



IT WAS A  
CONFUSION

**UNIVERSAL CREDIT  
AND MENTAL HEALTH:  
RECOMMENDATIONS  
FOR CHANGE**

# ABOUT SAMH

SAMH is the Scottish Association for Mental Health. Around since 1923, SAMH operates over 60 services in communities across Scotland providing mental health social care support, homelessness, addictions and employment services, among others. These services together with our national programme work in See Me – Scotland's National Anti-Stigma Programme, respectme – Scotland's National Anti-Bullying Programme, suicide prevention, sport and physical activity inform our public affairs work to influence positive social change.

# CONTENTS

<b>Summary</b>	<b>4</b>
<b>Context – What is Universal Credit?</b>	<b>6</b>
<b>Applying for Universal Credit</b>	<b>6</b>
<b>Assessment for Limited Capability for Work Elements of Universal Credit</b>	<b>8</b>
Delays to assessment	9
Conditionality while waiting for assessment	9
<b>Managing a Universal Credit Claim</b>	<b>10</b>
Initial payments:	10
Monthly assessment period	12
Conditionality and Work Coach Discretion	13
Sanctions and deductions	16
<b>Impact of support</b>	<b>17</b>
Universal Support	17
Community Partners Programme	18
Other support	19
<b>Scottish Flexibilities</b>	<b>20</b>
<b>Conclusion</b>	<b>21</b>
<b>Recommendations</b>	<b>22</b>
<b>Glossary</b>	<b>24</b>
<b>Endnotes</b>	<b>25</b>



# SUMMARY

The introduction of Universal Credit, starting in 2013, has been one of the largest changes to the UK's social security system in the last 20 years.

This report explores the experience of people with mental health problems in Scotland who have engaged with the Universal Credit system, and makes recommendations for changes. The report sets out how the aims of Universal Credit have been undermined through its structure and delivery. Far from simplifying the welfare system and supporting people into work, for people with mental health problems Universal Credit has created new barriers and added to people's distress. Our recommendations aim to positively change policy at a governmental level, as well as practice at delivery level in JobCentre Plus.

The report brings together findings from research reports from Scotland and across the UK. It has been informed by three in-depth case studies of people engaged with the Universal Credit System, including a young person and a carer. It has also been informed by other third sector organisations, working directly with people in receipt of Universal Credit, who took part in a SAMH policy workshop on Universal Credit in December 2018.

While the Universal Credit regime remains in its current form, SAMH believes no one should be transferred to Universal Credit from legacy benefits, either through natural migration or the forthcoming managed migration.

The report highlights a number of areas where Universal Credit is affecting people applying for and receiving Universal Credit, making recommendations on each area:

## Applying for Universal Credit

The report outlines difficulties with the 'Digital by Default' approach to Universal Credit. For people with mental health problems digital by default is a clear barrier when applying for Universal Credit. The hurdles include a lack of access to IT equipment and support; difficulties accessing alternative application methods through the Department of Work and Pensions (DWP); problems for some people using IT due to their mental health condition; and overall digital literacy. We believe that digital by default should be scrapped and people should be permitted to use the most appropriate contact channel for them.



***Far from simplifying the welfare system and supporting people into work, for people with mental health problems Universal Credit has created new barriers and added to people's distress.***

## The Universal Credit Limited Capability for Work Assessment

In most cases, people who have a medical or disabling condition must undergo a face to face medical assessment when applying for Universal Credit. This assessment decides whether they are entitled to the Limited Capacity for Work Element of Universal Credit and consequently, whether they will have to undertake job searching or work related activities in order to receive their benefit. The report highlights how face to face medical assessments do not work for people with mental health problems. The assessments fail to adequately gauge the impact of mental health and other fluctuating conditions, with assessors lacking a full understanding of mental health. Other issues include people waiting for their assessment being required to undertake work related activities at their Work Coach's discretion. We call for a fundamental rethink of the medical assessment process and an end to applying conditionality to anyone waiting to be assessed.

## Managing Universal Credit

The report highlights significant difficulties people with mental health problems face when managing their Universal Credit claim. People are too often subject to inappropriate conditionality, at times resulting in sanctions which cause financial and emotional distress. No evidence has been found showing sanctions move people towards employment. The report shows how the substantial degree of discretion given to Work Coaches compounds issues around conditionality and sanctioning. We call for strengthened guidance to Work Coaches on setting conditions on work related activity; and full use of Work Coaches' powers to pause or modify conditionality.

## Support while receiving Universal Credit

The final part of the report focuses on the level of support available to people in receipt of Universal Credit. Support is available through Universal Support, which while helpful is overly restricted and requires additional investment. The report highlights the Department for Work and Pensions (DWP) Community Partners programme as a good example of partnership working to support people receiving Universal Credit. We are calling for funding of this programme – due to end in March 2019 – to be continued. The report also highlights the positive impact that outside support from third sector organisations such as SAMH can have on people with mental health problems

The full list of recommendations to the UK Government and Job Centre management can be found at the end of the report. There is also a glossary at the end of the report explaining key terminology.

# CONTEXT - WHAT IS UNIVERSAL CREDIT?

Universal Credit replaces six income-related and out of work benefits with one single payment. Payments are made to households rather than individuals, with claims managed online.

The benefits replaced by Universal Credit are Child Tax Credit; Housing Benefit; Income Support; income based Jobseeker's Allowance (JSA); income-related Employment and Support Allowance (ESA); and Working Tax Credit. These benefits are referred to as 'legacy benefits' throughout this report.

The roll out of Universal Credit to new claimants in Scotland is now complete. Existing legacy claimants currently can be moved to Universal Credit by 'natural migration' when they have a change in circumstance, such as a change of address or a change in health. An individual's final Universal Credit award after natural migration can mean a reduction in income compared to their legacy claim.<sup>1</sup> The UK Government is planning for all people in receipt of legacy benefits to be transferred to Universal Credit through a process called 'Managed Migration' by the end of 2023.<sup>2</sup> Unlike for natural migration the Government's intention is that no one's Universal Credit award will be reduced through managed migration. People transferring to Universal Credit by managed migration will qualify for transitional protection to guarantee their Universal Credit award matches the value of their legacy benefits.

As of August 2018, 102,139 households in Scotland are in receipt of Universal Credit.<sup>3</sup> Of these 7,797 households (7.63%) have at least one person with limited capability to work.<sup>4</sup> Statistics provided by the UK Government Department of Work and Pensions (DWP) do not provide a breakdown of the reasons why someone has limited capacity to work, including when this is due to a mental health condition. This makes it impossible to know how many people in receipt of Universal Credit have

a mental health problem. We know that someone's mental health is the most common reason for someone to be in receipt of ESA.<sup>5</sup> From this it can be inferred that the proportion of people with mental health problems in receipt of Universal Credit now and in the future will be high.

The original purpose of Universal Credit was to simplify the complex UK social security system and support people into employment. SAMH supported these aims, recognising that good employment can support mental health, and that the UK social security system can be challenging to navigate, especially for people with mental health problems or other disabilities.<sup>6</sup> However, the Universal Credit system must be fit for people with mental health problems and not cause harm.



# APPLYING FOR UNIVERSAL CREDIT

One of the defining features of Universal Credit is that it is “digital by default”, meaning it has to be applied for and managed online. This is a barrier for many people who do not have digital skills or lack access to a computer, and poses particular issues for people with mental health problems.<sup>7</sup>

Research from the DWP itself has found that:

**24%**

of people with long term conditions could not register a Universal Credit claim online;

**53%**

needing support setting up a claim, and

**38%**

requiring ongoing support.<sup>8</sup>

These figures are affirmed in Citizen Advice Scotland’s Disconnected report, which detailed the experiences of people seeking advice at 33 Scottish bureaux in 2016. They found that 68% of people seeking to claim a disability benefit would require assistance to make an online claim.<sup>9</sup> Participants from the advice and employability sector who attended SAMH’s Universal Credit policy workshop reported that people with mental health problems commonly experience increased anxiety when claiming Universal Credit online. There can be practical issues arising from their mental health problem, such as difficulty remembering log in details.

