

Caught up in the net

How Universal Credit
benefit suspensions are
affecting people who come
to Citizens Advice for help.



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Summary

This report explores the impact of the government's efforts to reduce fraudulent benefit claims, a process that typically involves benefit payments being suspended while investigations take place, on the people Citizens Advice supports.

The research presented in this report involved interviews with Citizens Advice advisers, and detailed advice case note reviews. We conducted research in Spring 2022 and then again in Autumn 2023, allowing us to take into account changes to the fraudulent claim review process which came into effect in March 2023.

The research demonstrates that:

1. Benefit suspensions cause significant financial harm which can have long-term repercussions.
2. Claimants are not sufficiently empowered to take action to resolve their benefit suspensions and prove their entitlement in an efficient manner.

It should be noted that the government's own data suggests that **1 in 10 claimants have their benefits reinstated after suspension** – this means that the government should take a cautious approach to suspensions. We are particularly concerned that claimants in vulnerable circumstances, who will be most affected by a suspension of benefit payments, are not being adequately identified and supported.

We would therefore like to see the following changes to the fraud review process:

- Enable claimants to more easily and efficiently prove their entitlement.
- Conclude investigations more quickly, especially where claimants are fully engaged in the process.
- Create a baseline vulnerability criteria so that those most likely to be negatively affected by suspensions can be identified.
- Offer support for claimants who would either struggle with the evidence submission process or with a lack of funds following suspension. This could include only partially withholding payments, or providing a hardship fund that claimants affected can apply for.

Introduction

Reducing the number of fraudulent benefit claims has long been a priority for the Department for Work and Pensions (DWP). Shortly after the Risk Review Team (now the Enhanced Review Team) was introduced by DWP in May 2020 – which represented a significant scaling up of this agenda – our local advisers began notifying us that people were experiencing severe hardship after their benefits were stopped while under investigation.¹

The government is correct in seeking to reduce fraud, but it is clear that not all of those whose benefits are suspended are found to have committed fraud. Benefit suspensions don't affect the majority of the people we help, but we are concerned at the level of detriment experienced by those who do experience suspensions, and the difficulty our advisers have in supporting people while fraud and error investigations take place. We are particularly concerned about evidence that claimants in vulnerable circumstances are not adequately supported through the investigation process.

To understand the extent and nature of the problem, we ran two rounds of research: before and after changes made by the DWP to their fraud investigation processes from March 2023. The first section of the report outlines our methodology in more depth. The second section outlines our findings, focusing on the detriment caused by benefit suspensions, and the difficulties many people face in seeking to contribute to the investigation process. The third section outlines options for reforming policy in this area, focused on empowering and supporting claimants.

Fraud investigations have recently attracted attention due to the government's use of machine learning in identifying benefit claims that exhibit characteristics similar to those that have previously been found to be fraudulent. At the time of writing, the government is also seeking to extend its access to data held by third parties - such as banks - in order to further assist in identifying potential fraud.

¹ The Risk Review Team was introduced in May 2020 (see FOI 2022/08918, available at https://www.whatdotheyknow.com/request/enhanced_checking_service/response/1974246/attachment/html/3/Response%20FOI2022%2008918.pdf.html) and our advisers began flagging the issue to us in October 2020.

The government insists that such processes do not create biases in identifying claims for further investigation, but there remains the possibility that certain demographic groups are more likely to exhibit the kind of characteristics that machine learning systems will be searching for.² While this is not an issue we focus on in this report, there is evidence that foreign nationals, for instance, are significantly over-represented among the people that come to Citizens Advice for support around benefit suspensions.

The possibility that the processes that lead to benefit claims being investigated contain biases against certain groups only underlines the importance of our objective, that is, ensuring that claimants are fully supported to engage with the investigation process, and the impact of suspension is minimised while investigations proceed.

It is clear that benefit suspensions cause significant financial harm which can have long term repercussions, and that claimants are not being empowered to take action to prove their entitlement in an efficient manner. We would like to see the investigation process simplified from the claimant's perspective, and for a baseline vulnerability criteria to be adopted so those in need of greater support can be identified. People in such circumstances should not face full suspensions.

