

# SSAC consultation on Universal Credit (draft) (transitional provisions) (managed migration) amendment regulations 2018

## Response by the Disability Benefits Consortium (DBC)

19 August 2018

### About the DBC

The DBC is a national coalition of over 80 different charities and other organisations committed to working towards a fair benefits system. Using our combined knowledge, experience and direct contact with millions of disabled individuals, people with long-term health conditions and carers, we seek to ensure that Government policy reflects and meets the needs of all disabled people.

### Members of the DBC

Action for Blind People; Action Duchenne; Action for ME; Action on Hearing Loss; Advice UK; Advocard; Age UK; Ambitious about Autism; Arthritis Care; Arthritis Research UK; Aspire; The Brain Tumour Charity; Breast Cancer Care; British Lung Foundation; Capability Scotland; Carers UK; Child Poverty Action Group; The Children’s Society; Citizens Advice; CLIC Sargent; Contact a Family; The Council for Disabled Children; Crohn’s and Colitis UK; Cystic Fibrosis Trust; Deafblind UK; Dimensions UK; Disability Agenda Scotland; Disability Law Service; Disability Rights UK; Down’s Syndrome Association; Drugscope; ENABLE Scotland; Epilepsy Society; Epilepsy Action; Equalities National Council; Guide Dogs; Haemophilia Society; Hafal (mental health charity in Wales); Health and Social Care Alliance Scotland (the ALLIANCE); Inclusion London; Institute of Revenues, Rating and Valuation; Kidney Care UK; Lasa; Leonard Cheshire Disability; Livability; Macmillan Cancer Support; Marie Curie; Meningitis Research Foundation; Mind; Motor Neurone Disease (MND) Association; MS Society; Muscular Dystrophy UK; Multiple System Atrophy (MSA) Trust; Myeloma UK; National Ankylosing Spondylitis Society; National AIDS Trust; National Autistic Society; National Children’s Bureau; National Deaf Children’s Society; National Rheumatoid Arthritis Society; National Union of Students; Nimah; Papworth Trust; Parkinson’s UK; Rethink Mental Illness; Royal British Legion; Royal College of Psychiatrists; Royal Mencap Society; Royal National Institute of Blind People; RSI Action; Scope; Scottish Association for Mental Health; Sense; Sense Scotland; Shine; St. Joseph’s Hospice; The Stroke Association; Sue Ryder; Terrence Higgins Trust; Thomas Pocklington Trust; Together For Short Lives; Transport for All; Trades Union Congress; United Response; Vitalise; Welsh Association of ME & CFS Support (WAMES); Zacchaeus 2000 Trust.

### Summary of recommendations

1. The Department for Work and Pensions (DWP) should not proceed with “managed migration” to Universal Credit (UC) until the many outstanding problems have been analysed and addressed. “Managed migration” will affect around three million people (over two million claimants and their families) and as matters stand, it seems certain that large numbers will experience serious difficulties.

2. While this problem-solving exercise is taking place, there should be no further “natural migration” – as has already been conceded for recipients of the Severe Disability Premium (SDP) – so as to safeguard claimants from disadvantage while the proposed problem-solving review is in progress.

3. As and when “managed migration” takes place, there should be no termination of existing benefits until an award of UC has been determined.

4. The (at least) 5-week delay in making a first payment of UC should be removed, as follows:

 a.) for claimants in work, their last month’s earnings should constitute their assessed income for their first UC payment;

 b.) for those out of work, their “legacy benefits” should be converted to UC.

This would be achievable through an orderly review process. There would be a financial cost to removing this gap, but it is preferable that this should be borne by the Treasury rather than by people on low incomes, some of whom are among the most vulnerable in society.

5. Where a claim is a new claim outside of “managed migration” from legacy benefits, it would also be sound policy to avoid a long gap without income (or depending on repayable advance payments). Establishing alternative options for assessment and payment cycles should be one objective of the problem-solving exercise proposed above. Also, given the obstacles to a successful claim, the award should be backdated to the date the claimant first requested UC, regardless of the date the application is completed, with a right of appeal if there is a dispute.

6. It should be honestly acknowledged that, although arguably better than nothing, advance payments are not a solution to the built-in delay, but an alternative problem, as they are in effect loans that will reduce claimants’ incomes to very low levels as they are repaid.

7. Clarification is needed as to how access to passported benefits (free prescriptions, dental and optical treatment; free school meals etc.) will be affected while a new UC award is awaited. We already know that there are significant problems here with “natural migration”.