The experience of our case studies was mixed. For some people applying for and managing their UC claim online was beneficial. For example, case study B who was 19 and highly digitally literate, found the processes easy to understand:

*“I did the online application, I didn’t really find it was that hard. I grew up using technology, so it didn’t really bother me, but someone like my aunt who has a mild learning disability, I could see her really struggling with it.”*

(Case Study B)

This positive experience contrasted with Case Study A, who had to apply for Universal Credit on behalf of his son who has significant mental and physical health problems. He required assistance from his local Citizen Advice Bureau to make the application:

*“I’m terrible at filling out forms, I’m always frightened I’ll put the wrong thing in and I’ll have to begin again or “No, we’re not going for that” or whatever so I got help from the Citizen Advice.”*

(Case Study A)

DWP guidance does allow the option for applying for Universal Credit by telephone.<sup>10</sup> However, there are barriers to accessing this service. Call handlers must establish “overwhelming evidence to suggest a claimant is digitally excluded”, then “stress the importance and benefits of claiming online”.<sup>11</sup> Even where the claimant is vulnerable, the call handler must first ensure there is no one else who could support the claimant before allowing a phone application.<sup>12</sup> This places unacceptable pressure and stress on an already vulnerable person.

Another problem with the digital by default system is access to the internet

and IT. The 2017 Scottish Household Survey found that only 66% of households with low incomes (£15,000 or lower) had access to the internet at home compared to 99% of households with an income over £40,000.<sup>13</sup> This means many people have to rely on libraries and other public buildings to access the internet to make and manage their Universal Credit Claim. This is becoming more challenging due to increasing number of library closures.<sup>14</sup> For context, thirty Scottish libraries closed in 2017: up from 15 in 2016.<sup>15</sup>

The United Nations Special Rapporteur on extreme poverty and human rights highlighted in his 2018 statement on the United Kingdom that support from libraries to provide digital support to Universal Credit claimants is insufficient.<sup>16</sup> As a 2018 report by Stirling’s Citizen Advice Bureau points out, travelling to access the internet can be costly, especially in rural areas, and access to libraries and other public buildings is often time limited.<sup>17</sup> For people with mental health problems the use of public transport and engaging with public facilities can be distressing or not possible.<sup>18</sup>

**SAMH recommends that the UK government scrap Digital by Default for Universal Credit and permit people to use the most appropriate contact channel for them**

# ASSESSMENT FOR LIMITED CAPABILITY FOR WORK ELEMENTS OF UNIVERSAL CREDIT

People who have a medical condition or disability that affects their ability to work usually have to undergo a face-to-face Work Capability Assessment (WCA) when claiming Universal Credit. This is a functional assessment of their capacity to work which determines whether the person will be required to undertake job searching or other work related activities. This assessment is the same as the WCA for people applying for ESA.

If someone is found unable to work, following assessment, they are placed in the Limited Capability for Work Group and will not need to do any job searching, but are required to undertake work preparation activities.<sup>19</sup> If they are found to be unable to undertake work or work related activities due to their health, they qualify for the Limited Capability for Work and Work Related Activity group and will not have to undertake any work preparation activities.<sup>20</sup> Being placed in the Limited Capability for Work and Work Related Activity group makes you eligible for additional money as part of your Universal Credit payments – currently £328.32 extra a month.<sup>21</sup>

SAMH has consistently highlighted that the WCA does not work for people with mental health problems.<sup>22, 23</sup> The assessments do not adequately gauge the impact of mental health and other fluctuating conditions, with assessors lacking a full understanding of mental health. This can result in stigmatising behaviour and increased distress for claimants, as well as a focus on physical impairments by assessors.<sup>24</sup> We also know that people are not being proactively offered adjustments to their assessment, such as the option for a home assessment.<sup>25</sup>

One of our case studies who has social anxiety and depression explained how his requests for reasonable adjustments to the assessment were ignored:

***“I’d wrote on the form that it would be good to do a home visit, or do it over the phone. Or if I come in, could I be put just in a room. I’m not asking them to sit with me, just put me in a room where it’s just me. But I don’t even know if they read that at all to be honest.***

***“So, I went up, and I was sitting there for about an hour and a half. An hour and a half is long enough when you’re sitting waiting and you’re really, really uncomfortable, it feels like 12 or 13 hours, that’s just how it felt... I was just sitting there shaking and I didn’t feel safe, it felt uncomfortable”***

(Case Study C)

The WCA requires urgent and fundamental redesign to make it work for people with mental health problems. A face-to-face assessment should only be a last resort, where a decision on capability to work cannot be made on the basis of existing written evidence about the claimant. Claimants must be given a home assessment where they request one.

The creation of the new Scottish Social Security System and legislative underpinnings provides a potential model to redesign the WCA. While the Scottish system does not have powers over the WCA for Universal Credit, it will have responsibility for the delivery of non-income related disability benefits:

Personal Independence Payment (PIP) and Disability Living Allowance (DLA).

The Scottish Government has committed to: reducing face-to-face medical assessments; giving people choice and flexibility over assessment location, including home assessments; and audio recording as standard for all assessments, with claimants and tribunals having access to the recordings to ensure accuracy and build trust in the assessment process.<sup>26</sup> The legislation underpinning the new Scottish system also requires that assessments are carried out by a suitably qualified person with experience and training, meaning people with mental health problems should be assessed by someone with relevant mental health experience and training.<sup>27</sup>

This model has potential to significantly improve the experience of assessment in Scotland for non-income related disability benefits.

---

**SAMH recommends that the UK Government should use learning from the development of the Scottish Social Security system, particularly on disability assessments to inform the development of a replacement to the Work Capability Assessment**



### Delays to assessment

Another particular problem under the Universal Credit system has been unacceptable delays and a lengthy wait before assessment. At the start of a claim for Universal Credit, claimants are given four weeks to gather evidence on their health and capacity to work and complete a UC50 form.<sup>28</sup> Following the completion of the UC50 someone with a health condition will usually need to then attend a WCA. With limited exceptions, such as terminal illness, the person will not be paid the additional limited capacity to work and work related activity (LCWRA) element during the waiting period. The current (2018/19) value of the LCWRA element is £328.32 a month. This is a significant loss of income for some of the most vulnerable people in society while they are waiting for this assessment.<sup>29</sup>

In June 2018 the median time from application to final decision following a WCA was 15 weeks.<sup>30</sup> We know from our case studies that these waits can be significantly longer than the average, and that they add to the distress and anxiety of navigating the system. It also leaves claimants with no certainty over the final level of payment or what work related activities, if any, they will be expected to do.

Case study A manages his son's Universal Credit claim on his behalf, due to his significant mental and physical health conditions. At the time of interview his son had been waiting for over six months to receive his work capability assessment; his Work Coach was unable to give them clarity over a date for assessment. This was having a significant negative impact on both their mental health:

***"I don't think they know what's going on as well, they've no answers to what's happening, "when's his assessment?", "don't know, just have to wait and see". If I go to the Job Centre with his fit note, I've still got to go online to do his Universal Credit online, take in the fit note and get them to verify it and it's obvious when you see him that he's not fit for work."***

***"There's nobody assessed him to see what he's like, that's the annoying thing, the Job Centre sees what he's like but they've got to wait on obviously an appointment coming in for an assessment."***

(Case Study A)

The lack of an assessment means that there is no certainty over the financial value of his son's future Universal Credit. People are being left in financial uncertainty completely unaware of what income they will receive, leaving people unable to plan for their future. In this case it is causing significant distress to a father who has been unable to organise or pay for additional support for his son:

***"I can't say to people [carers etc.], "Can you come in and do this and do that?", because I don't know how much money he's going to get, I haven't got a clue and [son] wouldn't know, I find that one day he's going to go "Where's all my money went?", or I will have to say "sorry, we can't employ you anymore"."***

(Case Study A)

### Conditionality while waiting for assessment

While someone is waiting for their assessment they can still be required to undertake work related activities and job

searching, with the threat of sanction if they don't comply. This can be as much as 35 hours of job searching per week.<sup>31</sup> This is a marked contrast to the legacy system where work related activities are not applied until the WCA is complete and the person has been placed in the relevant ESA group.<sup>32</sup> This means someone who is unable to work due to a disability, such as a mental health problem, could be made to undertake work activities they are incapable of completing and then be sanctioned – potentially losing all of their income – for failing to meet the conditions set out without an assessment having taken place. This is unacceptable and must be stopped.

