



Beneath the trends

A detailed look at the issues facing claimants going through managed migration

November 2024

Summary

The Department for Work and Pensions (DWP) is in the process of moving legacy benefit claimants onto universal credit (UC) through managed migration. Gradually, claimants are being selected for managed migration and are sent a 'migration notice' informing them that they have three months to claim UC, after which their legacy benefit payments will be terminated.

Alongside the administrative challenge this poses to the DWP, the UC system requires claimants to make significant adjustments to how they manage their day-to-day finances. UC payments are less frequent, UC is primarily claimed and managed online, and claimants have their income assessed each month. Households that are financially worse off claiming UC may be entitled to 'transitional protection' to preserve their income temporarily at its pre-UC level. Some households will still be worse off in practice if higher debt deductions are made from their UC award.

Since early 2023, Child Poverty Action Group (CPAG) has been undertaking research to identify the key issues affecting claimants going through managed migration, with the objective of helping to improve the process. We have gathered case studies and spoken to welfare rights advisers and claimants to understand how managed migration has affected households, what went well and how it could be improved. We have shared our evidence with the DWP on an ongoing basis. This report is the final in a series of public briefings summarising our findings (other reports are available [here](#)).

This final report outlines the issues relating to managed migration as the DWP has begun sending migration notices to claimants with much lower incomes and who are likely to be more vulnerable. It highlights how the support offered can be improved to ensure that those facing the greatest barriers are able to make and sustain a UC claim. Lastly, it looks at the experiences of people who have completed the move to UC to highlight how UC can work better for everyone claiming.

Progress to date and plans for completion

In 2023/24, managed migration focused on tax credit-only claimants. It expanded to claimants of other benefits in April 2024. A total of 1.4 million legacy benefit claimants had been sent a migration notice by the end of September 2024.¹ At this point, most people on legacy benefits, except those receiving employment and support allowance (ESA) but not receiving tax credits, had been sent a migration notice.

Over this autumn and winter, claimants in deferred groups (such as terminally ill claimants and people with appointees) will be sent their migration notice. In addition, the DWP will start to scale managed migration to the final group of ESA claimants, aiming to send out 63,000 migration notices each month by February 2025 so that the legacy benefit system can close by April 2026.²

More than 300,000 claimants have had their legacy benefit terminated without making a UC claim

To date, 318,000 legacy claimants have not claimed UC before the deadline and have had their legacy benefit payments terminated.³ This is an overall non-move rate of 27 per cent. But the average masks a sizable variation in the non-move rate between individuals who were previously only receiving tax credits – 33 per cent have not claimed – and those previously receiving a DWP legacy benefit – 5 per cent have not claimed. This is likely to be because households claiming a DWP legacy benefit have much lower incomes and risk becoming destitute if they do not transition to UC.

It is welcome that the proportion of individuals not moving to UC is lower among DWP legacy benefit claimants than those only receiving tax credits. But, to date, more than 11,000 claimants of a DWP legacy benefit have had their payments terminated without moving to UC. The DWP has not published any explanation of why 5 per cent of these claimants are not moving to UC despite the strong financial incentive to do so, yet it plans to significantly increase the number of migration notices being sent to sick and disabled claimants.

More than 50,000 claimants have made a claim for UC after the deadline

Five per cent of people (more than 50,000) sent a migration notice miss their deadline but make a UC claim soon after their legacy benefits are terminated.⁴ People who claim within a month of the deadline on their migration notice (or the expiry of a deadline extension) can still get transitional protection, and their UC award will be backdated to the point at which their legacy benefits were terminated (though the delay will lead to an additional gap in their benefit payments). Once a claimant has passed the deadline on their notice (or extension), their legacy benefit payments are automatically terminated and the DWP does not have the power to retrospectively extend the claimant's deadline. If a claimant only reaches out to the DWP after they have passed the deadline, the DWP cannot resume the claimant's legacy benefit and the claimant will have to claim UC (if they are able) and wait five weeks for their first UC payment.

