



## **CSAN response to the Work and Pensions Committee inquiry into benefit delivery**

1. CSAN (Caritas Social Action Network) is the domestic social action arm of the Catholic Church in England and Wales. Our network includes 43 charities and dioceses who work with vulnerable people all across England and Wales

2. The response below is a collection of the frontline experiences of the CSAN network. Respondents include in particular: **Nugent Care, Cardinal Hume Centre, The Passage, St Vincent de Paul Society** and **Caritas Diocese of Salford**.

### **3. Summary**

- While the process of issuing payments correctly and promptly have improved for straightforward claims; delays still occur frequently when additional information such as medical forms are requested.
- The shift towards technology fails to recognise the varying abilities of clients, in particular those with language barriers or those with computer skills. As a result, unnecessary delays frequently occur, as well as sanctions which could have been avoided.
- The impact of errors and delays, in particular inappropriate sanctions, has caused severe hardship for many of CSAN charities clients. Employment Support Allowance (ESA) applicants and recipients as well as migrants are the groups most adversely affected.
- There needs to be a greater understanding by the decision makers behind benefit sanctions of the impact on people with health issues and especially those with mental health issues.
- CSAN charities have had to diversify their support services in order to mitigate the impacts of errors, delays and incorrect sanctions within the benefit system.
- CSAN has noted that previously few charities were providing funding for utilities with a focus instead on food parcels, we now however see that most provide clients with money to top up utility meters.

#### 4. Recommendations

*The extent to which the DWP delivers benefit and Universal Credit payments correctly and promptly*

- To allow charities and professionals to fully support vulnerable clients, there should be an intermediary line for advisors of charities to call on behalf of clients, similar to the one available for HMRC.
- Free phone lines and phone-banks in Jobcentres should be restored to enable claimants to receive an update on their application at no cost to themselves.
- There should be more opportunity for face to face contact with Jobcentre advisors, this will help claimants navigate the complicated procedures and reduce the number of errors made in the application stage.
- More recognition is needed of the varying abilities of computer skills, literacy, comprehension and language skills of claimants.

*The impact of errors and delays and how such effects are mitigated*

- It is the view of the CSAN network that the sanctions for ESA claimants are often inappropriate, particularly for those with ill health and disabilities. We suggest steps be taken to ensure vulnerable groups are exempt from sanctions.
- As recommended in the Feeding Britain report published by the All-Party Parliamentary Inquiry into Hunger in the United Kingdom, CSAN would support an introduction of a yellow-card system whereby claimants are given a chance to provide an explanation for a breach of rules rather than immediately receiving a sanction.
- Non-financial penalties should be explored as much as possible, this will prevent families and individuals from falling into destitution.

*How the Department's performance in this area might be monitored and improved*

- In order to improve the accountability and efficiency of the benefit delivery system, a monitoring process should be introduced. This could include recording the number of calls each application requires before a resolution is granted.
- To improve the efficiency of the system, there should be a review into the number of incomplete applications (started, but not finished) and statistics released on how long on average each online application form takes to be completed.
- In addition, to improve the accountability all phone calls between DWP call centres and claimants regarding their application should be recorded.

## **The extent to which the DWP delivers benefit and Universal Credit payments correctly and promptly**

5. In the experience of CSAN charities, the benefit and Universal Credit payments system has become more efficient in dealing with and processing claims from people who do not have any additional support issues. However, despite this welcome progress, there still remains significant issues in the efficiency and accuracy of processing applications which are not entirely straightforward.

6. Delays often occur when additional information, such as medical forms, are requested. In these cases it is not uncommon for DWP staff to be unable to locate clients' supporting information. This causes severe hardship and distress for clients who are awaiting an outcome of a claim and can often delay an application for many weeks.

### **Box A: lost & conflicting information**

'Lawrence', a client of Nugent Care, did not receive a payment for nine weeks. Lawrence was migrated from Universal Credit to Jobseekers Allowance and despite submitted sick notes from medical professionals, his claim for ESA was refused. There was conflicting information from advisors. Lawrence was eventually put on ESA element of Universal Credit, however the DWP then lost his sick notes - which meant more delays. This impacted on other benefits such as Housing Benefit and Council Tax benefit – resulting in huge rent arrears, and he was threatened with eviction from his housing association and court action.

