

Citizens Advice submission to the Welfare Safety Net Inquiry - December 2018



About Citizens Advice

Citizens Advice provides free, confidential and independent advice to help people overcome their problems. In 2017-18, we helped 2.6 million people face to face, over the phone, by email and web chat. We provide support in over 2,000 locations in England and Wales.

Over the last 12 months (up to the end of November 2018) we have helped over **586,000 people** with almost **1.4 million benefits issues**, including **over 109,000 people** with issues relating to Universal Credit. Thousands more have accessed our benefits advice content online. During the last 18 months we have also published [several reports on Universal Credit](#) based on our client data, insights from frontline advisers, and interviews with clients.

The geographical scope of this response covers **England and Wales**.

1. How should hardship and chronic deprivation be measured?

- 1.1 Deprivation is generally measured at the community level using Indices of Multiple Deprivation (IMDs). These cover factors such as wealth, health, accessibility of goods and services and community safety, and are usually reviewed and updated every 4 to 5 years. Responsibility for local measures of deprivation sits with the Ministry of Housing, Communities and Local Government (MHCLG) and the respective devolved administrations in Wales, Scotland and Northern Ireland.
- 1.2 IMDs are frequently used to target local and national interventions and funding at communities deemed most in need of support, with the aim of tackling both deprivation and inequality. For example, along with other data the IMD 2010 was used to distribute £448m of funding to local authorities in England for the Troubled Families Programme¹.
- 1.3 There are however a number of limitations to measuring deprivation this way which are acknowledged by the governments in each nation². For example, the timeliness of data can be an issue, particularly at the Lower Super Output Area (LSOA) level. Change over time is also relative to other areas, as opposed to being a direct measure of whether the situation has improved in a particular

¹ DCLG, [The English Indices of Multiple Deprivation 2015 - Research report](#)

² DCLG, [The English Index of Multiple Deprivation \(IMD\) 2015 - Guidance](#)

neighbourhood (eg. lower levels of unemployment or higher skills levels)³. In addition, while similar approaches are used across each nation of the UK direct comparisons cannot be made. Importantly it is also not a measure of affluence⁴.

- 1.4 It can also result in disparities between more populated and less populated areas – with populous areas more likely to be identified as having the highest concentrations of multiple deprivation⁵. Hence communities where the population is more dispersed are potentially missing out on the benefits of regeneration programmes and other interventions.
- 1.5 A combination of factors is placing additional pressures on many rural households, both financial and otherwise⁶. These include a low pay economy, higher rates of in-work poverty, and a general higher cost of living due to limited choice of physical services (including shops, banks, post offices and job centres); infrequent and costly public transport, and poor coverage of digital services (both Superfast broadband and 4G/5G mobile phone services). The latter has considerable implications for benefit claimants and job seekers as Universal Credit continues to be rolled out across the UK. The majority of claimants will be expected to make and manage their benefits claim online.
- 1.6 The IMDs provide important insight to a huge breadth of issues impacting on deprivation, to further improve its usefulness **Citizens Advice believes greater consideration should be given to how governments in all UK nations measure and monitor rural poverty/deprivation. in order that the specific circumstances facing rural communities can be taken into account.** This may involve changing the weighting factors applied to each domain or including additional indicators. It may be that a different system is needed altogether for measuring rural poverty/deprivation. We believe this option should also be explored and could include looking at how other countries with similar geographies manage such challenges.
- 1.7 Hardship is more frequently referred to in financial terms and is more commonly associated with individual households and their ability to fulfill their basic needs, including food, warmth and shelter. As with deprivation there are potentially multiple factors that can contribute to an individual or household experiencing hardship therefore obtaining a complete picture can be difficult. Appropriate measures may include levels of household debt, ability to pay essential household bills, threats of homelessness, food bank use and savings levels. However data on many of these measures is not currently standardised or routinely collected by regulators or government. For example, respective governments in each UK nation collect data on council tax arrears and local

³ OCSI, [Why the Indices of Deprivation are still important in the open data era](#)

⁴ DCLG, [The English Index of Multiple Deprivation \(IMD\) 2015 - Guidance](#)

⁵ [Rural deprivation statistics](#)

⁶ JRF, A minimum income standard for rural households, 2010

authority rent arrears, but there is no centrally held data on rent arrears to housing associations or to the private rented sector.

