



A fit-for-purpose managed migration process: safeguarding claimants with mental health problems in the move to Universal Credit

Summary

- By the end of 2024, the remaining 2.6 million households currently receiving “legacy” benefits are expected to have moved onto Universal Credit (UC). While some will do so through a change in circumstances, for instance getting a new job, many will move through a process called “managed migration”. If claimants going through managed migration don’t take all the actions required of them, they will ultimately stop receiving their benefit payment.
- More than 850,000 people in those households are known to have a mental health problem. Many thousands more are struggling with their mental health but potentially undiagnosed - all of whom will be required to move to UC under managed migration. Common symptoms of such conditions, such as reduced concentration and increased impulsivity, will present significant barriers for those trying to take the steps required as part of managed migration – raising the risk that vulnerable people will face serious financial and psychological harm.
- The experiences of people with mental health problems who are already in receipt of UC confirms these barriers are real. A survey we conducted found that, among respondents who had already made the move, four in five felt their mental health problems had negatively impacted their ability to apply for UC, and two-thirds found it difficult to complete at least one task involved in making a claim.
- Nearly all respondents who are still receiving legacy benefits said they are worried about migrating to UC, with particular concerns about reduced entitlements and difficulties coping with the five-week wait. More than eight out of ten reported they’ll need support to move to UC, yet a little over two in ten have someone to do so, and only two in ten know where to access support.
- There is a real risk that tens of thousands of people with mental health problems will find themselves cut off from their benefits at a time when living costs are spiralling and the UK looks set to enter a recession.
- As a priority, to prevent the sudden and avoidable loss of claimants’ incomes, the Department for Work and Pensions (DWP) should publicly guarantee that it will not stop the benefits of anyone who is migrating, until they’ve made a successful claim.
- To maximise the number of people who successfully migrate, the DWP should communicate with claimants in advance of migration notices to provide reassurance and alleviate fears, and ensure notices are designed and delivered in a way that makes it more likely that recipients are able to engage and respond.