² There is therefore a strong case for greater transparency around their use in this context. A recent National Audit Office inquiry found that only 30% of government departments and arms-length bodies surveyed had risk and quality assurance processes that explicitly incorporated artificial intelligence risks. See: <https://www.nao.org.uk/wp-content/uploads/2024/03/use-of-artificial-intelligence-in-government.pdf>

Methodology

We conducted research on this issue in Spring 2022, and then again in Autumn 2023. This allowed us to take into account changes to the review process which came into effect in March 2023.

Spring 2022

- We had exploratory conversations with several advisers, and surveyed 34 advisers to better understand the impact on the people we help and how local offices were supporting them.³
- We reviewed a random sample of 58 affected individuals' case notes to assess their demographic profile, the length of their suspension, what contact they had with DWP or the Enhanced Review Team, and whether they experienced any form of hardship as a result of their suspension.⁴
- We reviewed the full case note history of 15 affected households from 2 local offices to understand both the full journey of the fraud review process as experienced by individuals and advisers, and how (or if) the issues were resolved.

Autumn 2023

- We conducted qualitative group interviews with 9 advisers who have helped people with benefit suspensions since March 2023, to understand both how easy or difficult the review process is to navigate and what impact suspensions have.
- We reviewed the case note history of 72 households whose benefits have been suspended since March 2023 to assess their demographic profile, any issues they may have had with the evidence submission process, and whether they experienced any form of hardship as a result of their suspension.⁵

³ We surveyed our advisers in November 2022.

⁴ We searched for the term 'Risk Review Team' and 'Risk Review' in clients' case notes between October 2021 and March 2022. We reviewed clients' case notes returned by the search to confirm they had been investigated by the Risk Review Team and identified 348 households. We drew a random sample of 58 people from this cohort.

⁵ We searched for the terms 'Enhanced Review Team', 'Enhanced Checking Service', 'Risk Review Team' and 'Risk Review' in clients' case notes between August 2023 and October 2023. We

Our findings

In our initial research we found that affected households were having their benefits stopped for up to 2 years while being investigated for fraud.⁶ In a random sample of cases, at least 88% of people (51) experienced one or more forms of hardship as a result of having their benefits stopped.⁷ Our advisers also reported challenges resolving suspensions due to difficulties with the evidence submission process and a lack of channels for contacting the Enhanced Review Team.

From March 2023, changes were introduced to the fraud review process, including that claims will be closed after 30 days if claimants don't engage with the process. However, our latest research on suspensions since March 2023 indicates that many of the same problems with benefit suspensions remain. Affected households still face significant detriment due to their benefit suspension, and the fraud review process is still difficult for claimants and advisers to navigate.

Harm and detriment

Overall picture

We are concerned about the level of detriment experienced by the people we help with benefit suspensions. Our most recent research found that affected households are still suffering significant harm during their benefit suspensions, with **at least 63% of affected households (45) experiencing one or more forms of hardship**.⁸ As Sarah's⁹ story shows being left without essential income for any length of time can have significant knock-on effects:

reviewed clients' case notes returned by the search to confirm they had been investigated by the Enhanced Review Team or Risk Review Team since March 2023 or later. This identified 72 households.

⁶ We surveyed 169 local offices in November 2022, 34 had seen clients affected by the risk review process.

⁷ This included: rent arrears, eviction, energy arrears, council tax arrears, water bill arrears, debt to family and friends, food bank or other charitable support.

⁸ This includes all the issues shown in Figure 1 below.

⁹ Not their real name.

Sarah has five children, one of whom has a learning disability. She is also a survivor of domestic abuse. Her claim was flagged in August 2023 and, despite engaging with requests for evidence, she didn't receive payments in September or October.

As a result of her benefit suspension she was unable to afford food for herself and her children and needed food bank support. She also wasn't able to pay rent and built up arrears.

Sarah was contacted by the local council in September to say that the DWP had informed them that she was no longer a Universal Credit claimant. They told her they would be stopping her Council Tax Support and removing her children's entitlement to free school meals. This meant she built up further debt.