The decision to apply conditions while someone is waiting for their WCA is at the discretion of their Work Coach and should be based on the Work Coach's understanding of the claimant's health.<sup>33</sup> As will be discussed in the following section on conditionality, it is clear that Work Coaches do not currently have the necessary skills or time to make accurate assessments of someone's health to set appropriate conditions. It is crucial, as called for by the House of Commons Work and Pensions Committee, that guidance to Work Coaches is amended to ensure no one should be expected to undertake any conditionality while waiting for their WCA.<sup>34</sup>

**SAMH recommends that no one should have to undertake job searching or work related activities while waiting for a Work Capability Assessment and its outcome**

# MANAGING A UNIVERSAL CREDIT CLAIM

The experience of many people with mental health problems in receipt of Universal Credit is one of uncertainty and a lack of control. The reasons for this are both structural and due to the large amount of discretion over conditionality given to Work Coaches.

## Initial payments:

There is a five week wait for receipt of the first Universal Credit payment. It is important to be clear that this delay is deliberately built into the system and is not, as it is sometimes presented in public discussions, an error or fault affecting a few people. Citizens Advice Scotland reviewed areas where UC has been fully rolled out and found that this wait, combined with complications in accessing short-term support has contributed to:<sup>35</sup>

- A 15% rise in rent arrears issues compared to a national decrease of 2%
- A 87% increase in Crisis Grant awards nearly tenfold the national increase of 9%
- In two of five bureaux in affected areas, a 40% and 70% increase in advice about access to food banks, compared to a national increase of three per cent

People using SAMH services have reported similar negative impacts. People using our housing support service in Inverclyde reported waits of up to seven weeks for initial Universal Credit payments. This resulted in arrears, the threat of eviction and a great deal of distress. The impact of poverty and debt on mental health is clear with 86% of people with mental health problems feeling their financial situation made their mental health worse.<sup>36</sup> A study on the impact of Universal Credit in the North East of England found that managing a low income while navigating the Universal Credit system had led to deterioration in people's mental health, including an increase in thoughts of suicide.<sup>37</sup>



**15% increase in  
rent arrears  
issues**

**up to 70% increase in  
advice about access to  
foodbanks**

**87% increase in Crisis  
Grant awards**



To reduce the impact of the wait for first payment, claimants can apply for an 'advanced payment' any time before the last three days of the end of the initial assessment month. The value of the payment can be up to the full amount of the first Universal Credit payment.<sup>38</sup> However, advanced payments are a loan which must be repaid. The Government recently extended the repayment period from six months to a year, with the option of a three month delay to starting repayment.<sup>39</sup> The rate of repayment is high - up to 40% of a standard monthly Universal Credit payment, or 15% if someone is not in any employment.<sup>40</sup> The repayments are automatically deducted from someone's Universal Credit.

***"I phoned up and got an advance. It's not ideal, it's not ideal having to wait that long [6 weeks]. The Universal Job Match was a bit better that way, but once you get through that, you're sort of all right, but that's not ideal."***  
(Case Study C)

The advance payment system, while providing short term support, can exacerbate financial hardship, debt and increase emotional distress over an extended period of time. SAMH is clear that the built in waiting period for initial payment is unacceptable: this needs to be abolished. We agree with Citizens Advice Scotland that the advance payment system should be replaced by a non-repayable assessment grant for new Universal Credit claimants to prevent hardship and debt.<sup>41</sup>

---

**SAMH recommends the advanced payment system should be replaced with a non-repayable assessment grant for new Universal Credit claimants**

---

**SAMH recommends the immediate abolition of the unjustified five week waiting period for first payment**

**Monthly assessment period**

Payments of Universal Credit are calculated each calendar month.<sup>42</sup> For people who have a varying income this can mean it is difficult to plan their finances. For example one of our case studies has recently been supported into employment with the help of a SAMH Individual Placement and Support (IPS) employability service. Despite seeking assurances from his Work Coach and the DWP information support line, he has been given no clarity on the level of future payments:

***“So, I’m still receiving Universal Credit at the moment, I can’t tell you how it’s going to work though, because I’ve not received my first payment [from work] ... the folk in the Job Centre, the folk in the call centre, I spoke to four different people. I’ve had four different answers about how is this financially, what’s the financial impact, how is this going to work? How much help am I going to get?”***

(Case study C)

The impact of this uncertainty on the case study’s mental health was clear:

***“It brings it [my anxiety] out a lot. I try not to think about it, I’m sort of just coasting... I should realistically receive a letter next week at some point, but whether I do or don’t, sometimes they don’t send the letters out, sometimes I get letters. Then sometimes I just get letters and nothing’s changed, telling me something has changed and I’m like, “What’s changed?” It’s stressful”***

(Case study C)

Financial uncertainty can negatively affect mental health and act as a disincentive to work, undermining one of the key policy objectives of Universal Credit. One way the Government could act to mitigate this uncertainty would be to change the assessment period to look at average earning over a longer period of time, for example three months.

**SAMH recommends that the UK Government should replace the monthly assessment period for Universal Credit with a system that looks at average income over a longer period**



### Conditionality and Work Coach Discretion

Conditionality has become a key feature in the UK social security system for income related benefits. SAMH has long been concerned that conditionality does not work for people with mental health problems and can damage claimant's mental health, pushing people further from employment. Conditionality is a central feature of Universal Credit, including the threat of sanctions.

Conditionality is the requirement that to receive particular benefits (for example Universal Credit) the person has to agree to undertake specific obligations or activities. These activities are mainly job searching or other work related activities, such as engaging in an employability programme. Where the person does not comply with their conditions they risk having their benefits reduced or completely stopped, i.e. sanctioned.

People awarded Universal Credit must agree a 'Claimant Commitment'. These set out the actions that the claimant agrees to take, in order to progress towards employment. People who are placed in the 'Limited Capability for Work and Work-Related Activities' (LSWRA) are exempt from conditionality, while those found "Fit to Work" must undertake all work related requirements including intensive job searches.<sup>43</sup> People placed in the "Limited Capability to Work" (LCW) must take steps to prepare for work, but are not required to job search. This is the same as those in the legacy ESA WRAG group.<sup>44</sup>

However, the onus is on the claimant at their initial meeting with a Work Coach to disclose factors, such as their mental health problem, which will affect their ability to comply with conditions.<sup>45</sup> The need for disclosure is a significant barrier and source of distress for people with mental health conditions, diagnosed or otherwise, who may not have the confidence to discuss their mental health on first meeting a Work Coach.

