

Written evidence from Mind

1. Mind is the leading mental health charity in England and Wales. We provide advice and support to empower anyone experiencing a mental health problem. We campaign to improve services, raise awareness and promote understanding. Ensuring the benefits system is both fair and supportive for people with mental health problems is a key part our work due to the high numbers of people with mental health problems who receive this support.
2. While Mind welcomes the aspiration of making the benefits system simpler and more coherent for those who use it, this submission outlines a number of our concerns about the impact of the Universal Credit roll-out on people with mental health problems. As people with mental health problems make up 49% of the disability benefits caseload, we believe the Government will not see the improvements they expect from Universal Credit unless they can address these concerns.¹

Executive summary

3. The expansion of Universal Credit is likely to disproportionately affect people with mental health problems who are more likely than the rest of the population to experience problems with debt or managing their finances. The Department for Work and Pensions should better equip Work Coaches to support this group, and monitor the uptake of alternative payment arrangements by people with mental health problems.
4. Mind welcomes the Government's intention to provide support for people in work to increase their earnings and hours. However we are concerned that the use of sanctions and conditionality as part of this in-work support will be damaging for both the health and retention of people with mental health problems. The Department for Work and Pensions should make sure safeguards are in place so that this group does not face inappropriate pressure to increase their hours or levels of responsibility at the expense of their health.
5. Mind are concerned that under Universal Credit, the move to generic Work Coaches with mixed caseloads will lead to a lack of mental health expertise within the employment support system. The Department for Work and Pensions should trial the effectiveness of their approach compared to a model which allows for greater specialisation.

¹ [ONS \(2015\)](#)

6. Under Universal Credit, claimants will be expected to engage with the employment support system even before undergoing a Work Capability Assessment. While Mind welcomes that support will be available at an earlier stage, the fact that this support is subject to conditionality and mandation creates the risk that claimants will be required to look for work before they are well enough to do so. The Department for Work and Pensions should make this initial engagement voluntary for those waiting to attend a Work Capability Assessment.

Personal budgeting support and alternative payment arrangements

7. In 2009 a representative survey of over 8000 people in England, Scotland and Wales found that people with a mental health problem are roughly three times as likely to be in debt as the rest of the population.² Mind's own smaller-scale surveys of people with mental health problems in 2011 found that 3 in 5 reported often being confused about their finances.³
8. Mind is concerned that changes to benefit payments under Universal Credit place an additional burden on this group. Some people with mental health problems will need additional support to manage a budget on a monthly payment, to arrange direct payments with their landlord, and to understand how and when their benefits are likely to be reduced when they enter work.
9. The Department for Work and Pensions have recognised this is as part of their guidance to Personal Budgeting Support and Alternative Payment Arrangements.⁴ It is however unclear what provision has been put in place to equip Work Coaches to support people with mental health problems to access these measures. In October 2015 the Work and Pensions Committee heard evidence from representatives of housing associations that Work Coaches were failing to identify vulnerable claimants who would benefit from alternative payment arrangements.⁵
10. The Department has recently published a statistical release on the number of Managed Payments to Landlords broken down by Jobcentre Plus area.⁶ However there is currently no data on how many of these alternative payment arrangements have been awarded to disabled people or people with health conditions.
11. Mind's key concern is that Work Coaches need to be properly equipped to identify people who might benefit from personal budgeting support or alternative payment arrangements as a result of a mental health problem. This is especially true in cases

² [Jenkins, R. et al \(2008\)](#)

³ [Mind \(2008\)](#)

⁴ [DWP \(2016\)](#)

⁵ [Work and Pensions Committee \(2015\)](#)

⁶ [DWP \(2016\)](#)

where Work Coaches will not be aware that the claimant they are meeting has a mental health problem, either as they are a new claimant or are migrating from JSA.

- 12. The Department for Work and Pensions should provide specific training to Work Coaches on supporting people with mental health problems to navigate Universal Credit.**
- 13. The Department for Work and Pensions should collect and publish data on the number of people with mental health problems who are receiving alternative payment arrangements or who have been referred to personal budgeting support.**

In-work progression

- 14.** The Department for Work and Pension's December 2015 update on the delivery of Universal Credit states that earnings progression is one of the core objectives of the programme.⁷ While Mind welcomes the intention to provide more support to those who need it, we believe that the Department needs to act carefully in order to achieve this in a way which meets the needs of people with mental health problems.
- 15.** The current in-work progression trials exclude people who are unable to earn more as a result of a health condition or disability.⁸ However it is unclear whether the Department intends to extend this approach in future. We are concerned that extending in-work conditionality to this group would be counter-productive and risks damaging people's mental health. For many people with mental health problems, a reduced or flexible schedule is what enables them to return to work. There is no evidence that sanctions are effective for this group, and facing pressure to rapidly increase their hours is likely to lead to increased stress and a greater chance of falling out of employment.
- 16.** People with mental health problems tell us that one of the biggest factors affecting their retention and progression is the quality of support they receive from their employer. We know that many people with mental health problems do not feel able to talk about their mental health in the workplace. A Mind survey of over 2000 workers found that of the 22% with a diagnosed mental health problem, less than half (10%) had told their employer about their diagnosis.⁹ Despite this 80% of employers have no mental health policy and 40% view staff with mental health problems as a 'significant risk'.¹⁰