ESA claimants who have moved to UC have been inappropriately asked to look for work

To date, 80,000 ESA claimants have been sent a migration notice. Most of these claimants will be in the 'support group' of ESA⁵ which means that they are not required to work or undertake work-related activity

¹ Department for Work and Pensions, [Move to Universal Credit. July 2022 to end September 2024](#), 12 November 2024

² [Parliamentary Statement made by Sir Stephen Timmins](#), Minister for Social Security and Disability, Statement UIN HCWS205 12 November 2024

³ See note 1

⁴ See note 1

⁵ 84 per cent of ESA claimants are in the support group

because of the extent of their ill-health or disability. Yet individuals in the support group who have made a claim for UC through managed migration have often been required to undertake work-related activity, including attending work-focused interviews at the job centre, providing fit notes, developing a CV and/or searching for work.

We understand that this has happened because the decision about a claimant's limited capability for work is not made until the end of their first UC assessment period (a month after they claim), and claimants automatically have work requirements imposed on them in the interim. At the end of the assessment period, the decision maker will inevitably determine that claimants previously in the ESA support group are to be treated as having limited capability for work and work-related activity.

Many people in the ESA support group are exempt from work-related activity because the DWP accepts that there would be a substantial risk to the claimant's health (or that of another person) if they were required to undertake work-related activity. Exposing ESA support group claimants to work requirements after they make a claim for UC, even if only temporarily, risks causing harm to claimants, or others. We have come across multiple claimants who have been affected by this including a claimant with severe mental health needs and a history of self-harm and violence. In all the cases received by CPAG, the work requirements imposed on claimants have caused them distress and, in some cases, had an adverse effect on their health. The transition to UC is already something that claimants will be worrying about and the addition of inappropriate demands to prepare a CV or get work ready during that first month could be the tipping point for a vulnerable claimant.

It's not clear how many people have been inappropriately told to undertake work-related activity after claiming UC through managed migration. The cases we have seen have been referred to the DWP and promptly resolved, but this will only be a small fraction of those effected. We understand that in late November 2024, the DWP implemented an 'automated fix' intended to prevent this issue from affecting the majority of claimants who should not be required to undertake work-related activity, two months after we first became aware of the issue.

This example highlights the importance of slowing the managed migration roll out. Had the DWP adopted a more gradual pace of roll out to claimants of ESA and tax credits (rather than sending out 79,000 migration notices in the space of three months), this issue could have been addressed when the numbers affected were much smaller.

Gaps in the enhanced support journey

In preparation for the expansion of managed migration to claimants of DWP legacy benefits, the DWP introduced the 'enhanced support journey' (ESJ) for claimants of income support and ESA. The ESJ has two elements:

1. **A week before the claimant's deadline, the DWP contacts them to signpost them to support.** Three attempts are made to call the claimant on the phone. If the claimant does not answer, a home visit will be arranged and their deadline will be extended to allow time for the home visit to take place (income support claimants are only provided with a home visit if the DWP's records indicate that the claimant has support needs).
2. **'Pre-termination checks' are completed before a legacy benefit award is ended.** If someone does not request help when the DWP contacts them but does not claim UC before their deadline, the DWP will conduct 'pre-termination checks' before ending their legacy benefits. If the DWP's systems indicate that the claimant is vulnerable their deadline will be extended and the DWP will seek to contact the claimant again.

Through our work with vulnerable claimants going through managed migration, we have identified three major flaws with the ESJ which undermine the DWP's ability to reach vulnerable claimants in need of support.

1. 12 weeks is too long to wait to offer support

The three-month migration notice period is essential for claimants to gather documentation, seek advice and, if they can, set money aside for the five-week wait for their first UC payment. But it's important to acknowledge that these three months are a stressful time for claimants. The people we have spoken to during this project have repeatedly told us how panicked they have been in anticipation of moving to UC.

Multiple people we have spoken to have sought information and support during this time but have struggled to successfully access any. People have gone to their local Citizens Advice only to find that there were no appointments available, and people have been unable to get answers to their questions from the DWP's migration helpline. That was the experience of Erik W, a participant in [Changing Realities](#).