Introduction

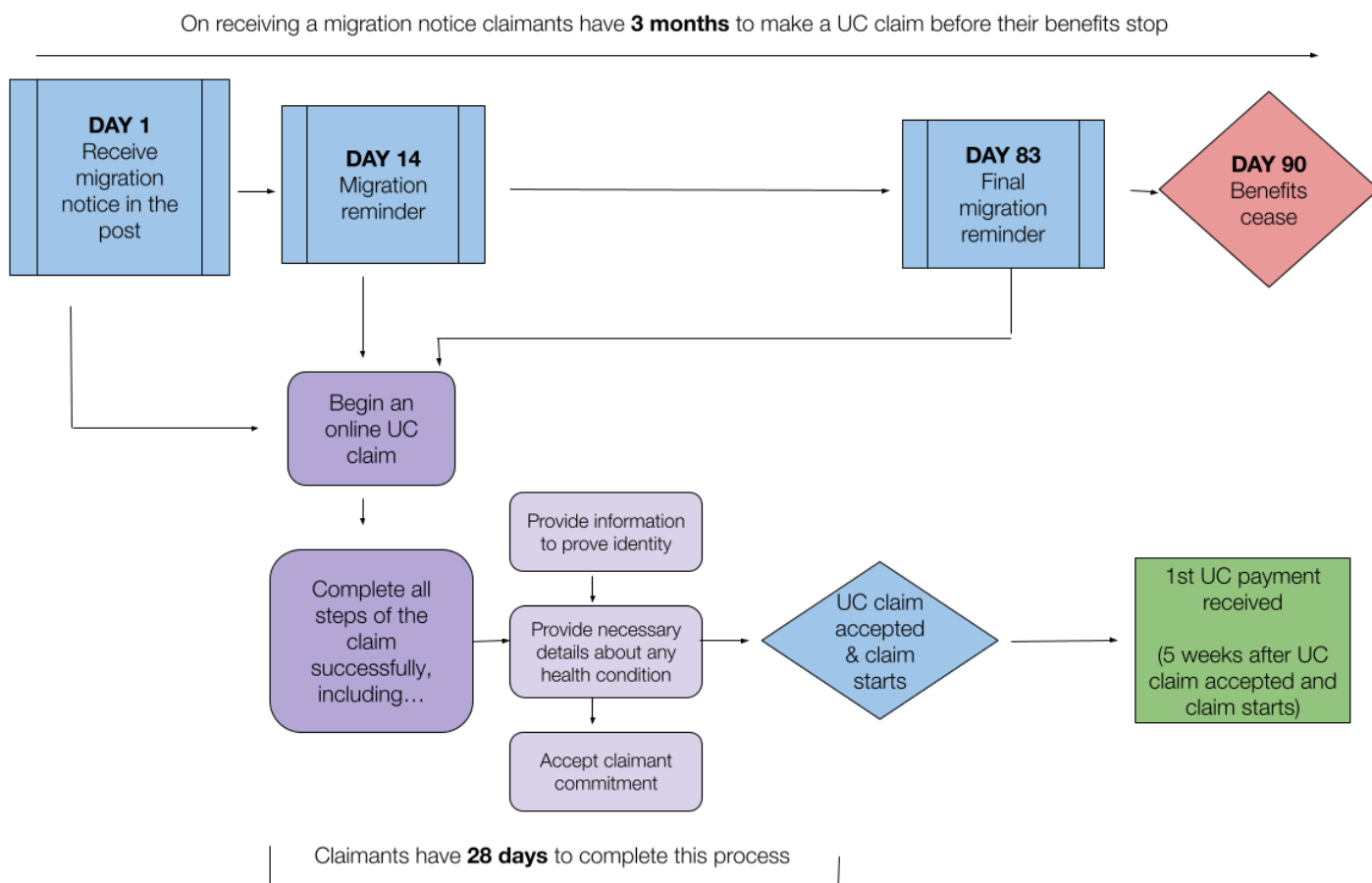
Universal Credit (UC) is now the main social security payment in the UK, having replaced several previous benefits. While the roll-out of the policy has been slow, 5.9 million people in a range of circumstances now receive UC¹, with a further 2.6 million households still to move from older “legacy” benefits by the end of 2024.²

Not all of those remaining 2.6 million households will transition to UC in the same way, however. Some will move through “natural” migration, where a change in the claimants circumstances - for instance, getting a new job - necessitates a move to UC. Others will move voluntarily, choosing to make the switch. Those taking the third route - “managed” migration - are the focus of this note. The Department for Work and Pensions (DWP) will write to these claimants and require them to make a UC claim.³ But with 867,000 of those yet to move

identified as being in receipt of Employment and Support Allowance (ESA) for a primary condition of a mental health problem,⁴ and many thousands more with a secondary mental health condition or undiagnosed⁵ - managed migration has to be designed with the needs of this group in mind.

Failure to do so could lead to dire consequences. Where claimants are unable to respond to managed migration notices within specified time frames, their benefits will cease. Beginning a UC claim means a claimant’s entitlement to legacy benefits stop. Even when claimants experience difficulties completing their claim, they risk being left without an income at a time of high and rising prices. Here, we explore what the DWP needs to do to prevent that, protecting the living standards of vulnerable claimants while helping the process to run more smoothly.

Figure 1: Illustration of the managed migration process



Source: Money and Mental Health illustration of the managed migration process based on The Universal Credit Managed Migration Regulations.⁹

Managed migration: requirements of claimants

Managed migration to UC requires substantial effort from claimants, the majority of whom will not have been expected to be so actively involved in managing their legacy benefit claim. As Figure 1 illustrates, once claimants receive a migration notice letter they'll have three months to make a successful claim online.^{6 7} Reminders will be sent two weeks after this first notification, as well as one week before the deadline.⁸ As well as the overall three-month deadline, claimants have to complete all of the required steps - including proving their identity and providing evidence - within 28 days of beginning their claim.