During this time, her disabled child was awarded the higher rate of DLA, but Sarah was unable to access the higher rate of disabled child element on Universal Credit while her claim was suspended

This all caused significant distress for Sarah. Her benefits were reinstated in October 2023, but the two months of suspension had a significant impact on her and her children's ability to cope.

Our advisers tell us that they struggle to mitigate the impact of benefit suspensions. Charitable support is limited and not sufficient to replace the total loss of people's benefit payments. Moreover, in some cases claimants have seen their applications for financial help rejected because of their benefit suspension.

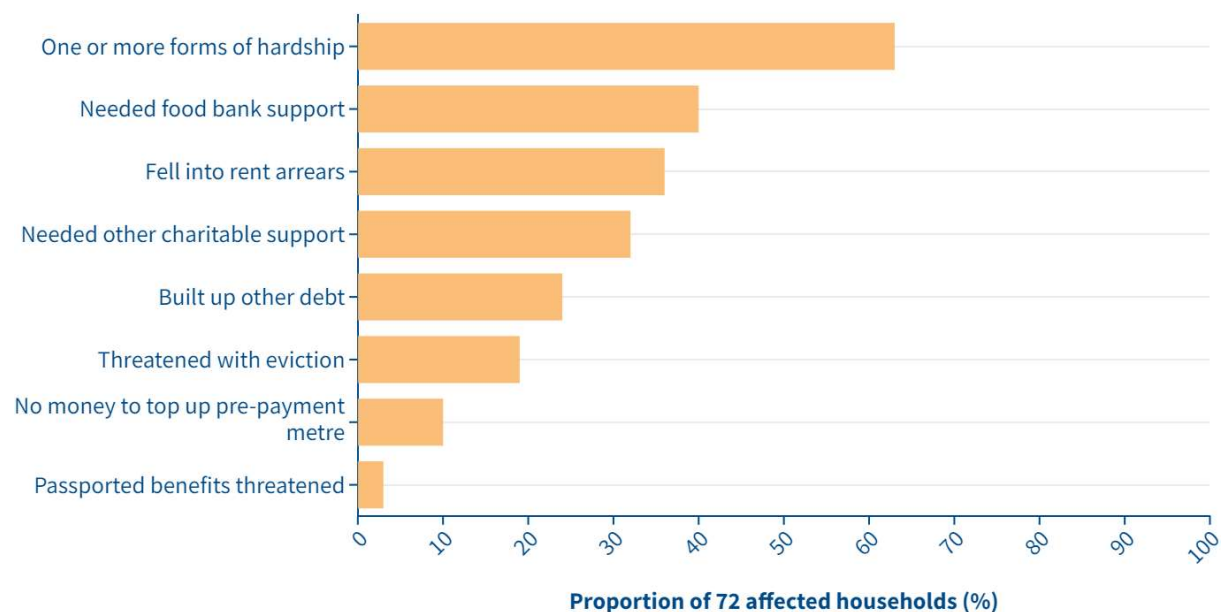
In addition, while support is backdated once claimants' benefits are reinstated, our advisers tell us that this doesn't sufficiently remediate the harms suffered. In our most recent review of cases, at least 22% of affected households (16) were already in some form of debt before their benefit suspension.¹⁰ Without benefit payments they are unlikely to be able to service their debt, which can have

¹⁰ In 16 cases it was noted by an adviser that the household had outstanding debts before their benefit suspension.

serious consequences. Moreover, we have seen several instances of families being evicted due to rent arrears they incurred during their benefit suspension.¹¹

One adviser told us: *“People are being left with nothing and we've seen a person lose her home. So it's okay saying “yeah, we'll get it backdated!” - well the landlord's not gonna wait. [...] It's quite far-reaching if I'm honest. The impact is astonishing.”*

Figure 1: Hardship during benefit suspensions¹²



Those least able to manage

We are particularly concerned about the impact of benefit suspensions on those least able to manage: people like Karen and Richard, whose story is below.¹³

¹¹ In our initial random sample of 58 cases, 4 households had been evicted due to rent arrears accumulated during their benefit suspension. In our latest review of 72 recent cases, 2 households had been evicted.

