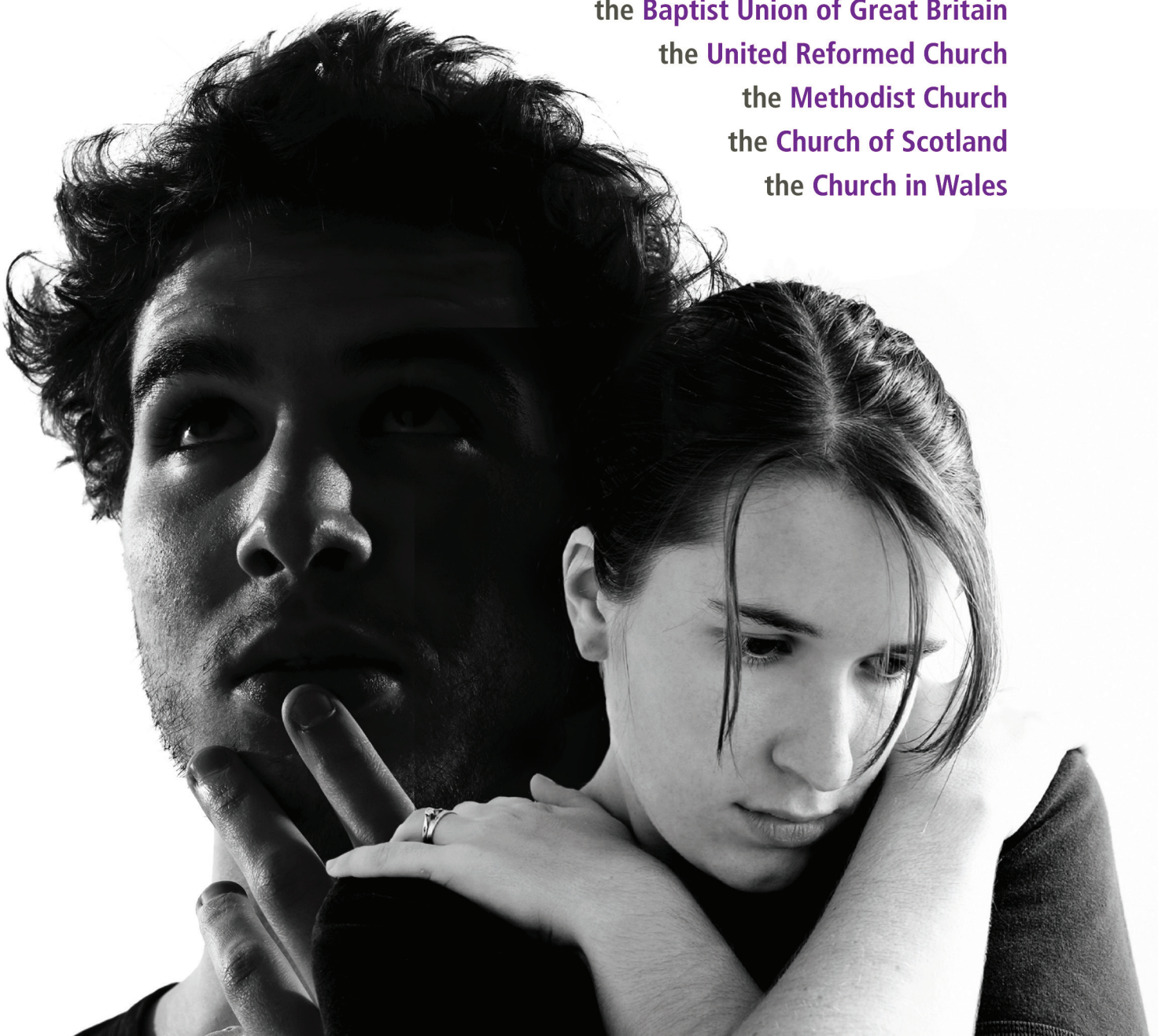


# Time to rethink **BENEFIT SANCTIONS**

A report by  
Church Action on Poverty  
the Baptist Union of Great Britain  
the United Reformed Church  
the Methodist Church  
the Church of Scotland  
the Church in Wales



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# Executive summary

Last year over 1,000,000 sanctions were imposed - 880,000 remained after appeals and reconsiderations. Over time more than a fifth of all Jobseekers are sanctioned. This means that their benefits were stopped, usually for one month, but in a small number of cases for up to three years.

Sanctions are a system of penalties imposed on those who have not obeyed, in full, detailed instructions related to finding work. This policy has been slowly introduced into the benefit system since the mid 1980s. Before this people who did not meet basic conditions such as being available for work were removed from the benefit roll. However, unlike sanctions, there was no punishment intended - therefore a person was able to reapply for benefit when they became available for work.

Sanctions are more than a simple withholding of benefit whilst a person is not compliant, they are imposed for fixed-periods, effectively making them a deliberate punishment. While people are not receiving money because of a sanction they must continue to obey these detailed instructions – or face further often longer sanctions. We are disturbed that a benefit system intended to provide for the needy and vulnerable is used as a means of coercion and compliance.

The penalties attached to sanctions often do not appear reasonable or proportionate to the “failure” that has occurred. If a similar system operated in a workplace - where pay was immediately removed for a month for being late for a meeting or not achieving a weekly target - we might reasonably expect action to be taken against the employer.

The implementation of Universal Credit will extend the sanctions system to many working people. We do not believe the system should be escalated while there are significant questions about its effectiveness and appropriateness.

There is a great deal of evidence to show that those with the most difficult lives are greatly affected by sanctions. Research for this report indicates that:

- over 100 people assessed as unfit for work due to mental health problems are sanctioned each day
- approximately 100,000 children were affected by sanctions in 2013/14.
- a total of almost 7,000,000 weeks of sanctions were imposed in the year 2013-14; up from 1-1,500,000 weeks per year during the previous decade

Those who have devised the sanctions system accept that *“it would be usual for a normal healthy adult to suffer some deterioration in their health”* if the person has no other resources to fall back on. The policy requires that many people in this situation must wait for two weeks before receiving any assistance.

Sanctions have a financial impact on individuals, but the personal costs of shame, demoralisation and destruction of self worth are much harder to measure. This is a system that leaves many people feeling under suspicion and valueless simply because they do not currently have work.

The UK's sanctions regime is one of the most severe in the developed world. The evidence that any sanctions system has long term beneficial effects is notably thin. There is however no evidence that a system as harsh as the UK's has beneficial effects.

Churches are concerned that the imposition of sanctions, in the way that is currently experienced by many, undermines human dignity and threatens the underlying philosophies of the Welfare State to which British citizens contribute through taxation. There are foundational Christian principles that call into question the sanctions system in operation today.

A 40 year old man from Glasgow was sanctioned for missing an appointment. A divorcee, he is a proud father who has worked for most of his life. He now has no gas or electricity and has been reduced to shoplifting for food. While telling his story, shame, humiliation and desperation reduced him to tears.

*Source: Poverty Truth Commission*

We have concluded that it is very hard to justify a system which impacts most harshly on the people who most need help and support. Irrespective of circumstances or material need, all people have innate human dignity and are created in the image of God. It is incumbent upon the Christian community to speak out against any system which treats people so unjustly.

We believe there is an urgent need to re-think sanctions and recommend the following:

- A full review of the impact and efficacy of the sanctions and conditionality regime;
- A revision of the hardship payments system to avoid the deliberate imposition of hunger
- For sanctions to be suspended for people with children and for those experiencing mental ill health.
- Most importantly there needs to be a change of culture, from one of enforcement and punishment to one of assistance and support.

"I suffer from dyslexia and find certain types of letters and forms very hard to read. This became even worse when I recently became unemployed. When I get letters from the DWP I am so stressed that I will read the appointment time wrong and end up getting sanctioned. As soon as the letter comes in, my mind goes into panic about feeding my family. The panic makes my dyslexia worse.

"There isn't even anyone you can go into the Jobcentre and speak to now. You have to phone them. That's no good if you don't have any credit on your phone. The stress of this has triggered my depression and I am now signing on the sick."

*Source: Poverty Truth Commission*

# Foreword

By members of the Poverty Truth Commission

Our lives have become chaotic through sanctions and the constant threat of sanctions. Every day we live in fear of being late for an appointment, missing a phone call, reading a letter wrong - and being sanctioned. Of having **no money** for one month, six months, three years. Losing your money is one thing. But what sanctions do to your mental health and dignity is another.

