hour contracts and self-employment – often resulting in monthly variations of the UC award. ONS data from 2019 shows that compared to non-disabled men, disabled men are more likely to be self-employed.⁸ The calculation of income is complicated in UC for the self-employed who may be able to work successfully on good days but who face considerable barriers leaving them unable to work on others. Some of these people would be eligible to be in the ‘limited capability to work group’ (where there are fewer employment conditions) but are subject to the Minimum Income Floor – a measurement of assumed earnings.⁹ Given that the disability employment gap (which is the difference in employment rates between people with and without disabilities) is 28.6 percentage points¹⁰ due to discrimination and additional barriers that many disabled people still face, it would be reasonable to suggest that many disabled self-employed workers struggle to make ends meet.
- A culture of **anxiety and fear** around UC is exacerbated by incorrect assessments which can have significant financial, health and emotional penalties. One interviewee said: “Work Capability Assessment (WCA) is the main issue – ensuring that people are being assessed correctly because then you are reducing delays because then there is no reconsideration or tribunal. It would reduce delays and therefore hardship.”
- The **conditionality and sanctions regime** often amplify this fear and anxiety. Wider evidence on sanctions suggests that they are largely ineffective in supporting people back into work and are often counterproductive.¹¹ For those with a disability, having

⁷ JRF (2020) UK Poverty 2019/20. <https://www.jrf.org.uk/report/uk-poverty-2019-20>

⁸ NB There was no significant difference for women self-employed. ONS data on disability and employment, UK: 2019. <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandemploymentuk/2019>

⁹ Since 30 March 2020, the Minimum Income Floor does not apply to UC calculations where actual earnings are used. For more see <https://www.gov.uk/self-employment-and-universal-credit>

¹⁰ House of Commons (2020) People with disabilities in employment. <https://commonslibrary.parliament.uk/research-briefings/cbp-7540/>

¹¹ Welfare Conditionality Project 2013-2018. Final findings report (2018) http://www.welfareconditionality.ac.uk/wp-content/uploads/2018/06/40475_Welfare-Conditionality_Report_complete-v3.pdf

conditions attached to their benefit with the risk of sanctions if they don't comply may exacerbate certain illnesses and impairments especially those related to mental health.¹²

- A survey respondent from the VCS captured some of the overall challenges:
 - “The 5 week wait for the initial payment, and garnishment of UC for advance payments and third party deductions are causing clients to get into debt and rent arrears. We are issuing 3 times as many food bank vouchers to clients as we were 2 years ago. This is a structural issue and unless the system is changed we will continue to struggle to assist people in this situation unless we find they are eligible for other benefits or concessions due to disability etc. There is also an ongoing issue relating to medical assessments which are often inaccurately carried out by private agencies resulting in clients on legacy benefits (ESA) having to appeal their decision to prevent them from moving on to UC. This has been mitigated slightly by SDP claimants being able to remain on ESA, but we still receive requests to provide representation in person at benefit appeals and support attending assessments which we currently don't offer. We are concerned about what will happen when the 1 year Help to Claim contract between the CAB and DWP ends in April. Will these clients be referred to us instead? If so, is there any additional funding available to enable this, as we are currently at capacity and local authority funding for the borough's advice sector was reduced by 16% last year.” (survey, VCS)

1.6 Results from survey respondents also revealed a significant lack of specialist support for disabled Londoners. This was echoed in the interviews where provision for a range of impairments was less accessible.

- Organisations who completed the survey are generally wheelchair accessible (80%) and provide extra time for appointments (75%). About half (49%) also provide community language translation. Other support for disabled Londoners – for example, the provision of British Sign Language interpreters, information in Easy Read was less common (Figure 1).
- There were examples where organisations supported specific impairments – for example dementia, or neuro diverse and mental health. Where support is not routinely available, it can delay a claim with potential financial penalties.
- Through the interviews, some bespoke solutions were shared that responded to specific impairments and need. For example the Motor Neurone Disease Association (MNDA) has developed a partnership with Citizens Advice Cardiff & Vale to offer specialist advice to their beneficiaries.¹³ They arrived at this service model through investigating a range of other models such as home visits and / or delivering in-house. The model works for them because the partnership is open and honest, there is dedicated support and MNDA beneficiaries can tap into the wider CAB network when required. Citizens Advice Cardiff & Vale have been trained on specific issues related to motor neurone disease by the MNDA team. Citizens Advice Cardiff & Vale take over 1000 calls annually and estimate that their advice generates £2.2million of support for their beneficiaries, mostly in claiming the right benefits. Telephone is by far the most popular route of engagement and feedback has generally been positive. Advice to other organisations who may want

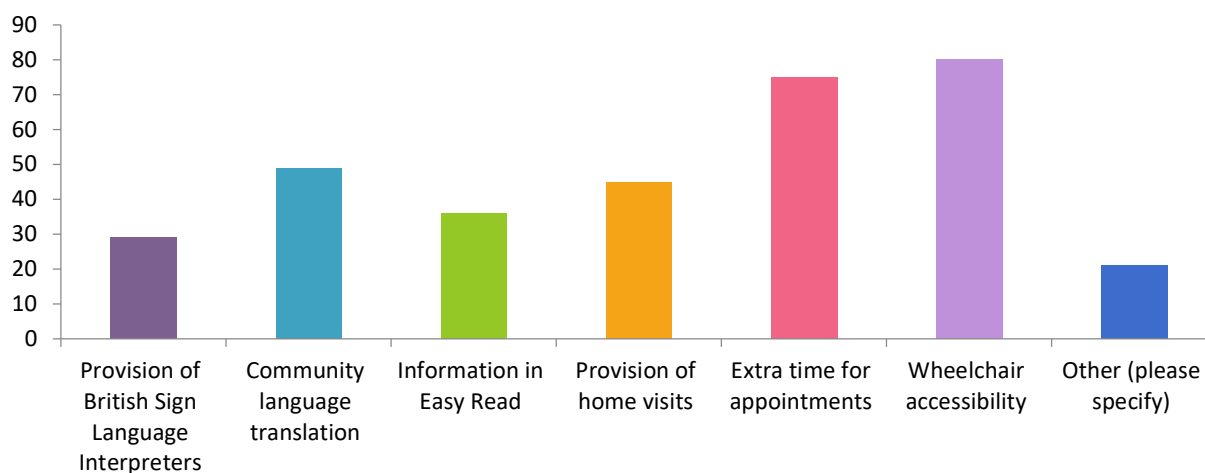
¹² Welfare Conditionality Project 2013-2018. Final findings disabled people (2018)

<http://www.welfareconditionality.ac.uk/wp-content/uploads/2018/05/40414-Disabled-people-web.pdf>

¹³ For more information, MNDA. <https://www.mndassociation.org/support-and-information/our-services/benefits-advice/>

to pursue this model is to think very carefully about the service and beneficiary needs; and know the main challenges that affect your beneficiaries so you can respond.