One of the case studies did not disclose their mental health problems while applying for Universal Credit, as a previous face-to-face assessment for PIP had been so stressful. There was, therefore, the potential that this person was being left short of money and facing inappropriate conditionality:

***"For anyone who's been on the PIP, the medical assessments that you have to go through for that and especially mental health conditions, you can find that you just have enough and that you don't want to then have to add another thing on top of that.... When you're hearing all those stories you just kind of decide that it's just not worth the risk of losing your benefit"***

(Case Study B)



The exact conditions people are expected to undertake are largely at the discretion of their Work Coach.<sup>46</sup> Work Coaches are expected to tailor conditions and support to each person's individual needs, taking into account claimants' vulnerabilities such as their mental health.<sup>47</sup> Evidence shows that this is not always occurring. Indeed the DWP's own research found that work coaches felt overwhelmed by the number of claimants with health conditions, lacked the time or means to confidently identify vulnerable claimants and did not have the confidence to apply reasonable adjustments to conditions.<sup>48</sup>

Work Coaches high caseloads which are predicted to quadruple, from 85 clients per Work Coach in March 2018, to 373 by 2024/25.<sup>49</sup> Other factors such as a lack of facilities to meet clients' needs undermine the ability of Work Coaches to properly identify and support clients with mental health problems.<sup>50</sup>

The case studies discussed practical difficulties related to their mental health that Work Coaches did not appear to adequately understand or make adjustments for. For example, one of the case studies found travelling difficult due to her medication, but the Work Coach would not allow their appointments to be over the phone, except on one occasion.

Adjustments ('easements'), including pausing conditionality, can be applied where someone has a complex need and their Work Coach believes "complying with their work related requirements would be unreasonable in the circumstances."<sup>51</sup> It is essential that Work Coaches make full use of these powers, particularly where someone's mental health may fluctuate making it impossible to adhere to strict work related

conditions. Evidence from the ESRC Welfare Conditionality project found that Work Coaches are not routinely applying, discussing or implementing easements with claimants.<sup>52</sup> Currently the DWP does not systematically gather data on claimant vulnerability or monitor adjustments made for vulnerable claimants.

---

**SAMH recommends that changes are made to the way the 'Claimant Commitment' is set. This should include the Jobcentre proactively gathering information about the person's health, and explaining adjustments that are available.**

---

**SAMH recommends that the DWP should routinely gather and publish data on claimant vulnerability, including adjustments made to support vulnerable claimants.**

The case studies who have informed this report highlighted the importance and impact of someone's personal relationship with their Work Coach, as well as the inconsistent approach to applying conditionality. In one case study, the Work Coach showed an understanding of the person's mental health and allowed their monthly meeting with the client to be done over the phone when he felt unable to go to the Jobcentre:

***"Once a month meetings aye. If I was struggling I could do it over the phone, things like that, but I think that just depends on the person, what coach you get and how they take to you as well."***

***"Because [in the past] I've been on Job Seeker's Allowance and there's times in Job Seeker's Allowance where it's not been like that, it's been very, very hard. I think if I wasn't classed as unwell, I think I would have found that a lot harder, because I think the expectations they've got of somebody who is willing to work, is just unrealistic."***

(Case Study C)

The same person expressed that the personal relationship with the Work Coach was key:

***“Aye, the work coach I had at the time was pretty understanding. I was quite pally with him, and he was new as well. I think if I had my second work coach at the start, I don’t think she’d have been as understanding. She was fine when I spoke to her, but I think if I had been in there and handed in a sick note, I think I’d have got a harder time with her than what I got off of him. I don’t know, I just got that vibe.”***

(Case Study C)

Unlike the other two case studies the third case study, who cares for his son, has trouble complying with conditionality. He has not been offered flexibility and feels the Work Coach does not understand the impact of his son’s mental health on both of them:

***“I don’t think so, no, they see you’re disabled, yes, but the impact it’s having on him and me, no, they don’t, there’s no help at all, there doesn’t seem to be that sort of ... understanding of his health problems, no, they understand that he’s disabled but not what he’s going through mentally. “***

(Case Study A)

A reliance on good personal relationships between Work Coaches and claimants is not a sustainable way to deliver a fair and equitable social security system.

---

**SAMH recommends that DWP guidance to Work Coaches over setting appropriate conditions is strengthened for vulnerable claimants including people with mental health problems**

---

**SAMH recommends that Work Coaches should make full use of powers over easement to conditionality, and inform claimants about their rights to easements**

## **58% of all ESA sanctions in the first six months of 2013 were applied to people with a mental health condition or learning difficulty.**

### **Sanctions and deductions**

There is no evidence that benefit sanctions for people with mental health problems incentivise employment.<sup>53</sup> Indeed, the experience and fear of sanctioning reduces trust in the UK welfare system, exacerbates claimants' mental health problems and creates an additional barrier to gaining employment.<sup>54</sup> The Scottish findings from the Welfare Conditionality project found that benefit sanctions exacerbated both physical and mental health problems and did not promote behavioural change in regards to moving towards employment.<sup>55</sup>

The latest statistics from the DWP show that, in August 2018, 2.9% of people in receipt of Universal Credit had a deduction to their award due to a sanction.<sup>56</sup> This is a much higher sanction rate compared to legacy benefits where, in August 2018, 0.2% of JSA claimants and 0.1% of ESA WRAG claimants had a benefit deduction due to a sanction.<sup>57</sup> The number of people with mental health problems who are sanctioned is not publically available as the DWP do not produce these figures.<sup>58</sup> We are concerned that people with mental health problems will be disproportionately sanctioned. Freedom of information requests in 2014 found that 58% of all ESA sanctions in the first six months of 2013 were applied to people with a mental health condition or learning difficulty.<sup>59</sup>

### **SAMH recommends that the DWP publish sanction statistics disaggregated by disability and medical condition**

As stated above people in receipt of Universal Credit can be subject to sanctions when they do not comply with conditions outlined in their interim or full claimant commitment. This could involve not meeting the work search requirement of their commitment or not attending their work-focused interview without good cause.<sup>60</sup> Claimants who are placed in the 'Limited Capability for Work and Work-Related Activities' group are not subject to any conditionality or sanctioning, though they are at risk of sanction prior to their WCA.

There are various levels of sanctions: higher, medium, low and lowest, with lengths of sanctions increasing the more times someone is sanctioned.<sup>61</sup> The maximum length of sanction is three years; this is for three or more 'higher level sanctions' within a one year period.<sup>62</sup> The rate of sanction is 100% of the standard Universal Credit Allowance. In a limited number of circumstances the rate is 40%, such as when someone is a carer of a child under the age of one, or someone's claimant commitment requires only attending work-focused interviews.<sup>63</sup> There is no exemption for people with disabilities, including mental health problems.

There is growing evidence about the use of sanctions for trivial matters such as genuine mistakes and being late for an interview with their Work Coach, even when claimants had good cause.<sup>64</sup>

Research SAMH undertook in 2016 regarding ESA highlighted the impact that sanctions and the threat of sanctions can have on someone's mental health.<sup>65</sup> People using our services told us that the overhanging threat of sanctions was debilitating:

***"The fear of being sanctioned is enough to ruin your life without [actually] being sanctioned."***

(SAMH Service User).<sup>66</sup>

As discussed above, Work Coach discretion results in inconsistency in when and for what reasons sanctions are applied.

