

Homeless Link's Submission to the Work and Pensions Select Committee: Universal Credit and 'survival sex'

Introduction

1. Homeless Link is the national membership body for frontline homelessness agencies and the wider housing with health, care and support sector. We represent around 750 organisations providing supported housing and homelessness services across England. We work to improve services through research, information, training and guidance, and to promote policy change that will ensure everyone has a place to call home and the support to keep it.
2. A sustainable home and a job is the best route out of homelessness, and people who are homeless may need a range of support to help them achieve this - improving poor health, overcoming substance use, and moving on from offending. This is why each year a range of homelessness services play a critical role in recovery, helping thousands of people leave homelessness behind and preventing many more losing their homes in the first place.
3. We are a member of the Making Every Adult Matter Coalition (MEAM), alongside Clinks and Mind, formed to improve policy and services for people facing multiple needs. Together we support 37 partnerships across the country to develop effective, coordinated approaches to multiple needs that can increase wellbeing, reduce costs to public services and improve people's lives. 25 of these areas are using the MEAM Approach¹ – a non-prescriptive framework to help local areas design and deliver better coordinated services – while twelve are part of the National Lottery Community Fund's Fulfilling Lives programme,² which we are pleased to support.
4. We are pleased the Committee is looking at Universal Credit and its links with 'survival sex.' We have a long history of presenting evidence to the Committee, as well as working constructively with the Department of Work and Pensions (DWP) on issues pertaining to homelessness. This has included working with the DWP to develop their recent guidance 'Universal Credit and homeless people: guide for supporting organisations,' and two joint initiatives between Homeless Link and DWP:
 - Development of an easement to Job Seekers Allowance (JSA), Employment and Support Allowance (ESA) and Universal Credit (UC) rules to allow "newly homeless" people a period of time where they will be taken out of job-seeking conditionality in order that they can focus on immediate accommodation needs. This led to a change in the law in June 2014.
 - A series of events entitled "Working Together" delivered by Homeless Link and DWP, aimed at improving joint working between homelessness organisations and Job Centre Plus (JCP) at a local level. The events led to the publication of a toolkit to assist local partnership development between homelessness and JCP staff, which has recently been updated.³

¹ <http://meam.org.uk/the-meam-approach/>

² <https://www.tnlcommunityfund.org.uk/funding/strategic-investments/multiple-needs>

³ Homeless Link (2018) Working Together Toolkit. Available at <https://www.homeless.org.uk/our-work/resources/working-together-toolkit-developing-relationships-with-jobcentre-plus>

5. We have developed this submission through our on-going work with partners from the Fulfilling Lives programme and our member organisations, including focus groups with people with lived experience of homelessness and frontline workers from across homelessness organisations in London, as part of our Health Related Pathways to Work and Trust for London funded work.
6. **Homeless Link would be glad to elaborate further on any of the information provided.**

What features of Universal Credit might drive people into “survival sex”? How does Universal Credit compare to the previous benefits system in this respect?

7. Recent welfare reform changes including benefit cuts have impacted disproportionately on women⁴ and have contributed to women’s homelessness by making it more difficult for women to cover basic housing costs resulting in women losing their homes.⁵ The National Commission on Domestic and Sexual Violence and Multiple Disadvantage cites that ‘poverty had forced many of the women they have heard from into activities they would not otherwise choose, such as involvement in prostitution in order to make money on which to live.’⁶ Our recent research has highlighted welfare benefit changes as a reason for an increase in the number of women presenting to homelessness services experiencing multiple disadvantage.⁷
8. Specifically, the level of income that people receive through Universal Credit, and the inaccessibility of making a claim for Universal Credit for some vulnerable people, means that some do not have an income to pay for food, fuel and housing.