¹² 'Other debt' includes debts such as energy arrears, Council Tax arrears, water bill arrears, or debt to family and friends. 'Other charitable support' includes support such as fuel vouchers or baby clothes. Furthermore, our advisers note that not all affected individuals are eligible for charitable support due to being without benefits and not knowing how long their financial needs would last.

¹³ Not their real names.

Karen is a full time carer for her partner Richard, who is disabled. He has been assessed as having Limited Capability for Work Related Activity on Universal Credit and receives the higher rate for both Daily Living and Mobility on PIP.

When their Universal Credit claim was suddenly suspended, Karen and Richard found themselves in immediate financial difficulty. They could no longer afford food and needed food bank support. They also had no money to put on their prepayment metre. This was a big problem for Richard because his symptoms get worse in the cold and he needs an electronic nebulizer to help with his breathing problems.

Karen struggled to balance her caring responsibilities with trying to access crisis support, as well as being available for the Risk Review Team to call at any time.

Karen and Richard are not alone. Our recent research found that nearly half of affected households (46%) included someone with a disability or long-term health condition. We also helped a number of people in insecure circumstances (11%) such as refugees, prison leavers, people who had experienced domestic abuse, and people who were homeless.

Additionally, more than half of affected households (54%) included dependent children, with almost half of these including children under 5 years of age.¹⁴

Being without funds is difficult for all the people we help, but in particular for those who have disabilities or long-term health conditions, those who are unable to work, and those who have young children. Given the DWP's own figures suggest that more than **1 in 10 households' benefits are reinstated** following a fraud review suspension, more needs to be done to protect those wrongly caught up in the net.¹⁵

¹⁴ Out of 72 households, 18 (25%) included children under the age of 5 and 7 (10%) included children under the age of 2.

¹⁵ See the parliamentary question UIN 142793, tabled on 8 February 2023: <https://questions-statements.parliament.uk/written-questions/detail/2023-02-08/142793>

Difficulty resolving suspensions

We also know that claimants can struggle with the process in place to prove their entitlement and have their benefits reinstated. This is a key part of ensuring investigations can be concluded swiftly.

Initial notification

Our advisers tell us that the initial notification households receive about their suspension doesn't provide any details as to the reason for the suspension or the evidence needed to address it. It only provides the general Universal Credit helpline number where they can request a callback. This creates a delay, during which time claimants can't take any proactive steps towards resolving their suspension.

One adviser described it in this way: "*[The people we help] don't know what documents to prepare for it and they've just basically been told to sit tight for seven days and then quite often [the Enhanced Review Team] don't come back to them. So the person is just literally sitting on tenterhooks and they have no idea what they've done.*"

The system of callbacks also means that people can't arrange to have the support of a friend, family member, or Citizens Advice adviser during the call, as they don't know when they will be contacted.

Evidence requests

When requests for evidence are made, our advisers noted that there were often unnecessary hurdles which drew out the process. In our recent research we found that **nearly one fifth (18%) of affected households struggled to provide the requested evidence.**

For example, in some cases evidence requests were not specific enough, resulting in multiple rounds of evidence submission. In other cases, upload links would not allow more than 5 documents to be uploaded, despite the claimant having been asked for over 20.

Advisers also noted that evidence was often rejected without explanation, or individuals were asked to submit the same documents several times. In some instances rejected evidence was immediately deleted from the claimant's

Journal. Our advisers found it difficult to help people in these cases, as it was not clear why the submitted evidence was not sufficient.

As one adviser said: "when you upload the evidence, it just gets deleted with a message of "ah, that's not good enough" with no explanation as to why it's not good enough [...] So okay, I'll put a message on [the Journal]: "why isn't it good enough?" Nothing, no response at all! And it's more frustrating."

These issues are compounded by the inability to contact anyone who knows about the benefit suspension. Advisers reported being unable to raise issues with their usual contacts at the Jobcentre or in the Complex Queries team, who normally help with Universal Credit issues, because they are unable to support with issues related to claims under investigation by the Enhanced Review Team. This leads to delays in clarifying issues, which in turn extends the length of the suspension.