There is something inhuman in the way sanctions are administered and the effect they have on people. The threat is so heavy. It is like being crushed. It seems as if we are no longer regarded as human beings. You are under constant suspicion and scrutiny. People are getting pushed to the limit. They are sick with the stress. It really hurts the bones on us. But we refuse to be victims.

You used to be able to go into the Jobcentre and talk to someone. To explain to them if you were having trouble with understanding forms or weren't computer literate or were worried about something. Now you are greeted by a security guard who demands to know your business, directed to a phone, and threatened with a sanction.

How is sanctioning us supposed to help us get work? Can you imagine for a moment what it is really like? How will not being able to heat your water and have a shower help you get a job? How will not being able to shave help you get a job? How will not eating help you get a job? How will not being able to keep your mobile phone going help you get a job? How will not having the bus fare to get to an interview help you get a job?

How will the stripping away of your dignity help you get a job?

We hope that when you read this report you will be challenged by it. We hope you will share it and the information contained in it with others. Let's start a conversation. We feel powerless as individuals. We need the people who read this report to join us in demanding change.

Marie McCormack  
Darren Murray  
**Poverty Truth Commissioners**

*The Poverty Truth Commission works with Faith in Community Scotland to bring together some of Scotland's key decision makers with those living at the sharp end of poverty. The Commission believes poverty will only be truly addressed when those who experience it first-hand are at the heart of the process.*



# Introduction

How would you cope?

Imagine that your income stopped suddenly tomorrow. Perhaps you would cope for a while, living on savings, running down the food in your kitchen cupboards, maybe making a few lifestyle changes that helped you save money. If someone else in your household were earning, you might be able to manage on their income for a while.

But imagine that you'd exhausted all of those options; if you are an adult of working age, you might reasonably expect that you could turn to the benefits system to give you some basic support. But now imagine that the very same benefits system actually brought about such circumstances. Where would you turn then? Is this what you would expect of a benefits system to which we contribute our taxes, to provide basic support for those who have no other form of income?

Or imagine that this situation was forced upon you by your employer, who decided to withhold a month's salary because you were late for a meeting, or failed to meet your performance targets one week. We might legitimately argue that such behaviour is totally unreasonable and expect to turn to some form of tribunal or employee rights legislation to provide protection. If this is true for people in work, should not the same basic rights and safeguards be extended to people who are out of work?

In 2014 the Baptist Union of Great Britain, the Methodist Church and the United Reformed Church, together with Church Action on Poverty, published a report *Faith in Foodbanks?* This was a response to the growing number of foodbanks that local churches were setting up to provide emergency provision for those in need. But it was also prompted by some of the questions and

concerns that were being expressed by those involved in providing this service. As we explored the significant rise in foodbank referrals, it quickly became apparent that one of the main reasons why people need to turn to them is that they have had their benefits stopped because of a sanction. This report seeks to explore why and how benefit sanctions are imposed and to question whether this is a reasonable, fair and effective part of our benefits system.

No-one would dispute that it is reasonable to expect people to meet some basic criteria in order to qualify for welfare benefits. For example, to claim Jobseeker's Allowance (JSA) a person must be unemployed, available for work and actively seeking work. People who do not meet these criteria are disqualified from the benefit and made to reapply. People who lie or cheat in order to receive benefit are rightly dealt with by the criminal justice system.

The sanctions system is distinct from this. Sanctions are not imposed because someone has made a fraudulent claim, but because they have failed to meet one or more conditions that have been imposed upon them. Their income will have been significantly disrupted, deliberately leaving them vulnerable, facing severe hardship and unable to purchase the most basic essentials. Foodbanks might be able to offer immediate and short-term help, but should we have a benefits system that deliberately makes people reliant upon voluntary provision? How are their other needs provided for? What support is available in locations where there is no access to a foodbank or similar facility?

People whose benefits are stopped through sanctions are still expected to actively seek work and attend Jobcentre and other appointments, even though they will not have the money to pay fares, make phone calls and undertake other job-

seeking activities. And during this time they will also have to feed themselves and keep warm.

The stories that were shared left those who heard them with a deep sense of injustice, and as a consequence the Joint Public Issues Team undertook further research and reflection upon what was uncovered. This report is the outcome of that work, and seeks to offer an overview of the sanctions system for those who might not be familiar with it. It strongly questions whether this is an appropriate response to the rights and dignity of our fellow human beings who for whatever reason need the support of the benefits system.

As Christians we believe that everyone is loved, valued and made in the image of God, and as such we have a responsibility to challenge any structure or system that undermines this inherent human dignity. We believe that there is good reason to ask whether benefit sanctions are one such example.

A participant said the sanction had affected her relationship with her children as they didn't understand why she couldn't give them pocket money.

*Source: Coventry Citizens Advice*

Peter\* (20 years old) was sanctioned twice - once for 4 weeks and once for 13 weeks - for failure to attend appointments with Groundforce (his Work Programme provider). On both occasions he had not received any letter stating that he had to attend an appointment.

The lack of income led to an estrangement from his own family who could not afford to support him. He moved to stay with his girlfriend's family but the financial pressures led to a further breakdown and he was re-housed in a hostel. He needed to claim hardship payments, discretionary housing payments, and use foodbanks in order to survive.

The Coventry Law Centre assisted with mandatory reconsideration letters and the decisions were overturned, although not all of the benefit owed to him was reimbursed.

*\* Not his real name*

*Source: Coventry Law Centre*

# Why Christians care about sanctions

Our concern about the current benefit sanctions system arises from our experience and our faith. Aspects of the system appear inconsistent with the Christian understanding of the inherent dignity all people have as 'children of God'. Some elements of it also fit uneasily with a biblical perception of what constitutes a "just society".

In this section we set out some of the principles that have guided our thinking, as people of faith, about the current sanctions system.

## Created in God's image

*"So God created humankind in his image, in the image of God he created them; male and female he created them".*

*Genesis 1:27 (NRSV)*

Christians believe that all people, regardless of birth or circumstance, are made in the image of God. All are therefore equally valued, cherished and loved by God.

This is what defines our innate human dignity and requires us to value and respect one another fully. Our welfare system, which was inspired by Archbishop William Temple and others, was premised on the assumption that this dignity and respect should be upheld and all should be able to develop to their full potential.

We believe that every aspect of our welfare system should reflect the spirit of this so that everyone without work can live and participate in our society with dignity. Christians have a responsibility to speak out and ask questions if they believe these principles are being undermined. We believe there are aspects of the current sanctions system which appear to be founded on an inherent belief that some are of less worth and deserve less dignity than other human beings.

Believing as we do that all are made in the image of God, we should be wary of judging a person on account of their poverty. In particular we should be aware of the effect a sanction can have on a person's sense of self-worth, dignity and sense of belonging to society.

## A God of justice

*"Learn to do good; seek justice, rescue the oppressed, defend the orphan, plead for the widow".*

*Isaiah 1:17 (NRSV)*

Not only are all people infinitely precious to God, the Bible often speaks of God's concern that we pay particular regard to the needs and rights of the poorest and the weakest – "the widow, the orphan and the stranger". These were the people least able to defend their own rights and to seek justice for themselves. Those with power are warned sternly against abusing their position and failing to protect the rights of the weakest.

Behind the creation of the welfare state lay the vision of providing support for the weakest and most vulnerable in society. It sought to achieve a minimum standard of living below which nobody would be allowed to fall. It is hard to see that it still achieves this end if someone can be forced to be without income for a period of four weeks. We also suggest that the current sanctions regime needs to further recognise its potential to discriminate against those not able to meet all the requirements placed upon them, particularly those experiencing mental or physical illness or the demands of being a carer.

For the system to be truly just it must not place burdens upon those unable to bear them.



## Avoidable destitution

*"God has so arranged the body ... that there may be no dissension within the body, but the members may have the same care for one another. If one member suffers, all suffer together with it..."*

1 Corinthians 12: 24-26 (NRSV)

The Church is intended to exemplify God's model for society. We were not created as atomised individuals but as people living in relationship with one another. The Bible is full of examples of God's concern that societies should operate on the principle of interdependence and demonstrate practical concern for those who are vulnerable or less able.

