

Written evidence submitted by the Childhood Bereavement Network and the National Bereavement Alliance to the Work and Pensions Select Committee Inquiry into Benefit Delivery

Executive summary

- Bereavement is a significant life change and challenge. The emotional impact of the death places bereaved people in a particularly vulnerable position, just at the time when they must accomplish a plethora of administrative and practical tasks often including significant financial decisions and new responsibilities in interacting with DWP and other official bodies.
- Tell Us Once and DWP's Bereavement Service have improved the Department's interactions with bereaved people, but significant challenges remain.
- Awareness of bereavement benefits remains low, and not everyone hears about the help available in time to take it up.
- Some problems remain in accessing local JobCentre Plus eg to certify marriage certificates and demonstrate eligibility.
- Inaccuracies in payments may have a disproportionately difficult impact for families struggling to balance their finances after a death.
- Delays in claims (including the interface between DWP and HMRC) can contribute to families facing a significant shortfall.
- The ineligibility of unmarried, cohabiting partners means that the benefits are not being delivered accurately to those that need them
- We are concerned about the impact of forthcoming changes to the benefits system which we anticipate will affect the timeliness and accuracy of bereavement benefits.
- In particular, we are concerned that the introduction of Universal Credit will impact negatively on current claimants of Widowed Parents Allowance (WPA), who will be almost £8 per week worse off than those widow(er)s who choose not to claim WPA, requiring a high level of knowledge and skill among advisors to give families the correct (although wrong-sounding) advice
- We are also concerned about whether JobCentre Plus advisers will be able to make sufficiently timely decisions to support bereaved people applying for easements of conditionality requirements under Universal Credit
- We are also concerned that under Universal Credit, the length of time before bereaved families are subject to the underoccupancy charge (because the death means they have a 'spare' room) will be shortened from 12 to 3 months after the death
- We recommend a national review of the impact of financial, administrative and economic changes on those who have been bereaved, including funeral and bereavement poverty
- We recommend strengthening use of the Family Test in scrutinising the likely impact of policies on bereaved people.

About us

1. The Childhood Bereavement Network is the national hub for those working with children and young people before or after the death of someone important in their lives. We underpin our 250+ members' work with essential representation and support, advocating for bereaved children's needs and helping professionals access the information and support they need to develop high quality services.
2. The National Bereavement Alliance is emerging group of organisations with a shared vision that all people have awareness of and access to support and services through their bereavement experience. The core membership of the Alliance comprises national and regional membership organisations with an interest in the field of bereavement care, national providers of bereavement care and local bereavement care providers which have no other means of being represented.

About this response

3. This paper discusses the timeliness and accuracy of DWP's delivery of bereavement benefits under the current system (Bereavement Payment (BP), Bereavement Allowance (BA) and Widowed Parents Allowance (WPA). It also looks ahead to some of our concerns about timeliness and accuracy following introduction of Bereavement Support Payment (BSP) in April 2017.
4. This response does not address the significant issue of delays and inaccuracies in Social Fund Funeral Payments, which are covered in detail in the response from Quaker Social Action.
5. This response has been prepared by Alison Penny, Coordinator of the Childhood Bereavement Network and Project Coordinator of the National Bereavement Alliance
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Bereavement and economic and financial challenges

6. Around 500,000 deaths are registered in England and Wales each yearⁱ. This number is likely to grow, with deaths each year in England predicted to rise by 15% between now and 2035ⁱⁱ.
7. Bereavement brings significant risks to health and other outcomes. Across types of bereavement it increases the risk of mortality, physical health problems, physical disability, use of medication and hospitalisationⁱⁱⁱ. Between 10 and 20% of people are likely to suffer 'complicated' or 'prolonged' grief following a death from natural causes: rates are likely to be higher among those bereaved of a child, or following a traumatic death^{iv} ^v.
8. The death of someone close doesn't just bring emotional challenges, it brings practical and often financial challenges too. In the immediate aftermath these include getting paperwork issued, registering the death; informing friends and relatives; organising and paying for the funeral; changing benefit claims and dealing with the bank and other institutions. Long drawn-out inquest and probate processes can cause further distress.
9. Over time, challenges include taking on new responsibilities such as managing finances for the first time, or looking after children alone. People may have to manage on drastically reduced incomes. These changes to household income might require changed working patterns or moving house – significant further upheavals. Those in social housing can face

particular difficulties: for example those who are unable to take over the tenancy from the person who died.