Immediately upon beginning a claim, claimants' entitlements to legacy benefits cease. This means that when a claimant begins but does not complete the claim within the 28-day period, their income

stops until they successfully navigate the process.

To understand the challenges claimants might face when required to go through this process, we surveyed 248 members of the Money and Mental Health Research Community, a group of thousands of people with lived experience of mental health problems.¹⁰ The survey explored the experiences of two groups of people: 100 respondents who've already moved to UC from legacy benefits, either by natural or voluntary migration; and 148 respondents on legacy benefits who are likely to be subject to managed migration.¹¹ Our research has identified three key difficulties facing claimants subject to managed migration and their ability to successfully make a claim for UC: reduced capability when it comes to complete tasks; fears about the process and its consequences; and limited awareness of or ability to get support.¹²

Table 1: Common symptoms of mental health problems and their impact on tasks required to make a successful UC claim

Task	Challenges for people with mental health problems	In the words of experts by experience in receipt of UC
Open postal migration notice	Difficulties with communication and anxiety can mean people struggle to open their post	"I put it off for a long time because I didn't understand the process."
Respond to reminders	Depleted energy levels and motivation can make it tricky to start a claim, create an account and complete forms	"I lost a few months of UC because my mental health was so bad I was in bed most of the time. I couldn't cook, eat, or look after myself. The bills mounted up, I had zero income, and this made my depression worse."
Act on migration notices	Reduced concentration can make it difficult to stay focused on long forms and provide the correct information	"I got overwhelmed while doing the application as there's so much detail they want from you."
Navigate online claim forms	Difficulties with clarity of thought can make navigating the online form and responding to messages problematic	"It was so very stressful. My anxiety levels were incredibly high. It got to the point where I couldn't look at the [UC] journal as there was an incessant stream of messages that made little to no sense or were not applicable to me. I had to beg them to stop."

Provide evidence to support your claim	Challenges with self-esteem and confidence can make it difficult to advocate for yourself and gather supporting medical evidence	"Chas[ing] up doctors for medical proof etc. was so horrendous. I can't emphasise enough how stressful the whole process was. It made me feel even more useless than I was already feeling."
Understand your claimant commitment	Difficulties processing information can make it harder to understand what is being asked of you and what you're required to do	"I found filling the forms, the commitments, proving yourself, etc. extremely difficult."

Reduced financial and administrative capability

Common symptoms of many mental health problems, such as difficulty thinking clearly and depleted energy levels, can make the UC claim process harder to navigate. Almost four in five (79%) respondents who had already moved to UC agreed that their mental health problems had negatively impacted their ability to apply for UC.¹³ Table 1 details the tasks involved in making a successful UC claim and how the cognitive and psychological effects of mental health problems can make this harder or, at times, impossible.