Figure 1: Capacity of surveyed VCS to meet needs of disabled Londoners



- 1.7** Known flaws in the system plus a lack of specialist provision creates a reluctance to move to UC for some potential claimants – both new and those who may naturally migrate.

“We have several clients who do not wish to make a claim because of the experience of other friends and families. We have clients that will not move out of a borough as it will trigger a claim for Universal Credit.” (survey, VCS)

- 1.8** For the organisations surveyed, ‘**Help to Claim**’¹⁴ a Government funded programme delivered by CAB to support clients to make a claim is working relatively well. The service was not designed to support more complex claims and / or ongoing maintenance of a claim. LAs and VCS organisations are trying to plug these gaps – sometimes proactively and in partnership and other times reactively. But demand is high, and many services have had to tighten up their eligibility criteria to respond. CABs themselves and other organisations suggested that the Help to Claim service needed to expand in breadth and depth, with funding made available to fill the gaps. As a DDPO organisation reflected in the survey:

“Supporting clients to access Universal Credit is relatively simple. The problems really occur when the cases are complicated. For example people who are illiterate and are unable to login online and update journals etc. Another big issue is with people who are working but on zero hours contracts [with fluctuating income] – this requires a lot of input from caseworkers”

- 1.9 Managed migration**¹⁵ was already causing significant concern for organisations supporting disabled Londoners. Worries included: that current flaws would be amplified; LAs and VCS organisations would be limited in their support without sight of DWP data; stability would turn into instability for some claimants who won’t have had a change in circumstances, but their benefits will change; there is limited transitional protection; and claimants are responsible for making a claim themselves (rather than an automatic transfer) where failure to do so risks payments stopping.

¹⁴ For more information, Citizens Advice. <https://www.citizensadvice.org.uk/about-us/contact-us/contact-us/help-to-claim/>

¹⁵ Also known as ‘Move to UC’ when everyone on existing benefits will move to UC.

- 1.10** The lack of **data sharing** particularly between the DWP and LAs was a significant problem identified mostly by LAs. When a claimant moves onto UC, the LA has fewer data touchpoints to connect with them primarily because housing costs are part of the Universal Credit award that replace Housing Benefit that is administered by the LA. This may translate into poor targeting of services. LAs have urged the DWP to share data ahead of ‘managed migration’ so they know who will be moving in the future.
- 1.11** Many organisations flagged that there was enough information available on UC; the challenge was about **accessing the right information at the right time** especially when the information required was specific to an individual / condition.
- 1.12** Despite some excellent provision, like CPAG’s London UC Advice Project,¹⁶ organisations – particularly small ones – had difficulty in finding time and money to access **quality training**. CPAG’s project aims to address UC support in London with a specific remit to offer advice and support to organisations who support BAME and disabled Londoners to access information and advice. It is free and targets organisations who might not specialise in UC. There is dedicated email and phone support as well as access to free training and resources. Last year the programme was over-subscribed.
- 1.13** Given the context of **severe and deep cuts** to services and budgets, it is not hugely surprising that many organisations are in **desperate need for funding**. Figure 2 provides a word wall from the survey of what the GLA could do to better support organisations. When respondents were asked for more specific ideas, they spanned from funding direct services like a helpline, to increasing capacity, unlocking barriers, providing training, and building partnerships:
- There is potential for the GLA to build a **strategic partnership** with JCP to achieve better outcomes for disabled Londoners. Several early conversations have already taken place between JCP and the GLA. JCP has national agreements with some charities where they work together to an agreed set of standards, processes, and outcomes. Recognising the complementary skills of each organisation is key, referral routes tend to be strong and funding is agreed. Each partnership also has an account manager. In some areas, the LA could also be involved. This is not without tension, particularly with the GLA also having a strong advocacy role to improve UC delivery.
 - Southwark has a **dynamic partnership model** that includes a UC Network;¹⁷ a local VCS forum; DWP liaison and JCP partnership meetings founded on solid relationships between CAB, DWP, LAs and the VCS. Some of this collaboration is funded locally.¹⁸
 - Inclusion London is a recipient of the **Mayor’s Civil Society Roots** that explicitly funds specialist civil society infrastructure recognising the value and expertise of DDPOs.¹⁹

¹⁶ For more information, CPAG. <https://cpag.org.uk/welfare-rights/universal-credit-london-advice-project>

¹⁷ For more information, Community Southwark. <https://communitysouthwark.org/resources/universal-credit-network>

¹⁸ For more information, United St Saviour’s Charity. <https://www.ustsc.org.uk/community-investments/strategic-grants/universal-credit/>

¹⁹ For more information, Civil Society Roots. <https://www.london.gov.uk/what-we-do/civil-society/civil-society-roots>

- **A social model of disability empowering DDPOs** like Trust for London and City Bridge Trusts' Strengthening Voices, Realising Rights funding.²⁰
- **Leveraging core funding** such as the London Legal Support Trust who provide core matched unrestricted funding to deliver legal advice and support.²¹
- **Enabling / funding effective partnerships** – to support partnerships that are complementary like Enfield CAB and Enfield Disability Action who work to support disabled people making and maintaining UC claims with positive outcomes for claimants.