10. These financial challenges impact on emotional coping and can make the grief worse. Feeling worse off financially increased the chances of bereaved women reporting symptoms of anxiety and depression for two years or more after the death of their spouse. The causes of this additional stress include feelings of financial insecurity, both immediately after the death and ongoing; and fears about penalties including financial losses and administrative problems through dealing with government departments (including DWP) and other official bodies^{vi}.
11. Both good and bad experiences with administrative and regulatory bodies linger long in the memories of bereaved people. Poor service including an abrupt manner on the telephone or letters wrongly addressed to the person who has died are 'wounding experiences' *'Some people remembered whole days spend getting over receipt of such a letter in the morning post'*.^{vii} Conversely, when things go well, people remember the kindness with which they have been treated. Some people report the volume of administrative processes to be a burden which *'seemed to get in the way of their feelings'*. Undoubtedly, the roll-out of the Tell Us Once service and the DWP's Bereavement Service have helped to mitigate this. Nevertheless, some significant challenges remain.

Hearing about bereavement benefits

12. For benefits to be delivered in a timely and accurate way, potential claimants must know about them. Awareness of bereavement benefits is very low in the general population, with one poll of over 2000 adults in the UK in 2012 finding that only 14% were aware of Bereavement Payment^{viii}. As one bereaved father said *'I had no idea bereavement benefits existed (why would I?) but they are a very welcome support.'*
13. Bereaved people learn about the benefits available to them in an ad hoc way, with sources including friends and family members, Jobcentre plus, funeral directors, registrars, hospitals, hospices, nurses, charities, the tax office and Pensions Service^{ix}. DWP's own research in 2012 suggest that those already in contact with the benefits system were more likely to hear about bereavement benefits^x. Following their own experience of bereavement, many people express surprise that there was no automatic, formal system of notification, and feel that they heard about entitlements by chance^{xi}.
14. Depending on area, the Tell Us Once service is helping to systematise notification, but this use of the service is still voluntary and misses some people. Similarly, DWP's Bereavement Service, while helpfully bringing together the functions, is still a reactive service.

Submitting a claim in time

15. A claim for BP needs to be made within 12 months of the death, and claims for WPA and BA cannot be backdated for more than three months. This means that someone eligible for BP and BA will receive nothing if they submit their claim 15 months after the death^{xii}. DWP's own qualitative research found some interviewees who were getting WPA or BA but who had missed out on the lump sum: *'I didn't get this. By the time I asked for it, it was a year after so I couldn't get it (Male, under 45, children) (p12)*^{xiii}.

16. It is difficult to estimate whether these difficulties in hearing about benefits mean that take up is low, because the number of eligible people who do not claim is not known. However, the most extensive qualitative study we know of concluded 'it appeared to the researchers that there might have been some non-take-up of benefits' (p93)^{xiv}. The Childhood Bereavement Network's estimates that 22,800 parents die each year in Great Britain, leaving dependent children under 18^{xv} yet DWP estimated the inflow of new claimants of WPA in 2012/13 to be 8,260^{xvi}. Even discounting those who were not married to the other parent of their child or who cannot claim for another reason, this does seem to be a discrepancy in take-up.
17. **We recommend that DWP investigates the take-up of bereavement benefits further, and investigates automatic notifications to those eligible.**

Making a claim

18. Accessing JobCentre Plus can be a barrier to some people making claims, particularly if they are not already in contact. This was the most frequently raised concern among bereaved parents we consulted from WAY Widowed and Young. Several respondents mentioned the difficulty in finding the direct telephone number to access their local branch. They also raised their uncomfortableness about the location and atmosphere once they got to the JobCentre Plus.