The Biblical Jubilee, for example, with its requirement that every few years debts be cancelled, slaves freed and land bought cheaply returned to its original owner, envisages communities in which all will have a stake and all enjoy the potential to flourish. The Bible contains many injunctions to treat those in need with special concern – a theme which, like the Jubilee, Jesus himself echoed in his ministry.

For Jesus, the greatest commandments in the Law were to love God and love your neighbour. He was clear that these Old Testament laws had universal application. The early Christians recognised their dependence on each other, for example Saint Paul used the metaphor of the body to suggest that we are all diminished when one part of us is harmed (as the verse above explains).

We are concerned that the sanctions system disproportionately impacts the most vulnerable in our midst. It also undermines the spirit of our welfare system, according to which each member of society pools their resources and shares the

risks of ill health and misfortune. We believe that society should more clearly reflect our mutual dependence and, rather than making life more difficult for those already in need, demonstrate a special concern that such people be enabled to play a fuller role in society.

*"If you take your neighbour's cloak in pawn, you shall return it before the sun goes down; for it may be your neighbour's only clothing to use as a cover; in what else shall that person sleep?"*

Exodus 22: 26-27 (NRSV)

The Bible places inherent human well-being as paramount in the ordering of our society. In the example above if a person took their neighbour's cloak as a pledge for a loan, this would leave them with no means of staying warm during the night. Therefore, even though the cloak was legally the lender's as a pledge, he or she was required to place their neighbour's basic needs above their own legal rights. It was not acceptable to make someone destitute: the well-being of the debtor was more important than their obligations to the lender.

For many people today being sanctioned does mean being destitute, and it seems to us that, as a society, we have reversed the priorities outlined above and their concern that all be treated justly and with dignity. The poor and most vulnerable are usually required to pay the highest interest when in debt to others, and we wonder if this is fair or just. Is their offence against the state, against society, so serious that it warrants deliberate disadvantage and destitution?

From our experience and from our faith, for reasons of human dignity, justice, community and avoidance of destitution, we believe that the sanctions system needs rethinking.

# What is a sanction?

To be **eligible** for unemployment benefits you have to be unemployed, available for work and actively seeking work. If you are not eligible you are **disallowed** from benefits, and must reapply when you become eligible again.

When you apply for benefits at your local Jobcentre you sign a **Claimant Commitment**. This specifies what you are required to do – usually in terms of the number of jobs to apply for, courses or meetings to attend - to receive benefit. Your benefits are conditional on completing the requirements: you are under **conditionality**.

If your benefits are **sanctioned** they are stopped for a period of time, usually a month, but potentially up to three years. A sanction is imposed because, although you are still eligible for benefit, you have not met a requirement of your Claimant Commitment.

Conditionality affects people who are unemployed and receiving **Jobseeker's Allowance (JSA)**. It also affects people who are recognised to be too sick to work and receive **Employment Support Allowance (ESA)** but who it is hoped will be able to return to work in the medium term.

The sanctions system is administered by the **Department for Work and Pensions (DWP)** who also run the local Jobcentres.

**D**uring a sanction, a participant was living on about £70 per fortnight in hardship payments. He paid £20 on gas, £20 on electricity and £10 on water, leaving him £20 for everything else for the fortnight.

*Source: Coventry Citizens Advice*

**A** participant was really shocked and worried by the sanction. She has suffered from stress and anxiety and has had to see her doctor because of problems sleeping. She has a history of depression and the sanction has been a trigger.

*Source: Poverty Truth Commission*

**"**I was on ESA (Employment and Support Allowance) and was called to attend a medical with ATOS. Later I was sent a letter one day before I was to be paid saying I had been sanctioned for six weeks. When I phoned to query this I was informed that I had been phoned to explain I was being taken off ESA and put onto JSA (Jobseekers Allowance) and invited to a meeting. I had not answered this phone call as I did not know it was from the DWP and am afraid to answer numbers I don't know on my phone as they are very often from debt collectors. I was given no direction over where to go for help. I felt so angry, insecure, negative, depressed and beaten. I felt like finding solace in drugs and drink."

*53 year old single male, Glasgow  
Source: Poverty Truth Commission*

# Sanctions in figures<sup>\*</sup>

## Referrals for sanction:

**1,800,000**

referrals for sanction made to a Decision Maker each year. The DM then judges if a sanction should be imposed.

**500,000**

referrals for an “intermediate level sanction” each year leading to the suspension of benefit before a judgement is made.

**500,000**

referrals cancelled each year because the referral was the result of a bureaucratic error.

## Number of sanctions:

**1,000,000**

sanctions were imposed last year.

**880,000**

sanctions remained after appeals and reconsiderations.

**22%**

of job seekers receive a sanction at some point in time.

## Number of people potentially subject to sanctions:

**1,300,000**

receiving Jobseeker’s Allowance or Employment and Support Allowance and therefore “under conditionality”, or potentially at risk of sanction, at the current time.

**200,000**

new people – mainly new claimants – are placed under conditionality each month. A similar number leave each month as they find work or come off benefit for other reasons.

<sup>\*</sup>DWP statistical release: <https://www.gov.uk/government/statistics/jobseekers-allowance-and-employment-and-support-allowance-sanctions-decisions-made-to-june-2014>. Rounded numbers are deliberately used as the structure of the DWP database makes placing weight on individual numbers problematic – long term trends are more reliable. For a commentary explaining these numbers see <http://www.cpag.org.uk/david-webster> and [http://www.cpag.org.uk/sites/default/files/uploads/CPAG-14-11-Sanctions-Stats-Briefing-D-Webster-Nov-2014\\_0.pdf](http://www.cpag.org.uk/sites/default/files/uploads/CPAG-14-11-Sanctions-Stats-Briefing-D-Webster-Nov-2014_0.pdf)

# Why Rethink Sanctions?

The main justification for sanctions is that they are intended to improve people's job seeking behaviour. However there is little evidence that the UK sanctions regime has made any positive contribution to people finding work. People who find themselves unemployed usually get a job within a few months. This has always been the case. The introduction of a more severe sanctions regime has not affected this<sup>1</sup>.

Regardless of what outcomes a system may or may not achieve, this can never be justified at the expense of basic issues of justice and human dignity.

## Sanctions are often disproportionate to the mistakes they punish

"Audrey attends the JCP [Jobcentre Plus] every other Thursday at 10am to sign a declaration. On 25.10.12 she fails to attend to sign. On 1.11.12 she attends to sign at her normal time saying she forgot to sign last week as she got muddled with her dates. On 6.11.12 the DM [Decision Maker] determines that Audrey failed without good reason to participate in an interview as arranged to sign a declaration. This is Audrey's first failure. A 4 week sanction is imposed."

*Source: DWP Training Memo DMG 37/12*

This story is from the memo given to Jobcentres and Decision Makers<sup>2</sup> explaining the new sanctions system to the people administering it. In it Audrey "got muddled with her dates" and - despite the fact this is the first time she has made such a mistake - she loses her benefit for a month. She was not given a warning, she was not given a second chance. Even though she was only in

breach of her agreement for seven days, she lost her income for a month.

When people hear shocking stories about benefit sanctions they are often tempted to believe that they must be based on mistakes and that this is not how the system is intended to function. However, punishing minor mistakes extremely harshly is core to the sanctions system. Our society would not tolerate a system where people in employment were subject to such a harsh regime – how can it be reasonable to impose it upon those who are without work?

Withholding benefit for the period for which a person is deemed to have failed to meet specified criteria might in some circumstances be justifiable but, by extending beyond that period, the sanction becomes a means of deliberate punishment. To manipulate benefits payments as a means of coercion flies in the face of the underlying principles of our welfare system .

A person who is not receiving benefit because of a sanction is in every other respect treated like any other claimant. They must continue to obey their Claimant Commitment and attend the Jobcentre or they will receive further sanctions of increasingly long duration. A person who is sanctioned will have to search for a job and attend appointments or interviews without having any money to pay for internet access, phone calls, transport and sometimes food.

While some may argue that removing some benefit is appropriate, it does not seem reasonable or fair to deny someone their income because of a failure to fully comply with requirements. It is important to remember that sanctions are not applied when an individual has become ineligible for their benefit. Moreover, they are expected to continue to comply with the

requirements of the benefits regime throughout its duration.