- 1.8 Similarly, utility regulators differ in their approaches to monitoring levels of debt amongst customers in their respective sectors. For example Ofgem records annual levels of fuel debt whereas Ofcom only carries out occasional surveys to estimate the proportion of customers in debt to their telecoms providers. In addition the Bank of England also collects and publishes monthly statistics on consumer credit, and since 2012 the Money Advice Service has been monitoring levels of over-indebtedness in the UK, which is updated regularly⁷.
- 1.9 While all these respective measures are welcome and help to provide an indication of hardship being experienced by people across the UK, there is currently no overall central body responsible for the coordination or analysis of such data.
- 1.10 As a starting point, **Citizens Advice believe the government should play a bigger role in collecting and reporting annually on the level of debt to government departments and to essential service providers⁸.**

Two changes would enable the government to do that:

- The Cabinet Office or Treasury should take responsibility for collating data from departments and reporting levels of debt owed across all government departments, including debts to local authorities.
- The government should require all regulators of essential service markets to collect and publish data on the level of debt in their market.

- 1.11 It is important that levels of hardship amongst the UK population are more consistently monitored and measured. Beyond that, **we believe it is equally critical for all governments, local and national, to undertake full impact and equality assessments when developing and implementing their own policies, to help prevent people experiencing hardship in the first place. This should include routinely reviewing data and evidence gathered by organisations who work directly with those affected by particular policies and actions.**
- 1.12 For example, as we have reported to the Committee [previously](#), Citizens Advice has been calling for readiness checks ahead of further expansion of Universal Credit. We have set out three principles which we believe should shape the Government's approach to assessing performance and readiness within UC, ahead of the acceleration of managed migration. This includes setting out clear criteria for what 'good' looks like and establishing measures that are reflective of the experiences of both claimants and frontline staff.

This could be achieved by:

⁷ Money Advice Service, [Levels of Over-indebtedness in the UK](#)

⁸ Citizens Advice, [Hidden Debts](#), August 2018

- consulting with claimants, frontline organisations, and key stakeholders when setting success criteria. Stakeholders have experience, expertise and insight into how the new benefit is working on the ground. In many cases, they also hold data which may be helpful in assessing the nature and scale of the impact on individual households
- capturing the experiences of different groups of claimants to help identify where policies may be having a disproportionate impact on particular groups more vulnerable to hardship eg. disabled people or those with health conditions
- regularly and transparently reviewing progress against any success criteria.

2. What do we know about chronic deprivation and hardship in the UK? Is it changing? How?

Why do some households fall into poverty and deprivation?

2.1 The reasons why some people experience hardship or deprivation are multifaceted and complex. As we set out below, our evidence and that of others shows how a combination of factors **over the last decade** is likely to be contributing to many households becoming more exposed to significant financial difficulties and potential hardship. This includes:

- no rise in real average earnings
- an increase in more insecure types of employment
- low levels of savings, and
- a reduction in the value of many working age benefits.

As a result many household budgets have become more volatile and stretched, with more people struggling to meet everyday living costs.

Rise in financial insecurity

2.2 Recent Citizens Advice research⁹ highlights financial insecurity is being driven by two things. Firstly, many people's finances are unpredictable. Almost half (48%) of adults have experienced at least one monthly drop in income in the last year, while more than 1 in 10 (13%) said their income changes significantly from month to month. In most cases such income changes are due to changes in employment, including redundancy, reduced hours or a decrease in pay. There is also a strong association between financial insecurity and how people are employed, with those in insecure work or the self-employed being more likely to report their household income is volatile. Another cause of unpredictable incomes is a significant life event, such as having a child or a period of ill health.