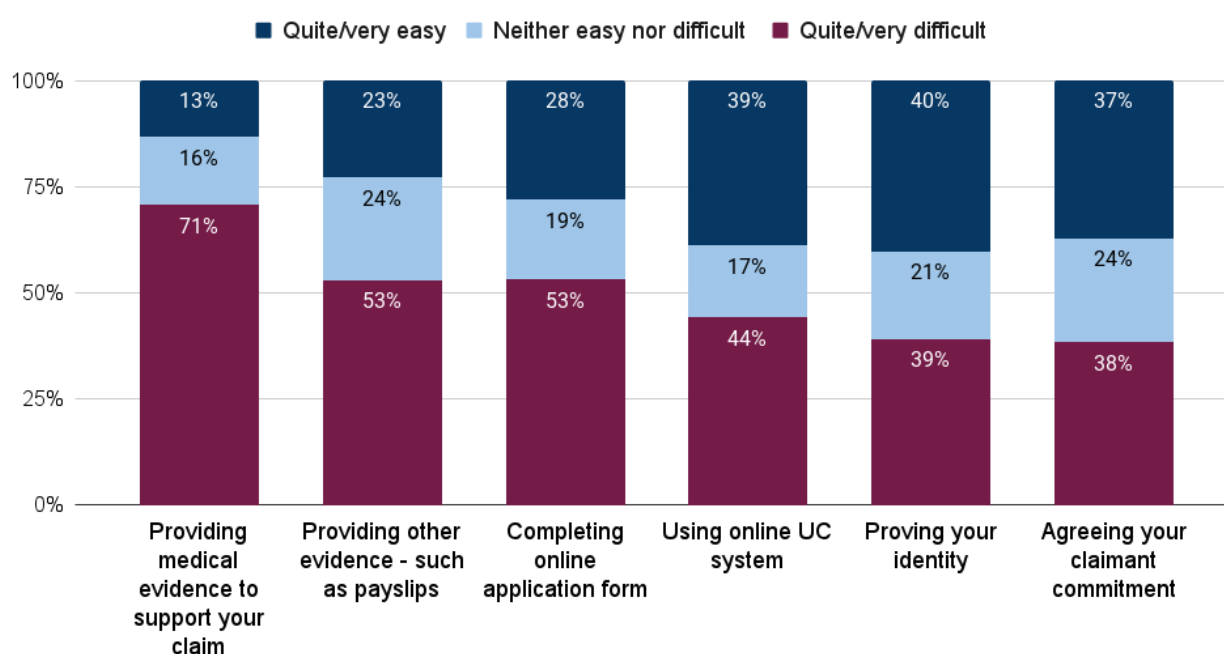
Of respondents who had already moved to UC under natural or voluntary migration, two-thirds (66%) found at least one task involved in making a claim difficult.¹⁴ While this group ultimately

managed to navigate the process successfully, for many it was an arduous task that exacerbated their mental health problems and threatened their income.

"My very first time applying for UC... I was in the middle of a mental health crisis. Applying for UC didn't seem important as I couldn't see a future."
Expert by experience - UC claimant

The task that respondents who had already moved to UC found hardest was providing medical evidence, with seven out of ten (71%) reporting that this was difficult. Over half of respondents (53%) found completing the online application form hard, and over four in ten (44%) found using the digital online system tricky.¹⁵

Figure 2: How easy or difficult did you find the following parts of making your UC claim?



Source: Money and Mental Health survey. Base for this question: 100 people who had already moved to UC either through natural or voluntary migration.

Given these common difficulties, there is a very real risk that the tasks involved in making a UC claim will prove too difficult for many subject to managed migration, and they'll fall through the cracks. Unable to respond to migration notices or reach out to signposted support services - a topic explored further below - they risk their benefit incomes being cut off simply because they're too unwell to comply with the managed migration process.

Pain points in the UC system drive fears among legacy claimants

Beyond the difficulties completing specific tasks involved in applying for UC, levels of anxiety about moving to UC were across the board extremely high, with 97% of respondents on legacy benefits agreeing that they were worried about migrating.¹⁶

"I'm not the world's quickest person at responding, so I'm scared I will run over time limits, and I will get sanctioned before I've even made a claim." Expert by experience - Legacy benefit claimant

We have identified three 'pain points' in the UC system which are driving fears around migrating. The DWP has offered partial solutions to these challenges. Yet, some of the measures are insufficient, and others fail to reach the claimants needing them.

1. Fears about reduced entitlements under UC

Nearly all (95%) legacy respondents were worried about receiving a lower entitlement under UC.