I also had trouble making an appointment with the local job centre due to lack of direct number, because I had to get my marriage certificate certified. I had no idea where the job centre was and once I found it, it was not obvious where I was supposed to go as there were all sorts of departments in one building. When I arrived at the allotted time, no-one could find the person I was supposed to see! I had to sit & wait, surrounded by swearing youths waiting to sign on, and then saw a woman who made me feel I was stopping her doing something more important. It was a horrible experience when I was still shocked by my husband's death. Really unpleasant.

I also struggled to get appointment at job centre to get documents certified. Spoke to Dover office who pay out the bereavement payments and they seemed to think it was straightforward but getting the direct number of job centre was difficult to put it mildly. Also they were not interested in engaging in what other benefits or help I could get.

19. As well as difficulty in finding the correct number for their local JobCentre Plus, some parents did also report excessive wait times when phoning DWP and JobCentre Plus.

Inaccuracies in payments

20. Any inaccuracies in payments (including overpayments of Carers Allowance or of benefits which the person who died was receiving) can be very distressing to bereaved families, who are having to manage a degree of uncertainty and rebalancing of finances anyway, alongside their grief.

Delays in processing claims for bereavement benefits

21. Delays in receiving bereavement benefits sometimes originate in other government departments. One widower reported that DWP had informed him that his claim for

Widowed Parents Allowance was being delayed because they were waiting for HMRC to provide his wife's full tax details for the year. Claims relating to deaths which happen at busy times in the tax year may be particularly subject to delays.

Delays in changing child benefit and tax credit claims

22. Other concerns were raised by widowed parents of dependent children in relation to child benefit. If the claimant had died, a whole new claim had to be submitted. One parent reported being told initially that they had to submit the birth certificate again with the new claim (delaying it while a new one was ordered, as the original was lost) when in fact this information was incorrect.

23. As tax credit claims are made jointly, the death of one partner counts as a change in circumstances which requires a new claim. Parents report some problems with this:

I called tax credits to inform of the death of my husband. They stopped my payments, it was a month before Christmas, and they took weeks to sort out a new single claim. They are not set up to deal with situations like this. Will UC be any different? I missed 2 months of payments with Christmas and a funeral to pay for, and two children under the age of three. Thankfully I had some savings, but I know there are many out there who don't. There has been lots of misinformation, two awards calculated, incorrect tax codes, lots of messing about.^{xvii}

Accuracy in targeting bereavement benefits at the groups who need them

24. Currently, Widowed Parents Allowance is only paid to those who were married to their partner, and this restriction in eligibility will continue under the new Bereavement Support Payment. We believe this is inaccurate targeting of a benefit whose policy aims are to provide fast, direct financial help for immediate needs following bereavement and to give recipients the flexibility they need to regain control of their situation.

25. The higher rate of bereavement benefit currently paid to those with children is in recognition of the costs - emotional, practical and financial - of bringing up children when a partner has died. Children themselves have no influence over whether their parents are married or not, so it seems harsh to deprive some of financial support following a parent's death based on their parents' marital status. In 2013, 31% of babies were born to cohabiting - but unmarried - couples. None of these families would qualify for BSP if one of the parents died.

26. We recommend that eligibility for Widowed Parent's Allowance (and forthcoming Bereavement Support Payment) should be extended to unmarried, cohabiting partners with dependent children with the person who died. We note that our position is supported by the Social Security Advisory Committee^{xviii}.

Forthcoming changes which may affect timeliness and accuracy of payments

Interaction between Universal Credit and Widowed Parents Allowance

27. We are very concerned about a potential interaction between Widowed Parents Allowance. Current claimants of Widowed Parent's Allowance will lose almost £8 per week - over £400

per year – if they are on Universal Credit. Many claimants are likely to be in receipt of WPA and UC for some time into the future.