⁹ Citizens Advice, [Walking on thin ice](#), February 2018

- 2.3 To some extent this volatility is inevitable as lives and work situations will often change. However, the situation becomes more problematic when combined with a lack of financial resilience. People's capacity to save is also at a near record low¹⁰. This means large numbers of people are poorly placed to manage this income unpredictability. Nearly half (45%) of UK adults have no cash savings or savings of less than £2,000¹¹ to help them manage financially when faced with an unexpected life event or income shock such as losing a job or becoming ill. Recent GB-wide polling commissioned by Citizens Advice found almost 1 in 4 respondents (23%) would only be able to continue to pay essential bills (such as rent, mortgage, gas and electricity) for a week or less if they were to lose their job, without having to borrow or miss payments. This rose to 36% of renters¹².
- 2.4 Many UK households not only have no financial buffer, they also have little flexibility in their spending - more than 1 in 5 (21%) households spend more than 60% of their income on essentials like food, housing and fuel each month, with nearly 1 in 10 (9%) spending more than 80%¹³.
- 2.5 People with unpredictable incomes often have to make difficult decisions on how to prioritise spending, frequently having to balance paying their bills against paying for other essential day-to-day costs like food or travel. This could mean going without, borrowing money or using credit, or delaying bill or loan payments.
- Our research found:
- 1 in 5 (21%) of those with volatile incomes have gone without food or essentials in the past year (compared with 8% with stable incomes)
 - 1 in 4 (25%) have used a credit card to pay for essentials such as food, utilities or rent, and a similar proportion report using their overdraft
 - 1 in 10 (11%) have ignored or delayed a bill or loan repayment¹⁴.
- 2.6 These findings reflect a growing trend in the type of debt problems Citizens Advice and others have seen over the last few years. There has been a notable shift from consumer credit debts to problems with household bill debts¹⁵.

¹⁰ ONS (2017) UK quarterly sector accounts

¹¹ Financial Conduct Authority, ['The financial lives of consumers across the UK'](#), June 2018

¹² ComRes poll of 2,034 adults in Great Britain aged 18+, conducted online between 8th and 9th August 2018

¹³ Citizens Advice, [Walking on thin ice](#), February 2018. All analysis of spending patterns is from NPI's analysis for Citizens Advice of the Living Costs and Food Survey 2015-16.

¹⁴ Citizens Advice, [Walking on thin ice](#), February 2018

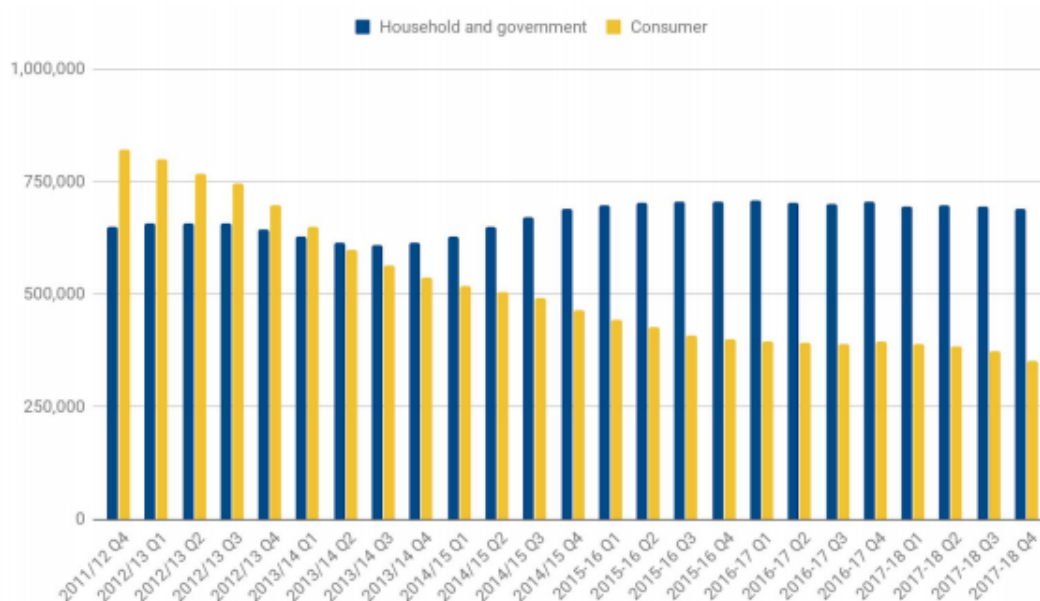
¹⁵ Citizens Advice, [Hidden Debts](#), August 2018. For the purpose of our analysis household bill debts includes other debts to government such as repaying tax credits and benefit overpayments and magistrates fines.