8. The DWP needs to ensure that alternative methods of claiming, other than digitally, are readily available where needed (face-to-face, by telephone or through home visits).

9. Recognising that such support, even if successfully accessed, is essentially concerned with initial claims rather than ongoing claim maintenance, the DWP should expand options for making and managing claims.

10. All communications with claimants on all aspects of the transfer must be clear and specific and in the claimant’s required format.

11. The turmoil surrounding the sudden cessation of legacy benefits is likely to throw into sharp relief the DWP’s unsustainable policy of demanding repeated “explicit consent” in order to communicate with claimants’ advisers. The restoration of an orderly system of “implicit consent” must be achieved before managed migration commences.

12. Every opportunity should be taken to “protect transitional protection” (TP) so that it is not too easily lost.

13. TP should not be removed as a result of a “defective claim” (including where there has been a delay in providing evidence or information).

14. The loss of TP following a temporary lapse of a claim (possibly because of a job that does not last) is a clear work disincentive. The limited linking period of three months provided for in draft reg. 57(2) should be at least one year.

15. There may be other circumstances where a similar linking period would be merited – for example, a claim broken by pressures associated with the onset of disability, ill health, caring or childcare responsibilities, or a period abroad for health or caring reasons. There would therefore seem to be a case for a more general linking period than one purely related to employment.

16. The wide range of circumstances embraced by UC could easily lead to anomalies in the operation of TP. For example, the erosion as a result of the birth of a second child of TP deriving from the SDP would not be logical. As has been the case with child care costs, more thought needs to be given to the circumstances in which TP is eroded.

17. There should be a right of appeal in relation to decisions as to whether or not TP is applicable in a given case and as to the amount.

18. The DWP should explain clearly its methodology and calculations for arriving at its proposed compensation figures for former SDP recipients who have been “naturally migrated” to UC (as set out in para. 110 of the Explanatory Memorandum).

19. The complex nature of the new SDP transitional arrangements will require particular attention to staff training and to clear and specific information for claimants, which (as noted above) should always be in the claimant’s required format.

20. The role of UC in relation to self-employment should be revisited, in consultation with relevant labour market experts, to achieve a more credible balance between opening up opportunities and realistic assessment of a business’s prospects. In particular, purely arithmetical financial calculations should be replaced by a more holistic assessment of the viability of a business.

21. In determining the minimum income floor, the number of hours that claimants can reasonably be expected to work will be an important issue for many disabled people and clear guidance (developed in consultation with disabled people and disability organisations) will be needed.

### 1. Introduction

1.1 Universal Credit will be of major significance to disabled people. This is partly because it replaces benefits, or aspects of benefits, that specifically concern disability or long-term health conditions; and partly because, as a means-tested benefit, it focuses on low incomes, which disproportionately affect disabled people.

1.2 The DBC is therefore pleased to have the opportunity to comment on these draft regulations. We have consulted our member organisations, some of which have sent us copies of their own submissions and some of which sent us separate comments and evidence. We have used all of this to build up the picture that informs our comments below.

1.3 We have, of course, focused in this submission primarily on the issues around “managed migration” from the old to the new system. There are many observations we could make on the wider structure and operation of UC – not least the inferior provision for disability within the new benefit. Many of the problems with transitional protection are in fact not the result of TP itself, but of the changes that cause the losses in the first place (such as the removal of premiums).

1.4 Before making more specific comments, some contextual observations would be appropriate. The “managed migration” that is envisaged will entail simply stopping the current benefits received by the three million people concerned and telling them to take their chances with a demanding claims process for a new one. It is difficult to see how this is any kind of orderly migration:

“In what sense is this migration "managed"? It seems to be a case of, "cut off existing funds and hope for the best". We shall do our best, along with other organisations in the visual impairment field, to prepare and support blind and partially sighted people through the change, but it seems inevitable that many will be left without money”.

[**UC “managed migration”**, e-mail message, Thomas Pocklington Trust, 16/8/18].

“We are concerned that the proposed process for managed migration will allow many claimants to either fall through the cracks in the migration system or float away from the welfare system due to the complexity of engagement. The current proposals do not provide the managed process that the title implies and which claimants, vulnerable or otherwise, require”.

[**Moving claimants to Universal Credit from other working age benefits**, Institute of Revenues, Rating and Valuation, August 2018].

