



# Public Law Project

The Rt Hon Thérèse Coffey MP  
Secretary of State for Work and Pensions  
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Your Ref:

Our Ref: AP

Date: 24 July 2020

Dear Secretary of State

Further to our letter dated 1 July 2020, I am pleased to report that we have begun a dialogue with Neil Couling, the Senior Responsible Officer for Universal Credit, and with James Marriott who is responsible for the Understanding Universal Credit website, about how the Public Law Project can work with your department to improve the information available to claimants to ensure that their claimant commitments are appropriately tailored.

Subsequently, we have learned from the Minister for Employment Mims Davies MP's answer to [parliamentary question 69516](#) that work coaches will now be allocated 30 minutes – down from 50 minutes - to conduct claimant commitment appointments.

As referenced in previous correspondence, our work on benefit sanctions and Universal Credit over the last three years has consistently identified the need to ensure that claimants are aware that they can negotiate the terms of the claimant commitment which they must satisfy in order to receive their benefits, and that doing so will reduce the risk of unfair sanctions.

At a time of growing pressure on the benefits system, we believe that reducing the time available for claimant commitment appointments could place claimants at even greater risk of unfair sanctioning.

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- The recent and unprecedented increase in the number of claimants coupled with an anticipated surge in unemployment means that there will be many more claimants than there are jobs available. More people will be claiming benefits and undertaking to meet the requirements of their claimant commitments than the system of Universal Credit has so far had to manage.
- Increasing the number of work coaches from 13,500 to 27,000 will mean that a very large number of inexperienced Job Centre staff will be responsible for bigger caseloads and will conduct claimant commitment appointments in a shorter period of time than experienced staff have so far had to manage.
- These factors place an even greater emphasis on the need to ensure that claimant commitments are appropriately tailored to individual circumstances if we are to avoid an increase in the numbers of people who are unfairly and unreasonably sanctioned.

Secretary of State, as you said in the Commons on 29 June, “There will be some people right now who have not had to look for a job for the last 20 to 30 years, and they will need careful support, tailored to make sure they can start to look for the jobs that are available”.

We agree that tailored support is vital.

In light of all this, I am writing to ask what best practice guidelines exist for work coaches to follow in respect of claimant commitment appointments, and to ask what measures are being put in place to ensure that best practice is developed and followed.

I would also like to take the opportunity to suggest that – at minimum - work coaches must ensure in their 30 minute appointment that claimants understand:

- The various adaptations which can be made to a claimant commitment
- The range of personal factors and circumstances that can be taken into account in making such adaptations
- Areas where work coaches may exercise discretion, and
- That claimants can ask for their commitments to be changed even after their meeting with work coaches if their circumstances have changed and or if something relevant occurs to them after their meeting.

I note that in her [answer](#), the Minister said that the Department intends to evaluate the testing of the 30 minute claimant commitment interview and to keep the change under review. In relation to that evaluation, we would like to ask:

- Does the Department intend to publish the results of that evaluation, and over what period will the evaluation take place? and
- Will that evaluation consider the equality impacts, bearing in mind that some groups with protected characteristics may require additional time to explain their circumstances, or have more complex needs?

As ever, I would welcome the opportunity to discuss how the Public Law Project can support the work of your department to ensure that all claimant commitments are appropriately tailored. I will follow up with your office shortly.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alison Pickup', written in a cursive style.

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