⁷ [DWP \(2015\)](#)

⁸ [Work and Pensions Committee \(2016\)](#)

⁹ [Mind \(2014\)](#)

¹⁰ [Shaw Trust \(2010\)](#)

- 17. The Department for Work and Pensions should put in place safeguards to make sure that people with mental health problems are not subject to in-work conditionality or pressured to increase their hours at the expense of their mental health.**
- 18. Work Coaches will need to be equipped to identify people with mental health problems and understand how these might affect their capacity to increase their hours, or take on new duties or responsibilities at work.**
- 19. To support the progression of people with mental health problems within the workplace, Work Coaches will need to work with employers to make sure they are equipped to support their staff with mental health problems.**

Work Coach Delivery Model

- 20.** As part of the move to Universal Credit, the Department has begun to implement what it calls the 'Work Coach' delivery model.¹¹ Under this system each claimant will have a named Work Coach who will work with them for the entire time they are unemployed. Each Work Coach will have mixed caseloads which include both people claiming Jobseekers Allowance and people claiming Employment Support Allowance. While Mind supports the aspiration of giving greater continuity to people going through the employment support system, we are concerned that the move to mixed caseloads will result in a lack of mental health expertise within Jobcentres.
- 21.** This move to mixed caseloads is especially concerning given the significant reduction in the number of Disability Employment Advisers over the last parliament.¹² While Mind welcomes the Secretary of State for Work and Pension's commitment to restore 500 of these posts, this would still leave a ratio of 1 adviser for roughly every 400 claimants.¹³
- 22.** Disabled people and people with health conditions already report a lack of specialist knowledge in the employment support system. A 2014 survey of 550 disabled recipients of Jobcentre Plus and Work Programme support found that only around

¹¹ [DWP \(2015\)](#)

¹² [The Independent \(2015\)](#)

¹³ [Based on figures from Work and Pensions Committee \(2014\)](#)

30 per cent felt their adviser had adapted activities to take account of their condition and the impact it had on their ability to engage.¹⁴

- 23.** There is evidence from Department for Work and Pensions commissioned research that specialist advisers are more effective at working with claimants with complex needs. The evaluation of the Intensive Activity Trial found that ‘Drug Champions’ within jobcentres were better placed than generic advisers to develop supportive working relationships with claimants with drug problems.¹⁵
- 24. The Department for Work and Pension should develop randomised control trials to test the Work Coach Delivery Model against alternative models where Work Coaches are able to specialise in working with particular groups of claimants.**
- 25. The Department for Work and Pensions should continue to increase the numbers of Disability Employment Advisers working within jobcentres.**

Early engagement with support

- 26.** Under Universal Credit people waiting to attend Work Capability Assessments will be required to attend meetings with their Work Coach. They can be mandated to look for work or undertake work-related activities, though Work Coaches will have the discretion to relax these requirements.¹⁶ Mind are concerned that this approach will leave many people who are unable to work subject to inappropriate conditionality and sanctions.
- 27.** We recognise and welcome the drive to make sure that support is available to claimants as early as possible. However this new approach means that Work Coaches will be asked to make a judgements about whether someone is well enough to look for work, even before that person has had an assessment with a healthcare professional. This is especially concerning given the move to generic Work Coaches and mixed caseloads mentioned earlier in this submission. The consequences of Work Coaches getting this judgement wrong will be claimants being forced to undertake activity when they are not fit or ready to do. This will both damage their health, and make them less likely to engage positively with the wider system of employment support.
- 28. The Department for Work and Pensions should make engagement with support voluntary for claimants who are waiting to attend a Work Capability Assessment.**

Evaluating the impact of Universal Credit on people with mental health problems

¹⁴ [Disability Benefits Consortium \(2014\)](#)

¹⁵ [DWP \(2011\)](#)

¹⁶ [DWP \(2013\)](#)

29. Mind welcomes that the Department for Work and Pensions has acknowledged the need to evaluate the impact of Universal Credit on particular groups, and that it has committed to publishing an externally commissioned evaluation on how the UC roll-out has affected people with health conditions and disabilities.¹⁷ This should be published as soon as possible alongside information about how the Department has used it to inform the way UC is being expanded to ESA claimants.

*Mind,
July 2016*

¹⁷ [DWP \(2016\)](#)