“People end up doing sex work as it feels like the only option – the thought of having no money is absolutely terrifying.” **Health Related Pathways to Work focus group participant, 2018**

Level of income

9. The introduction of caps to Local Housing Allowance (LHA) has rendered housing unaffordable for many people, since LHA rates do not meet rental levels in many areas.⁸ Allied to this, the introduction of the Shared Accommodation Rate (SAR) for people under 35 has further pushed accommodation into unaffordability.⁹ Outside of London, two out of every three LHA rates for shared accommodation have a weekly gap of £4 or more. Tenants are expected to make up any gap out of their jobseeker’s allowance (JSA) or other basic benefits, which have also been subject to the uprating freeze and are now only worth 93% of their 2012 value.¹⁰
10. Further, the five-week wait for the first payment of Universal Credit, necessitates individuals to take out an Advance payment to cover food, fuel and housing costs. This must be paid back, however, due to the freeze the level of monthly benefit is such that repayments push people into debt.
11. Reductions through sanctions can further leave people without enough income, in spite of safeguards such as Hardship payments. The increased severity of sanctions (in terms of level of award and length of time)

⁴ S Reis, The Impact of Austerity on Women (2018)

⁵ (Homeless Link, 2019) ‘Promising practice from the frontline: Exploring gendered approaches to supporting women experiencing homelessness and multiple disadvantage.’

⁶ The [National Commission on Domestic and Sexual Violence and Multiple Disadvantage](#), is established by [AVA](#) (Against Violence and Abuse) and [Agenda](#), the alliance for women and girls at risk.

⁷ (Homeless Link, 2019) ‘Promising practice from the frontline: Exploring gendered approaches to supporting women experiencing homelessness and multiple disadvantage.’

⁸ Crisis (2018) Everybody In, Access at

https://www.crisis.org.uk/media/239633/everybody_in_how_to_end_homelessness_in_great_britain_2018.pdf

⁹ Homeless Link (2018) Preventing homelessness before it begins. Available at <https://www.homeless.org.uk/sites/default/files/site-attachments/Prevention%20research%202018.pdf>

¹⁰ Crisis (2018) Everybody In, Access at

https://www.crisis.org.uk/media/239633/everybody_in_how_to_end_homelessness_in_great_britain_2018.pdf

under Universal Credit, and the lack of supporting information for individuals, heightens the risk of people becoming destitute. Our research, [A High Cost to Pay](#),¹¹ found that people who then experience homelessness were being pushed into debt, food poverty and survival crime as a result of having their benefits sanctioned. Crucially, clients were less likely to be motivated to engage with JCP as a result of sanctions.

Inaccessibility of Universal Credit

12. There are a number of assumptions and requirements within Universal Credit which render Universal Credit inaccessible to many;
- i. Universal Credit requires people to have a level of literacy and ability to identify errors where they arise and act upon them. However, 51% of people experiencing homelessness lack the basic literacy skills needed for everyday life; people with cognitive impairments, or who lead chaotic lifestyles, can also experience problems remembering basic information, including passwords. For those who are unable to rely on support from family, friends or outside help these issues take on increased significance, and if unaddressed potentially leave people unable to open and maintain a claim.
 - ii. Universal Credit operates a 'digital by default' model which presumes that most benefit claimants can use IT to manage their claims and undertake activities in standard claimant commitments, such as using a browser, creating an email, completing and reviewing an online form, monitoring their account, communicating via a journal and uploading documents. Clients who are unable to have not been able to access support through JCP.
 - iii. Further, people experiencing homelessness will often have limited access to computers, increasing their reliance on access to IT facilities in libraries and other public spaces, which can impose time limits too restrictive to make a claim. Although potential claimants can now use phone lines, people experiencing homelessness often do not have mobile phones, and access to public phones is limited.
 - iv. Universal Credit also introduces new requirements around budgeting, with housing payments no longer (by default) going to landlords, and payments being made monthly and in arrears. Budgeting on Universal Credit from the beginning of a claim can be impossible for some; low levels of payment mean individuals will have to manage a deficit budget, and those who do not get paid monthly will see fluctuations in their payments. Further, work has identified that Alternative Payment Arrangements, which could support claimants, are not offered at the outset of a claim. This may relate to identification procedures not being robust, and a lack of understanding about these.
 - v. By default, Universal Credit is paid as a single payment to a household. Although there exists a mechanism to request split payments, this requires an individual to disclose that they are experiencing domestic abuse to a work coach. We have heard from Women's Aid how this process is ineffective, and heightens the risk of financial exploitation and control.
13. This inaccessibility of Universal Credit leaves many with no financial support and then at risk of turning to 'survival sex.' **Homeless Link would recommend the 'Beyond the Streets' inquiry response for**