### **SAMH recommends that the UK Government should end benefit sanctions for people with mental health problems**



# IMPACT OF SUPPORT

People applying for and receiving Universal Credit can access support for managing their claim from the DWP Universal Support (US) service. Universal Support provides 'Assisted Digital Support' (ADS) to help people make and maintain online claims; and 'Personal Budgeting Support' (PBS) to help people manage their money.<sup>92</sup> The service has been delivered by local authorities, but from April 2019 it will be delivered by Citizen Advice and Citizen Advice Scotland.<sup>93</sup>

## Universal Support

A DWP evaluation of Universal Support trials in 2016, found that 45% of the claimants in the trial were disabled, with mental health problems the most commonly reported condition.<sup>67</sup> Of those with a disability 60% reported stress and anxiety; 58% depression and 28% another mental health problem, compared to 46% with mobility impairment.<sup>68</sup>

While the provision of government funded support is welcome, to date it has been insufficient, time-limited and challenging for people to access.<sup>69</sup> The DWP's own figures found that the take-up of Universal Support has been one third of what was expected, with the service not being routinely offered to claimants.<sup>70</sup>

Universal Support is time limited to the first three months of someone's Universal Credit claim.<sup>71</sup> The House of Commons Work and Pensions Committee found that, in reality, people were restricted to as little as two hours of support, as this is all that is funded by the DWP.<sup>72</sup> Furthermore, Universal Support provides no debt advice through its personal budgeting service, despite this being a key issue for claimants. Indeed, debt is a recurring problem for people who have to take an advance payment, while waiting for their initial Universal Credit payment.<sup>73</sup>

Evidence from Citizen's Advice shows that Universal Credit actively increases the likelihood of someone getting into debt: including rent arrears and council tax arrears.<sup>74</sup> Citizen Advice clients in receipt of Universal Credit were more likely to have problems with debt compared to legacy benefit clients – 26% compared to 19%; and less available credit to help pay off the debts.<sup>75</sup>

Reasons for this include structural problems with Universal Credit such as the initial waiting period for the first payment; high rates of deductions from Universal Credit payments, including to pay back advanced payments and difficulty budgeting, especially where someone is paid Universal Credit monthly.<sup>76</sup>

The move of delivery from April 2019 to Citizens Advice and Citizens Advice Scotland is welcome and can hopefully provide more consistent support, as well as links to co-locate support beyond the limited scope of Universal Support. However, this positive move risks being undermined if the budget provided by the DWP to deliver Universal Support is not increased to meet demand and the service is not expanded to offer longer term support, including debt advice.

---

**SAMH recommends that Universal Support be funded to meet demand with longer term support provided, including debt advice**

### Community Partners Programme

Research published by the DWP in 2017 found that Work Coaches often lack previous experience working with people with mental health problems, and find conversations about mental health “difficult, personal and uncomfortable to handle”.<sup>77</sup> While this research focused on ESA one of its aims was to inform the DWP about the needs of Work Coaches during the roll out of Universal Credit.<sup>78</sup>

To assist Work Coaches in supporting disabled people, including people with mental health problems, the UK Government funded 200 Community Partners and additional Disability Employment Advisors (DEAs) to work within Jobcentres.<sup>79</sup> Both these roles provide specialist disability experience to support Work Coaches.

Community Partners are people with professional or personal experience of disability. Their role is to provide local knowledge to identify opportunities for tailored support to claimants and provide insight on the additional barriers disabled people face entering the workplace.<sup>80</sup> Community Partners have individual specialisms. For example, the programme includes Mental Health Community Partners, Young Person’s Community Partners and partners specialising in drug and alcohol addictions.<sup>81</sup>

In researching this report, we heard of initiatives by Mental Health Community Partners to support both Work Coaches and claimants around mental health. These included: holding focus groups with Jobcentre clients who have mental health problems; working with local GPs and mental health organisations, including bringing mental health organisations into the Jobcentre for

claimants to access; organising job clubs in the Jobcentre facilitated by peer workers; and encouraging Work Coaches to focus initial conditionality around wellbeing, rather than job searching and traditional work related activities.

It is unacceptable that the UK Government has not confirmed funding for the Community Partners programme or the DEAs past March 2019.<sup>82</sup> This cut comes at a time when the UC case load will substantially rise due to natural and managed migration. Indeed, witnesses to the Work and Pensions Committee’s Universal Credit Inquiry highlighted the need to increase the number of Community Partners and DEAs, as Work Coaches were struggling to support disabled people due to high caseloads and a lack of expertise.<sup>83</sup>

---

**SAMH recommends that the UK Government commit to ongoing funding to the Community Partner programme and additional DEAs**

---



---

**SAMH recommends all Jobcentre Plus’ must have access to a mental health Community Partner, with shared learning and good practice between Community Partners facilitated**

---

### Other support

Support provided by the advice, advocacy and wider third sector is crucial to help people with mental health problems navigate the complex Universal Credit system. All three of the case studies who informed this report had been supported by a variety of organisations when making and managing their Universal Credit claim.

Two of the case studies were clients at SAMH's Individual Placement and Support (IPS) employability services. IPS provides specialist employability support to people with mental health problems, and is two to three times more effective than other interventions.<sup>84</sup> Both case studies found that their IPS worker helped them to prepare for the workplace, supported them in work and helped them to engage with the Universal Credit system:

***"I'd say especially stuff like the IPS scheme that really helped me out and it's quite good because I think they can give a bit more specialised support that the Jobcentre just can't because if you have someone who's been trained, a specialist like SAMH, who know about mental health, they're going to know what's appropriate, what's not."***

(Case study B)

***"Aye, it's [IPS] definitely helped me. It's helped in regards to I got offered various different things that I thought were brilliant, like they get me some new clothes and that for starting work, and getting a bus pass...It's definitely helped me, [IPS worker] was going to come to one of my meetings with my Work Coach as well, this when all the confusion was happening, and nobody knew it was happening when I'd started work. She was going to come up and she was going to ask, because obviously I don't like to do the ... I don't like to interact as it is, so confrontation, it's a lot harder. "***

(Case Study C)

Despite these positive experiences there are structural problems in the Universal Credit system that can make it more difficult for external support to engage clients. Unlike the practice for legacy benefits, Welfare Advisors can no longer contact the Jobcentre or DWP on behalf of their client about Universal Credit without "explicit consent".<sup>85</sup> In practice this means that the client must give permission in writing, over the telephone or in person to the DWP, in order for a representative to speak to the DWP about their claim.<sup>86</sup>

In contrast, for legacy benefits such as ESA, Welfare Advisors can contact the DWP using "implicit consent". This means that the client can give prior consent to the Welfare Advisor, so they do not have to contact the DWP themselves and do not need to be present when the Welfare Advisor contacts the DWP. The removal of implicit consent has made it harder for welfare advisors to do their job resulting in delays to addressing problems with people's claims causing subsequent hardship and distress to clients.<sup>87</sup>

**SAMH recommends that implicit consent to welfare advisors and other relevant representatives be reinstated for Universal Credit**

# SCOTTISH FLEXIBILITIES

While Universal Credit is a reserved benefit – meaning the UK Government has responsibility for it – aspects of its delivery have been devolved to the Scottish Government by the Scotland Act 2016.

Specifically the Scottish Government has powers over the frequency of payment of Universal Credit; the ability to pay the housing element of Universal Credit directly to a landlord; and powers over splitting the payment between members of a household where a couple is in receipt of Universal Credit. To date, the Scottish Government has exercised their powers over direct payments to landlords and frequency of payments. These are called Universal Credit Scottish Choices.<sup>88</sup> Since October 2017 Scottish Universal Credit claimants have had the choice to receive their payment twice monthly rather than monthly and can choose to have their housing element paid directly to their landlord. The payments themselves are still delivered by the DWP.

SAMH welcomes these choices and believes that they will assist people in managing their money and avoiding financial hardship.<sup>89</sup> Despite the positive impact of the Scottish Choices, their administration has caused some problems to social landlords.<sup>90</sup> For example, the housing element under the Scottish Choices is paid to landlords in arrears on a four weekly basis and does not match the calendar monthly schedule for Universal Credit payments to claimants. This has caused administrative problems and uncertainty over arrears and income for social landlords as well as confusion to claimants.<sup>91</sup>

***“it was about his rent, it was a confusion to me because they were taking [X amount of money]. I left a message and it took them over a month to answer it. Why was he only getting X amount when he should be getting Y amount? It’s the system, the way they do the system and the problem with the council, they kept telling me he’s in arrears with his rent but the Universal Credit paid his rent, that’s not my problem, that they don’t pay you till a month later, that’s not my problem, they keep sending me letters or phoning me that he’s in arrears and he’s not because it’s Universal Credit that’s paying his rent and so on.”***

(Case Study A)

It is unacceptable that administrative problems should be a barrier to people in receipt of Universal Credit accessing their right to the Scottish Choices.