**Nugent Care, Liverpool**

7. Many Catholic charities have also reported the difficulties that have arisen out of the shift towards digital technology. There is an expectation on the claimant to be computer literate with a strong command of English. For many vulnerable clients of CSAN charities, in particular migrants, this has added another layer of difficulty in the process as they require professional help to use computers. Due to the complicated online forms, many clients are unable to complete their application and have to re-do it on a number of occasions.

### **Box B: Lack of computer skills**

'Anthony' is a single man in his 60's who is living with arthritis. After failing a medical assessment, Anthony was told to apply for JSA and to complete his job searches on the internet. Anthony does not have the computer skills to enable him to apply for work in this way and due to this; he was then sanctioned and his Housing Benefit stopped. Anthony was left with no income and his mental health began to decline to the point where he began to self-harm. For the first time in his life Anthony began to get into debt and was going without hot water, gas and electric because he was not in receipt of any benefits for 3 months. Anthony is now on medication to treat his depression and has been put back onto ESA. He is currently awaiting an appeal hearing against the original decision to take him off ESA and is dreading the thought of facing another medical assessment as he fears he will be once again be subjected to a life of poverty and despair.

**Cornerstone Centre, Caritas Diocese of Salford**

8. The shift to technology has also depersonalised the process, leaving the most vulnerable claimants with an increased sense of isolation and helplessness when they encounter difficulties completing the application. There is strong encouragement to avoid the phone help line and to instead use the online application form.

9. The removal of free phones in Jobcentres for claimants to use has created additional difficulties for those who wish to check on progress but cannot afford to call the expensive number in order to do so.

10. Many clients rely on CSAN charity staff to assist them in completing applications and to obtain further information on a variety of decisions. However, the current procedures often prevent staff at charities from being able fully to support their clients. Clients ask for staff to handle claims for a number of reasons, including: the client would have difficulty dealing with a call back, due to vulnerability or language problems, or because organisations are a centre for homeless people who may not be able to wait the three hours waiting time for a call-back. CSAN charities are often advised that the person dealing with the case will not necessarily divulge the information. This despite the fact the client has given his or her express authorisation.

## **11. Recommendations**

- To allow charities and professionals to fully support vulnerable clients, there should be an intermediary line for advisors of charities to call on behalf of clients as there is for cases relating to HMRC.
- Free phone lines and phone-banks in Jobcentres should be restored to enable claimants to receive an update on their application at no cost to themselves.
- There should be more opportunity for face to face contact with Jobcentre advisors, this will help claimants navigate the complicated procedures and reduce the number of errors made in the application stage.
- More recognition is needed of the varying abilities of computer skills, literacy, comprehension and language skills of claimants. .
- In order to improve the accountability and efficiency of the benefit delivery system, a monitoring process should be introduced. This could include recording the number of calls each application requires before a resolution is granted.
- In addition, to improve the accountability all phone calls between DWP call centres and claimants regarding their application should be recorded.
- To improve the efficiency of the system, there should be a review into the number of incomplete applications (started, but not finished) and statistics released on how long on average each online application form takes to be completed.

## **The impact of errors and delays and how such effects are mitigated**

12. The impact of errors and delays on individuals and families is often severe and causes a great degree of hardship and distress, especially in the case of incorrect and inappropriate benefit sanctions where many hoops have to be jumped in order to have a decision overturned.