Figure 2: How the GLA could support your organisation



1.14 Voice and advocacy – this work adds further evidence to a system struggling to cope. Previously the Mayor has called for a halt to the roll out of UC²² and an end to the benefit freeze.²³ Supporting and promoting the health and needs of disabled Londoners will become more important.

²⁰ For more on Strengthening Voices, Realising Rights – Disability Initiative, Trust for London.

²¹ For more information, The London Legal Support Trust. <https://www.londonlegalsupporttrust.org.uk/>

²² "Mayor calls on government to halt Universal Credit rollout" (2018) GLA press release available <https://www.london.gov.uk/press-releases/mayoral/mayor-calls-on-government-to-halt-universal-credit>

²³ "London's poorest households hardest hit by tax and welfare changes" (2019) GLA press release available <https://www.london.gov.uk/press-releases/mayoral/londons-poorest-households-hit-by-welfare-changes>

2.0 ADAPTING FINDINGS TO SUPPORT DISABLED LONDONERS THROUGH COVID-19

2.1 Many organisations are working to quantify and qualify vulnerability because of Covid-19. Disabled Londoners are likely to be at higher risk compared to others.

- Known vulnerabilities include those who are categorised as ‘shielded’ with pre-existing medical conditions and / or undergoing particular treatment.²⁴ LAs are largely responsible for supporting these individuals. Many disabled Londoners will fall into this group.
- Councils and the VCS have quickly adapted their focus to also support others deemed at risk or vulnerable that includes preparing and delivering food parcels and medical supplies, sourcing temporary accommodation, supporting to mitigate financial hardship and tackling isolation.
- It is likely that new vulnerabilities will emerge as a result of Covid-19, for example those at risk of long-term unemployment;²⁵ who will have medical treatment delayed or cancelled;²⁶ the newly bereaved;²⁷ and widening educational inequalities as a result of different access to home schooling resources.²⁸
- ‘Easements’ have also been announced by the Government to the Care Act 2014.²⁹ This allows a LA to temporarily discharge some of their statutory duties to provide social care to individuals. Although in some cases, this discretion will be welcomed as it may create more flexibility for LAs to support those who need care, concerns have also been raised by disability stakeholders. Disabled people may receive diminished levels of care as a result, placing further barriers to work and to an individual’s well-being. The Care Quality Commission is monitoring Councils using these easements to ensure that standards are not compromised.³⁰

2.2 There are already over 1 million new UC claimants in England and Wales since the lockdown measures came into force on 23 March 2020 – a rise of unprecedented scale.³¹ Although there have been significant and welcome changes announced to UC that will support new and existing claimants such as the removal of the minimum income floor for the self-employed, an increased basic UC allowance, suspension of face to face appointments, an increase in the Local Housing Allowance (LHA) that supports renters, suspension of job-

²⁴ Guidance on shielding and protecting people who are clinically extremely vulnerable from COVID-19 (2020). <https://www.gov.uk/government/publications/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19>

²⁵ Robert Joyce and Xiaowei Xu (2020) “Sector shutdowns during coronavirus crisis: which workers are most exposed.” IFS Briefing note <https://www.ifs.org.uk/publications/14791>

²⁶ For example “NHS to postpone millions of operations to tackle coronavirus” 17th March 2020, The Guardian <https://www.theguardian.com/society/2020/mar/17/nhs-postpone-millions-operations-tackle-coronavirus>

²⁷ For example, the Childhood Bereavement Network <http://www.childhoodbereavementnetwork.org.uk/covid-19.aspx>

²⁸ “Only 2% of teachers working in the most disadvantaged communities believe all their pupils have adequate access to devices for home learning” (2020) Teach First press release <https://www.teachfirst.org.uk/press-release/only-2-teachers-working-most-disadvantaged-communities-believe-all-their-pupils-have>

²⁹ Care Act easements: guidance for local authorities (updated 1 April 2020) <https://www.gov.uk/government/publications/coronavirus-covid-19-changes-to-the-care-act-2014/care-act-easements-guidance-for-local-authorities>

³⁰ The Care Act and the ‘easements’ to it. Care Quality Commission. <https://www.cqc.org.uk/guidance-providers/adult-social-care/care-act-easements-it>

³¹ For example “Coronavirus: Nearly a million universal credit claims in past two weeks” 1st April 2020, BBC <https://www.bbc.co.uk/news/uk-politics-52129128>

seeking requirements and delaying some debt deductions for 3 months; there are still elements of UC that pose significant challenges.³²

2.3 Some of the current challenges for disabled Londoners and UC

- A significant proportion of **new UC claimants** will have existing disabilities / long-term health conditions. For many the move to UC will have been unexpected and **all will need to wait 5 weeks** for their first payment. With very few low-income families having a savings buffer³³ a shortfall in income risks claimants seeking high cost credit and / or going without essential goods.
- With new pressures on UC due to high volumes, **very few of the challenges raised through this work will be addressed**. Errors in payments, a reliance on digital communication and reduced support for those with complex needs may exacerbate existing needs. Some charities will have reconfigured services to support those in crisis; others will have stopped delivering face-to-face services. These changes may exacerbate emotional and financial need of disabled Londoners already on UC.
- The VCS is under even **more pressure to deliver with less resource**. Although there are several initiatives starting to address capacity, for example Mayoral funding³⁴ and the Chancellor's package of support for charities³⁵, it is also likely that a significant proportion of organisations will struggle to survive.
- **LAs** are in crisis mode – very few currently have the capacity to work beyond providing an immediate response to those who are seen to be the most vulnerable. The long-term financial implications of this support – such as reduced provision in the future – is yet to be fully determined. And tension is already brewing between central and local government over the allocation of funding.³⁶
- **Financial loss** and **emotional distress** are likely to be amplified for many households, with many being personally touched by Covid-19. Data published by the ONS shows that disabled adults are more worried compared to non-disabled adults, and a majority (64.8%) of disabled adults said that Covid-19 was having an impact on their well-being.³⁷
- Given **existing precarity in the labour market for disabled Londoners**, employment opportunities and experiences may mean disabled Londoners struggle to not only remain in work but are at greater risk of long-term unemployment as the economy recovers. Concern is mounting that some furloughed employees are being pressured to work that HMRC has set up a hotline to report abuse.³⁸ There is also anecdotal feedback from charities supporting disabled Londoners that some who are self-isolating are being

