

James Wolfe
Director of Poverty, Family and Disadvantage
Department for Work and Pensions
Caxton House
Tothill Street
London
SW1H 9NA

27 January 2026

Dear James,

The Universal Credit, Personal Independence Payment, Jobseeker's Allowance and Employment and Support Allowance (Claims and Payments) (Amendment) Regulations 2026

Thank you for the full and constructive engagement from you and your team in advance of and during the Committee's scrutiny of the above regulations on 21 January. My colleagues and I appreciated the clarification provided on the rationale for removing the sunset clause, and the helpful update on the Department's evaluation activity. Your explanation on the day, beyond what was included in the supporting papers, of DWP's engagement with a wide range of sources to monitor the consequences was particularly valuable.

Following careful consideration of the proposals, and the supporting evidence presented to us, the Committee has decided that it does not intend to take these Regulations on formal reference and that they may proceed as planned.¹

However, I am writing to share a small number of observations and recommendations from the Committee about the need for ongoing monitoring, and the importance of flexibility in applying mitigations.

Lone parents and Article 14 European Convention on Human Rights considerations

The Committee notes that paying lone parents appear to be disproportionately represented in the group of Universal Credit recipients who retain less of their entitlement, as reported in Table 3 of the supporting papers.² However, the

¹ Under the powers conferred by Section 173(1)(b) of the Social Security Administration Act 1992.

² "The table shows that paying parents, who are lone parents, will retain less of their UC award, when compared to all affected households – although this proportion is still substantially lower than the UC population as a whole. Any differences are likely related to the combinations of deductions these households have and could be amplified by the small numbers of households in each group."

documentation did not explain what consideration had been given to the mechanisms, and the reasons, for this disproportionate impact. We acknowledge the Department's explanation that it is Government policy to deduct child maintenance payments from the paying parent. Nonetheless the Committee would welcome a clearer understanding of the factors that result in paying lone parents being disproportionately worse off, and whether mitigations for this group were considered in the policy design. If not, we consider it important to explore further whether there are interactions with other deductions or circumstances that may be contributing to the particular effects observed for such lone parents, and whether additional mitigations may warrant consideration.

Under Article 14 of the European Convention on Human Rights, and the principle established in *Thlimmenos v Greece*,³ we understand that discrimination can occur where there is a failure, without objective and reasonable justification, to treat differently those people whose situations are significantly different. The Committee is of the view that further clarification of the Department's reasoning in this area would be valuable in ensuring the policy aligns with that legal framework and with the Government's wider child poverty aims in respect of paying parents, in particular lone parents, who have responsibility for other children.

In particular, the Committee would like to have further clarity on the potential impact on the children for whom paying parents – and in particular lone parents - have responsibility, and how this fits with the Government's objectives in relation to child wellbeing and financial resilience.

Where there may be a risk of financial pressure contributing to disproportionate financial hardship, the Committee is of the view that the Department should consider the degree to which mitigations - such as greater flexibility in recovery of Universal Credit advance payments - might support the effective application of this policy.

Importance of clear information and signposting

It is evident that the first-priority status of child maintenance deductions from Universal Credit may create additional financial considerations for some paying parents. Clear communication from the Child Maintenance Service about how child maintenance is treated within debt-advice settings, and strong signposting to independent support services, will be important in ensuring parents understand their options and can access appropriate help. The Committee would welcome assurance that guidance, training and communications will support this.

³ [Thlimmenos v Greece \(bailii.org\)](https://www.bailii.org/uk/eu/cj/other/2000/115.html), European Court of Human Rights, 2000

Recommendations

In light of our constructive discussion, and our reflections set out above, the Committee recommends that the Department:

- **Continues to monitor** the impacts of the policy, including any differential effects on lone parents and the children in their care.
- **Retains flexibility** in applying mitigations where individual circumstances may justify adjustments.
- **Keeps under review** how the policy aligns with the Government's wider child-poverty objectives and Article 14 considerations.
- **Ensures clear signposting** through the Child Maintenance Service to debt advice and other appropriate support services, with provision of clear guidance on the treatment of child maintenance within debt-advice assessments.

The Committee would welcome an update in due course on the Department's monitoring activity - including the planned use of administrative data to discover more about the characteristics of the small number of paying parents who have high deductions - and any mitigations under consideration (or indeed implemented). The Committee secretariat will be in touch with you team to arrange a follow up discussion in due course. In the meantime, I would, naturally, be happy to discuss further any of the points raised in this letter if that would be helpful.

Thank you again for the constructive engagement at, and in the lead up to, the Committee's scrutiny of these proposals last week.

A copy of this letter goes to the Rt. Hon Sir Stephen Timms MP (Minister for Social Security and Disability).

Yours sincerely,



Dr Stephen Brien
SSAC Chair