Changing nature of debt

2.7 Since 2014, it has been more common for people to come to Citizens Advice for help with household bill debts - such as council tax, rent or energy bill arrears - than with problems related to consumer credit debts - such as credit cards, personal loans and overdrafts. For example, in the 12 months up to the end of November 2018, Citizens Advice helped over 327,000 people with more than 847,000 debt-related issues. Almost half of these issues related to household bill debts (49%), with a quarter (24%) relating to problems with consumer credit products. Conversely, in 2011-12 38% of debt problems we helped people with were caused by problems with consumer credit products and just 30% of issues were caused by problems with paying household bills.

The graph below highlights this changing nature of debt.

Figure 1: Total number of problems Citizens Advice helped people with by debt type over time (12 month rolling average, 2011-2018)



2.8 Problems with 2 types of household bill debts have grown particularly quickly. Between 2011/12 and 2017/18:

- Council tax arrears problems increased from 168,000 to 217,000 (up 29%)
- Rent arrears problems increased from 104,000 to 125,000 (up 20%).

Other debt advice organisations have seen similar trends:

- Last year, 2 in 5 people who received debt advice from StepChange were in arrears on 1 or more of their essential household bills. They estimated that 3 million people fell behind on their bills over the course of a year¹⁶.

¹⁶ StepChange, [Behind on the Basics](#) May 2018

- The Money Advice Trust have also reported that calls to National Debtline relating to council tax arrears have increased from 14% in 2007 to 26% in the first three quarters of 2017. Calls relating to benefit overpayments increased from 10% in 2014 to 16% in the first three quarters of 2017¹⁷.

2.9 This shift is particularly concerning as household bill debts are predominantly 'priority debts' - debts where the consequences of not paying them are more severe. This can involve being evicted, having your gas and electricity cut off or receiving a court summons.

2.10 Our debt clients overall tend to be in a more precarious financial situation than Citizens Advice clients as a whole. However, our evidence shows those with household bill debts are even more likely to be in vulnerable circumstances, including being unemployed, lone parents or having mental health difficulties. This vulnerability can be exacerbated by the severity of collection powers and practices associated with such debts, including the use of enforcement agents.

The top 3 collection issues seen by Citizens Advice during 2017/18 included:

- Enforcement by bailiffs or High Court Enforcement Officers - 89,622 issues
- Eviction, threatened eviction or possession claim - 29,688 issues
- Court claim eg. liability order (often linked to the collection of council tax arrears) or summons - 22,630 issues.

2.11 This approach to debt collection can often force people to make more risky financial decisions. For example, using credit cards or payday loans, or going without food or electricity, to pay off bills, and result in increased hardship, as well as significant anxiety and stress¹⁸.

The prevalence of issues we see associated with enforcement by bailiffs, and the hardship this causes, has led Citizens Advice to call on the Ministry of Justice to bring bailiffs and bailiff companies under an independent regulator.

2.12 In order to help people repay 'priority debts' the DWP is able to set up automatic deductions from people's benefits. The rules around deductions have changed under Universal Credit. Some deductions are taken at higher rates than under legacy benefits and the overall cap stands at 40% of a claimant's standards allowance, although this is due to be reduced to 30% from October 2019. Citizens Advice evidence has found some claimants are experiencing increased hardship as a consequence of UC deductions¹⁹.

¹⁷ Money Advice Trust, [Stop the Knock](#) November 2017

¹⁸ Citizens Advice, [Hidden Debts](#), August 2018

¹⁹ Further details to be found in a forthcoming Citizens Advice report

- 2.13 The Treasury is currently consulting²⁰ on proposals to help people recover from financial problems and get their debt problems under control by introducing a 'breathing space' and Statutory Debt Repayment Plan (SDRP). Some household bill debts such as rent arrears²¹, utility arrears and benefit overpayments are likely to be eligible for these proposed measures.

Citizens Advice is calling on the Treasury and DWP to include debts which can be deducted directly from Universal Credit in the 'breathing space' and SDRP, including advance payments and other deductions that are already being taken. This would protect claimants who are struggling financially in the short term and ensure their debts are more likely to be collected in the longer term.