³² Latest Government information on changes to UC <https://www.gov.uk/guidance/coronavirus-covid-19-what-to-do-if-youre-already-getting-benefits>

³³ StepChange (2019) Statistics Yearbook 2019. <https://www.stepchange.org/policy-and-research/2019-personal-debt-statistics.aspx>

³⁴ For more, London Funders information <https://londonfunders.org.uk/what-we-do/london-funders-projects/covid-19>

³⁵ For more, Chancellor's statement on coronavirus (COVID-19): 8 April 2020. <https://www.gov.uk/government/speeches/chancellor-of-the-exchequer-rishi-sunak-on-economic-support-for-the-charity-sector>

³⁶ "Jenrick warns not all costs will be covered and brands lost income estimates 'highly speculative'" 5 May 2020, LGCplus <https://www.lgcplus.com/politics/coronavirus/jenrick-warns-not-all-costs-will-be-covered-as-lost-income-estimates-branded-highly-speculative-05-05-2020/>

³⁷ ONS (2020) Coronavirus and the social impacts on disabled people in Great Britain. <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/coronavirusandthesocialimpactsondisabledpeopleingreatbritain/2020-04-24>

³⁸ See HMRC urges people to report companies abusing furlough scheme 8 April 2020 in Metro <https://metro.co.uk/2020/04/08/hmrc-urges-people-report-companies-abusing-furlough-scheme-12526123/>

pressured to return to work. Disabled people now needing to work from home may also struggle to access required adaptations and adjustments. Concerns have also been raised by disabled people through Inclusion London about the Access to Work³⁹ scheme that supports employers to make adjustments such as delays to payments, processes not being accessible and flexible to accommodate a range of conditions.⁴⁰ These challenges may limit someone's ability to remain in work.

- Those with regular health / social care needs may have had **treatment cancelled or postponed**, which may result physical and emotional distress.
- The pressure on **social care services** is more visible because of Covid-19. The significant death toll, the low pay rampant in the sector, and the physical and emotional exposure of social care staff are all likely to play a role in how the sector may be reconfigured in the future.⁴¹
- With many charities and welfare advice services restricting their operations, cutting out face to face appointments, and moving online; support for some disabled Londoners may be more inaccessible.

³⁹ Get support in work if you have a disability or health condition (Access to Work) <https://www.gov.uk/access-to-work>

⁴⁰ Inclusion London (2020) Access to Work issues arising from Covid-19 emergency. <https://www.inclusionlondon.org.uk/wp-content/uploads/2020/05/AtW-issues-arising-from-covid-19-letter-from-Inclusion-London.pdf>

⁴¹ Nye Cominetti, Laura Gardiner and Gavin Kelly (2020) "What happens after the clapping finishes? The pay, terms and conditions we choose for our care workers", Resolution Foundation. <https://www.resolutionfoundation.org/publications/what-happens-after-the-clapping-finishes/> & The King's Fund work on adult social care <https://www.kingsfund.org.uk/topics/adult-social-care>

3.0 SUMMARY AND RECOMMENDATIONS FOR CHANGE

- 3.1** This work has added further evidence to the design and implementation challenges that made the process of claiming UC for disabled people difficult pre-Covid19. Cuts to the voluntary and community sector as well as Local Authority budgets had already hollowed out a lot of support for disabled Londoners. None of the challenges identified in this research are likely to recede; if anything, they will be amplified with more Londoners living with disabilities becoming more vulnerable or at greater risk of vulnerability.
- 3.2** Covid-19 has exposed and is magnifying underlying inequalities. The Mayor was already calling on the Government to pause managed migration and remove the 5-week wait to support disabled Londoners.⁴² Boosting the VCS to support disabled Londoners is now more urgent. Poverty rates were already rising according to the JRF who highlighted that disabled working age-adults “were more than twice as likely to be in poverty as someone who is not disabled.”⁴³ This is fuelled by a persistent disability employment gap and a failing benefits system where disabled Londoners have been bearing the brunt of changes.⁴⁴
- 3.3** There is a potential window of opportunity to **renew rather than simply fix what was already broken**. Existing challenges combined with a surge of new claimants has further exposed the gaps in UC and a VCS struggling to cope with demand for its services. This research adds to the evidence base for genuine reform. The following looks at what the GLA could do; on advocating for change and taking more direct action.
- 3.4 Advocating for change** to UC and wider welfare reform to better support disabled Londoners.
- This work adds evidence to bolster the Mayor’s existing calls for reform to UC to:⁴⁵
 - o Offer non-repayable advances to all new UC claimants to improve access to financial support
 - o Temporarily pause natural migration to ease pressure for new claimants
 - o Halt UC managed migration plans until capacity exists
 - o Suspend requirements to provide medical evidence for a claim given the difficulties in accessing medical appointments
 - o Wider benefit changes on housing support and child benefit to support with the basic cost of living
 - o Suspend policies where there are unnecessary deductions in benefits for those who are vulnerable – for example the benefit cap, sanctions, two child limit, bedroom tax and specifically for disabled claimants to reinstate the previous level of benefits for those who are part way through a mandatory reconsideration appeal process.
 - For genuine and sustainable reform many across the VCS are calling on the Government to make permanent some of the temporary policy measures, for example, the increase to the basic rate of UC and LHA and suspension of the Minimum Income

⁴² Mayor calls on government to halt Universal Credit rollout (2018). GLA press release available <https://www.london.gov.uk/press-releases/mayoral/mayor-calls-on-government-to-halt-universal-credit> & London’s poorest households hardest hit by tax and welfare changes (2019). GLA press release available <https://www.london.gov.uk/press-releases/mayoral/londons-poorest-households-hit-by-welfare-changes>

⁴³ JRF (2020) UK Poverty 2019/20. <https://www.jrf.org.uk/report/uk-poverty-2019-20>

⁴⁴ GLA (2019) Cumulative Impact Assessment of Welfare Reform in London.