Talking about the difficulty resolving one household's benefit suspension, an adviser said: *"[When] they came to us they hadn't had any money for a couple of months. We were on it with as much resources we could put on it - which is myself, as an advisor, and a supervisor. And we did everything possible and we personally uploaded all the documents for them and we still couldn't resolve it and we still couldn't stop the eviction of that individual."*

Those who will struggle most with the process

While both advisers and the people we help struggle to navigate the fraud review process, there are certain groups of people who are at a particular disadvantage. Our recent research found that **two-fifths of people we helped with benefit suspensions had some kind of communication barrier**. This includes people with communication difficulties, such as those who don't have English as their first language, and those with health conditions affecting their ability to communicate. It can also be due to barriers such as a lack of internet access or a lack of digital or literacy skills. Separately, we also know that people with mental health difficulties face extra difficulties coping with the review process.

Leigh is disabled and also has mental health issues. She was the victim of a serious crime a few years ago and receives daily support from the charity Victim Support

When her Universal Credit claim was suspended in July 2023 it caused her significant hardship and distress. She is partially sighted and struggles to read her Journal messages or use a phone. This made seeing evidence requests and taking clear pictures of her documents difficult. When she did submit her documents, these were rejected because of the lighting in the pictures.

Leigh made several requests for someone from the Jobcentre to come and do a home visit to verify her documents, but it took several months before the Enhanced Review Team agreed to this. In this time, she had become so distressed and overwhelmed that she no longer felt able to have anyone in her home. She stopped eating and her physical and mental health worsened significantly.

More than half the households we helped included foreign nationals (51%)¹⁶ and nearly a quarter of people we helped (24%) had a language barrier which made it difficult for them to engage with the fraud review process. These claimants often found it difficult to understand which documents were being requested and why they may have been rejected.

We also helped people whose health conditions made submitting evidence especially difficult, like Leigh, whose story is summarised above.¹⁷

10% of affected households lacked digital access, and a further 10% lacked digital skills. This makes uploading documents to the Journal very difficult. Advisers also noted that many people only have access to the internet via their mobile phone and may therefore struggle to submit evidence.

¹⁶ Over the same period, for people we helped with Universal Credit issues where nationality is recorded, only 17% were foreign nationals. While we do not record nationality in most cases, this does suggest that foreign nationals are overrepresented in the fraud review cases that Citizens Advice helps with.

¹⁷ Not their real name.

One adviser shared: *"We've got loads of clients who haven't got IT skills [and] some clients have only got mobile phones, [so] being able to upload documents correctly in a short period of time is a major task for a lot of these vulnerable clients."*

Bradley has mental health issues and a history of street homelessness. When his Universal Credit claim was suspended without explanation in August 2023 it put him under extreme stress.

He was unable to engage with the fraud review process himself and needed the help of his support worker to contact the Universal Credit helpline and submit evidence.

However, when the evidence they submitted was rejected without explanation, Bradley became suicidal and told his support worker he was considering leaving his flat and becoming street homeless again due to the stress he was under.

Our advisers contacted the local Jobcentre and MP on Bradley's behalf to try and flag the case and ask for support. Though they received no reply, Bradley's suspension was suddenly lifted in October 2023 and his payments reinstated.

During the 2 months without benefits, Bradley neglected his personal hygiene, built up rent arrears and faced the threat of eviction. He already struggled to trust and engage with services, and this experience put him at risk of becoming homeless again.

Finally, we also know that some people will particularly struggle with the stress of the process. Our advisers told us that people with mental health problems may become easily overwhelmed or disengage due to distress. That was the case for Bradley, whose story is summarised above.¹⁸

¹⁸ Not their real name.

Policy options

Changes are needed to ensure that the fraud review process can:

- Empower claimants to quickly resolve issues and prove their entitlement
- Support those who will struggle most during their benefit suspension

Empowering claimants

Claimants should be empowered to take action to resolve their benefit suspension. This could include giving them a list of required evidence from the very first notification of their suspension and giving an explanation when a piece of evidence is rejected. Improved channels of communication, such as providing a way for claimants or advisers to contact the Enhanced Review Team directly, would also allow issues to be resolved much more quickly.