Changing nature of employment

- 2.14 While the UK economy has shown signs of improvement in recent years, with unemployment rates halving over the last 7 years from 8.5% in November 2011 to 4.1% in October 2018²², as referred to earlier in this section, the changing nature of employment is such that many of those in work are still struggling financially.
- 2.15 Over the last decade the UK workforce has become increasingly diverse and mobile - more people now work for themselves, via agencies and with hours that vary. In some circumstances this can lead to flexibility for both the worker and employer. However, growing labour market complexity also creates risks, particularly for the security of income people value so highly. In a recent survey commissioned by Citizens Advice 91% of working age people rated receiving a *steady* income as important, compared to 87% who rated the *amount* of pay they receive as important²³. These findings remain consistent with previous research by Citizens Advice undertaken two years ago²⁴. Limited employment options can mean people have to settle for work which does not offer them the security and predictability of income they need to effectively manage their finances.

²⁰ HMT, [Breathing space scheme: consultation on a policy proposal](#), October 2018

²¹ Proposals currently allow for mortgage or rent arrears to be excluded at the request of the debtor or a debt adviser.

²² ONS, [UK Labour Market: December 2018](#)

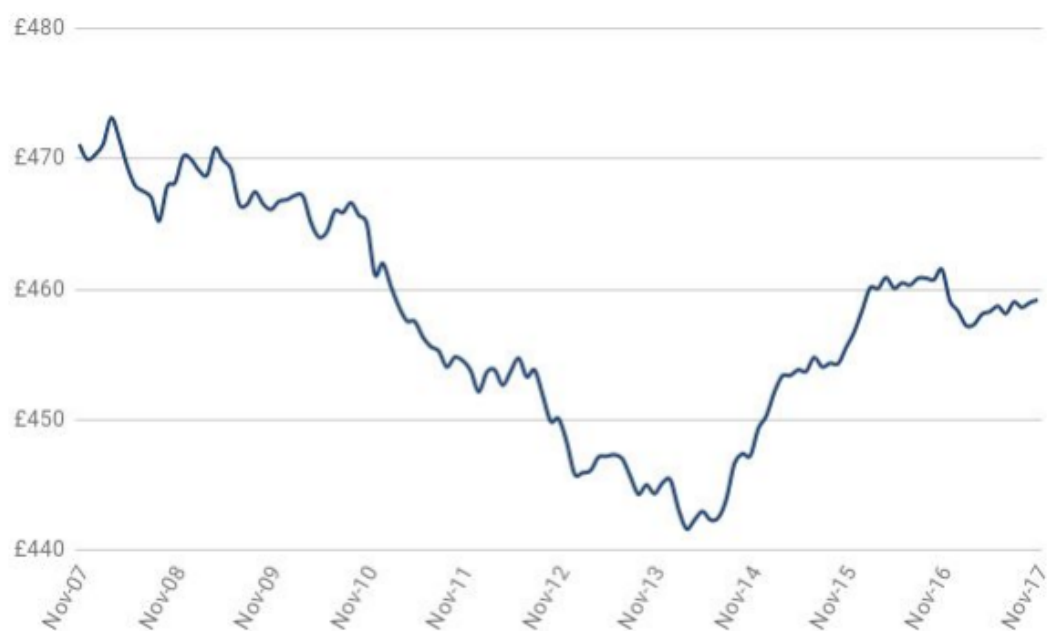
²³ YouGov online poll undertaken across GB between 22 and 26 March 2018. Figures have been weighted and are representative of all GB adults (aged 18+). Total sample size = 4,178 respondents.

²⁴ Citizens Advice, [The importance of income security](#), June 2016

- 2.16 Alongside income instability, over the last decade or so wage levels have also failed to keep up with rising living costs. As Figure 2 shows, real average earnings are still below what they were 10 years ago²⁵.