Magistrates courts in England and Wales, and Sheriff courts in Scotland, punish dishonesty and attacks on other people. The maximum fine they can impose is £10,000. The sanctions system by contrast penalises a variety of often minor infractions in job seeking behaviour. A DWP Decision Maker uses a lower standard of proof and does not meet the person accused – who is not entitled to any legal representation. Despite this the Decision Maker is able to remove benefits for up to three years equating to a maximum penalty of £11,300. A magistrate ensures fines are paid in instalments such that a person is able to meet their basic needs. The sanctions system - which deals with many people who are already living hand to mouth - has no such safeguards.

## People who are recognised as too sick to work are sanctioned

People receiving the sickness and disability benefit ESA are divided into two groups. Around half a million people who are currently judged “unfit for work” by their GP, the Government contractor Atos (soon to be Maximus) and the DWP are currently in the “Work Related Activity Group”. That means that they are expected to attend meetings, courses or work placements, or face sanctions. Analysis for this report, shown on pages 14 and 15, indicates that at least a hundred people receiving ESA as they are too mentally ill to work are nonetheless sanctioned *each day*. This is usually because they are late or do not turn up for meetings with a work programme contractor.

## Hardship payments don't prevent hardship

The sanctions system is often defended with the claim that there is a “well-established” system of hardship payments. But there are significant conditions attached to this which means that many people still face hardship. First there is a rigorous means test. Claimants have to ask friends and relatives for money before being considered for a hardship payment.

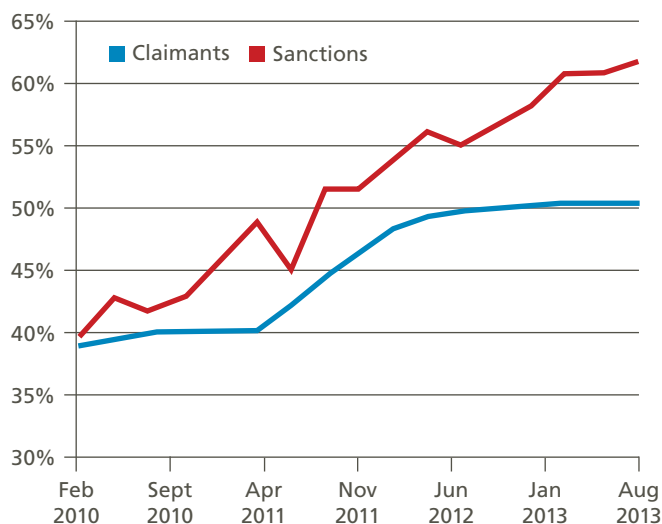
If a person is receiving the new Universal Credit and are sanctioned they are expected to “consider” charitable help such as foodbanks before apply for a hardship payment.<sup>3, 4</sup> Under this new system the payments become loans. They are repayable out of benefit income<sup>5</sup> and these repayment rules mean that most people will need to survive on just 60% of already low benefits until the loan is repaid.

Even if the claimant is able to demonstrate that they cannot afford food due to being sanctioned, they will still not become eligible for a hardship payment for a further two weeks in order to “*not undermine the deterrent effect of sanctions*”<sup>6</sup>. Once eligible to apply it is likely to take a further two weeks before payment actually arrives, although the Department for Work and Pensions which administers the system has stated their intention to reduce this part of the delay.<sup>7</sup>

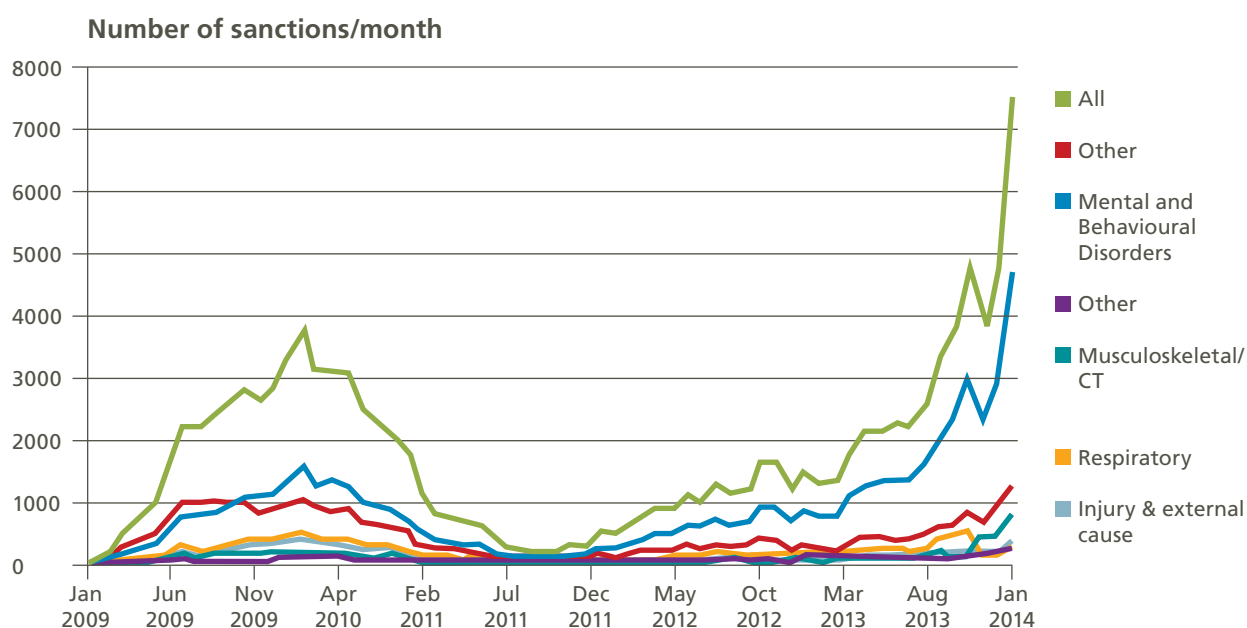
People who are considered vulnerable – eg those with dependent children or a qualifying long term medical condition – will not have to experience the first two week delay before receiving a hardship payment. However if the job seeker has a long term mental health condition they would not qualify for an immediate hardship payment<sup>8</sup>.

# 100 people with severe mental illness sanctioned each day

Advice centres and foodbanks raised concerns with us that there might be a particular problem for people suffering with mental health problems. Research undertaken for this report indicates that **more than 100 people a day who receive benefits because they are unfit for work due to mental health problems are having their benefit sanctioned** [i].



**Graph 1:** The blue line shows the proportion of the ESA population whose primary qualifying condition is classified as "mental and behavioural" conditions. The red line shows the proportion of sanctions given to those with mental and behavioural conditions. The increasing distance between these lines indicates that those with mental health problems are increasingly disproportionately sanctioned.



**Graph 2:** Shows the number of sanctions given out by month. All groups see a large increase in sanctions applied with the latest data showing 4500 sanctions given to those with mental and behavioural problems.



Freedom of Information requests show that in March 2014 – the last month for which data is available - 4,500 people who were judged as unfit to work because of long term mental health problems nonetheless had their sickness and disability benefit removed. Moreover the data shows that as the sanctions regime was tightened those with mental health problems were disproportionately affected.

The most common reason for being sanctioned is that a person has been late or not turned up for a Work Programme appointment. For some the symptoms of their illness can be extreme tiredness, a lack of motivation, or an inability to face social situations. It is therefore not surprising that people experiencing these symptoms can find it very difficult to attend Work Programme appointments. It is a sad fact that the Work Programme continues to deliver many more sanctions than it does jobs. Sanctioning such people is not a measured response to wilful misbehaviour. It is effectively punishing a person for the symptom of an illness, equivalent to sanctioning someone with a broken leg for limping.

The data collected through the Freedom of Information requests refer only to seriously affected individuals whose mental health problems mean they qualify for sickness benefit as certified by their doctor, the DWP's private sector contractor ATOS, in addition to the DWP. People with physical health conditions are also likely to experience mental ill health, but are not included in these figures. Job seekers have mental health problems at almost twice the rate of the general population, with almost a quarter having symptoms of depression or anxiety at any one point in time. DWP data does not allow us to determine if these groups are also disproportionately sanctioned although theory, as well as the experience of practitioners, indicates that this is very likely.[ii]

[i] Full raw data and calculations available in excel format for download and further analysis [www.methodist.org.uk/news-and-events/rethink-sanctions](http://www.methodist.org.uk/news-and-events/rethink-sanctions)

[ii] Health, mental health and wellbeing among recent JSA claimants (DWP 2012)

[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/193392/rrep810.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/193392/rrep810.pdf)

This study gives the most recent figures which are in broad agreement with the body of literature.