<https://data.london.gov.uk/dataset/welfare-reform-2019>

⁴⁵ Letter sent by Mayor of London to Secretary of State for Work and Pensions on 14 April 2020.

Floor. And there are calls for wider reform too, for example uprating legacy benefits to match UC increases either temporarily or permanently.

- Addressing the digital divide should also be a priority. The digital first approach to UC was already a big problem affecting so many disabled Londoners with the highest support needs. The risk is that digital exclusion widens with more disabled Londoners not able to access the support they need because of their impairment and the lack of alternative routes of support.
- With many organisations presenting similar evidence to Government urging change, the GLA could join them, building effective coalitions. Some of these organisations are the JRF, CPAG, Disability Rights UK, CAB.

3.5 In addition to advocating for change, the GLA can play a more direct role in supporting the VCS to support its beneficiaries. This includes **boosting specialist support for disabled Londoners** through:

- **Disability / welfare rights officers** – the need for specialist advice to help navigate a complex system was already lacking. With increased pressure now on services and more changes to an already complicated benefits system, the GLA could work with Councils to scope and implement specialist roles to support disabled Londoners to navigate the benefits system and maximise income. This could be by directly funding disability / welfare rights officers locally and / or across London.
- **Awareness of funding opportunities** – in a fast-changing funding landscape, the GLA could ensure that VCS organisations – especially smaller organisations – are made aware of all the available support. This could be done by supporting existing networks and cultivating new ones.
- Ensure that social care funding is not deprioritised. Before Covid-19, a long-term **social care funding** settlement remained elusive, with a Social Care Green Paper promised but not forthcoming. Covid-19 has cast a sharp lens on the importance of sustainably funding the sector. Given the likely recession that will follow the pandemic and the knock-on effects on unemployment, mental and physical health, it will be increasingly important to prioritise social care within future health and care plans.

3.6 Support efforts such as those by the London Office of Technology and Innovation (LOTI) working with LAs and DWP towards **better data sharing** arrangements between LAs and DWP, and towards better use of existing local authority data.⁴⁶

3.7 Access to affordable training and high-quality advice – there is likely to be a gap in provision as VCS organisations and LAs are prioritising crisis response services. The VCS sector is likely to contract, and new needs will emerge; few will be able to prioritise funding provision and access to high quality training. Working with partners such as CPAG and others to deliver widely through innovative methods and ongoing support is likely to be of great value to the sector.

⁴⁶ Eddie Copeland (2020) "Beyond the crisis: How might local government build a positive legacy after Covid?" <https://medium.com/loti/beyond-the-crisis-how-local-government-can-build-a-positive-legacy-after-covid-3ac6e3d32a24>

- 3.8 Develop networks and partnerships** by working through priority organisations such as JCP and London Councils to develop effective and beneficial relationships that are outcomes focused.
- 3.9 Social model of disability** – the voices of disabled Londoners should not be lost in responding to immediate need, nor future planning. Trust for London recently adapted their funding guidelines to only fund organisations where at least 50% of staff members are Deaf or Disabled as well as a significant majority of their governing body.⁴⁷ And Addressing Poverty with Lived Experience (APLE) Collective places people’s voices at the heart of decision making and advocacy.⁴⁸
- 3.10 Capacity building** – together with other funders, the GLA has been quick to offer crisis support grants and ‘delivering differently’ grants to organisations for direct delivery and capacity through the London Community Response.⁴⁹
- 3.11** When conceived, this work was of vital significance in supporting the voluntary and community sector who support disabled Londoners in their UC journey. Very few challenges have disappeared, and Covid-19 will undoubtedly add hardship for individuals, families, communities and organisations. There is no quick fix, nor easy solutions, but the proposals here – generated from front-line organisations who work with disabled Londoners every day – can and should help set the direction for sustainable and fundamental change.

⁴⁷ See Update to our funding guidelines for Deaf & Disabled People’s Organisations <https://www.trustforlondon.org.uk/news/update-funding-guidelines-ddpos/>

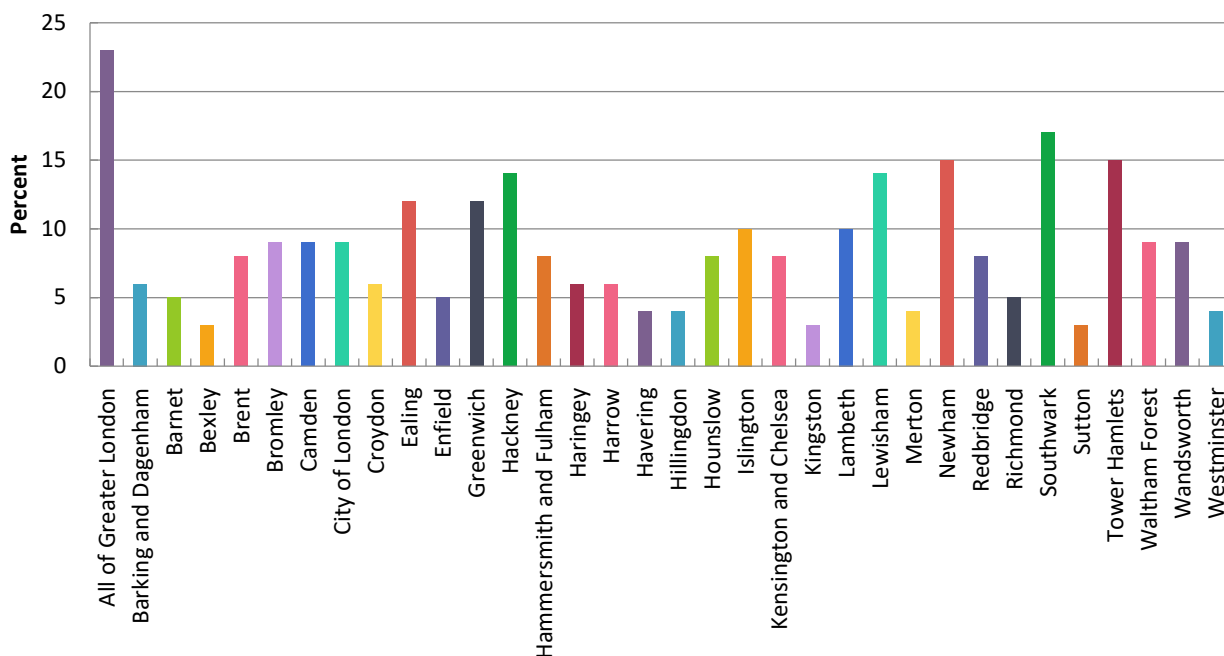
⁴⁸ For more, APLE Collective - <https://www.jrf.org.uk/contact/ape-collective>