Figure 2: A decade without a pay rise

Time series of real average weekly earnings (seasonally adjusted, regular pay, equivalent to 2015 prices)



Source: ONS, Monthly Wages and Salaries Survey

- 2.17 Recent analysis by the Joseph Rowntree Foundation (JRF)²⁶ has found since 2004/05 in-work poverty has been rising at a faster rate than employment. They estimate that across the UK 4 million workers are now living in poverty - a rise of more than half a million over the last 5 years. The situation is particularly severe for working lone parents. This is being driven by their disproportionate concentration in low paid work, comparatively high housing costs (due to needing the same size home as couple families) and cuts to benefits and tax credits.
- 2.18 Some people also face additional barriers to work which can make finding and remaining in a job with a regular, steady income more difficult. This can include a lack of appropriate skills and qualifications, poor access to public transport and affordable childcare, or securing employment which enables them to manage other caring responsibilities or to manage a health condition or disability.

²⁵ ONS (2018) Monthly Wages and Salaries Survey

²⁶ JRF, [UK Poverty 2018](#), December 2018

2.19 Disabled people and those with health conditions are likely to work fewer hours overall and can be more limited in their choices in the labour market. Many disabled people who leave their job are no longer able to work and therefore become economically inactive out of necessity. However, Citizens Advice analysis shows a significant proportion (30%) move into unemployment and are therefore still actively seeking work²⁷.

We have previously highlighted to the government the importance of having a **reliable and responsive benefit system to ensure working age disabled people and those with health conditions have access to a secure income, and are able to focus on their health and employment**²⁸.

A programme of welfare reform

2.20 Over the last 6 years there has been a substantial programme of welfare reform in the UK. This has resulted in major changes to some benefits, most notably the introduction of Universal Credit (UC) and Personal Independence Payments (PIP). There have also been reductions in the value of others, including the introduction of the under occupancy charge for Housing Benefit claimants, the reduction of Local Housing Allowance (LHA) rates from 50% of Broad Rental Market Area rents to 30%, abolishing the work-related activity component within Employment and Support Allowance (for those placed in the work-related activity group), a benefit cap and a freeze in the value of certain working age benefits for four tax years (from April 2016 to April 2020). Certain aspects of the welfare system have also been devolved in recent years, such as council tax support and discretionary elements of the social fund (i.e. Crisis Loans and Community Care Grants). Combined with the fact that further responsibilities for welfare have been passed to the Governments in Scotland and Northern Ireland, this means some aspects of the welfare system are now operating quite differently across each nation of the UK.

Further comment relating to the impact of the benefit changes on our clients and other claimants more broadly is highlighted in section 3 below.

3. Is our welfare safety net working to prevent people falling into Deprivation? If not, how could it better do so? What role does Universal Credit play in relation to deprivation, or could it play in tackling it? Do Jobcentre Plus procedures and benefit delays play a role [in reported increases in indicators of deprivation]?

²⁷ Citizens Advice, '[Halving the Disability Employment Gap](#)', February 2017. Citizens Advice analysis of the Labour Force Survey, England and Wales from 2013-2015.

²⁸ Citizens Advice, '[Halving the Disability Employment Gap](#)', February 2017

3.1 Citizens Advice believe any welfare safety net should :

- Provide people on low or unpredictable incomes with financial security
- Be of sufficient value to ensure people are able to meet all their essential living costs
- Work for everyone in need of support, taking into account the range of different circumstances and needs of claimants
- Ensure people have access to the right support at the right time to help them move into and progress in work, as well as supporting those who can't work
- Make sure people in need get their benefits reliably and quickly to avoid any unnecessary hardship and prevent problems turning into crises.

3.2 Since 2010 the UK welfare system has seen unprecedented reform. The impact this series of reforms has had on benefit claimants has been considerable. Some claimants have seen their benefit income increase under the revised system. For example, some PIP claimants are in receipt of higher awards than they received previously under Disability Living Allowance. Likewise, some households - particularly households with children where at least one person is in work - may be better off under UC than on the legacy system.

3.3 However, many people stand to lose out from changes to the benefit system. For example, our recent report outlined the impact that Universal Credit will have on single disabled people.²⁹ Despite welcome changes announced in the 2018 Budget (such as the increase in the Work Allowance) many disabled people are facing losses due to the removal of disability premiums, the removal of the Limited Capability for Work (LCW) element, and the requirement for people claiming UC to be assessed as not fit for work in order to access the Work Allowance.