## The sanctions system deliberately harms health

This may seem like a shocking accusation, but Department for Work and Pensions guidance for assessing whether someone has a long term medical condition accepts that it is “usual” for the health of a claimant to deteriorate while they are sanctioned, if they have no other resources to fall back on. It states *“It would be usual for a normal healthy adult to suffer some deterioration in their health if they were without (1) essential items, such as food, clothing, heating and accommodation or sufficient money to buy essential items for a period of two weeks...”*<sup>9</sup> The DWP guidance repeatedly acknowledges that the sanctions it administers are expected to cause deterioration in the health of normal healthy adults.

This undermines a foundational principle of the welfare system. It is precisely because of the damage caused by poverty on human well-being that the welfare state exists. We would argue that any human society should be disturbed by a statutory system that deliberately causes harm to another human being. At the heart of our Christian understanding of social justice is that human society should make provision for the weakest and most vulnerable. It is alarming to discover a welfare system that deliberately sets out to exploit a person’s vulnerability in order to achieve control and compliance.

## Six in ten sanctions are overturned if challenged

Sanctions cause major financial disruption to claimants. Individuals who receive benefits payments are often those who have the least capacity to absorb a sudden loss of income. These are the individuals for whom credit is most

difficult to find and who can easily become prey to unscrupulous lenders. It has to be recognised that sanctions which are wrongly applied and later overturned can still have catastrophic effects on those who are subjected to them.

It is a matter of real concern that, when challenged, a significant number of sanctions - six out of ten - are overturned. However the appeals process takes sufficiently long that even if successful it holds no prospect of averting the immediate financial crisis caused by a sanction.

It has already been recognised that sanctions can cause an immediate crisis and a deliberate deterioration in well-being and health. An individual facing such circumstances is likely to make their priority addressing these immediate needs, so their capacity to lodge an appeal is already diminished. Time limits apply, meaning that usually an appeal cannot be lodged after the crisis has subsided.

At the very least, given the huge impact of a sanction, there seems to be a moral obligation to make access to an independent appeal swift and straightforward. Yet the reality is that an increasingly complex process has been introduced with significant obstacles and restrictions.<sup>10</sup>

## Recent policy changes have increased the impact of sanctions

The introduction of Jobseeker’s Allowance in 1996 began the widespread use of sanctions in the UK. Their impact and the problems caused by them have however increased in the past 3 years. This is due in large part to two major changes in policy.

Firstly, legislation was introduced to substantially increase the duration of sanctions. The most

common sanction – for a single failure to attend an appointment - quadrupled in severity from one week's loss of benefit to four weeks' loss of benefits. The punishment for missing a second appointment increased 6-fold from 2 weeks to 13 weeks. The maximum loss of benefit was also increased 6-fold from 26 weeks to 156 weeks or 3 years<sup>11</sup>.

The second change was that the number of sanctions increased greatly, primarily due to a much more vigorous imposition of the existing regulations<sup>12</sup>.

These two changes – an increase in the length of sanctions and an increase in the number of sanctions – have led to an increased impact of sanctions, as demonstrated by these graphs. The first graph below shows this large increase in the number of sanctions. The second graph shows the "severity index": the number of weeks of

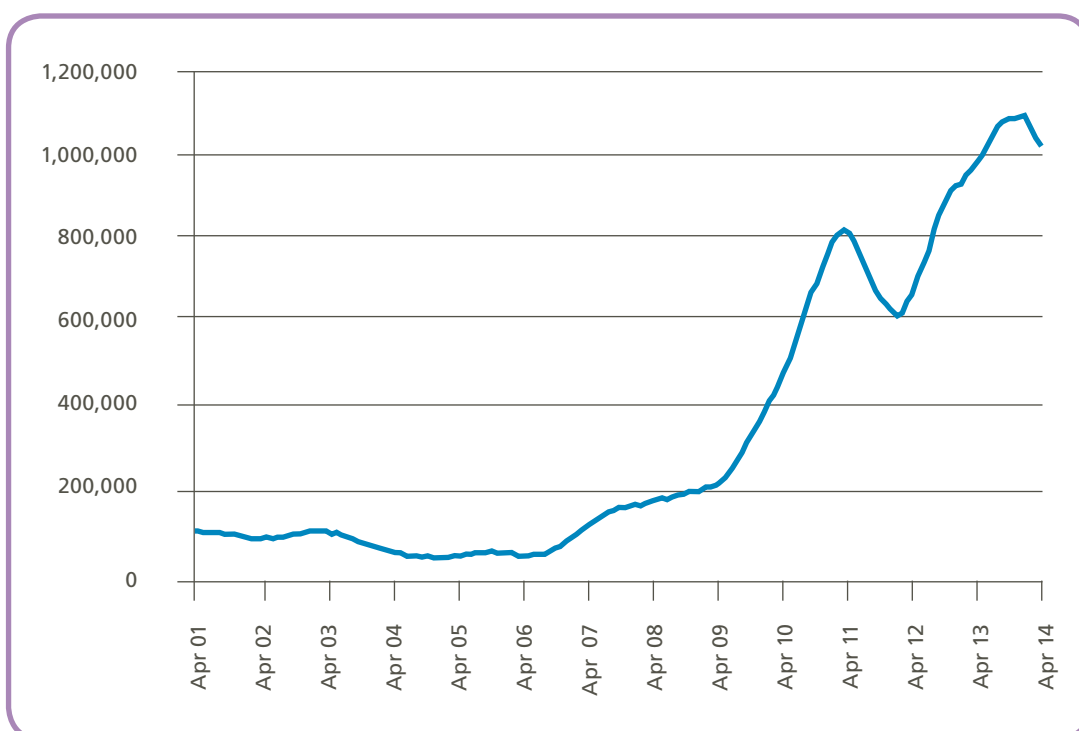
benefit unpaid due to sanctions, which combines the effect of the increased duration of sanctions and the increase in number of sanctions.

A few years ago, only welfare experts and those directly affected knew about benefit sanctions. The severity index suggests why so many more people, including those at church-run foodbanks, have become concerned about the impact of sanctions.

## Sanctions can incentivise targets above human well-being

Despite persistent allegations about the practices of some individual offices<sup>13</sup> it appears extremely unlikely that there is a central target for sanctions. Many of the DWP's targets are however based around benefit off-flow – the rate at which people leave the benefit roll. Increased sanctioning is likely to encourage people to leave