**SAMH recommends that the DWP and Scottish Government work together to urgently correct issues over the delivery of the Scottish Choices to provide assurance to Universal Credit claimants and landlords**



# CONCLUSION

## UNIVERSAL CREDIT IS NOT WORKING FOR PEOPLE WITH MENTAL HEALTH PROBLEMS.

SAMH welcomed the principles of simplifying the UK social security system and supporting people into employment. But the operation of Universal Credit has undermined these aims and caused hardship and additional emotional distress to people using the system.

The reliance on a rigid digital by default system is a significant barrier to people with mental health problems when claiming and then managing their Universal Credit entitlement. There are also structural issues with Universal Credit that are direct obstacles to people with mental health problems accessing essential support and financial security. These include the initial five week wait for payment; the reliance on face-to-face assessment to establish eligibility for the disability component of the award; the time-limited nature of Universal Support; and removal of implicit consent for welfare rights advisors. The central feature of Universal Credit – conditionality – has left claimants lacking control and is not tailored to support people with mental health problems. The conditionality regime relies largely on the discretion of Work Coaches, who are not specialists in mental health or disability. This is compounded by a regime of sanctioning and the threat of sanctions where claimants do not comply with job searching and work related conditions. It is essential that the level of uncertainty and reliance on discretion is reduced in the system, while Work Coaches should be trained and empowered to make genuinely supportive adjustments to claimants' conditions to support their mental health and wellbeing.

# RECOMMENDATIONS

**While the Universal Credit regime remains in its current form, SAMH recommends that no one is transferred to Universal Credit from legacy benefits, either through natural migration or the forthcoming managed migration.**

---

## **Applying for Universal Credit**

SAMH recommends that the UK government scrap Digital by Default and permit people to use the most appropriate contact channel for them.

---

## **Being Assessed for Limited Capacity to Work**

SAMH recommends that the UK Government use learning from the development of the Scottish Social Security system, particularly on disability assessments, to inform the development of a replacement to the Work Capability Assessment (WCA).

SAMH recommends that no one should have to undertake job searching or work related activities while waiting for a WCA and its outcome.



## Managing Universal Credit

SAMH recommends the advanced payment system should be replaced with a non-repayable assessment grant for new Universal Credit claimants.

SAMH recommends the immediate abolition of the unjustified five week waiting period for first payment.

SAMH recommends that the UK Government should replace the monthly assessment period for Universal Credit with a system that looks at average income over a longer period.

## Identifying Vulnerabilities

SAMH recommends the Jobcentre proactively gathers information about the person's health, prior to setting their Claimant Commitment. Jobcentre staff must explain, offer and apply reasonable adjustments that are available.

SAMH recommends the DWP should routinely gather and publish data on claimant vulnerability, including adjustments made to support vulnerable claimants.

## Conditionality

SAMH recommends that DWP guidance to Work Coaches over setting appropriate conditions is strengthened for vulnerable claimants, including people with mental health problems

SAMH recommends that Work Coaches should make full use of powers available to them (easements) to ensure that conditionality is as flexible as possible. Claimants should be fully informed about their rights to easements.

SAMH recommends that the DWP publish sanction statistics, disaggregated by disability and medical condition.

## Sanctions

SAMH recommends that the UK Government should end benefit sanctions for people with mental health problems.

## Support for People in receipt of Universal Credit

SAMH recommends that the 'Universal Support' service is funded to meet demand with longer term support provided, including debt advice.

SAMH recommends that the UK Government commit to ongoing funding to the Community Partner programme and additional Disability Employment Advisors (DEAs).

SAMH recommends that all Jobcentres have access to a mental health Community Partner, with shared learning and good practice between Community Partners facilitated.

SAMH recommends that implicit consent to welfare advisors and other relevant representatives is reinstated for Universal Credit

## Scottish Flexibilities

SAMH recommends that the DWP and Scottish Government work together to urgently correct administrative issues over the delivery of the Scottish Choices, such as payment of the housing element to social landlords, to provide assurance to Universal Credit claimants and landlords.

# GLOSSARY

## Advanced Payment

This is a payment that can be applied for while waiting for the first Universal Credit payment if a person is struggling with finances. The value of the payment is part or all of the first Universal Credit Payment. The advanced payment is a loan with repayments automatically deducted from subsequent Universal Credit payments.

## Claimant Commitment

A personalised document signed by the Universal Credit claimant as part of the claims process. The document outlining activities the person must do in return for receiving Universal Credit. This may include a requirement to job search or undertake work related activities to prepare for work.

## Conditionality

To receive Universal Credit, claimants must undertake activities set out in their claimant commitment. This is referred to as conditionality. Conditions depend on the circumstances of the person. They vary from: No work-related requirements – where someone is earning above the earnings threshold or if they are in the Limited Capability for Work and Work Related Activity group due to health or disability; to All work-related requirements – where the claimants are usually expected to look for full-time work of 35 hours.

## Easement

A legal power which allows work coaches to temporarily stop (“switch off”) job searching or work related activity conditions due to the claimants personal circumstances.

## Individual Placement and Support (IPS)

IPS is an evidence based employability model to support people with severe and enduring mental health problems to achieve mainstream employment in competitive jobs part time, full time or in some cases permitted working hours.

## Legacy benefits

There are the six benefits that Universal Credit are replacing:

- Income-based Jobseeker’s Allowance (JSA)
- Income-related Employment and Support Allowance (ESAP)
- Income Support
- Housing Benefit
- Working Tax Credit
- Child Tax Credit

## Limited Capability for Work

When someone has a health condition or disability that affects their ability to work. This is usually determined through a Work Capability Assessment.

## Limited Capability for Work and Work Related Activity

When someone has a health condition or disability that affects their ability to work or undertake work related activity This is usually determined through a Work Capability Assessment

## Managed Migration

The process by which legacy benefit claimants will move to Universal Credit where they haven’t had a change of circumstances. The UK Government plan to begin this process in 2019 and complete it by 2023.

## Natural Migration

The process by which legacy benefit claimants move to Universal Credit, usually when their circumstances change, requiring them to make a new claim for Universal Credit.

## Sanction

A sanction is where someone’s Universal Credit is cut or stopped completely because they have failed to meet one or more of the requirements in their claimant commitment. For example they have not turned up to an interview. Sanction levels and length depend on the claimants personal circumstances, what they did and how many times they did it.

## Transitional Protection

Transitional Protection is an extra amount of money which will top up a Universal Credit award so the claimant is not worse off when they moved from legacy benefits to Universal Credit though managed migration. Transitional protection is not available to people moving to Universal Credit by natural migration.

## Work Capability Assessment

The face to face assessment used by the Department of Work and Pensions (DWP) to determine if someone’s health or disability affects their ability to work. The test is undertaken by a medical professional, who will send the results to a DWP decision maker who decides if the person qualifies for the limited capacity for work component of Universal Credit.