My migration notice arrived through the door, saying I need to claim Universal Credit in order to continue receiving benefits. There is very little information about how this will affect me in the coming weeks or even what information you need in order to apply. I recently contacted my local citizens advice for information as my daughter has now finished full time education, but they are so overrun with enquiries at the present time that all they could do was point me towards various online sites for information which sometimes can be difficult for me to understand.⁶

The ESJ doesn't begin until a claimant's deadline is one week away – 12 weeks after they first receive their migration notice. This is too late to offer vulnerable claimants support. Some people who need help won't wait this long; they will claim UC with the help of a neighbour, family member, or a friend, but may struggle to maintain the claim because they have not been provided with the support they need. This is particularly the case for people who lack digital skills or access, who may make a digital UC claim initially with support, but struggle to maintain this and in practice need to manage their claim over the phone. Some people struggle to cope with the prospect of change and will wait until the last minute to claim UC, but during those 12 weeks before support is offered, the stress of their situation may have already caused harm.

For those who have not claimed UC by week 12 and receive a phone call or home visit from the DWP, the support they are eventually offered is very limited. The DWP will only assist those who need an appointee to manage their UC claim. Everyone else in need of some kind of support, but not an appointee, is merely signposted to Help to Claim (a phone service provided by Citizens Advice).

2. DWP callers are not supported to anticipate the claimant's needs

When a caller representing the DWP phones a week before a claimant's final deadline, they do not check the claimant's records beforehand for signs of vulnerability, limiting their capacity to anticipate if the claimant faces any barriers to claiming. We spoke to a claimant who had obvious and complex support needs and needed help to make a claim for UC. She struggled to understand the migration notice and to get help independently. Rather than being offered a home visit and support to claim UC, when she was called by the DWP they only provided her with a four-week extension. This case shows how these calls are not effectively identifying the support claimants need to enable them to safely move to UC.

⁶ Changing Realities, Erik W, changingrealities.org/e/SpyNR, 24 Jul 2024

CPAG received a call from a claimant of income support, housing benefit and, we assume, child tax credit. The claimant had very complex needs – she was unable to read and write, she spent her childhood in care and had experience of street homelessness. She used a wheelchair and had cancer. The claimant lived with, and cared for, her severely autistic 18-year-old child who received PIP.

As the claimant was unable to read and write, she asked someone at her doctor's surgery to read the migration notice to her. She thought the DWP was calling her a migrant and was very confused. She went to her local Citizens Advice before it opened to join the queue, but they were unable to see her that day. She found out more about UC via YouTube, but this only made her more concerned. The prospect of moving to UC triggered suicidal thoughts in the claimant. Fearing that she would soon lose all her income, she bought a tent and some potatoes so she and her daughter could survive if they became homeless.

She was called by someone from the DWP, and her deadline was extended by four weeks, but no other help was offered despite the claimant's obvious vulnerabilities. When we spoke to her, she was very distressed and two days away from her extended deadline to migrate to UC.

3. People who submit a UC claim but are unresponsive are not offered any help

A claimant going through managed migration to UC is treated as a 'business-as-usual' case from the point they submit their UC application. This includes claimants who received help through the ESJ – that support ends when they submit their UC claim. But claimants have to do more for their first payment to be made five weeks later. This could include attending the job centre, accepting a claimant commitment and verifying aspects of their claim (such as ID, or providing a tenancy agreement).

A claimant who manages to submit their claim with the help of someone else, but does not understand that they need to check their online journal for to-dos, risks having their claim closed before a payment is made because they did not 'comply' with the process. This would leave them without legacy benefits or UC in payment.

After we spoke to the claimant mentioned above, we referred her case to the DWP and someone helped her make a claim. But the help stopped there. Five weeks later, she got in touch with us again.

The day after the claimant was supported by the DWP to make a claim for UC she took documents to verify her circumstances to the job centre. She was told that she had done everything that she needed and her first UC payment would be made five weeks later.

But then she started getting journal messages saying that she had to look for work unless she could get a sick note from her doctor. She has also been told that she needs to return to the job centre to provide the same documentation she has provided already.

As she cannot read or write, she struggles to communicate via UC's online journal. She told us: 'I can't keep asking people to look at my journal for me and tell me what's what. I am frightened they are going to sanction me when I can't understand nothing.' She tried calling the UC helpline, but they have told her to post her questions on the journal.

In the five-week wait for her first UC payment she has had to skip meals; she has been provided with a food bank voucher by her GP. She got a statement saying that her first UC award would be much lower than what she was getting before. She doesn't understand why but it won't be enough to cover her rent let alone food, gas or electricity costs for her and her daughter.