Rolling annual total of ESA and JSA sanctions



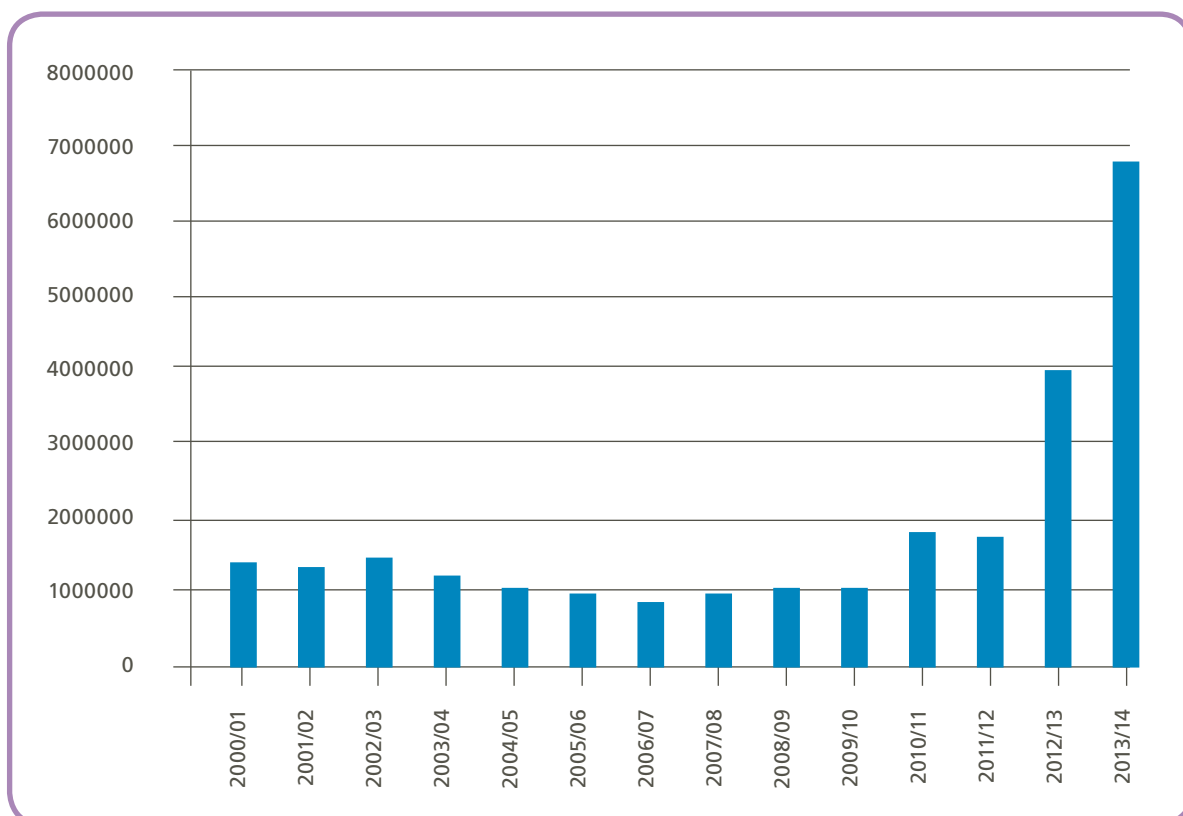
Webster (2014) [www.cpag.org.uk/sites/default/files/uploads/CPAG-14-11-Sanctions-Stats-Briefing-D-Webster-Nov-2014\\_0.pdf](http://www.cpag.org.uk/sites/default/files/uploads/CPAG-14-11-Sanctions-Stats-Briefing-D-Webster-Nov-2014_0.pdf)

benefits and so contributes indirectly to the achievement of off-flow targets.

Some sanctions (called intermediate level sanctions) assist in meeting off-flow targets directly. Before an intermediate sanction is applied the person is first disqualified from benefits and removed from the benefit roll. The person may reapply for benefit before the sanction period is officially imposed. Because the first stage of this rather complicated process removes people from the benefit roll it increases the benefit off-flow that the DWP targets<sup>14</sup>. There has been a 57% rise<sup>15</sup> in these intermediate level sanctions over the past three years.

- There are persistent reports of Jobcentre workers feeling pressured to increase the number of sanctions they impose.<sup>16, 17</sup> One of the authors of this report has spoken to a number of Jobcentre advisers who were finding it difficult to reconcile their Christian faith with what they were required to do in the Jobcentre. The advisers felt that, even by following the rules with integrity, they were required to administer sanctions to people who would be damaged and had done nothing that warranted such a serious punishment. There are also a few reports of advisors setting claimants up to fail in order to keep up their sanction rate<sup>18</sup>. This is a culture in which job seekers are less likely to seek the help and support they need and to which they are entitled.

Number of weeks sanction imposed



Full raw data and calculations available in Excel format for download and further analysis [www.jointpublicissues.org.uk/rethinksanctions](http://www.jointpublicissues.org.uk/rethinksanctions)

# Who is affected by sanctions?

## Sanctions affect those who already have the hardest lives

The sanctions system's aim is to enforce compliance. Research both internationally<sup>19</sup> and in the UK shows that people who are sanctioned are often unable to comply with conditions rather than unwilling<sup>20</sup>. Impediments such as health conditions, caring responsibilities or even simple transport difficulties get in the way of full and unwavering compliance. A single minor mistake or misfortune will often result in a sanction, as Jobcentres are encouraged to refer for a sanction *"first-time every time"*<sup>21</sup>.

UK evidence shows that people with the most difficult lives are the ones who are most likely to receive a sanction. Reports also document the damaging effects of sanctions on the most vulnerable - young people not in education, employment and training<sup>22</sup>, care leavers<sup>23</sup>, people who are homeless<sup>24</sup>, people with long term physical and mental health problems<sup>25</sup>, single parents<sup>26</sup>, those experiencing domestic violence<sup>27</sup> and others. Multiple reports from the Citizens Advice Bureau and other advice services make for similar reading: the people who are worst affected are those who are least able to jump through the hoops<sup>28</sup>. Making it difficult for vulnerable people to access support designed to help them people is simply perverse.<sup>29, 30</sup> See pages 14 and 15.

## Sanctions and Children

Freedom of Information requests gathered for this report indicate that last year around 100,000 children were affected by sanctions in Great Britain, with 6,500 of the affected children living in Scotland. It is important to recognise that sanctions reduce the whole family's income and that children – who cannot be held responsible

for the compliance of their parents - are adversely affected<sup>31</sup>.

## Stigma, sanctions and suspicion

If sanctions hit hardest those who already have the most difficult lives, then we need to take particularly seriously claims that the benefit system in general, and the sanctions system in particular, stigmatises those whom the system is designed to protect. Some people describe experiencing a *"culture of contempt"*<sup>32</sup>, whilst research indicates that the most stigmatising thing about living in poverty was interacting with statutory institutions, particularly the benefits system<sup>33</sup>.

The first thing an unemployed person must do is sign a Claimant Commitment. The DWP's model document is just three pages long but contains nine threats of sanction as well as one threat of a fixed penalty fine and one of imprisonment<sup>34</sup>. The document is 961 words long; 503 of those words are used to explain threats.<sup>35</sup> The commitment is one-sided and contains no reciprocal commitments to support the claimant nor are there consequences for the DWP even if it fails to pay benefits on time.

The Claimant Commitment sets the tone of the relationship as one where it is assumed that the claimant needs to be threatened into behaving responsibly. Benefit is paid because people are ill or unemployed. Neither of these is a moral failing. Neither of these are reason to assume a person needs to be threatened. The majority of unemployed people get into work within a few months and this has been the case whether sanctions existed or not. As a society we recognise that the constant use of threat is not a good way of motivating people<sup>36</sup> and it would not be tolerated in the workplace. So why is it

applied to the people who have fallen on hard times?

Throughout this report our recurring theme is that all are made in the image of God and deserve to be treated with dignity and respect. Our concern is that this dignity is not afforded to many who need the support of the benefit system. Our faith calls us to challenge any system which automatically treats people with suspicion and threats - a system that can even encourage contempt. The sanctions system obligates Jobcentre staff, however much they wish to help people who have fallen on hard times,

to administer sometimes harsh and damaging policies.

Sarah\* worked as a charity project coordinator until she was laid off at the end of July 2013 due to funding cuts. Her husband who also worked in the charity sector had been laid off a year ago also due to funding cuts. She was asked to apply for eight jobs a week, but always applied for more as she was keen to get back to work.

One week she was unable to fill out her job search on the computer because there were workmen fixing her roof and she had to stay in the house. Instead she filled out her search in a booklet. She contacted the jobcentre to explain, and ask if they needed any proof to support the booklet as she had emails from prospective employers and had even attended interviews. They said they didn't need anything from her.

When Sarah went to collect her money she was told she had been sanctioned. However, she did not receive the letter telling her she had been sanctioned so was unable to apply for discretionary funds to help support her and her family.

Sarah successfully appealed the decision, though she says that Jobcentre Plus staff repeatedly tried to discourage her from doing so.

"Usually I'm quite a confident person, but they crush you. I found the experience at the Jobcentre Plus so awful I'd rather starve than go back there again. They should properly train the people in the job centre to treat us like people ... That whole attitude that people are scroungers is terrible, there's just no respect."

*\* Not her real name*

*Source: Church Action on Poverty*



# Do sanctions get people into work?

The sanctions system comes at substantial cost. There are administrative costs and importantly there are costs in terms of increased hardship for benefit claimants. The intended payoff is improved employment outcomes for benefit claimants but there is currently no evidence that the UK sanctions system delivers this.