The length of benefit suspensions could also be reduced through measures such as:

- Ensuring evidence requests are specific.
- Explaining to claimants what they should do if they don't have certain types of evidence.
- Not deleting evidence uploaded to the Journal until the suspension is resolved.
- Ensuring upload links on the Journal can accommodate all the requested documents.

We believe these adjustments to basic administrative processes and communication with claimants represent relatively minor changes that would nevertheless have a significant impact

Finally, while the Enhanced Review Team's new 'standard process' is to close claims after 30 days if a claimant is not engaging with the process¹⁹, we believe it should have a similar commitment to conclude investigations quickly where claimants are fully engaged in the process.

¹⁹ See the DWP Annual Report and Accounts 2022-23:
<https://assets.publishing.service.gov.uk/media/64a576d47a4c230013bba1e7/annual-report-accounts-2022-23-web-ready.pdf>.

Supporting claimants

The DWP maintains that its staff check for 'vulnerability' at every stage of the enhanced review process. However, we are concerned that there are 3 main points where people can fall through the net and fail to receive the support they need: when issues are flagged, when cases are assessed, and when support is offered (or not).

At present, it is difficult for claimants to flag any vulnerable circumstances to the DWP (or for our advisers to flag these circumstances on claimants' behalf). Secondly, even where the Enhanced Review Team is aware of issues such as homelessness or severe disability, our understanding is that they do not always deem these as serious enough to warrant support. Finally, the support offer for those identified as being in vulnerable circumstances is currently limited to the offer of a home visit, or the ability to submit evidence at a Jobcentre. Our understanding is that delaying suspensions is also an option at the DWP's disposal, but it is not clear how, and in what circumstances, such decisions could be made.

Our research shows that many people in need of extra support are not being identified or offered enough support. This was also indicated by the coroner in relation to the death of a claimant last year.²⁰ Alongside streamlining the fraud review process, we would therefore like to see the creation of a baseline vulnerability criteria and a tailored offer of support for those identified as needing extra help or protection. It would be based upon claimants' experience of fraud investigations and benefit suspensions, but could have a wider application within the Universal Credit system.

In relation to benefit suspensions, we have identified 2 groups who may need different kinds of support:

²⁰ This case was reported by *The Guardian* on 10 March 2024 (see: <https://www.theguardian.com/society/2024/mar/10/coroner-criticises-benefits-rules-after-vulnerable-claimants-death>). The coroner's report, including the individual's name, is in the public domain. However, we have decided not to include this information in the present report. It is not clear whether or not the claimant was investigated by a fraud team, but the case highlights flaws within the processes by which the DWP identifies and supports highly vulnerable claimants before applying penalties to their claim.

1. Those who would suffer significant detriment due to a lack of funds throughout the suspension process.
2. Those who would struggle most to engage with the evidence submission process.

The evidence we have gathered from the people we help provides an indication of how the Enhanced Review Team could identify people within these two groups. It may also be helpful, and cost-effective, to create a pathway for people to flag their own hardship or need of additional support.

Those who will struggle most with a lack of funds

In light of the recent prepayment meter scandal, where energy companies were forced to halt the forced installation of prepayment meters due to the harm being caused to consumers in vulnerable circumstances, we believe it is similarly in the government's interest to ensure that certain groups are protected from the risk of significant harm while being investigated by the Enhanced Review Team.

This could include:

- Households with children under the age of 5.
- Households affected by temporary circumstances such as pregnancy or bereavement.
- Households where somebody has a disability or long-term health condition.
- Households affected by domestic abuse.

This is information which the DWP mostly already holds about claimants. The scope of circumstances covered here is informed by the new protections in place for force-fitting prepayment meters.²¹

We recognise that DWP is understandably seeking to move away from the term 'vulnerable customer', because anyone can need extra support at different times due to personal circumstances or life events. However, the potential detriment created by removing 100% of people's benefits during a suspension means a

²¹ See the Ofgem press release from 8 January 2024, available at: https://www.ofgem.gov.uk/publications/ofgem-sets-out-prepayment-meter-expectations-energy-bosses-edf-octopus-and-scottish-power-meet-regulators-restart-conditions?mc_cid=5d32b1ccd1&mc_eid=f5a459087f.

greater level of caution is needed than for other parts of the benefits system, and a framework for identifying potentially vulnerable claimants is warranted.