⁴⁹ For more, London Community Response <https://londoncommunityresponsefund.org.uk/>

Appendix 1: about the participating organisations

- A survey was circulated in February 2020 primarily through existing networks. So the results reflect organisational views pre-Covid-19.
- 91 organisations completed the survey. The majority of organisations were from the Voluntary and Community Sector (VCS), with CABs, Local Authorities (LAs) and a number of housing associations also responding.
- In addition to the survey responses, we also interviewed 29 stakeholders from across Local Authorities, JobCentre Plus, CAB and the voluntary and community sector to gain further insight into how they support disabled Londoners on UC, the opportunities and limitations as well as their ideas on how the GLA could better support organisations.
- All London boroughs were represented by survey respondents (Figure 3). Some organisations serve a specific locality (often a borough) where services are available for anyone living in the borough; and there was also representation from local organisations who served a specific population group – for example local MIND groups, a local charity supporting survivors of domestic abuse. Responses were also received from national and local specialist disability organisations – that included for those with sight loss, mental health problems and learning disabilities.

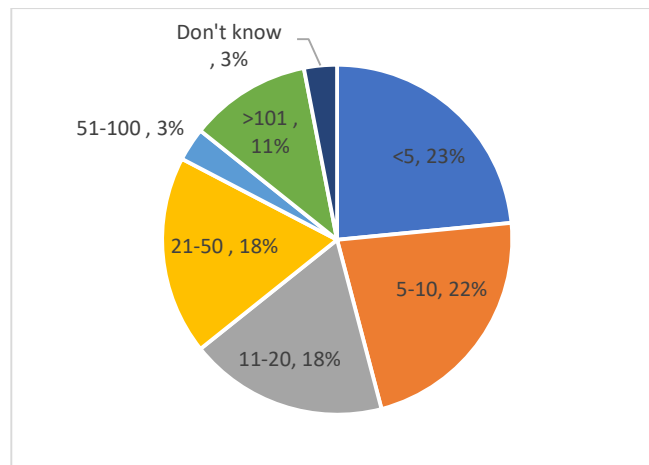
Figure 3: Geographical coverage by borough



* some organisations operate in multiple boroughs and/or across London, so numbers don't equal 100%

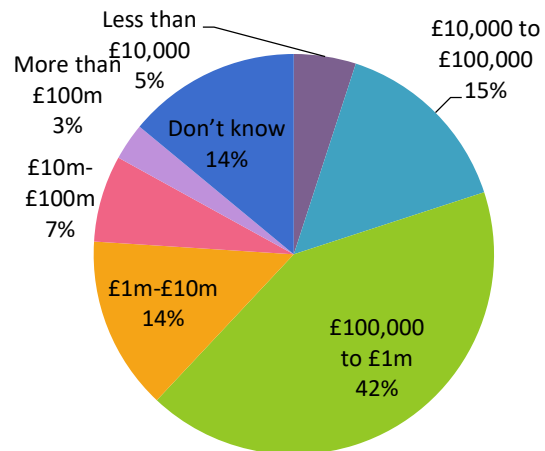
- There was also variation in terms of organisational size, but the vast majority of organisations had less than 50 members of staff (FTE). A further breakdown is provided in Figure 4.

Figure 4: Organisational size by number of staff (FTE) (n=87)



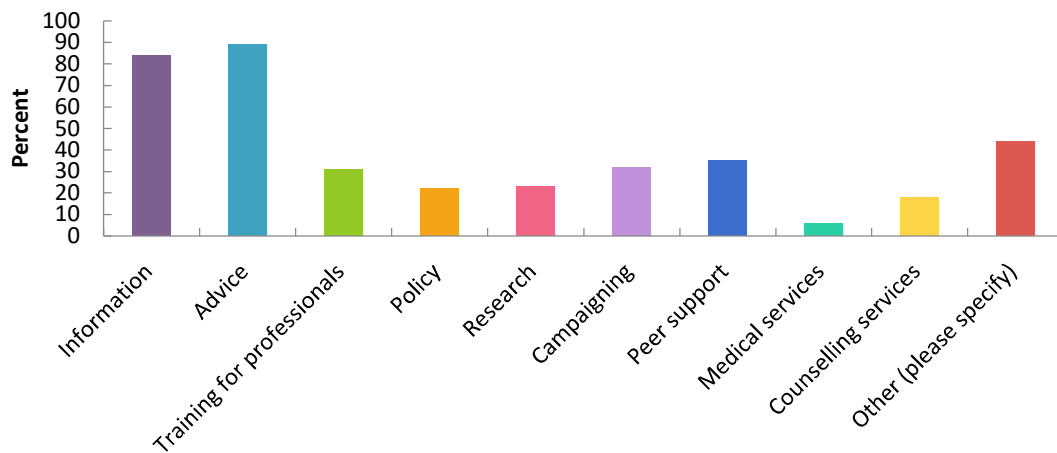
- And this translated into most organisations' annual turnover either between £100,000 and £1m or £10,000 and £100,000 (see Figure 5). Those with annual incomes over £10million were Local Authorities, large Housing Associations, some national charities, and funders.

