

The Rt Hon Lord Freud
Minister of State for Welfare Reform
Department for Work and Pensions
Caxton House
Tothill Street
London
SW1H 9NA

16 November 2016

Dear David

The Universal Credit (Housing Costs Element for Claimants Aged 18-21) (Amendment) Regulations 2016

The Social Security Advisory Committee considered the above regulations at its meeting on 9 November.

I should start by emphasising that the Committee was impressed by the thoroughness of the Department's approach in developing the detail of these proposals in consultation with relevant stakeholders. We were advised by officials that information supplied by stakeholders helped to identify all potential groups with a justifiable case for exclusion, and that helped shape the proposals that were presented to us. It was largely on the strength of that consultation and collaborative approach that we concluded that little useful purpose would be served by conducting further research of our own. Therefore, after careful consideration and noting the Department had agreed to most, though not quite all the suggestions put to it, the Committee concluded that it would not take the draft regulations on formal reference.

Nonetheless, there are two issues that we would like to raise with you (in addition to some detailed issues that officials have agreed to consider further).

While the Department adopted a commendable approach in its consultation with stakeholders, we took the view that it had been less assiduous as far as health issues are concerned. The Committee concluded that the input of experts dealing in health issues affecting 18-21 year olds, and particularly mental health issues, could identify some issues that might have been overlooked to date. We would encourage the Department to rectify that by undertaking a short targeted consultation of appropriate stakeholders in the health sector.

Our second concern is the ever-expanding expectations being made of work coaches. We have voiced this concern on more than one occasion before as it seems that, with almost every new set of draft regulations, we are being

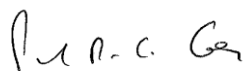
advised that new and revised guidance will be made available to work coaches.

Because the role of the work coach is key to so much of the successful operation of Universal Credit, the Committee feels it is important to look closely at the expectations on individual staff members – in terms of capacity and capability - to take on more information to do their job effectively. We are supportive of the work coach model, but it would be a great pity if the pressures placed on staff in undertaking this important and valuable role were too demanding for them to be able to provide the right quality and consistency of tailored support and challenge to claimants.

The Committee would be very happy to be consulted on the draft guidance which is being produced as a result of these changes, and has already made that offer to DWP officials.

As ever, I would be very happy to discuss these issues further with you if that would be helpful.

I am copying this letter to the Secretary of State, Caroline Nokes, Robert Devereux and Jeremy Moore.

A handwritten signature in black ink, appearing to read 'Paul Gray'.

Paul Gray
Chair, Social Security Advisory Committee