1.5 There are at least three reasons to be concerned about this:

Firstly, people who are disabled or have long-term health conditions may well be disadvantaged in seeking to navigate a challenging claims process heavily dependent on information technology.

Secondly, there is already a worryingly high level of failure to complete a claim. In a recent parliamentary answer by the Minister of State for Employment, to a question from Marsha de Cordova MP, it was stated that:

“Our latest analysis, from management information for Universal Credit Full Service claims made (declared) in November 2017, shows that 29% were closed and not paid, of which the majority were accounted for under the following categories:

* failure to attend an initial interview (10%)
* Claimant Commitment not accepted (6%)
* the claim was withdrawn (4%)
* failure to attend a subsequent interview (4%)”.

[Alok Sharma MP, written answer to WPQ 166515, 30/7/18].

This is worrying, as only 4% of these claims were actually withdrawn. What is the story behind the rest? What are the factors explaining non-attendance at interviews and claimant commitments not being accepted? There seems to be a lack of official knowledge or indeed interest in this crucial matter. Responding to an article in the *Observer* on this issue, the DWP commented that:

“It may be that they’ve found higher-paying employment and no longer need support”.

[“Complex rules for Universal Credit see one in five claims fail”, Michael Savage, **Observer**, 13/5/18].

This is an almost flippant response to a serious issue.

Thirdly, even if all goes as intended, the stop-and-start approach to “migration” means that claimants will have a 5-week wait for a payment – and in practice, it could be much more. Advance payments are not a solution to this, but an alternative problem, as they are in effect loans that will reduce claimants’ incomes to very low levels as they are repaid.

1.6 The 5-week gap before UC is paid is not a necessary design feature of such a benefit. Our understanding is that it exists at the Treasury’s behest in order to make savings. As one of the architects of UC recently put it:

“The rationale for the delay has been lost, in part because it never existed. Hiding behind administrative ease – ‘We need to know income before we can assess Universal Credit’ – is an outrageous cost shunt from the Treasury to low income households…. The worst thing about this policy is that it is a one-off cost saving, a working capital movement from the government to low-paid workers, similar to a large corporate organisation paying its suppliers late in order to improve its own short term financial position”.

[Deven Ghelani, “Universal Credit – how do we make practice follow policy intent?”, **Benefit**, Institute of Revenues, Rating & Valuation, Dec. 2017].

1.7 The recent reduction of the standard delay from six to five weeks makes no difference to the central point here. We see no structural reason why the delay should not be addressed:

 a.) for claimants in work, their last month’s earnings should constitute their assessed income for their first UC payment;

 b.) for those out of work, their legacy benefits should be converted to UC.

1.8 The DWP pleads that a totally new claim is necessary to check on the accuracy of current information; gather new information, notably concerning capital held by Tax Credit claimants; and to get claimants’ permission to assess them for a new benefit. But there is no reason why all this should not be achieved through an orderly review process.

1.9 There would be a financial cost to getting rid of the gap, but it is preferable that this should be borne by the Treasury rather than by people on low incomes, some of whom are among the most vulnerable in society.

1.10 Where a claim is a new claim outside of “managed migration” from legacy benefits, it would also be sound policy to avoid a long gap without income (or depending on repayable advance payments). Establishing alternative options for assessment and payment cycles should be one objective of the problem-solving exercise proposed above. Also, given the obstacles to a successful claim, the award should be backdated to the date the claimant first requested UC, regardless of the date the application is completed, with a right of appeal if there is a dispute.

1.11 A specific query concerning the gap is how access to passported benefits (free prescriptions, dental and optical treatment; free school meals etc.) will be affected while a new UC award is awaited. We already know that there are significant problems here with “natural migration”. The claimant normally has no proof that they are in receipt of UC – and even if they do, perhaps through an advance payment, they still have no proof as to what their earnings are, which is a real obstacle where there is an earnings threshold (for example free school meals, free prescriptions and some local authority services).

1.12 The DWP has acknowledged that:

“During the managed migration process a large proportion of the caseload being migrated from existing benefits will have a disability or health condition. To give an indication of this, an estimated 36% of those being managed migrated to UC will be ESA(IR) claimants”.

[DWP **Explanatory Memorandum**, para. 133].

1.13 The Memorandum goes on to refer (at para. 135) to the possible role of face-to-face or telephone claims and the fallback possibility of seeking help from the DWP Visiting Service. Possible time extensions are referred to (at para. 137).