## Fewer eligible people apply for benefits

Over a million people are unemployed and looking for work but not claiming benefits. This represents an unusually high proportion by international standards and has risen significantly since the mid 1990s.<sup>38</sup> This coincides with a toughening of welfare policy, including the extension of sanctions.

Sanction regimes reduce the number of people applying for benefits. People's experience of the process, illustrated by the concerns highlighted in previous sections, is off-putting. The increasingly complicated set of conditions causes many people to make the judgement that rather than assisting in finding work it would be a distraction.<sup>39</sup>

## More people leave benefits – but not to work

Recent UK data indicates that for every 100 sanctions imposed, 42 people will leave benefits but only 7 will enter work. There is not a clear picture of how the remaining 35 who leave benefit manage.<sup>40</sup> However it is clear that many move still further away from finding work. Charities report that large numbers of people who both want and need support to get back into work will not consider approaching a Jobcentre. This is because of its association with

compliance and punishment rather than support and assistance.<sup>41</sup>

There is also important evidence that those who are pressured by the threat of sanction to get a job very quickly do not do as well as those given more flexibility. It suggests that people get lower paying jobs that are less likely to be sustained, and they are more likely to find themselves back on benefits than those who are given more time to find the right employment<sup>42</sup>.

## Increasing the severity of sanctions does not make them more effective

Recent reforms to the UK sanctions regime have their origin in the 2008 Gregg report.<sup>43</sup> This report recommended a five-point scale of sanctions, starting with a warning and escalating up to a maximum of one month's loss of benefit. It also recognised that such a loss of benefit was a serious matter and should only occur after the claimant had access to a representative to help them present their case. There were expected to be less than 1000 such one-month sanctions per year. Last year there were 880,000 sanctions of one month or more. No-one has access to a representative, and the maximum penalty is 36 months.

The OECD<sup>44</sup> recently published a report comparing sanctions systems in developed countries. It classified as "severe" any system which imposed sanctions for 14 weeks or more for repeated failure to take up employment. In the UK the maximum penalty is more than ten times greater.

It is tempting to think that if a one week sanction deters a person from missing their appointments then a four week sanction will deter them four times as much. There is no evidence to support this. For example the analysis of the New Deal

for Young People in the early 2000s showed that longer sanctions caused claimants to become disengaged and less likely to accept help<sup>45</sup>.

Possibly the most influential study showing sanctions to have a positive effect in moving people into work used data collected in the Netherlands in the 1990s<sup>46</sup>. The main sanction used was a penalty of just 20% of the value of a person's benefit for one or two months. This is a long way from the UK system where **all** benefit is removed and for potentially a much longer period. No research has ever shown positive job outcomes of a sanction system that is as severe as the UK's, nor has any study looked at the full cost of a sanctions system, especially the cost in terms of increased human hardship.

## Could sanctions get people into work?

From the UK there is some anecdotal evidence from Work Programme providers that occasionally sanctions can be useful when working with people who cannot otherwise be persuaded to co-operate. But these people represent a minute fraction of those who are looking for work, and don't justify a system which extends the threat of sanctions to over 200,000 new people each month, and which imposes 1,000,000 sanctions a year.

At the heart of our concerns is a fundamental question. What is the aim of our sanctions system? If it is simply to reduce the number of Jobseeker's Allowance or Employment and Support Allowance claimants, then it could be argued to work very well. If this is the aim, why would our society choose to have out-of-work benefits at all? If we want a population that is engaged in the labour market, doing fulfilling, sustainable, economically viable jobs, this system

appears to do more harm than good. If our aim is also to avoid hardship, then there is unequivocal evidence that the UK sanctions system actually causes harm.

The Jobcentre sent Josh\* (aged 19) a letter about an appointment he was required to attend, but they sent it to the wrong address, despite Josh informing them that he had moved.

Josh's adviser rang him and informed him that he had been sanctioned for six months due to the missed appointment. Josh explained he had not received the letter and that he had provided his new address with plenty of notice. His adviser explained that he could appeal against the decision and that he may be eligible for a hardship payment. He did appeal but was not successful nor did he receive a hardship payment.

Josh had no family that he could turn to for help. He used a local church food bank but he was unable to pay any of his bills which caused arguments between him and the friend with whom he lived, who asked him to move out.

*\* Not his real name.  
Source: Thrive Teeside*

# Misunderstanding the sanctions system

The debate around sanctions is often hindered because the subject appears complex and there are many misconceptions about what sanctions are and what they are intended to discourage. Below are four common examples.

## Misunderstanding One:

There have always been sanctions

*"Sanctions have been part of our social security system since its foundation"*

Rachel Reeves MP,  
Shadow Secretary of State (2014)<sup>47</sup>

Sanctions are penalties lasting a fixed length of time imposed on people who have not behaved as the Jobcentre directed. This practice was first introduced for groups of long term unemployed in 1986<sup>48</sup>, for all job seekers in 1996<sup>49</sup>, for lone parents receiving Income Support in 2001 and for some sick and disabled people in 2008<sup>50</sup>. What has always been the case is that people who did not meet very basic conditions such as being available for work could be removed from the benefit roll. However, unlike sanctions, there was no punishment intended - therefore a person was able to reapply for benefit as soon as they became available for work.

## Misunderstanding Two:

Sanctions punish fraud

*"What would you say, just as an example, to a group of people who work in the black economy but, at the same time, claim benefits, such as Jobseeker's Allowance? Do you not think that they should perhaps be sanctioned?"*

Graham Evans MP at the House  
of Commons Select Committee enquiry  
into Benefit Sanctions (2015).<sup>51</sup>

Fraud as described by Mr Evans MP is punished through the courts, and not by sanctions. The

failure that is punished by a sanction is not obeying Jobcentre or Work Programme officials. Conflating fraud with sanctions perpetuates the myth that people who are sanctioned are dishonest and cheating the system.

## Misunderstanding Three:

You only get sanctioned for deliberately doing something wrong

*"The people who get sanctions are wilfully rejecting support for no good reason"*

Esther McVey MP, Employment  
Minister, (2013)<sup>52</sup>

People who are sanctioned are portrayed in many of the policy documents and public statements about sanctions as "wilfully" having taken an action that should be punished. Freedom of Information<sup>53</sup> requests to the DWP have confirmed that there is no requirement in the law or regulation for an action to be either wilful or negligent to warrant a sanction. There is an overwhelming body of evidence to say that a large proportion and possibly the majority of sanctions are given out for actions that were unavoidable or inadvertent.

## Misunderstanding Four:

Only a small number of people are sanctioned

*"The reality is, sanctions are a necessary part of the benefits system but they are used as a last resort in a tiny minority of cases where people don't play by the rules"*

DWP Spokesperson (2015)<sup>54</sup>

It is difficult to reconcile the phrase "tiny minority" with the fact that 18% of all people receiving Jobseeker's Allowance last year received a sanction. Looking over the past 5 years that number rises to 22%.<sup>55</sup>

# The future: sanctioning working people?

Ours is not the only voice to express concerns about sanctions. It is clear that large parts of civil society are increasingly alarmed about their impact. At the very moment we need to stop and rethink sanctions, the system is being expanded to an entirely new group of people.

Currently only those out of work or working very few hours receive benefits that fall under the threat of sanctions. These include about 500,000 people who receive the sickness and disability benefit ESA and have been placed in the “Work Related Activity Group” and around 900,000 people who receive Jobseeker’s Allowance.

A significant expansion of sanctions and conditionality is imminent. In April this year the first trial of conditionality for working people needing the support of the benefits system will begin. Over the next few years Universal Credit (UC) will be rolled out which will combine six benefits into one. Alongside those who are out of work, those earning below a threshold level – normally set at £11,300<sup>57</sup>, and receiving UC, will become subject to conditionality and sanctions. The Resolution Foundation estimates this measure will bring an additional 1,200,000 people into conditionality.<sup>58</sup>

Details of how this will operate have not yet been published, however it has been confirmed that, for the first time, Housing Benefit will be subject to sanction<sup>59</sup>. The legal framework allows people to be instructed to do things like change jobs, attend training, or increase hours in order to earn more than the threshold income. Sanctions can then be imposed on those who do not comply with the requirements.

This means that people who are already in work, ie the ‘working poor’, may become subject to sanctions unless they work for longer hours, find additional jobs, or find jobs which pay more money.