¹¹ Homeless Link (2013) A high cost to pay: The impact of benefit sanctions on homeless people, Available at: <http://www.homeless.org.uk/sites/default/files/site-attachments/A%20High%20Cost%20to%20Pay%20Sept%202013.pdf>

specific case studies of individuals who have engaged in survival sex due to the inaccessibility of Universal Credit.

How widespread is this problem? To what extent are any increases in prevalence directly attributable to Universal Credit?

14. Homeless Link member Changing Lives¹² have provided Homeless Link with growing evidence of increasing numbers of women involved in 'survival sex' as a direct impact of recent welfare policy. When surveying services across five areas of the North East of England, they found that three quarters of services had supported clients who have disclosed involvement in survival sex or sex work as a **direct result** of Universal Credit. Further, 50% of services have reported an **increase** in clients disclosing sex work/survival sex as a result of the introduction of Universal Credit.

15. Please reference Changing Lives' response to this inquiry for further details.

Are some claimants at particular risk of turning to "survival sex"? If so, who are they and what are the risk factors?

16. Changing Lives have identified the women that they support who are involved in survival sex typically:

"...experience multiple and complex needs such as mental ill health, homelessness, drug and alcohol misuse, contact with the criminal justice system, family breakdown and/or removal of children into care. Experience of domestic abuse and violence is common, from both customers and partners where coercive control and grooming can play in significant role in women becoming involved in sex work. Childhood sexual exploitation and trauma is also a common experienced for the women we work with; this is often compounded by traumatic experiences in adulthood too." **Changing Lives project**

17. Individuals who are at risk of destitution could be considered in turn at a heightened risk of engaging in survival sex. A particular risk factor that has been highlighted to Homeless Link by members would be people leaving prison. The barriers to accessing Universal Credit, such as poor access to digital technology, delay for first appointment, lack of ID and bank accounts, can lead to people being released from prison with no access to funding beyond a £46 discharge grant. As mentioned previously, although accessing an Advance payment can relieve some initial pressure initially, this will lead people to being in sustained debt over the repayment period, through which people will have to manage a negative budget to survive.

What changes to Universal Credit could help tackle this problem and better protect claimants?

18. For Universal Credit to help tackle this problem and better support claimants, investment will be required so that claimants are able to meet the costs of food, fuel and housing. In particular, this will mean reviewing the maximum level of LHA, and removing the five week wait for first payment for both new claimants and those migrated onto Universal Credit.

¹² Changing Lives offer a range of services to women across the North East including: Offending support programmes, Services for women involved in sex work and specialist women-only accommodation projects for women at risk of homelessness and domestic violence. www.changing-lives.org.uk/how-we-change-lives/forwomen

19. Further, Universal Credit must be accessible and responsive to the differing requirements of individuals. Of urgency, reform is needed so that Universal Credit supports individuals *towards* the attainment of IT literacy and money management skills, rather than requiring these skills from the outset. This will require investment in effective support, and alternative methods of making and maintaining a claim for those without access to IT, such as home visits, improved availability of phone support, and reviews of explicit consent procedures. To further support money management, claimants moving on to Universal Credit should receive Alternative Payment Arrangements (including split payments) by default, with the opportunity to opt-out, rather than the current mechanism which requires individuals to both understand exemption processes and be able to disclose any vulnerabilities.
20. Homeless Link supports the call from the [National Commission on Domestic and Sexual Violence and Multiple Disadvantage](#), that the Department of Work and Pensions produce a comprehensive Equality Impact Assessment for the continued roll out of Universal Credit, and for all future policy and decision making around welfare reform.