1.14 However, it remains to be seen how well this will work in practice. These measures all depend on claimants who need such support being successfully and promptly identified and the necessary resources being put in place. For example, the Trussell Trust told us that:

“…..we are concerned that these flexibilities, which require the Department to proactively identify vulnerable groups and manually change the system, will not be applied appropriately, as the Department maintains that it cannot readily access data from legacy benefits. The onus is then placed on claimants to provide “good reason” for some flexibilities to be applied, and given the complex needs of the groups being managed migrated, as well as the additional caseload for Work Coaches and DWP staff, vulnerability may not be picked up or disclosed early enough”.

[**Response to the SSAC’s consultation on managed migration regulations**, Trussell Trust, July 2018].

Similarly, Mencap commented that:

“We believe that issuing a notice to people that their existing benefits will come to an end and that they need to apply for Universal Credit leaves disabled people vulnerable to having their benefits stopped before they have made a successful claim….. While “vulnerable” claimants will have longer to apply for Universal Credit under the regulations, Mencap is concerned by how the Department will identify those claimants…..”

[**Response to the SSAC consultation on the Universal Credit (Transitional Provisions) (Managed Migration) Amendment Regulations 2018**, Mencap, August 2018].

The Motor Neurone Disease Association told us that it is:

“…..extremely difficult or impossible for many people with MND to complete their benefits applications either by phone or online, particularly in the context of a one-month deadline. Although the DWP offers home visits in theory, in practice these are frequently denied on the basis that the person’s carer or support staff should make the application on their behalf instead. Apart from the data protection issues involved with this approach, it ignores that care and support workers or unpaid carers have a hugely demanding job to do to manage the complex needs arising from MND, and simply do not have the time to fill out lengthy forms. There is a strong possibility that people living with MND and other disabling conditions will be unable to complete their applications in time due to the impact of their disability, leading to the loss of essential support on which they rely”.

[**SSAC consultation on Universal Credit (draft) (transitional provisions) (managed migration) amendment regulations 2018**, MND Association, August 2018].

And Rethink Mental Illness commented:

“Although help from the DWP is available for home visits, claimants face great difficulties in accessing them. Even when they are available, they only support with an initial claim, rather than managing one in the longer term. Though the option to apply over the phone exists, claimants are often pushed to the Jobcentre instead. Absolute insistence is required to be successful in claiming over the phone. This level of resilience and insistence can be extremely challenging for people severely affected by mental illness. To rectify this, we believe that the Government should expand the ability to apply for and manage a claim beyond online only”.

[**Universal Credit regulations consultation response**, Rethink Mental Illness, August 2018].

1.15 It is indeed important to note that such support, even if successfully accessed, is essentially concerned with initial claims rather than ongoing maintenance, where claimants who struggle with online demands will risk sanctions. We agree that the DWP should expand options for making and managing claims.

1.16 DBC member organisations are becoming increasingly familiar with the problems associated with UC “natural migration”, notably:

* a difficult claims process;
* delays in payment (both built-in and unintended);
* a difficult process of ongoing claims management, including inappropriate jobseeking or work-related activity requirements (such as carers being pressured to seek employment; and claimants with long-standing and severe health conditions being required to look for work until a Work Capability Assessment (WCA) is organised, which in many areas takes 26 weeks or longer);
* failure to translate the Employment and Support Allowance (ESA) Support Group element into the UC equivalent, even where a WCA is recent – wrongly insisting upon a new WCA instead;
* a variety of difficulties with the housing costs element;
* payment cycles that clash with claimants’ patterns of income receipt;
* a high risk of problem debt, including repayment of advance payments, exacerbated by high levels of deduction from monthly UC to repay creditors, such as landlords, utility companies and the DWP itself;
* poor communication and information provision and consequent lack of awareness and understanding of UC among claimants;
* scarcity of advice and support;
* “explicit consent” restrictions that impede advisers’ attempts to communicate with the DWP on claimants’ behalf.

1.17 All of the above suggests a need to pause and take stock before taking the dramatic step of stopping disabled people’s legacy benefits and leaving them to sink or swim in the unpredictable currents of UC. We support the National Audit Office (NAO)’s view that the DWP should not proceed with “managed migration” until problems have been analysed and addressed:

[**Rolling out Universal Credit**, NAO, June 2018, p.11]:

<https://www.nao.org.uk/report/rolling-out-universal-credit/>

1.18 While this is taking place, there should be no further “natural migration” (as has already been conceded for recipients of the SDP) so as to safeguard claimants from disadvantage while the proposed problem-solving review is in progress.