# ENDNOTES

- 1 CPAG. (2016) [Universal credit and 'natural migration'](http://www.cpag.org.uk/content/universal-credit-and-natural-migration) <http://www.cpag.org.uk/content/universal-credit-and-natural-migration>
- 2 UK Government. (2019) [Amber Rudd sets out fresh approach to Universal Credit](https://www.gov.uk/government/news/amber-rudd-sets-out-fresh-approach-to-universal-credit) – Press release. <https://www.gov.uk/government/news/amber-rudd-sets-out-fresh-approach-to-universal-credit> [accessed January 2019]
- 3 StatXplore. [Households on Universal Credit](#) [accessed January 2019]
- 4 StatXplore. [Households on Universal Credit](#) [accessed January 2019]
- 5 StatXplore. [ESA – Data from May 2019](#) [accessed January 2019]
- 6 Waddell and Burton. (2016) [Is Work Good for your Health and Well-being?](#)
- 7 Work and Pensions Committee. (2018) [Universal Credit: Support for Disabled People](https://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/news-parliament-2017/government-must-not-betray-disabled-people-in-transition-to-universal-credit/). <https://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/news-parliament-2017/government-must-not-betray-disabled-people-in-transition-to-universal-credit/>
- 8 DWP. (2018) [Universal Credit Full Service Survey](#).
- 9 CAS. (2018) [Disconnected: Understanding digital inclusion and improving access](https://www.cas.org.uk/system/files/publications/cas_disconnected_report.pdf). [https://www.cas.org.uk/system/files/publications/cas\\_disconnected\\_report.pdf](https://www.cas.org.uk/system/files/publications/cas_disconnected_report.pdf)
- 10 DWP [Support by telephone](#)
- 11 DWP [Support by telephone](#)
- 12 DWP [Support by telephone](#)
- 13 Scottish Government. (2017) [Scottish Household Survey](https://www.gov.scot/publications/scotlands-people-annual-report-results-2017-scottish-household-survey/). <https://www.gov.scot/publications/scotlands-people-annual-report-results-2017-scottish-household-survey/>
- 14 The Scotsman. (2018) [Scottish library closures soar as council cuts bite](https://www.scotsman.com/news/politics/scottish-library-closures-soar-as-council-cuts-bite-1-4756903). <https://www.scotsman.com/news/politics/scottish-library-closures-soar-as-council-cuts-bite-1-4756903> [accessed February 2019]
- 15 The Scotsman. (2018) Scottish library closures soar as council cuts bite. [www.scotsman.com/news/politics/scottish-library-closures-soar-as-council-cuts-bite-1-4756903](http://www.scotsman.com/news/politics/scottish-library-closures-soar-as-council-cuts-bite-1-4756903) [accessed February 2019]
- 16 UNOHCHR. (2018) [Statement on Visit to the United Kingdom, by Professor Philip Alston, United Nations Special Rapporteur on extreme poverty and human rights](#).
- 17 Stirling Citizen Advice Bureau. (2018) Bridge or Barrier? Vulnerable claimants' experience of full-service Universal Credit in Stirling District
- 18 Mind, (2017) [Universal Credit and mental health – written evidence to the Work and Pensions Committee's inquiry on the roll-out of Universal Credit](http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/work-and-pensions-committee/universal-credit-rollout/written/71538.pdf). <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/work-and-pensions-committee/universal-credit-rollout/written/71538.pdf>
- 19 UK Government [Health conditions, disability and Universal Credit](https://www.gov.uk/health-conditions-disability-universal-credit). <https://www.gov.uk/health-conditions-disability-universal-credit> [accessed February 2019]
- 20 UK Government Health conditions, disability and Universal Credit. [www.gov.uk/health-conditions-disability-universal-credit](http://www.gov.uk/health-conditions-disability-universal-credit) [accessed February 2019]
- 21 UK Government [Universal Credit – What you'll get](#) [accessed February 2019]
- 22 Mind and SAMH. (2017) Mind and SAMH submission to the Work and Pensions Committee inquiry on PIP and ESA assessments. [www.samh.org.uk/documents/Mind\\_and\\_SAMH\\_submission\\_to\\_the\\_Work\\_and\\_Pensions\\_Committees\\_inquiry\\_into\\_PIP\\_and\\_ESA\\_assessments.pdf](http://www.samh.org.uk/documents/Mind_and_SAMH_submission_to_the_Work_and_Pensions_Committees_inquiry_into_PIP_and_ESA_assessments.pdf)
- 23 SAMH. (2015) Fit For Purpose. [www.samh.org.uk/documents/fit\\_for\\_purpose\\_final\\_2\\_.pdf](http://www.samh.org.uk/documents/fit_for_purpose_final_2_.pdf)
- 24 SAMH. (2015) Fit For Purpose. [www.samh.org.uk/documents/fit\\_for\\_purpose\\_final\\_2\\_.pdf](http://www.samh.org.uk/documents/fit_for_purpose_final_2_.pdf)
- 25 Work and Pensions Committee. (2018) Universal Credit: Support for Disabled People. <https://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/news-parliament-2017/government-must-not-betray-disabled-people-in-transition-to-universal-credit/>
- 26 Scottish Government. (2018) Ministerial Statement – Dignity and respect in Scotland's Social Security System. <https://news.gov.scot/speeches-and-briefings/ministerial-statement-dignity-and-respect-in-scotlands-social-security-system>
- 27 The National Archives. (2018) [Social Security \(Scotland\) Act 2018](#) [accessed January 2019]
- 28 CAS. (2018) [Getting Universal Credit if you're sick or disabled](#) [accessed January 2019]
- 29 UK Government. [How to Claim Universal Credit – What you'll get](https://www.gov.uk/universal-credit/what-youll-get). <https://www.gov.uk/universal-credit/what-youll-get> [accessed January 2019]
- 30 DWP. (2018) [Employment and Support Allowance: Work Capability Assessments, Mandatory Reconsiderations and Appeals](#)
- 31 House of Commons Work and Pensions Committee. (2018) [Benefit Sanctions](#)

- 32 House of Commons Work and Pensions Committee. (2018) [Universal Credit: Support for Disabled People](https://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/news-parliament-2017/government-must-not-betray-disabled-people-in-transition-to-universal-credit/). <https://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/news-parliament-2017/government-must-not-betray-disabled-people-in-transition-to-universal-credit/>
- 33 House of Commons Work and Pensions Committee. (2018) [Universal Credit: Support for Disabled People](https://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/news-parliament-2017/government-must-not-betray-disabled-people-in-transition-to-universal-credit/) <https://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/news-parliament-2017/government-must-not-betray-disabled-people-in-transition-to-universal-credit/>
- 34 House of Commons Work and Pensions Committee. (2018) [Universal Credit: Support for Disabled People](#) 2018
- 35 Citizens Advice Scotland. (2017) Press Release: [CITIZENS ADVICE SCOTLAND CALLS FOR HALT TO UNIVERSAL CREDIT](https://www.cas.org.uk/news/press-release-citizens-advice-scotland-calls-halt-universal-credit) July <https://www.cas.org.uk/news/press-release-citizens-advice-scotland-calls-halt-universal-credit>
- 36 Money and Mental Health Policy Institute. (2016) [Money on Your Mind](https://www.moneyandmentalhealth.org/link-between-money-and-mental-health/) <https://www.moneyandmentalhealth.org/link-between-money-and-mental-health/>
- 37 Fuse, Gateshead Council et al. (2018) ["It's hitting people that can least afford it the hardest" the impact of the roll out of Universal Credit in two North East England localities: a qualitative study](https://www.gateshead.gov.uk/media/10665/The-impact-of-the-roll-out-of-Universal-Credit-in-two-North-East-England-localities-a-qualitative-study). [https://www.gateshead.gov.uk/media/10665/The-impact-of-the-roll-out-of-Universal-Credit-in-two-North-East-England-localities-a-qualitative-study-November-2018/pdf/Universal\\_Credit\\_Report\\_2018pdf.pdf?m=636778831081630000](https://www.gateshead.gov.uk/media/10665/The-impact-of-the-roll-out-of-Universal-Credit-in-two-North-East-England-localities-a-qualitative-study-November-2018/pdf/Universal_Credit_Report_2018pdf.pdf?m=636778831081630000)
- 38 UK Government. (2017) [Universal Credit advances Guidance](https://www.gov.uk/guidance/universal-credit-advances). <https://www.gov.uk/guidance/universal-credit-advances>
- 39 UK Government [Universal Credit advances Guidance](#) October 2017
- 40 UK Government. (2013) The Social Security (Overpayments and Recovery) Regulations 201. <http://www.legislation.gov.uk/ukxi/2013/384/contents/made> [accessed January 2019]
- 41 CAS [Rent Arrears: Causes and Consequences for CAB Clients](#) October 2018
- 42 DWP [Universal Credit: different earning patterns and your payments \(payment cycles\)](#) 2018
- 43 House of Commons Work and Pensions Committee. (2018) [Benefit Sanctions](#) 2018
- 44 Work and Pensions Committee [Universal Credit: Support for disabled people](#) December 2018
- 45 Work and Pensions Committee [Universal Credit: Support for disabled people](#) December 2018
- 46 Work and Pensions Committee [Universal Credit: Support for disabled people](#) December 2018
- 47 Work and Pensions Committee [Universal Credit: Support for disabled people](#) December 2018
- 48 Department of Work and Pensions. (2018) [Universal Credit Full Service Survey](#)
- 49 National Audit Office. (2018) [Rolling out Universal Credit](#)
- 50 NAWRA. (2018) [Work and Pensions Committee Universal Credit inquiry: NAWRA observations and recommendations on disability and universal credit – follow up to oral evidence on 4 July 2018](#)
- 51 National Audit Office [Rolling out Universal Credit](#) 2018
- 52 ESRC. (2018) [Final findings: Social security in Scotland \(Welfare Conditionality: Sanctions, Support and Behavioural Change\)](#). <http://www.welfareconditionality.ac.uk/wp-content/uploads/2018/09/40677-Scottish-final2.pdf>
- 53 Mind. (2016) [Benefit Sanction and Mental Health – Written Evidence to the Public Accounts Committee Benefit Sanction Inquiry](#). <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/public-accounts-committee/benefit-sanctions/written/44069.pdf>
- 54 Mind [Benefit Sanction and Mental Health – Written Evidence to the Public Accounts Committee Benefit Sanction Inquiry](#) 2016
- 55 ESRC. (2018) [Final findings: Social security in Scotland \(Welfare Conditionality: Sanctions, Support and Behavioural Change\)](#) 2018
- 56 DWP. (2018) [Benefit Sanctions Statistics](#)
- 57 DWP [Benefit Sanctions Statistics](#) November 2018
- 58 Work and Pensions Committee. (2018) [Benefit Sanctions](#)
- 59 UK Government Freedom of Information request 2014–79 March 2014
- 60 DWP. (2018) [Universal Credit and you – official guidance December 2018](#) [accessed January 2019]
- 61 DWP. (2018) [Universal Credit and you – official guidance December 2018](#). <https://www.gov.uk/government/publications/universal-credit-and-you/universal-credit-and-you-a#sanctions> [accessed January 2019]
- 62 DWP [Universal Credit and you – official guidance December 2018](#) [accessed January 2019]