She told us: 'Migrating over to Universal Credit was one of the worst things I've ever done in my life. I tried to take my own life last week and I can't live like this no more... There is no help or support if you can't do it. The lady said you have to get someone to do it for you.'

In submitting a UC claim, claimants sever their existing benefit payments but have not completed all that they need to do to receive UC. It is essential that vulnerable claimants are provided with support with *all* the steps in the UC claim process to avoid becoming destitute. As the DWP cannot extend legacy benefit payments once a UC claim has been submitted, it's vital that vulnerable claimants get support at least until the first UC payment is made in full before being considered a 'business as usual' case.

Adjusting to UC

Through this research we have interviewed claimants after they have moved to UC to understand how they have adjusted to the new system. While the DWP considers managed migration complete at the point an individual submits a claim, for the claimant it is far from over. The three case studies below – Victoria, Claire and Carmel⁷ – illustrate some of the difficulties claimants have faced after moving to UC from legacy benefits.

Victoria has weekly job centre appointments where she is told she must work 18 hours a week, even though she already does

Victoria is a single parent of a 10-year-old child and works in a shop earning the minimum wage. Since moving to UC, she has had to attend weekly appointments at the job centre because her earnings are below £892 a month. At these appointments, Victoria is told she needs to work 18 hours a week. She already works 18 hours a week, but because she is paid every four weeks her pay is just below £892 and the UC system concludes that she is not working enough. She walks with a stick and she had requested for the meetings to take place over the phone but this has been refused.

In the spring there will be a month when Victoria won't be paid any UC at all. That will be when two of her four-weekly pay cheques fall in the same month. Even though her earnings have not changed, the UC system will register that her earnings have doubled, and she won't get paid any UC.

Before Victoria moved to UC, she was receiving tax credits which looked at her income over the period of a year so it didn't matter that she was paid every four weeks. Her pay was stable and so were her tax credit payments.

UC would work better for Victoria if there was more flexibility in the monthly assessments system. Instead, UC is unable to compute Victoria's four-weekly pay cycles, penalising Victoria because of her employer's pay cycles and wasting the time of job centre staff. It also imposes hardship by removing support for one month of the year because the system incorrectly thinks Victoria's earnings have doubled.

⁷ Pseudonyms have been used

Claire works as a supply teaching assistant and was sanctioned because she was caring for her children during half term instead of looking for work

Claire lives with her partner and her two children. She works for an agency as a teaching assistant and her partner is self-employed (full time). When Claire moved from tax credits to UC, she was told she needed to work 30 hours a week. To do this, she needed to double the amount of childcare she had but all the local providers were full. When she explained to the job centre that childcare wasn't available for her to work more, they suggested she work nights when her husband was home. She told us: 'I said "when am I meant to sleep?" and they said "that is not my problem."'

During the June half term, she did not look for work because she was caring for her children and schools did not need supply work. Claire was sanctioned as a result – her first UC payment was reduced by £500. When school returned, she found childcare for her youngest child so she could work more hours, but it was not an Ofsted approved placement and she wasn't able to get help with the costs through UC (she didn't know Ofsted approval was a requirement at the time). After paying for childcare costs, she made £20 a day.

Fearing that she would be sanctioned over the summer holidays, Claire found childcare so she could spend the days applying for jobs. It took months for the childcare costs to be repaid through UC which added to the financial pressure the family was under when they were still recovering from the sanction.

UC would work better for Claire if there was more flexibility and support with balancing work and childcare. The system needs to provide clear instructions about what help is provided towards childcare costs and to pay it back sooner. It also needs to recognise the shortage of childcare, and not punish families of young children for not seeking work when childcare spaces are not available in their local area.

Carmel is self-employed but is hit by the benefit cap for not earning enough

Carmel is a self-employed single parent. She moved to UC from tax credits and housing benefit. Soon after she claimed UC, she had a job centre appointment about her business where the work coach recognised its potential. He told her that she would have a 12-month start-up period to grow the business before she would see deductions to her UC. All she needed to do was upload her accounts on the 20th of every month. (She would prefer to do her accounts to match the calendar month to align with her tax return, but the UC system does not allow this).