"I'm terrified of having to move over, and I'm not sure why. Maybe it's the horror stories I've heard and the suicides that have happened after being left for weeks without no money, so no heat or food etc." Expert by experience - Legacy benefit claimant

To address this risk, the DWP introduced transitional protections. These protections ensure that claimants subject to managed migration will see no difference in their entitlement at the point they are moved to UC. The DWP estimates that, of the 900,000 people expected to have a lower entitlement under UC, 600,000 will receive transitional protection.^{17 18} Yet the DWP is not effectively communicating messages about entitlement protections, thereby missing opportunities to dispel fears and provide reassurance.

2. Difficulties waiting five weeks for a first UC payment

Nine out of ten legacy respondents (91%) were worried about having to wait a month for the first payment.

To address this, the DWP introduced two key policies. Advance payments to support people who have insufficient funds to live on during the five-week wait, and a two week run-on payment for some legacy benefit claimants.¹⁹ Around 60% of UC claimants apply for advances to tide them over the initial wait for their first payment.²⁰ Notwithstanding the wider debate around the suitability of advance payments as a solution to the five-week wait,²¹ the fact remains that people are not always aware of these options ahead of migration notices, and this can drive panic and fear.

"I was unaware that I was able to apply for an advanced payment. I literally did not eat for nine days." Expert by experience - UC claimant

3. Challenges managing money across a four-week period

Just under three-quarters of legacy respondents (73%) were worried about the change from fortnightly payments under their current arrangement to monthly payments under UC, and their ability to manage this.²² There are significant concerns around vulnerable claimants' ability to budget on a monthly basis, and how this poses an increased risk of claimants being left without any funds at all.²³

To address this, the DWP introduced alternative payment arrangements (APAs). Two types of APAs - the option to have more frequent payments and/or have housing costs paid directly to landlords - are particularly relevant for people with mental health problems.²⁴ Yet, despite the evident need and demand for these alternative processes,^{25 26} they are not well utilised. Only 2% of claimants have taken up the offer of more frequent payments,²⁷ and only 20% of claimants with housing costs have their rent paid directly to landlords.²⁸ The guidance identifies mental health problems as a circumstance which might mean an APA is required, yet very few people access them, and when APAs are used, they're typically offered too late, after financial harm has occurred.

“Currently, my housing benefit is paid directly to the council, but I've been told the money will come to me, and I have to pay it to the council. I'm worried that if I'm manic, I'll see that money in my bank and go out and blow it. I need not to have access to it.”
Expert by experience - Legacy benefit claimant

Awareness and take-up of support to make a claim

Against the backdrop of pain points in the system, over half (53%) of people who had already moved to UC found completing the online application form difficult.²⁹ Yet six out of ten (60%) respondents did not receive any help to make a claim.³⁰ Of those who did have support, three in ten (30%) received help from a professional involved in their care. This paints a picture of people struggling with the transition to UC and the systems they're required to navigate, yet the support services available to help people move to UC that are not fully utilised.