### **Box C: Incorrect sanction**

'Sarah', a 28yr old British woman, received a letter from DWP saying her benefits were 'changing' and that if she wanted more information about this change, she must ring a call centre number. After finally hearing back from the call centre (who operate a '3 hour' call back system – in reality the 3 hours often extend over a much longer timescale) she was informed that the 'change' to her benefits was in fact a suspension. Her benefits had been suspended because she had not been able to provide payslips for the 1hr per week work she does as a piano teacher at a private school. The school was closed for the summer holidays and she was not able obtain the payslips until September. The Cardinal Hume Centre (CHC) intervened and offered the client's bank statements as evidence of the payments in lieu of the payslip and asked for her benefits to be reinstated urgently. Sarah was given this letter to take with her when she next signed on and to request for it to be sent by HOTT (scanning/electronic transfer) to the Benefit Centre. However, this didn't happen and 10 days later, the claim was still suspended. Sarah by now had managed to obtain payslips and took them to the local Jobcentre who forwarded the letter by post to the Benefit Centre causing more delay. CHC failed to reach the DWP Call Centre at first before eventually getting through and receiving confirmation that suspension had finally been lifted.

### **Cardinal Hume Centre, Westminster**

13. The adverse impact is particularly pertinent for the most vulnerable clients, such as people with mental health issues or those in receipt of ESA. There needs to be a greater understanding by the decision makers behind benefit sanctions of the impact on people with health issues and especially those with mental health issues.

14. As a claimant is appealing a decision of being declined or withdrawn from ESA they are expected to claim JSA. However, many are unable to fulfil the claimant commitment required by JSA such as attending appointments due to their mental and physical health issues. This results in these individuals receiving further sanctions, which more often than not leads to a deterioration of their health conditions, especially mental well-being.

### **Box D: Incorrect ESA sanction**

'John', a sufferer of severe diabetes and other medical conditions, following assessment by the independent agency had removed his entitlement to ESA. John's GP provided evidence which said he was more ill than ever before, but the assessor refused to accept this evidence. The decision was sent to appeal. In the meantime his income was cut to the absolute minimum. He has passed out on a number of occasions both in his house and outside, once having his money and shopping stolen. In the meantime he continued searching for a job and attending classes on literacy, maths and IT. The job search threw up jobs for which he was not qualified, despite him telling the authorities he had, for instance, no driving licence and no means of travelling to the jobs, some 50 miles away. He was sanctioned on more than one occasion for failing to attend either a class or an interview. In more than one case, letters had been sent to an address at which he had never lived. Ultimately, after several interviews and appeals and through dogged determination, he has successfully managed to have his benefits reinstated in full and backdated several months. All this over a period of 2-3 years of worry, lack of the right diet

(not good for a severe diabetic) and inability to live a reasonable life. SVP St Robert's helped with cash, food parcels, food bank vouchers, furniture and transport.

**SVP, St Robert's**

15. Migrants are often adversely affected by errors and delays; CSAN charities such as the Cardinal Hume Centre deal with cases where refugees and migrants are provided with incorrect information by the Jobcentres which leads to their claims being refused on false grounds.

**Box E: Incorrect information provided**

'Mr and Mrs B' had worked for 11 and 13 years respectively for the same employer until being made redundant in November 2014. After Mr B was diagnosed with TB – and Mrs B had failed to find alternative employment – they tried in January 2015 to claim ESA and JSA respectively, based on their National Insurance contributions. They were then advised by the Jobcentre that Mr B had to withdraw his ESA claim and that they had to make a joint claim for JSA: this of course applies only to people claiming income-based JSA, not contribution-based JSA as she was trying to claim. This led to Mr and Mrs B being pushed into the habitual residence test, which would not have applied to the contributory benefits they had been trying to claim. The Passage got involved in mid-March, only to be informed the couple had failed to provide proof of immigration status, which in fact they had provided on several occasions. When the Passage phoned to ask for the contributory benefits to be processed, they were advised proof of immigration status is required for these also, which of course it is not. Mrs B was then awarded income-based JSA for the couple in early April. Until then, they and their young son – who also has health problems – had been relying on food parcels and travel tickets from the Passage centre, money from friends, and bank overdraft. Mr B was finally awarded contributory ESA on 6th May 2015, while Mrs B was not awarded contribution-based JSA until 15th June 2015.

**The Passage, London**

**Box F: 'Hurdles to jump'**

'Nadima', a young Sudanese client of the Cardinal Hume Centre (CHC) was granted refugee status on 13/04/15. Nadima was capable, articulate and spoke English fluently but it still took 2 months to get her Jobseeker's Allowance claim processed and required multiple interventions from the Cardinal Hume Centre. During this time, she did not have any money to live on and she could not resolve her homelessness situation because hostels would not take her until her benefit was awarded.