- 63 Work and Pensions Committee. (2018) [Benefit Sanctions](#)
- 64 ESRC. (2016) [First Wave Findings: Universal Credit](#)
- 65 SAMH. (2015) [Fit For Purpose](https://www.samh.org.uk/documents/fit_for_purpose_final__2_.pdf) [https://www.samh.org.uk/documents/fit\\_for\\_purpose\\_final\\_\\_2\\_.pdf](https://www.samh.org.uk/documents/fit_for_purpose_final__2_.pdf)
- 66 SAMH [Fit For Purpose](#) 2015
- 67 DWP. (2016) [Evaluation of the Universal Support delivered locally trials](#)
- 68 DWP [Evaluation of the Universal Support delivered locally trials](#) 2016
- 69 Work and Pensions Committee. (2018) [Universal Support](#)
- 70 House of Commons Committee of Public Accounts. (2018) [Universal Credit](#)
- 71 Work and Pensions Committee [Universal Support](#) October 2018
- 72 Work and Pensions Committee [Universal Support](#) October 2018
- 73 Work and Pensions Committee [Universal Support](#) October 2018
- 74 Citizen Advice. (2017) [Universal Credit and Debt Evidence from Citizens Advice about how Universal Credit affects personal debt problems](#) 2017
- 75 Citizen Advice [Universal Credit and Debt Evidence from Citizens Advice about how Universal Credit affects personal debt problems](#) 2017
- 76 Citizen Advice [Universal Credit and Debt Evidence from Citizens Advice about how Universal Credit affects personal debt problems](#) 2017
- 77 DWP. (2017) [The 2015 ESA trials: A synthesis of qualitative research with Work Coaches](#)
- 78 DWP [The 2015 ESA trials: A synthesis of qualitative research with Work Coaches](#) 2017
- 79 DWP & Department of Health. (2017) [Improving Lives: The Future of Work, Health and Disability](#) (green paper)
- 80 House of Commons Work and Pensions Committee. (2018) [Universal Credit: Support for Disabled People](#)
- 81 DWP & Department of Health. (2017) [Improving Lives: The Future of Work, Health and Disability](#) (green paper)
- 82 House of Commons [Disability: Advisory Services: Written question – 188029](#) November 2018
- 83 House of Commons Work and Pensions Committee. (2018) [Universal Credit: Support for Disabled People](#). <https://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/news-parliament-2017/government-must-not-betray-disabled-people-in-transition-to-universal-credit/>
- 84 Centre for Mental. (2016) [Health Priorities for Mental Health: Economic report for NHS England Mental Health Taskforce](#)
- 85 NAWRA Work and Pensions Committee. (2017) [Universal credit update inquiry NAWRA Response](#) <https://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/news-parliament-2017/government-must-not-betray-disabled-people-in-transition-to-universal-credit/>
- 86 DWP. (2018) [Universal Credit consent and disclosure of information – Guidance, updated December 2018](#). <https://www.gov.uk/government/publications/universal-credit-detailed-information-for-claimants/universal-credit-consent-and-disclosure-of-information> [accessed January 2019]
- 87 CPAG. (2017) [Universal credit: problems and solutions](#). [http://www.cpag.org.uk/content/universal-credit-problems-and-solutions#footnote7\\_3jpt33](http://www.cpag.org.uk/content/universal-credit-problems-and-solutions#footnote7_3jpt33)
- 88 Scottish Government. [Universal Credit \(Scottish choices\)](#) [accessed January 2019]
- 89 SAMH. (2017) [SAMH Submission to the Work and Pensions Committee Inquiry into Universal Credit rollout](#). [https://www.samh.org.uk/documents/SAMH\\_Submission\\_to\\_the\\_Work\\_and\\_Pensions\\_Committee\\_Inquiry\\_into\\_Universal\\_Credit\\_rollout.pdf](https://www.samh.org.uk/documents/SAMH_Submission_to_the_Work_and_Pensions_Committee_Inquiry_into_Universal_Credit_rollout.pdf)
- 90 CAS. (2018) [Rent Arrears: Causes and Consequences for CAB Clients](#). [https://www.cas.org.uk/system/files/publications/rent\\_arrears\\_oct\\_2018.pdf](https://www.cas.org.uk/system/files/publications/rent_arrears_oct_2018.pdf)
- 91 CAS. (2018) [Rent Arrears: Causes and Consequences for CAB Clients](#). [https://www.cas.org.uk/system/files/publications/rent\\_arrears\\_oct\\_2018.pdf](https://www.cas.org.uk/system/files/publications/rent_arrears_oct_2018.pdf)
- 92 DWP. (2018) [Universal Support – Guidance April 2018](#). <https://www.gov.uk/government/publications/universal-support/universal-support> [accessed January 2019]
- 93 UK Government. (2018) [Citizens Advice to provide support to Universal Credit claimants – Press release](#). <https://www.gov.uk/government/news/citizens-advice-to-provide-support-to-universal-credit-claimants>



for Scotland's mental health

SAMH is the Scottish Association for Mental Health.  
Scottish Charity No. SC008897

Registered Office:  
Brunswick House  
51 Wilson Street  
Glasgow G1 1UZ

SAMH is a company limited by guarantee  
registered in Scotland No 82340.

**Published March 2019**

**[www.samh.org.uk](http://www.samh.org.uk)**



[www.facebook.com/SAMHmentalhealth](https://www.facebook.com/SAMHmentalhealth)



[@SAMHTweets](https://twitter.com/SAMHTweets)