28. For the purposes of UC, WPA will be treated as "income other than earnings". This means that it will be deducted at a pound-for-pound rate from the claimant's UC entitlement. This means that the actual value for a widowed parent with no other income will be £0 per week.
29. However, WPA will also continue to be treated as taxable income. For this reason, working claimants may not only have their WPA deducted in full from their UC entitlement, but also pay tax on it in addition. The outcome of this is that working widowed parents in receipt of both UC and WPA could end up overall paying £7.90 per week, on account of their receipt of WPA. Advisers will need a high level of skill and knowledge to give families the correct – but perverse – advice that they would be better off not claiming WPA.
30. **We recommend that the government assess our suggested options for avoiding this loss for widowed parents:**
 - a. Remove WPA (and its predecessor WMA) from the list of benefits treated as "income other than earnings" for the purposes of UC entitlement.
 - b. Partially disregard WPA for the purposes of UC entitlement.
 - c. Treat WPA as earnings rather than income for the purposes of UC.
 - d. Continue to treat WPA as income other than earnings, but introduce a "widowed parent's element" as an additional component within Universal Credit. A similar approach is seen in the interaction of Carer's Allowance and the Carer element in Universal Credit.

Easements of conditionality requirements under Universal Credit

31. The introduction of BSP from April 2017 means that those widowed parents with ongoing income support needs will claim Universal Credit, with the conditionality requirements it brings, rather than the current WPA which does not have such requirements.
32. These conditionality requirements will be suspended for six months following the death of a partner or child. Parent claimants whose child's distress in bereavement disrupts their childcare responsibilities will be able to request a one-month suspension of work related requirements. These can be requested once every six months, for up to two years (four one-month periods in total).
33. We welcome the acknowledgement of the ongoing and emerging nature of children's grief and its impact on their parent's capacity for work. However, we are concerned that the imposition of conditionality after six months – even with one-month suspensions – is **unnecessary** and will be **counterproductive**. Further, we believe that the system for claiming one-month suspensions will be **disruptive and stigmatizing** to parents and their children.
34. Work coaches will ask parent-claimants to provide evidence that their child needs greater care and attention from them, particularly for a second or subsequent easement. This may come from a third party such as a health care professional or the school. We believe that having to ask for this evidence will be stigmatising to parents, who will experience it as a judgement on their parenting and capacity to cope. This in turn will increase their stress.

35. We also believe that the process of having to make an appointment, see the work coach and then provide evidence is in itself burdensome and disruptive for families. It could easily take a week or fortnight to arrange the necessary appointments. Some families will find these additional arrangements outweigh the benefits of a short term suspension, and will be put off from requesting it. We believe that the rolling nature of suspensions and re-impositions is also likely to be counterproductive to parents' capacity to return to work, making the situation even less stable for families.

36. We recommend full conditionality be suspended for two years following the death affecting the child.

Underoccupancy charge

37. **The 'under-occupancy charge'** affecting any family in social housing where the death means they have a 'spare' room. Currently, families have 52 weeks after a death before they are re-assessed, but once UC is introduced they will have three months in which to decide whether to move to a smaller property (assuming there is one available) or face a reduction in their housing benefit, which could leave them unable to continue to pay their rent^{xix}.

Cumulative impact of changes

38. We are concerned about the **cumulative impact** of financial and administrative changes that are impacting on bereaved families. In addition to those raised above, these include

- a. **Rising funeral poverty:** the average shortfall among those struggling to pay for a funeral is £1277^{xx}. Without action we will not only see continued distress but also more funerals where the local authority bears the cost, while other vulnerable bereaved people spiral further into debt^{xxi}. For more information on difficulties associated with making a claim to the Social Fund for Funeral Payment, please see Quaker Social Action's response to this Inquiry.
- b. **Changes to bereavement benefit from 2016/17^{xxii}** which will make some people newly eligible but are much less generous to many of those with children: 75% of these families will be worse off than they would be under current arrangements^{xxiii}. 88% of working families will be worse off, and 57% of those out of work^{xxiv}. Claimants with younger children will be disproportionately badly affected, as they can currently claim for longer.
- c. **Hardship for unmarried partners** who get no help under current or proposed bereavement benefit schemes, even if they had children together. If the person who died didn't leave a will, their unmarried partner has no automatic right to inherit^{xxv}.

39. Because of the complexity, range and fast-paced reform of financial issues affecting bereaved families, we recommend that the Government undertakes a full review of funeral and bereavement poverty.