Nadima approached CHC after spending 5 weeks trying in vain to resolve the problem. She had made a claim for JSA but it had still not been paid because no National Insurance number had been allocated; she was going round in circles. She would contact the Jobcentre, only to be told to call the National Insurance number (NINO) booking line, who would then redirect her back to the Jobcentre. After escalating the case, the CHC were informed that she would be contacted within a week for the interview she needed to get a National Insurance number.

The CHC advised Nadima that although she could not be paid Jobseeker's Allowance until she had a National Insurance number, she could apply for a Short Term Benefit Advance (STBA) whilst she waited. When she first called, they refused to even take her application because she didn't have a NINO. CHC contacted them on her behalf and they

eventually accepted her STBA application, only for it to be refused (wrongly) because she didn't have a NINO.

CHC then had to escalate the case again and this time were told a NINO interview had finally been arranged but it had been scheduled "blind". The benefit centre could not tell the Nadima the date or time it was booked for. They promised to contact her. She was called back by the NINO centre but she was given the right day and time but the wrong location. She went to her local Jobcentre, as advised, but this was not where they had booked her an interview. Meanwhile, they wouldn't budge on her STBA decision, maintaining that there was another hurdle she'd have to jump. She was advised that she'd need a Habitual Residence Test interview although refugees are exempt from this test. As they were able to arrange an interview the same day, she decided to do it anyway. Her NINO interview had to be rescheduled and she made a third application for a STBA. Again the contact centre refused to take her application, and CHC had to call on her behalf – the fourth attempt. She was finally allocated a NINO but the benefit centre then called her to say that they had never received her claim form and she would need to complete another new claim form. Fortunately, CHC knew this was not true and we were able to step in at that point and direct them to their colleagues in another team who had the paper form.

**Cardinal Hume Centre, Westminster**

16. In addition to supporting clients in their applications and attending various meetings, CSAN charities have had to diversify their support services to help mitigate the delays and errors which occur.

17. In 2014 the Cardinal Hume Centre, in response requirements around benefit applications, employed a full-time Welfare Rights Officer. This has proved to be a vital lifeline for many clients, especially the most vulnerable.

18. Since 2013 Nugent Care have had to expand the criteria for the distribution of funds to clients. In addition, the type of items clients can receive financial support for now include rent, gas and electricity among other household essentials. Despite not being a major, or known, foodbank in the area they have distributed over 380 food parcels in the period of March 2014 to June 2015.

19. The Passage has developed a credit system for breakfast and lunch provided at their centre in London, as well as giving access to their clothing store. Clients in the supported accommodation are also often provided with food parcels. In addition, small cash loans are now provided to clients to enable them to top up electricity and gas key meters.

20. A number of parishes and charities have also established foodbanks; the Southwark SVP set up a foodbank in response to local residents being affected by issues and errors in benefit payments and administration. This also, like many other CSAN charities, includes money being provided for electric and gas meters.

21. CSAN has noted that previously few charities were providing funding for utilities with a focus instead on food parcels, we now however see that most provide this funding.

## **22. Recommendations**

- It is the view of the CSAN network that the sanctions for ESA claimants are often inappropriate, particularly for those with ill health and disabilities. We suggest steps be taken to ensure vulnerable groups are exempt from sanctions.
- As recommended in the Feeding Britain report published by the All-Party Parliamentary Inquiry into Hunger in the United Kingdom, CSAN would support an introduction of a yellow-card system whereby claimants are given a chance to provide an explanation for a breach of rules rather than immediately receiving a sanction.
- Non-financial penalties should be explored as much as possible, this will prevent families and individuals from falling into destitution.

### **Additional information**

In July 2015, CSAN published a report on the impact of the welfare changes, which has further evidence and information on the impact of sanctions and welfare delays on vulnerable people. To read this report, please go to: [www.csan.org.uk](http://www.csan.org.uk).