No other country in the world has imposed a widespread sanctions regime on low-paid or part-time workers. There is no evidence that doing so will have a positive effect either on individuals or the economy. Moreover, the idea that the income of the poorest working people should be dependent on complying with detailed requirements from a Jobcentre or private contractor, or that they may be required to leave a job where they are flourishing in order to take a job that moves them closer to the £13,500 threshold, certainly deserves a great deal of scrutiny.

Not only is this an expansion of sanctions, this is a move into uncharted territory. This is why the call for a rethink of sanctions is becoming increasingly urgent.

“We had a number of customers who had been sanctioned including one guy who had been sanctioned for being late for his appointment at the job centre because the queue was so long it took him to past his appointment time to be seen. He was sanctioned even though he had arrived at the job centre in plenty of time.”

*Source: Highbridge and Burnham on Sea Foodbank*

# Conclusion and Recommendations

It was the stories of churches and foodbanks witnessing increasing numbers of people in hardship as a result of receiving benefit sanctions that prompted this report. The evidence we went on to collect indicates these are not isolated examples and that the problems have indeed increased dramatically over the past three years.

While it is tempting to suggest that this is the result of the regime being misapplied, such hardship occurs even when the system is used exactly as intended. The design of the sanctions system includes both the threat and the use of hunger as an instrument of policy.

It is unacceptable for anyone to be punished such that “it is usual for their health to deteriorate”. The criminal justice system accepts this principle. Neither fines nor imprisonment are allowed to prevent a person from meeting their basic needs. There are no such safeguards in the sanctions system.

The evidence also points to this being a system that is disproportionately punitive towards those who already have the most difficult lives. New data indicates that over one hundred people a day who have been recognised as unfit for work due to mental ill-health are sanctioned. Other groups such as the physically ill, lone parents, homeless people, care leavers and others are also disproportionately affected. These are the people the benefit system is supposed to support – it is simply unacceptable to dismiss their needs on the grounds that they have failed to play by what may for them be unachievable rules. It is even more concerning that 100,000 children, who are wholly blameless, are affected by sanctions.

In short this is a system that is fundamentally broken. It is time to rethink sanctions.

## Recommendations

The current sanctions system hurts those the benefits system is supposed to be helping, often by punishing people for their frailties or their misfortune. It also fails in its goal of getting people into work, in fact for many it has the opposite effect.

- It is never justifiable to punish people with prolonged hunger. Therefore, as a matter of urgency, the two week waiting period before “non-vulnerable” people can receive a hardship payment should be removed. As the DWP itself recognises this rule causes deterioration in health, this is sufficient to warrant immediate action.
- A full and independent review should be undertaken examining evidence for any positive effects on employment outcomes due to the sanctions system, alongside evidence of both the human and financial costs of sanctioning.
- In the interim, sanctions should be suspended for families with children, and for people suffering from mental ill health

The relentless focus on conditionality has led to claimants feeling mistrusted and under suspicion simply because they have the misfortune of not currently having work. A repeated message is that this has changed the culture in Jobcentres, undermining the human dignity of both the claimant and the official. As Christian people this is a matter of particular concern as it flies in the face of our understanding of human value. Therefore we would like to endorse a main recommendation of the Scottish Parliament’s Welfare Reform Committee: that there should be *“a sea change in the culture of the policy from punitive to supportive”*<sup>60</sup>.

# Appendix 1

## The process of getting a sanction

### SETTING THE RULES: THE CLAIMANT COMMITMENT

- Every person claiming JSA must sign a Claimant Commitment
- It is a detailed list of tasks to be completed each week in order to avoid being sanctioned.
- Normally specifies activities that will take 35 hours a week
- These can include: Number of job applications, time spent online searching for jobs, door-to-door enquiries; additional courses; and signing-on appointments.
- There are as many as 30-40 activities, failure to comply with any one can result in a sanction

*The commitment is one sided – no specific commitments are made to the claimant*

### REFERRAL FOR A SANCTION

- Non-compliance with the Claimant Commitment or other directions from Jobcentre will lead to a referral
- Jobcentre officials have some discretion but are instructed to refer for sanction “first time and every time” they suspect non-compliance
- Work Programme providers have even less flexibility and must refer even when they are aware of exceptional circumstances.

*In around a third of cases payment of the benefit is suspended at this stage\*.*

### DWP DECISION MAKER MAKES JUDGEMENT

Looks at evidence, can seek more evidence from either party if they view it necessary and has 4 options for an outcome:

- Adverse decision - person is sanctioned (last year ESA 26%, JSA 46%)
- Non-adverse decision - no sanction applied (last year ESA 28%, JSA 24%)
- Cancelled – the referral was a bureaucratic error (last year ESA 46%, JSA 25%)
- Reserved – the person is no longer claiming benefit so cannot be sanctioned

*The issues considered are did the person comply with the Jobcentre and if not did they have “Good Reason” not to. “Good Reason” is not defined and decisions do not set a precedent, meaning actions can be defined as good reason one day, but not the next. It is clear from the DM’s Guide the phrase is interpreted very tightly.*

### REMOVAL OF BENEFITS

- After an adverse decision benefits are stopped as soon as possible to “ensure that claimants see the consequences of their actions or inactions sooner.”
- This leaves little time to plan for a period with no income.
- Many report that the first they knew of a sanction is when they were unable to draw money at the cash machine.

\* Decision Makers Guide: Volume 6 Chapter 35 Para 35099 and Appendix 6  
[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/391572/dmgch35.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/391572/dmgch35.pdf) (Accessed 02 January 2015)



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- 10 D Webster (2014) personal communication and [www.cpag.org.uk/sites/default/files/uploads/CPAG-14-11-Sanctions-Stats-Briefing-D-Webster-Nov-2014\\_0.pdf](http://www.cpag.org.uk/sites/default/files/uploads/CPAG-14-11-Sanctions-Stats-Briefing-D-Webster-Nov-2014_0.pdf) indicating 60% overturn rate over the past year.  
[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/387429/stats\\_summary\\_nov14\\_final\\_v1.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/387429/stats_summary_nov14_final_v1.pdf) This gives a 51% overturn rate from October 12 onwards
- 11 JSA: overview of revised Sanctions Regime [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/238839/jsa-overview-of-revised-sanctions-regime.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/238839/jsa-overview-of-revised-sanctions-regime.pdf) (the document contains one important error – it states 3 year sanctions are only imposed for deliberate actions. Actions do not need to be deliberate)
- 12 Remarks by the Head of Jobcentre Plus to the Scottish Welfare Committee give an insight into the Department's changing thinking around sanctions regulations. [www.parliament.uk/documents/PCS%20\(SAN0161\)%20300115.pdf](http://www.parliament.uk/documents/PCS%20(SAN0161)%20300115.pdf)
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Produced by the Joint Public Issues Team: the Baptist Union of Great Britain, Church of Scotland, Methodist Church and United Reformed Church working together on behalf of the Baptist Union of Great Britain, Church Action on Poverty, the Methodist Church, the Church of Scotland, the United Reformed Church and the Church in Wales.

With thanks to: Andy Buck and the team at Sheffield Citizens Advice and Law Centre, Shona Alexander and the team at Newcastle Citizens Advice, Coventry Law Centre, Fiona Weir and the team at Gingerbread, Elaine Downie at the Poverty Truth Commission, Dr David Webster, Ian Childs and the team at Medway Foodbank, Revd Sally Coleman, Claire Bennett, Tom Pollard and the team at Mind, Thrive Teeside, Jennifer Herrera and the team at Acts 435, Catherine Hale

Thanks do not imply endorsement of the full text.

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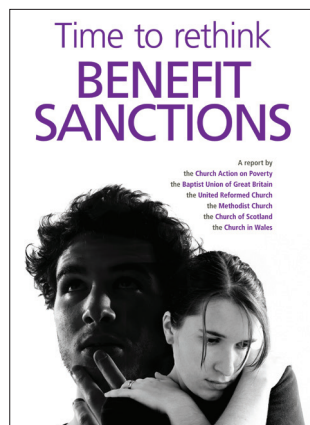
March 2015



The **Methodist Church** 



The Church of Scotland



Design and production: Methodist Publishing,  
on behalf of the Methodist Church in Britain.

Registered charity no. 1132208

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