Figure 5: annual turnover (n=86)



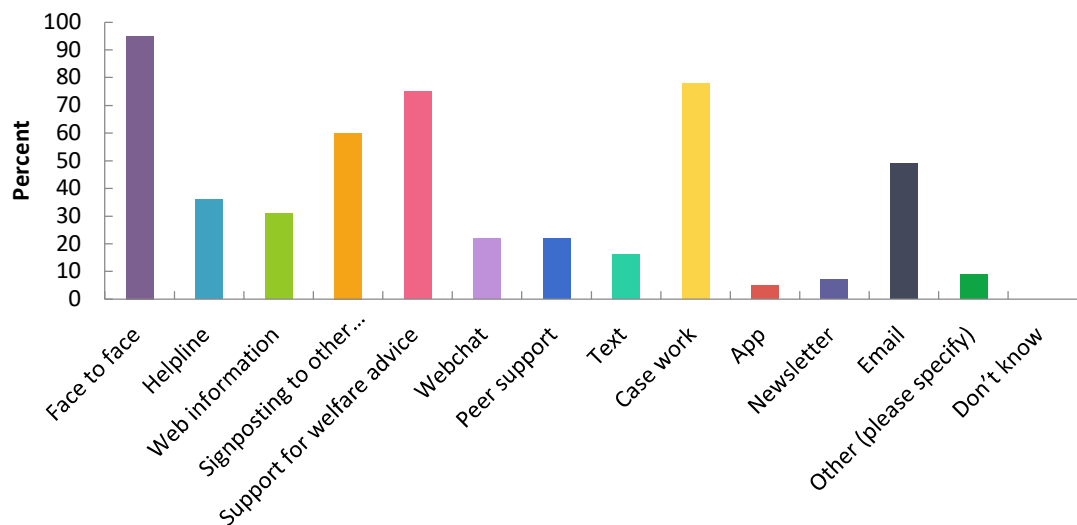
- Most of the organisations who completed the survey offered information (84%) and advice (89%). Peer support, policy research, campaigning and counselling were also available (Figure 6).

Figure 6: services offered by your organisation



- Almost two-thirds (63%) of the organisations who completed the survey supported disabled Londoners with UC – these included both organisations who are specialist disability charities and organisations who offer wider support. Every organisation that was interviewed also saw themselves as offering disabled Londoners support with UC. They offered a range of support. Figure 7 illustrates from survey respondents the range of services that are available for potential UC claimants – where the overwhelming majority of those who offer UC support offer face-to-face provision in addition to other services. Welfare advice and case work are the other common areas of provision.

Figure 7: UC support offered by organisations



- When asked in more detail about the 3 most common types of support that disabled UC claimants most frequently want, support with the initial claim stands out at almost 80%, then appeals (46%) and then there are a number of areas clustered such as support with ongoing claim, support with digital access and support with assessment. Together this highlights some of the pitfalls for disabled Londoners in digital being the default for UC.

Appendix 2: Voices from the front line

Rich evidence collected and analysed throughout the research illustrates some of the issues facing disabled Londoners and supporting organisations. A short selection of quotes has been collated here as a resource to be used to bolster the GLA and other partner organisations' asks.

UC Complexity is undervalued

- Although quite long, the quote below conveys much of the frustration and many of the issues that were raised through the research:

“Where to begin? Lack of funding. Lack of interest by local/central government. Austerity impacting on local services, including DPPOs. Complexity of UC. Lack of support for Deaf/BSL Mental health still not understood. DWP and Job Centre staff need basic training in recognising/understanding needs and difficulties for disabled people; physical and mental health. Assessment process and assessment itself riddled with inconsistencies, biases and ignoring/denying medical evidence by assessors. Same goes for mandatory reconsiderations. 'Disability advisors' at job centres only try to push people who are appealing WCA decisions and are sick/physically unable to work, into work. Use of threats of sanctions against ill/disabled people with complex medical histories for missing appointments or calls due to ill health or doctors appointments. Lack of support for those with limited computer skills. Where they cannot use a computer, UC accounts being setup but clients never sent any paperwork about decisions. Work conditionality often completely unfeasible. Lack of support for deaf or blind citizens. One deaf client made to setup account without BSL interpreter present, completely illegal. Some work coaches deliberately refusing to see client representatives with clients. UC50s taking months to get results, same with appeal dates up to 16 months. Those with sickness and disability should be backdated to start of claim not three months in from claim. Disability/sickness does not begin on an arbitrary date defined by the DWP. Five week payments, even with advance, a problem. Coaches take sometimes months to reply to UC messages. Online journal messages never read properly or replied to adequately by work coaches. Clients reporting health problems treated with extreme suspicion and hostility by some work claimants. Many more problems.”
(survey, DDPO)

Digital by default does not work and barriers are higher for some impairments

- Breaking that down into some of the different components, the reliance on **digital** and many of the challenges associated with **assessments and appeals** arose as specific challenges for disabled Londoners.

“I and many claimants feel that there is lack of face to face information and advice for disabled UC claimants, there is lack of help needed to make claims, disabled people have difficulty using online services, they cannot access their files, they are unable to scan and attach documents online and feel that that JC staff do not want to help and mostly asked to do online stuff by themselves or get a friend or a relative to help. They have lost out on money they are entitled too as no one advises them that they

get backdated benefit. They are not aware that they can get financial help from DWP and waiting for more then (sic) 5/6 weeks to get first payment many go without food, heating and end up getting rent and council tax arrears which in return makes their life more difficult.” (survey, VCS)

- Some disabled claimants find the digital threshold even more difficult – particularly those with low levels of literacy, learning difficulties, visual impairments or mental health challenges. This is for both making and maintaining a claim.

“Support for people who cannot use a PC. Also people with learning difficulties. The process is made hard for the claimant and it deters them from claiming and getting what they are entitled to ...” (survey, DDPO)

“This is really a travesty and the reason why we opted to take part in this survey. The government rolled our (sic) UC without first investing in digital skills development for we would say – almost 10-15% of [our] borough residents. The biggest gap remains to be digital exclusion and that is why we developed a unique initiative to develop user digital skills while at the same time supporting the access and maintain the UC claim (UC Journal). The travesty as alluded to above – the government completely ignored due process or even the courtesy to find out struggling civil society organisations up and down the country that had to almost set up emergency intervention to support desperate citizens make a claim and maintain the UC claims.” (survey, VCS)

Assessments and appeals

- The tension in the assessment process was explained by someone working for a disability rights organisation who reflected on the contradiction at the heart of the assessment process – that claimants need to demonstrate their illness, but for many it has to be their best day when they can attend.