What role should Jobcentre Plus play in supporting claimants who are involved in “survival sex” or sex work more widely?

Ensuring claimants can fully access their entitlements

21. Accessing JCP safeguards, exemptions and other relevant procedures (for example Alternative Payment Arrangements, Advance Payments, tailored Claimant Commitments, Easements to Conditionality) are crucial for many people so they have income for fuel, food and housing. These safeguards require DWP staff to identify people as meeting a particular ‘vulnerability’, which as cited by Changing Lives may put people at risk of engaging in survival sex, or for people to pro-actively disclose their particular ‘vulnerabilities.’
22. JCP procedures for identifying people, particularly those who are homeless, are currently not sufficiently robust, with many people not being identified and so not receiving their entitlements, thereby heightening the risk that they will require income through other channels. Homeless Link members have highlighted that a cause of this may be low levels of understanding amongst Jobcentre Plus staff around the experience of homelessness and other risk factors, and the availability of safeguards and exemptions to standard procedures. Increasing workloads placed on JCP staff can lead to a lack of time to develop skills and little time to develop relationships with claimants, particularly at the outset of a claim.
23. Homeless Link recommends that staff within DWP be trained to develop the skills and awareness to avoid stigmatisation and ensure that people are provided with non-judgemental support.¹³ **Given that the experience of trauma is a particular risk factor, Jobcentre Plus should ensure that the built environment is ‘psychologically informed,’ and that staff are trained in trauma-informed approaches.**¹⁴ Eastbourne JCP has worked with the Fulfilling Lives project to assess whether their building was a Psychologically Informed Environment, and have proactively implemented suggested changes. Homeless Link recommends that DWP apply learning from this work to other JCP across the country.

¹³ (Homeless Link, 2019) ‘Promising practice from the frontline: Exploring gendered approaches to supporting women experiencing homelessness and multiple disadvantage.’

¹⁴ Full details of these approaches can be found here: <https://www.homeless.org.uk/connect/blogs/2015/aug/19/do-you-know-your-tic-from-your-pie>

24. MEAM and Fulfilling Lives recently published their research 'Jumping through hoops,'¹⁵ conducted by AVA, on how MEAM and Fulfilling Lives areas are working for women. **Coordinated approaches, involving working with local Jobcentre Plus and womens services, which are gendered and trauma-informed, are recommended as key to supporting women experiencing multiple disadvantage.** Homeless Link is aware of further good work in this area, with Lancashire Women's Centre having formed partnerships with 26 JCPs in Lancashire and Cumbria, working to support clients coming out of prison with benefits and housing. Again, Homeless Link recommends that DWP apply learning from this work to other JCP across the country.

Contact

Chris Brill, Policy Manager

Chris.brill@homelesslink.org.uk

0207 840 4421

¹⁵ Sharpen, J. (2018) Jumping through hoops: How are coordinated responses to multiple disadvantage meeting the needs of women? London: AVA, MEAM, Agenda and St Mungo's http://www.meam.org.uk/wp-content/uploads/2018/10/Jumping-Through-Hoops_report_FINAL_SINGLE-PAGES.pdf



What we do

Homeless Link is the national membership charity for organisations working directly with people who become homeless or who live with multiple and complex support needs. We work to improve services and campaign for policy change that will help end homelessness.

Let's end homelessness together

Homeless Link
Minorities House, 2-5 Minorities
London EC3N 1BJ

020 7840 4430

www.homeless.org.uk

Twitter: @Homelesslink

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Homeless Link, Minorities House, 2-5 Minorities, London EC3N 1BJ | 020 7840 4430

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