Carmel was shocked when her first UC payment had a £850 deduction because she was not earning enough to escape the benefit cap (the work coach did not warn her about this aspect of the UC system). She now knows that she needs to earn at least £793 each month to escape the benefit cap, but she won't be able to do this every month – some months are more profitable than others.

She told us: 'With tax credits I knew exactly what I was entitled to. I knew exactly what I had to do on a yearly basis. How many hours I needed to work and everything else. With universal credit, I haven't got a clue. There's a lot of things which are just such grey areas.'

UC would work better for Carmel if it had more support and predictability for self-employed people whose earnings fluctuate. Even though UC is supposed to provide more support when earnings fall, the benefit cap means Victoria gets less support when she needs more. The complex and inconsistent rules relating to self-employment do not provide Victoria with enough information, however she is still required to fulfil monthly income reporting that does not align with the tax filing requirements of HMRC.

The issues affecting these women are not related to managed migration, they are problems with the way that UC works more widely. But they are a new challenge for people who have migrated to get used to.

These same issues will affect much larger cohorts of claimants. If the government wants to increase employment and income security, and reduce child poverty, it needs to reform UC to work better for people like Victoria, Claire and Carmel.

Conclusion and recommendations

In preparation for the managed migration of ESA-only claimants, the following changes must be made to the ESJ to ensure vulnerable people are given the support they need to prepare for the move to UC and to complete their claim in full.

- Check for vulnerability before the migration notice is sent. If the claimant has known support needs that would make moving to UC difficult (such as anxiety), someone from the DWP should call them within the first four weeks of the migration notice being sent to check they understand the process, how to get help and if they need support. This would be an additional step at the beginning of the ESJ.
- DWP callers should check the claimant's records for indications of support needs before contacting them so they can better anticipate and respond to the claimant's needs on the call.
- When a claimant is contacted as part of the ESJ, the DWP must do more than offer a deadline extension or signpost claimants to Citizens Advice's Help to Claim service. The DWP should ensure that vulnerable claimants are provided with appropriate and accessible support to complete a UC claim.
- If a claimant submits an online claim for UC but does not respond to the journal for seven days, the DWP should make three calls to check that the claimant understands what is required of them to start their claim, and to explain what accommodations can be made if appropriate. This will reduce the likelihood of claimants with additional needs having their UC payments delayed. This would be an additional step at the end of the ESJ.
- The pace of roll out should reflect the needs of the case load and the capacity of job centres to respond to them. Claimants should not be faced with repeat deadline extensions or delays in payment because the DWP has not been able to accommodate the claimants in time.
- Face-to-face advice services should be resourced so they can meet the spike in demand that managed migration is causing. While funding of the Help to claim service is welcome it is not sufficient for claimants with more complex needs and those who require face-to-face support.

These recommendations are about safeguarding vulnerable claimants to make sure they get the best possible start on UC. Beyond that, UC itself needs to be reformed. As the government begins to consider how it will reform UC, it should speak to those with experience of the legacy system and UC to understand what does and doesn't work on UC and how it can be improved.

About CPAG

Child Poverty Action Group works on behalf of the more than one in four children in the UK growing up in poverty. It doesn't have to be like this. We use our understanding of what causes poverty and the impact it has on children's lives to campaign for policies that will prevent and solve poverty – for good. We provide training, advice and information to make sure hard-up families get the financial support they need. We also carry out high profile legal work to establish and protect families' rights. CPAG is a registered charity in England and Wales (294841) and Scotland (SC039339). cpag.org.uk

Acknowledgements

The cases described in this report come from CPAG's Early Warning System (EWS), a database of case studies submitted by frontline workers about the problems people experience accessing social security benefits. We are grateful to the advisers and welfare rights workers who have submitted a case to the EWS. We would also like to thank Erik W, a participant in [Changing Realities](#), for his sharing his experience of managed migration to UC.

This work has been funded by the [abrdn Financial Fairness Trust](#) but the views expressed are those of the authors and not necessarily the Trust. abrdn Financial Fairness Trust funds research, policy work and campaigning activities to tackle financial problems and improve living standards for people on low-to-middle incomes in the UK. It is an independent charitable trust registered in Scotland (SC040877).