3.4 A significant number of claimants will have been or will be experiencing more than one change to the benefits they receive. Their ability to cope with the cumulative impact of these changes will vary depending on individual circumstances, but many thousands of people will have seen their income reduced, in some cases substantially.

3.5 Recent analysis estimates the combined effects of the major reforms implemented before 2017 - namely the under occupancy charge, the localisation of council tax support, the LHA shortfall, the benefit freeze and the benefit cap - result in an average nominal income loss of £23.01 per week for each working-age household³⁰. This figure excludes any changes in income relating to the introduction of UC and allows for mitigation measures introduced by the Government over the same time period, namely the progressive increase in the National Living Wage and the rise in the personal tax allowance.

²⁹ Citizens Advice, [Universal Credit for single disabled people](#), October 2018

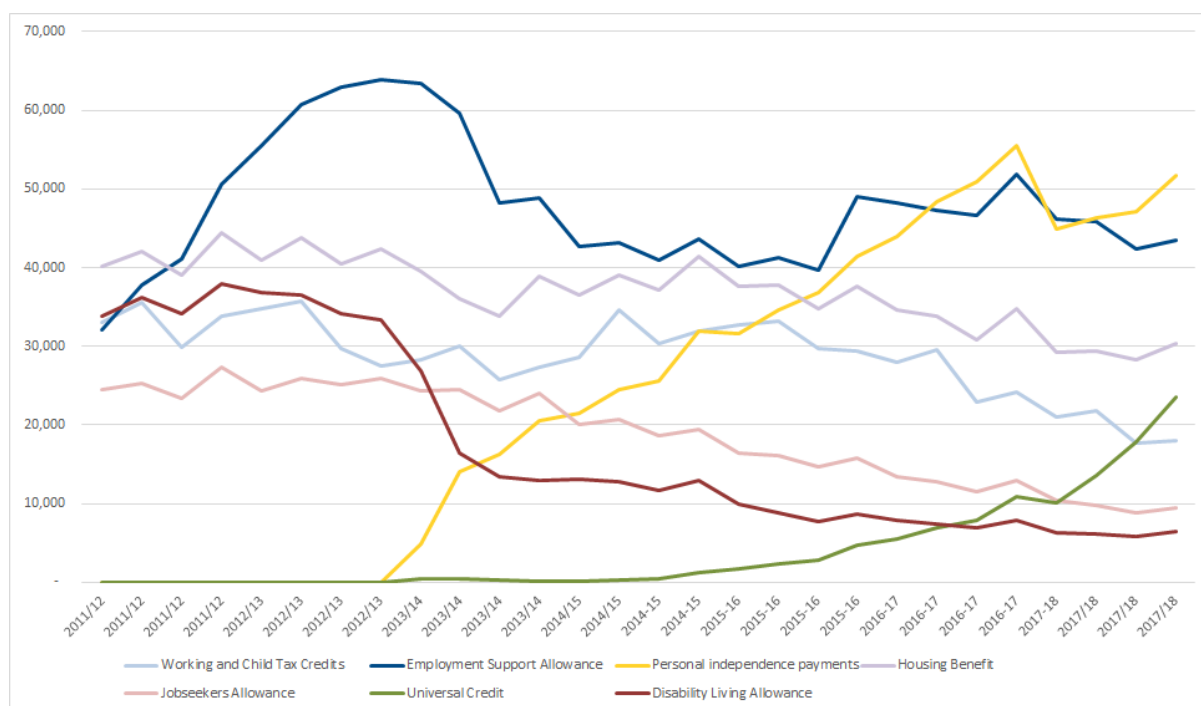
³⁰ Policy in Practice, [The cumulative impacts of welfare reform: a national picture](#), August 2017

3.6 At Citizens Advice over the last 12 months (up to the end of November 2018) we helped **586,000 people** with almost **1.4 million benefits issues**, including Universal Credit.

3.7 Any change to the benefits system is often reflected in the types of issues our clients need help and support on. None more so than when new benefits are introduced. Since April 2013 we have helped **over 580,000 clients with PIP-related issues**. Similarly, we have helped **over 175,000 people with UC related issues** since rollout began and are currently seeing the equivalent of around **1 in 10 new starts to UC**.