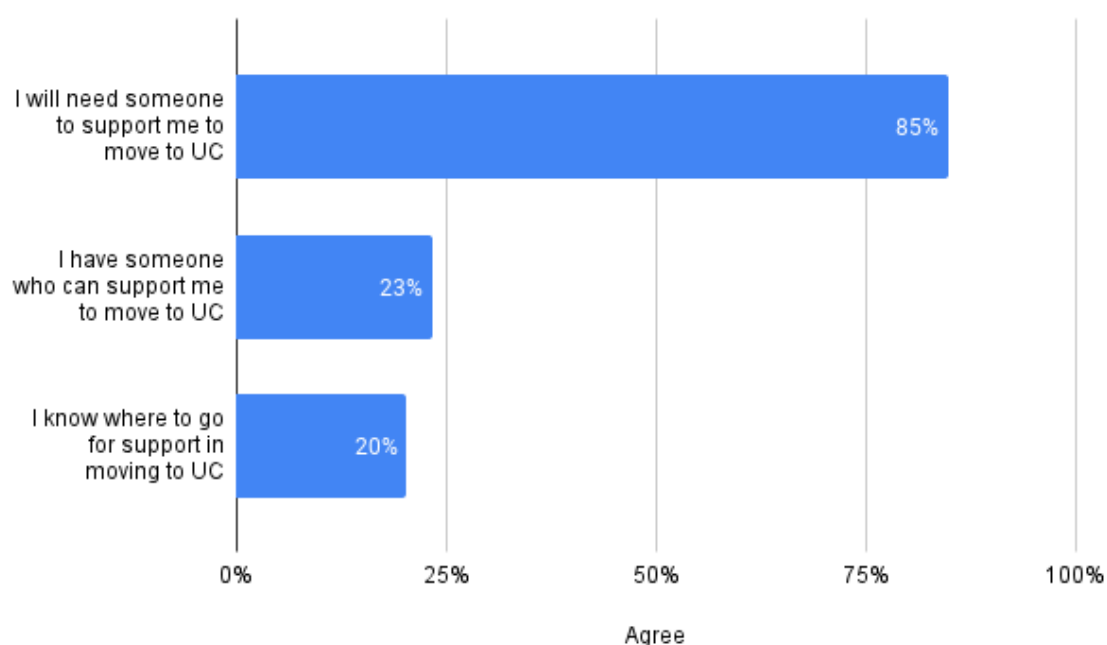
As Figure 3 demonstrates, of respondents still to migrate to UC, more than eight in ten (85%) agreed they will need someone to support them to move to UC.³¹ Yet, less than a quarter (23%) have someone to support them, and only one-fifth (20%) know where to go for support.³²

The DWP have confirmed that claimants will be

signposted to relevant support services in migration notices. This approach is insufficient for many people with mental health problems, particularly those who are acutely unwell or in crisis. Difficulties with motivation, memory or self-advocacy can mean that people struggle to reach out to sources of support even when provided with information and contact details. Some people are simply too unwell or overwhelmed with the number of tasks required of them and struggle to take any action. Others may reach out to support services they've been signposted to, but difficulties managing stressful situations can mean long hold times on the phone, or difficult online processes prove to be too much.

The government-funded 'Help to Claim service' delivered by Citizens Advice is intended to provide assistance to support people to make an initial UC claim. The overwhelming need for this service is apparent, with 100,000 people receiving assistance to make a claim in the first six months of the programme in 2019.³³ Yet recent contractual changes introduced in April 2022 mean the Help to claim service is no longer provided face-to-face and only available through telephone and digital channels.³⁴ This narrowing of delivery channels risks some of those with the most complex needs, including mental health problems, falling through

Figure 3: To what extent do you agree or disagree with the following statements about your support needs in moving to UC?



Source: Money and Mental Health survey. Base for this question: 133-138 people on legacy benefits and likely to be subject to managed migration.

the gaps.

Recommendations: mitigating the harm of managed migration

The cognitive and psychological effects of mental health problems, together with the design of UC, mean the managed migration process as it is currently configured is ill-suited to the needs of people with mental health problems. UC policy decisions and design elements risk vulnerable claimants facing very real and imminent harm. Below, we present a suite of preventative measures to make it easier for people with mental health problems to move to UC. These recommendations remove potential roadblocks to the completion of managed migration to UC, by maximising claimants' ability to respond to migration notices while also ensuring the incomes of vulnerable claimants are safeguarded.

As a priority, to prevent the sudden and avoidable loss of claimants' incomes, the DWP should:

- **Provide a guarantee that they will not stop anyone's legacy benefits until they have successfully made a claim to UC.** In line with the campaign by Mind,³⁵ this would safeguard all claimants, including those who have mental health problems but may not have a diagnosis or be unaware they're experiencing a mental health problem.
- The above option is optimal to protect vulnerable claimants. However, we are aware the DWP is committed to completing migration and sees this safeguard as a potential deterrent to claimants responding to migration notices and moving over to UC. Therefore, as a less preferable option, the DWP should, at the very least, **provide a guarantee it will not stop the benefits of anyone the department knows is vulnerable as part of the migration process.** This would include but is not limited to all those in receipt of ESA, Personal Independence Payment (PIP), as well as any other claimants the DWP are aware of who are vulnerable. This would

mitigate some risk of harm and safeguard some of the most vulnerable claimants.