1.19 As and when “managed migration” does take place, there should be no termination of existing benefits until an award of UC has been determined.

1.20 We now go on to look at aspects of the draft regulations in more detail.

### 2. Notice of termination of legacy benefits [draft reg. 44 & following]

2.1 We referred above to the “sink-or-swim” nature of this approach. Mind told us that it:

“…..places the responsibility for navigating the process of claiming UC on the person who is being migrated. This includes people who are very unwell, many of whom will have had a stable situation with their benefits for several years….. It places a great deal of pressure and stress on the moment in time when a person receives a migration notice. The notice that their benefits will stop is likely to be very destabilising for people who may be very unwell and fearful about the future. Even with safeguards in place, the current approach will generate anxiety and fear around the process of moving to UC”.

[**Universal Credit managed migration**, briefing, Mind, June 2018].

The Motor Neurone Disease Association said that:

“…..it is likely that claimants of legacy benefits will undergo significant stress and anxiety when notified that their legacy benefits will stop and that a new claim for Universal Credit is required. Many claimants have previous experience of the DWP’s poor record of assessing claims for disability benefits….. A notice of termination of legacy benefits is likely to have a destabilising and stress-inducing effect, particularly for claimants who are already coping with the impact of illness and/ or disability”.

[MND Association, as above].

2.2 This could be said of many other health conditions and impairments which are likely to make this sudden financial challenge a source of apprehension and stress. Disability organisations are fully expecting many of their clients to be without an income for a lengthy period when their legacy benefits cease – and we should remember that not all of those claimants affected will be in touch with an agency that can help.

2.3 This might be the appropriate point for us to emphasise that it is essential for all communications with claimants on all aspects of the transfer to be clear and specific and in the claimant’s required format:

“All communications really must be accessible and in the claimant’s required format, or the incidence of late or ineffective claims from people with sensory impairments or with other accessibility needs will be even worse than is generally expected”.

[**Universal Credit**, e-mail message, Royal National Institute of Blind People, 19/8/18].

 “It is important to stress that everything needs to be accessible”.

[**DBC draft response to UC regulations**, e-mail message, Sense, 14/8/18].

2.4 The turmoil surrounding the sudden cessation of legacy benefits is also likely to throw into sharp relief the DWP’s unsustainable policy of demanding repeated “explicit consent” in order to communicate with claimants’ advisers. The restoration of an orderly system of “implicit consent” must be achieved before managed migration commences.

### 3. Transitional protection [draft reg. 48 and following]

3.1 Perhaps better described as “transitional freezing”, the idea of TP is to avoid cash losses at the point of change. TP has a long history in the evolution of the benefits system, but it is not usually the case that transition from one regime to another takes a number of years. Thus, there are many opportunities for the subjects of UC “natural migration” to lose their access to TP. Even after “managed migration” commences, TP will be easily lost. We recommend that every opportunity should be taken to “protect transitional protection”.

The following are causes of particular concern:

3.2 The likelihood of “defective claims” (including where there has been a delay in providing evidence or information) is bound to be high, as claimants struggle to navigate the process. So the loss of TP under draft reg. 48(2) seems particularly harsh. TP should not be removed as a result of a “defective claim” (including where there has been a delay in providing evidence or information).

Dimensions told us that:

“…..our main concern is that we will see a repeat of what happened with the transition from DLA to PIP for many people with learning disabilities and autism – in that people will have great difficulty understanding the regulations around the migration and will not find the new application process accessible.

We think the DWP need to anticipate an increase in the number of claimants who have made mistakes in their UC application and be prepared to accommodate this and support people to amend their claims”.

[**UC managed migration**, e-mail message, Dimensions, 17/7/18].

3.3 The loss of TP following a temporary lapse of a claim (possibly because of a job that does not last) is a clear work disincentive. A limited linking period of three months is provided for in draft reg. 57(2) – within which TP would be reinstated upon a new UC award. This should be at least one year.

3.4 There may be other circumstances where a similar linking period would be merited – for example, a claim broken by pressures associated with the onset of disability, ill health, caring or childcare responsibilities, or a period abroad for health or caring reasons. The MS Society told us:

“For claimants who will receive the SDP as TP once they are managed migrated to UC, and then end their claim for various reasons, it seems that it will not be possible for them to receive the SDP again, despite still having the same level of need. For example, a person with MS who ends their claim to go and live abroad with family in order to receive support, and then returns to the UK, will no longer be eligible for the payment, putting this claimant at a financial disadvantage. The Department should consider how it aims to resolve such cases”.