“... We often find that claimants put their best foot forward at assessment not wanting to appear vulnerable and if they attend alone they are often incorrectly assessed as being more capable of work than they actually are. This is particularly true of mental health conditions which the assessors are singularly unqualified to pass judgement on and also some long term conditions such as fibromyalgia, ME, chronic pain etc. To ensure that these issues are addressed funding should be directed to places where claims can be maintained over time, not just new claims, and also so that trained advisor can support claimants at their health assessments ...” (survey, VCS)

- The lack of consistency, variation in expertise of assessors, and submitting evidence were other prominent issues raised. Not every assessment is undertaken by someone with relevant skills; someone with a mental health condition may be assessed by a physio which could be difficult.

“There must be much greater funding to help UC claimants access support when they need to appeal a decision. Advocacy services can only meet a tiny fraction of the demand for tribunal representation.” (survey, VCS)

“There needs to be more assistance with helping claimants obtain documents needed in order to be assessed. There also needs to be support to those who are working and are unable to take time off from work to go into a Job Centre for a required appointment. Maybe offering Saturday hours would help.” (survey, LA)

“More independent home visits from advice sector, more support services at libraries and local authority sites where people can obtain help with maintaining their claims. Also, more funding for advice so that claimants can be supported at health assessment to mitigate the risk of misrepresentation and poor quality health assessments that lead to bad decisions that require appeals that are likely to be successful. The majority of the advice sector will tell you that they are overloaded with preventable demand caused by failing, underfunded or deliberately punitive central and local govt. departments. Addressing these systemic issues is paramount. Digital by default services are not the answer to everything. We are a generation away from universal digital access and a large proportion of people are being excluded from what should be mainstream and universal services.” (survey, VCS)

- These issues increase anxiety for some facing assessments:

“Many disabled client [sic] suffer high level of anxiety at medical assessment. Many clients state what they said in the assessment is not reflected in the outcome report. We would like to see audio recording within the assessment. We obtained a FOI on the number of unrepresented clients at tribunal and these figures were rather alarming. There is likely to be another cohort of disabled clients who do not pursue an appeal due to the lack of representation.” (survey, VCS)

Making and maintaining a claim

- When asked about what could help, a range of ideas were suggested. These are presented to capture the range and diversity. They are in no particular order.

“Better support for claimants with additional needs. Better information-sharing with referring organisations [sic]” (survey, VCS)

“Needs to be long-term Needs to help beyond the first payment Needs to be possible to have the date of the claim when the claimant first contacted them Needs to be much more widely publicised” (survey, housing association)

“Provide interpreters and regular weekly help for each client” (survey, VCS)

“It should be delivered by organisations embedded in communities of interest, e.g. migrant, diaspora, LGBT, young parent, etc. 'One fits all' approach works only for best [sic] demanding cases therefore is a waste of resources as those who need them most are most likely excluded from the service.” (survey, VCS)

“More awareness raising for professionals on what the service is and how to utilise it. Co-location within other services, for example homelessness departments. We

frequently see people approaching as homeless who don't understand how to make a UC claim to pay for their temporary accommodation." (survey, VCS)

The wider welfare context

- The limited ability of organisations to meet demand was another strong theme. Many were already having to deliver more with less; some services tightening eligibility criteria to cope with rising demand; losing critical specialist organisations because they no longer have funding; and local authorities only funding statutory services leaving little room for funding preventative work.

"Budgets to support local organisations and the pressure on Local Authorities (LA) means less funding for community organisations – that's the reality. LAs have to provide statutory services and so it's hard to fund preventative which is where community organisations often exist; that's the funding pressure." (interview with LA manager)

"We are based in Newham, and although we have participants from across the M25 area, most are Newham residents. There are no local organisations left to signpost our members to. We are about to employ a Lottery funded worker directly whose role will include trying to support participants whose benefit claims are affecting their engagement with us ..." (survey, Deaf and Disabled People's Organisation, DDPO)

"The brutality of the cuts makes it difficult – so often they fund generic and hope for the best." (interview with DDPO CEO)

"Funding, funding, funding" – partnerships, networks, infrastructure and voice

- When respondents were asked for more specific ideas they spanned from funding direct services like a helpline, to increasing capacity, and unlocking particular barriers. Some examples – but are not limited to – included

"We need more financial resources to deploy more advisers, do more home visits and set up a dedicated helpline for disabled people in [our area]" (survey, CAB)

"Training for our staff would be great. Some funding to help us with the support!" (survey, DDPO)

"We would welcome funding to expand our tribunal advocacy service. We are very cost efficient as we train aspiring lawyers to represent clients for free." (survey, VCS)

"We need funding. We need a strong campaigning presence that resists austerity and privatisation, that stands up for excluded and marginalised groups." (survey, VCS)

"There needs to be better funding opportunities for smaller organisations who are helping and supporting people with their UC claims." (survey, VCS)

"Having advocates available and also making benefit application support available from the local council a compulsory requirement. We don't have enough energy to support all members who need help as virtually all our members / trustees have

varying levels of disability / illness due to Myalgic Encephalomyelitis (ME) / Chronic Fatigue Syndrome (CFS) / Fibromyalgia themselves.” (survey, support group)

“We are reliant on fundraising to support the advice aspects of our services, organisation in East London that receive direct funding for this work from national or local government struggle to provide the right support to people with learning disabilities and people with autism” (survey, VCS)

“Money to support the salary of our 2 advice workers. Universal credit has reduced the number of clients that we see because it all takes so long and then there is regular follow up because they cannot access the internet. We are having a funding crisis and will have to close in 6 months. We see over 300 clients per year and make 1200 appointments with them. If we don't support them who will. UC will save a lot of money in payments for the most vulnerable clients.” (survey, VCS)

“Fund our helpline.” (survey, VCS)

“Make the initial process easier. Release step by step guidance documents in a range of languages including easy read/braille/audio versions Develop a better system for supporting claimants experiencing financial abuse.” (survey, VCS)