The priority recommendation to safeguard claimants must be accompanied by immediate practical changes: implementing measures to communicate with claimants preemptively to address fears and provide reassurance; and delivering migration notices in a way that optimises claimants' ability to respond to them. This will have the benefit for DWP of minimising the number of 'vulnerable' claimants who would end up needing the safety net outlined above.

To communicate with claimants preemptively in advance of migration notices to address known fears, the DWP should:

- **Provide advanced notifications of the five-week wait for payment** to those claimants who will not automatically receive the two week run on payment. Information should include a simple outline of the option of an advance payment and what this means for claimants.
- **Make people aware of transitional protections under managed migration**, by providing advance reassurance that the move will not result in lost income and notifying, in advance, those claimants who will be eligible for a two week run on payment, effectively reducing the five week wait.
- **Proactively offer budgeting support to all claimants subject to managed migration** to assist them with moving to monthly payments.
- **Actively promote housing cost and frequency of payment APAs to vulnerable claimants**, including those in receipt of ESA, PIP and who previously had housing costs paid directly to landlords.

To optimise claimants' ability to respond to migration notices, the DWP should:

- **Routinely record claimants' communication preferences** and, in addition to formal written notices and

reminders, communicate with claimants via their preferred channel.

- **Ensure the tone of communications is reassuring**, reminding people of the options available to them around transitional protections, two week run on payments, advance payments, budgeting support and help with making a claim. Information should be provided in simple and accessible language, acknowledging the anxieties this may provoke and providing a point of contact for support.
- **Reinstate face-to-face delivery of the Help to Claim service.** In light of the complexity of the needs of vulnerable claimants going through managed migration, the DWP should reinstate funding for the face-to-face delivery of the Help to Claim service in the new contracts due to take effect from April 2023.

Finally, we have identified the following two stretch recommendations which would evidence the DWP's commitment to safeguarding vulnerable claimants.

The DWP should:

- **Withdraw the request to lift the 10,000 cap on managed migration.** The DWP recently requested to pass legislation to lift the existing 10,000 cap on the number of people who can be migrated to UC without returning to parliament for permission to roll out nationally.³⁶ The DWP reports that a return to parliament is no longer required with the new iterative approach to managed migration. This change in approach is also driven by a desire for expediency with rolling out UC. The DWP's request to bypass robust parliamentary scrutiny serves to exacerbate stakeholders' existing fears and perpetuate the fear and anxiety that we have identified is a significant barrier to many on legacy benefits moving over to UC. While stakeholders in the welfare benefits sector are mindful of the

Department's intention to complete managed migration by the end of 2024, this must categorically not be at the expense of vulnerable claimants.

- **Commit to transparency with stakeholders on the iterations of managed migration.** While the DWP is confident the test-and-learn approach to managed migration is sufficient to safeguard vulnerable claimants, to date, it has not provided sufficient evidence to reassure stakeholders of this. Those working in the welfare benefit sector have grave concerns that vulnerable claimants are being placed at risk - and that difficulties responding to migration notices will lead to people's incomes being cut off, with potentially devastating consequences.³⁷ As the first migration deadline approaches, the DWP should commit to transparency around the precise steps they are taking to engage and protect vulnerable claimants.

Endnotes

¹ DWP. [Universal Credit statistics April 2013 - July 2021](#). Published: August 2021

² DWP. [Completing the move to Universal Credit](#). Published: June 2022.

³ Ibid

⁴ Stat-Xplore. 867,868 people receiving ESA legacy benefits with a primary condition of a mental or behavioural disorder as of November 2021.