The creation of a baseline vulnerability criteria in relation to suspensions would ensure the safeguarding of people who are likely to suffer the greatest harm through any benefit suspension, while still allowing Enhanced Review Team officers to use their discretion to identify other people who may need additional support.

The offer of support could include:

- Not suspending payments while the household engages with the fraud review process.
- Withholding only part of their payments, whether in percentage terms or through certain elements of Universal Credit being exempt from suspension.
- Providing a hardship fund that claimants affected can apply for.

Our understanding is that the Enhanced Review Team already has the discretion to reinstate funds when appropriate: one of the people Citizens Advice helped had her payments temporarily reinstated for 6 months during her fraud investigation, after our advisers flagged a high risk of detriment. This allowed the claimant the breathing space needed to re-engage with the evidence review process, ultimately speeding up their fraud review while also protecting them from harm.

By identifying people in vulnerable circumstances and offering appropriate support, investigations can be concluded in a way that shields people from undue harm.

Those who will struggle most with the process

For those with communication barriers or other issues which make the evidence submission process challenging, extra support is also needed to ensure they are not penalised unfairly by the fraud review process.

Those who need extra support include:

- Those with non-digital phone based claims.
- Households without access to the internet.

- Households where somebody has a disability or long-term health condition, especially those with mental health issues or disabilities affecting communication.
- Households with English as a second language.

The offer of support could include allowing people more time to submit evidence, allowing people to submit evidence in person at a Jobcentre, allowing people to nominate someone to act on their behalf during the investigation, and scheduling callbacks from the Enhanced Review Team at specific times to allow claimants to arrange support during the call.

These relatively minor adjustments would reduce the risk of anybody being unfairly disadvantaged and would enable claimants to more easily and quickly comply with the fraud review process.

Conclusions and recommendations

We are concerned about the impact that the fraud review process is having on those we help. People are having their benefits stopped for extended periods and are experiencing serious hardship as a result. Many claimants facing suspension – 1 in 10, according to DWP's own data – ultimately have their benefit reinstated.

The government is understandably focused upon reducing levels of fraud in the benefits system but the experience of those coming to us for support and our advisers suggests that there could be more effective ways to conduct these reviews.

This report's primary focus has been the processes that ensue once a potentially fraudulent claim has been identified. Our research points to the need for claimants to be more empowered to resolve their benefit suspension efficiently, and better protections and offers of support for people who will struggle most with their suspension.

We are therefore recommending **the creation of a baseline vulnerability criteria** in relation to suspensions, ensuring the safeguarding of people who are likely to suffer the greatest harm through any benefit suspension, while still allowing Enhanced Review Team officers to use their discretion to identify other people who may need additional support.

Groups covered by this criteria could include households with children under the age of 5, households affected by temporary circumstances such as pregnancy or bereavement, households where somebody has a disability or long-term health condition, and households affected by domestic abuse, households with non-digital phone based claims, households without access to the internet, households where somebody has a disability or long-term health condition (especially those with mental health issues or disabilities affecting communication), and households with English as a second language.

The government should provide appropriate support and adjustments for those who would otherwise struggle to engage with the review process. It should also consider **not suspending payments while a household engages with the**

fraud review process, or withholding only part of their payments. Alternatively, it could provide a hardship fund that claimants affected can apply for.

It is essential also that investigations are concluded quickly – especially where claimants are fully engaged in the process. Indefinite suspensions, with some cases taking 2 years to resolve, are highly problematic.

The government should also **empower claimants to engage with investigations by making adjustments to how claimants experience the process**. This would include ensuring evidence requests are specific, explaining to claimants what they should do if they don't have certain types of evidence, not deleting evidence uploaded to the Journal until the suspension is resolved, ensuring upload links on the Journal can accommodate all the requested documents. It must also be much easier for claimants to flag potential vulnerabilities.

We believe these measures would ensure an appropriate balance between tackling fraud, and ensuring those who are entitled to Universal Credit are adequately supported and protected while they prove their entitlement.

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