Figure 3 below illustrates how over the last 6 years we've seen increases in the number of clients seeking help on PIP and UC related issues, along with corresponding decreases in those seeking help on the benefits they're replacing.

Figure 3: Clients seeking help from Citizens Advice on benefits and tax credit issues between 2011/12 and 2017/18



3.8 Citizens Advice support Universal Credit's aims to simplify the benefits system, help people move into and progress in work, and support those who can't work. Some of the problems associated with UC are to be expected with the rollout of a new benefit however, our evidence suggests this reform is being undermined by delivery challenges and a number of design problems which are negatively impacting on some claimants - many of whom are in vulnerable situations.

- 3.9 These problems are not only of concern in themselves, but also due to their knock-on effects. For example, debt is still more common for our clients on UC than those still claiming legacy benefits - 24% of clients who came to us for advice with their UC claim between April and November 2018 also sought debt advice, compared to 17% on legacy benefits³¹. People on UC are particularly likely to have priority debts such as rent, council tax or utility bills - 82% of UC clients, compared to 74% of legacy benefit clients³². As mentioned earlier in our response this can leave them at risk of being evicted from their homes, having their electricity or gas cut off or exposed to aggressive collection practices. We have highlighted many of these issues with the Committee in previous submissions to the Universal Credit inquiry³³.
- 3.10 We welcome the 'test and learn' approach the Government is taking on UC. It is a hugely ambitious programme and with such a substantial change, for both the department and claimants, it is critical that processes are effectively tested and any problems addressed as and when they become apparent. It is also vital that people's income is protected during the whole process. For example, while we accept there must be a mechanism within managed migration to ensure people do not remain on the legacy system indefinitely as it stands, DWP's power to stop legacy benefit payments puts the most vulnerable claimants at risk of being left without an income.
- 3.11 The Government has rightly recognised some of the identified issues with UC and has made, or has committed to make, a series of welcome changes to this benefit. We do however remain concerned that fundamental problems still exist.
- Delivery issues - including problems with ID verification and evidencing additional costs - are causing additional delays to people's UC payments. This is on top of the designed in 5 week wait for first payment which many are struggling with.
 - Our evidence suggests the system of monthly assessments and the Minimum Income Floor for self-employed people are resulting in financial difficulties for some working claimants, particularly for those in less traditional forms of work.
 - Finally, while many will benefit from the move to UC, some groups - including some disabled people - will see their benefit payments reduce in comparison to the legacy system.

³¹ Further details to be found in a forthcoming Citizens Advice report. Data from Citizens Advice cluster reports, April 2018 to November 2018 Base: 83,241 UC clients, 369,536 legacy benefit clients.

³² Money Advice Recording Tool, April to June 2018. Base: 21,085 clients, including 1,551 UC clients and 5,179 legacy benefits clients.

³³[Citizens Advice response - UC & working claimants](#); [Citizens Advice response - UC & childcare](#); [Citizens Advice submission - response to Budget 2018](#)

Left unresolved these problems not only risk undermining the core principles of UC. They also leave many people in vulnerable situations without the safety net they need and at greater risk of increased hardship.

3.12 Ahead of many more people moving onto UC, both those who 'naturally migrate' and those subject to 'managed migration', Citizens Advice is calling on the Government to prioritise fixing existing problems with UC. We believe they should:

- **Clarify the reasons why the two-week run on of legacy benefits will not be introduced until July 2020 and consider introducing this measure urgently**
- **Evaluate the impact of design features of Universal Credit - including its monthly cycle of assessments, the initial 5 week wait, and the Minimum Income Floor (MIF)**
- **Commit to continued assessment of the financial sufficiency of Universal Credit, taking into account the financial disparities between people who naturally migrate and those subject to managed migration**
- **Complete the outstanding 'to do' list for Universal Credit build and fix - for example, fully automating payment calculation and completing rollout of the Landlord Portal**
- **Guarantee that legacy benefits will not be stopped during managed migration in cases where someone has struggled to engage with or complete the claim process, and that the power to stop benefits will only be used in exceptional circumstances**
- **Commit to continuing to investigate and respond to problems within Universal Credit as and when they become apparent - rather than at the end of rollout.**