[**Universal credit migration regulations – comments for the DBC consultation response**, MS Society, July 2018].

There would therefore seem to be a case for a more general linking period than one purely related to employment.

3.5 The wide range of circumstances embraced by UC could easily lead to anomalies in the operation of TP. For example, the erosion as a result of the birth of a second child of TP deriving from the SDP would not be logical. As has been the case with child care costs, more thought needs to be given to the circumstances in which TP is eroded.

3.6 Draft reg. 50 specifies that the Secretary of State will determine whether or not TP should apply in a given case. Obviously, the Secretary of State does not make these decisions personally: this is coded language for “there is no right of appeal, as it is not a decision maker’s decision”. TP is in fact too important a matter to be left to non-appealable administrative decisions: there should be a right of appeal in relation to decisions as to whether or not TP is applicable in a given case and as to the amount.

3.7 As noted above, it has been conceded that claimants currently in receipt of the SDP should not be “naturally migrated”, so as not to lose TP. (We have argued above that this should apply to all claimants while current problems with the UC scheme are fixed). Those SDP cases that have already been migrated are to be compensated. However, the compensation amounts given at para. 110 of the Explanatory Memorandum are in some cases opaque and apparently too low.

3.8 Specifically, for those claimants in the UC Limited Capability for Work-Related Activity Group, the compensation level is reduced to reflect the fact that the UC LCWRA element is significantly more generous than the corresponding ESA Support Group addition. But if we subtract the latter from the former and then subtract the result from the SDP, we get a monthly value of £114.35, not the £80.00 proposed.

3.9 The derivation of the £360.00 proposed for couples who received the higher rate of SDP in their legacy benefits is also obscure.

3.10 The DWP should set out clearly its methodology and calculations for arriving at its proposed compensation figures.

3.11 The complex nature of the new SDP transitional arrangements will require particular attention to staff training and to clear and specific information for claimants, which (as noted above) should always be in the claimant’s required format.

### 4. Minimum income floor not to apply for first six months

4.1 The UC scheme has achieved some notoriety in the employment field for its lack of understanding of the realities of start-up times for, and likely initial earnings from, self-employment. This approach is at variance not only with the real labour market, but also with Government employment policy, which seeks to encourage self-employment.

4.2 The role of UC in relation to self-employment should be revisited, in consultation with relevant labour market experts, to achieve a more credible balance between opening up opportunities and realistic assessment of a business’s prospects.

4.3. In particular, purely arithmetical financial calculations should be replaced by a more holistic assessment of the viability of a business.

4.4 In determining the minimum income floor, the number of hours that claimants can reasonably be expected to work will be an important issue for many disabled people and clear guidance (developed in consultation with disabled people and disability organisations) will be needed.

### 5. Conclusion

5.1 These regulations will be critical to the wellbeing of around three million people. There is a widespread and well-founded belief that the UC system is simply not ready and that the prospect of large numbers of disabled people finding themselves without an income for a protracted period is very real.

5.2 There is also a widespread view that the built-in delay of at least five weeks in receiving a first payment is unnecessary and should be addressed by means other than loans (“advance payments”). Removing the gap and substituting a genuinely managed transition would be achievable through an orderly review process.

5.3 We hope that this submission has helped make the case for a pause to “managed migration” (and preferably also to “natural migration”) while these and other problems are fixed.

5.4 As and when “managed migration” does take place, we have argued that there should be no termination of legacy benefits until an award of UC has been determined.

5.5 We hope also that our observations on various other aspects of the draft regulations will be of interest.

### For further information, please contact:

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### Appendix: glossary of abbreviations

DBC Disability Benefits Consortium

DLA Disability Living Allowance

DWP Department for Work and Pensions

ESA Employment and Support Allowance

ESA(IR) Employment and Support Allowance (Income-Related)

LCWRA Limited Capability for Work-Related Activity

MND Motor Neurone Disease

MS Multiple Sclerosis

NAO National Audit Office

PIP Personal Independence Payment

SDP Severe Disability Premium

SSAC Social Security Advisory Committee

TP Transitional Protection

UC Universal Credit

WCA Work Capability Assessment

WPQ Written Parliamentary Question