⁵ Money and Mental Health analysis of Department for Work and Pensions, Employment and Support Allowance statistics, May 2018, and Adult Psychiatric Morbidity Survey 2014. For more, see Bond N and Braverman R. The benefits assault course. Money and Mental Health Policy Institute. 2019.

⁶ DWP. [The Universal Credit \(Transitional Provisions\) Managed Migration Amendment Regulations 2018](#).

⁷ In May 2022, the DWP introduced, for the first cohort of 500 claimants receiving migration notices, an automatic one-month extension to the three-month deadline for claimants to respond to migration notices. The DWP have not yet confirmed if this automatic extension will be offered to subsequent cohorts of claimants who receive migration notices.

⁸ Ibid

⁹ DWP. [The Universal Credit \(Transitional Provisions\) Managed Migration Amendment Regulations 2018](#).

¹⁰ The survey was carried out between 11 and 17 March 2022

¹¹ Money and Mental Health survey. Base for this question: 248 people currently claiming either UC or legacy benefits.

¹² We recognise there are multiple concerns around the design and administration of UC, however, many of these issues are outside of the scope of this report - which focuses specifically on managed migration. Our previous work looks at some of the wider issues with UC, including our report [Set up to fail](#) and consultation response on,

[The wait for a first payment.](#)

¹³ Money and Mental Health survey. Base for this question: 99 people who had already moved to UC.

¹⁴ Money and Mental Health survey. Base for this question: 96 people who had already moved to UC.

¹⁵ Money and Mental Health survey. Base for these questions: 70 - 99 people who had moved to UC.

¹⁶ Money and Mental Health survey. Base for this question: 146 people in receipt of legacy benefits.

¹⁷ DWP. [Completing the move to Universal Credit](#). Published: June 2022.

¹⁸ The remaining 300,000 expected to receive a lower entitlement under UC and not afforded transitional protections, are expected to either leave benefits, migrate naturally or receive a severe disability transitional payment.

¹⁹ Policy in Practice. Universal Credit: legacy benefits run-on starts today. 2020

²⁰ Gov.UK. [Universal Credit: personal welfare](#). January 2019.

²¹ Bond N. Work and Pensions Committee's inquiry on Universal Credit: the wait for a first payment. Money and Mental Health Policy Institute. 2020

²² Money and Mental Health survey. Base for this question: 143 people in receipt of legacy benefits and likely subject to managed migration. .

²³ CPAG. [Universal credit: budgeting support](#). David Simmons. 2013

²⁴ DWP. [Alternative Payment Arrangements](#). May 2020.

²⁵ Bond N, Evans K and Holkar M. Where the heart is. Money and Mental Health Policy Institute. 2018

²⁶ N Keohane, R Shorthouse, Sink or Swim? The impact of universal credit, Social Market Foundation, 2012

²⁷ Gov.UK. [Universal Credit: personal welfare](#). January 2019.

²⁸ Ibid.

²⁹ Money and Mental Health survey. Base for these questions: 99 people who had already moved to UC.

³⁰ Money and Mental Health survey. Base for these questions: 99 people who had already moved to UC.

³¹ Money and Mental Health survey. Base for this question: 138 people in receipt of legacy benefits and likely subject to managed migration.

³² Money and Mental Health survey. Base for this question: 133 people in receipt of legacy benefits and likely subject to managed migration.

³³ Citizens Advice. Help to Claim – the story so far. 2019.

³⁴ UK Parliament. Hansard. Help to claim. 26 January 2022.

³⁵ Mind. [Leading Charities unite to tell UK Government to halt managed migration](#). May 2022

³⁶ Gov.UK. [The Universal Credit \(Transitional Provisions\) Amendment Regulations 2022](#). July 2022

³⁷ Mind. [Leading Charities unite to tell UK Government to halt managed migration](#). May 2022