40. In addition, we recommend strengthening use of the Family Test in scrutinising Government policy. The test specifically asks 'What kind of impact will the policy have on families going through key transitions such as becoming parents, getting married, fostering or adopting, bereavement, redundancy, new caring responsibilities or the onset of a long-term health condition?'

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- ⁱ <http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-370351>
- ⁱⁱ Office of National Statistics (2011) *ibid*
- ⁱⁱⁱ Stroebe, M.S., Schut, H., and Stroebe, W (2007) Health outcomes of bereavement. *Lancet*, 370, 1960-73.
<http://www.comsegovia.com/paliativos/pdf/Health%20outcomes%20of%20bereavement.pdf>
- ^{iv} Prigerson, H et al (2008) A case for inclusion of prolonged grief disorder in DSM-V. In Stroebe M et al (eds) *Handbook of Bereavement Research and Practice* Washington DC: American Psychological Association
- ^v Elizabeth A. Lobb , Linda J. Kristjanson , Samar M. Aoun , Leanne Monterosso , Georgia K. B. Halkett , Anna Davies (2010) [Predictors of Complicated Grief: A Systematic Review of Empirical Studies](#) *Death Studies* Vol. 34, Iss. 8, 2010
- ^{vi} Corden A, Hirst M, Nice K (2008) *Financial Implications of Death of a Partner* Working Paper No ESRC 2288 12.08
<http://www.york.ac.uk/inst/spru/research/pdf/Bereavement.pdf>
- ^{vii} Corden et al (2008)
- ^{viii} http://www.carrcandc.co.uk/images/uploads/RGA_release_Apr_2012_Bereavement_FINAL.pdf
- ^{ix} Oldfield K, Adams L, Gunstone B (2012) Department for Work and Pensions Research Report No 790: Bereavement benefits: findings from qualitative research http://statistics.dwp.gov.uk/asd/asd5/report_abstracts/rr_abstracts/rra_790.asp, Corden A, Hirst M, Nice K (2008) *Financial Implications of Death of a Partner* Working Paper No ESRC 2288 12.08
<http://www.york.ac.uk/inst/spru/research/pdf/Bereavement.pdf>
- ^x Oldfield et al (2012)
- ^{xi} Oldfield et al (2012), Corden et al (2008).
- ^{xii} <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN00431>
- ^{xiii} Oldfield et al (2012)
- ^{xiv} Corden et al (2008)
- ^{xv} <http://www.childhoodbereavementnetwork.org.uk/research/key-statistics.aspx>
- ^{xvi} <https://www.gov.uk/government/statistics/further-analysis-on-the-reform-of-bereavement-benefits-for-new-claims-from-april-2016>
- ^{xvii} http://www.gingerbread.org.uk/file_download.aspx?id=7582
- ^{xviii} https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/324532/ssac-bereavement-benefits-response.pdf
- ^{xix} <http://www.housing.org.uk/policy/welfare-reform/bedroom-tax>
- ^{xx} Sun Life Direct (2013) When it's gone, it's gone. The paradox of saving for funeral costs. Sun Life Direct Cost of Dying Report 2013
<http://www.sunlifedirect.co.uk/About-Sun-Life-Direct/Press-Office/Research/Cost-of-Dying-2013/>
- ^{xxi} Woodthorpe, K (2012) Affording a Funeral: Social Fund Funeral Payments. Axa Sun Life Direct.
- ^{xxii} <http://services.parliament.uk/bills/2013-14/pensions.html>
- ^{xxiii} <https://www.gov.uk/government/publications/further-analysis-on-the-reform-of-bereavement-benefits-for-new-claims-from-april-2016>
- ^{xxiv} DWP (2013) Further analysis on the reform of bereavement benefits for new claims from April 2016
<https://www.gov.uk/government/publications/further-analysis-on-the-reform-of-bereavement-benefits-for-new-claims-from-april-2016>
- ^{xxv} <http://lawcommission.justice.gov.uk/areas/intestacy-and-family-provision-claims-on-death.htm>