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Foreword



Advice NI, the membership organisation for independent advice centres across Northern Ireland (NI), has been heavily involved in the welfare reform debate as far back as 'New Labour's' first green paper on social security reform, published in 1998, entitled *New Ambitions for our Country: A New Contract for Welfare* to the current Welfare Reform Bill which failed to pass Final Stage in the NI Assembly in May 2015.

In setting the scene it must be remembered that recession, job loss, reduced working hours, cuts to benefits and tax credits and rising food prices have all served to place tremendous pressure on household budgets. As a result of these pressures, demand for advice services has soared over recent years. Advice NI, which has over 60 member organisations across NI, received 270,710 requests for help last year. The bulk of these enquiries were social security related and many came from people who had not previously interacted with the social security system. Our advisers have also represented at 3,182 social security tribunals last year the bulk of which related to Disability Living Allowance and Employment & Support Allowance. Debt problems have also grown significantly. Since August 2012 our Debt Action NI service has helped 16,591 clients with £226.4 million of debt covering 41,019 debts.

Moving to welfare reform, the Welfare Reform Bill in Great Britain (GB) received Royal Assent at Westminster on 8th March 2012, has generated much debate and controversy – in GB for the impact of measures including harsher benefit sanctions; and in NI most notably in relation to parity issues in terms of how we can best 'get it right' for the unique circumstances of NI.

Our own Minister for Social Development has achieved some significant concessions from Westminster such as flexibility over fortnightly benefit payments and housing costs continuing to be paid to landlords. The Minister also acknowledged the difficulties presented by the sanctions proposals in the Bill. These developments are to be welcomed but much more will be needed. More must be done in terms of protecting the most vulnerable who will be worst affected by welfare reform generally and the sanctions issue in particular.

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This paper focuses on the issue of benefit sanctions. Sanctions are now used much more frequently than in the past within the benefits system. The duration and severity of sanctions has also increased. The implementation of the Welfare Reform Act in GB allows us to see the impact a harsher benefits sanctions regime has had on benefit claimants. The following information sources represent just a fraction of the material generated about the situation in relation to sanctions:

- Independent review of the operation of Jobseeker's Allowance sanctions validated by the Jobseekers Act 2013 (Oakley Review)¹;
- Commons Work and Pensions Committee: Benefit sanctions policy beyond the Oakley Review²;
- More than 1.75m sanctions applied to jobseeker's allowance claimants since new regime began in GB in October 2012³;
- Scottish Parliament's Welfare Reform Committee: Interim Report on the New Benefit Sanctions Regime: Tough Love or Tough Luck?⁴
- More than 60 per cent of ESA claimants sanctioned in Scotland between December 2012 and August 2014 had mental health problems⁵;
- Growth in use of food banks directly linked to welfare cuts and sanctions⁶;

Advice NI is aware of issues besetting the sanctions regime as it currently exists in NI and which are outlined in this paper. We have also noted the issues plaguing the harsher regime in GB and which may at some point impact upon claimants here. The purpose of producing this paper is to (i) highlight systemic issues which can be reviewed and addressed now; & (ii) recommend a forward-looking approach to the issue of sanctions which is tailored towards circumstances in NI and which protects the vulnerable.


Bob Stronge



Background

Advice NI has become increasingly concerned about the impact of benefit sanctions as applied by Job Seekers Allowance (JSA) decision makers based on information relating to claimants participation on the Steps to Success (S2S)⁷ employment programme. The S2S programme is the responsibility of the Department for Employment and Learning (DEL) and is delivered by three Lead Contractors across Northern Ireland (Ingeus for the Belfast Region; EOS for the Northern Region; Reed in Partnership for the Southern Region) with support from local providers. The programme was introduced under Jobseeker's Allowance (Schemes for Assisting Persons to Obtain Employment) Regulations (Northern Ireland) 2014 and is designed to assist and support claimants who are unemployed to find and sustain employment.

Participation on Steps 2 Success is a mandatory requirement for all Jobseeker's Allowance (JSA) claimants who are:

- Aged between 18 and 24 and have been claiming JSA for 9 months or more;
- Aged 25 and over and have been claiming for 12 months or more.

The claimant responsibilities within Steps 2 Success include:

- A requirement to continue to sign every fortnight and meet JSA conditionality;
- A requirement to engage and complete all activities as directed within the S2S programme (including attending interviews, taking phone calls, completing activities).

Sanctions for failing to take part in Steps 2 Success, including failure to attend a Steps 2 Success Referral Interview with an employment service Adviser without "good cause", will incur the following fixed period suspensions:

- 2 weeks for a first failure to meet S2S requirements;
- 4 weeks for a second failure to meet S2S requirements within 12 months of a previous S2S sanction; OR
- 26 weeks for a third or subsequent failure to meet the provision requirements incurred within 12 months of the previous S2S sanction.



Job Seekers Allowance Sanctions Legislation

The application of sanctions in Northern Ireland is defined within The Jobseekers (Northern Ireland) Order 1995 (Article 21), which sets out the circumstances in which JSA is not payable, specifically⁸:

21. –

(5) The claimant -

- (a) has, without good cause, refused or failed to carry out any jobseeker's direction which was reasonable, having regard to his circumstances,
- (b) has, without good cause—
 - (i) neglected to avail himself of a reasonable opportunity of a place on a training scheme or employment programme;
 - (ii) after a place on such a scheme or programme has been notified to him by an employment officer as vacant or about to become vacant, refused or failed to apply for it or to accept it when offered to him;
 - (iii) given up a place on such a scheme or programme; or
 - (iv) failed to attend such a scheme or programme on which he has been given a place; or
- (c) has lost his place on such a scheme or programme through misconduct.

(6) The claimant -

- (a) has lost his employment as an employed earner through misconduct;
- (b) has voluntarily left such employment without just cause;
- (c) has, without good cause, after a situation in any employment has been notified to him by an employment officer as vacant or about to become vacant, refused or failed to apply for it or to accept it when offered to him; or
- (d) has, without good cause, neglected to avail himself of a reasonable opportunity of employment.

Job Seekers Allowance Sanctions Process

Where a claimant fails, without good cause, to carry out an activity within the S2S employment programme the Lead Contractor delivering the S2S programme must make a referral (using the 'S2S 9' form) to the Employment Service Adviser in DEL including details of the activity, the date and time it was due to take place.

The Employment Service Adviser will forward a copy of the S2S 9 to Job Seekers Allowance (JSA) decision makers within the Social Security Agency who will notify the claimant on form S2S 37 (Fail to Participate) to give their reasons for non-attendance on the S2S programme by attending the J&BO/Job Centre or contacting their Employment Service Adviser by telephone within 5 working days.

When the claimant contacts the J&BO/Job Centre, the Employment Service Adviser should take a statement from them on form S2S4 FP (Steps 2 Success Statement Form: Non-Participation on Steps 2 Success) detailing their reasons for failing to participate in Steps 2 Success.

The Employment Service Adviser should then complete a JS 567 form (Decision Referral Form) forward this to the JSA Decision Maker immediately, who will consider the facts of the case and any potential sanction.

In circumstances where the claimant fails to contact the J&BO/Job Centre within 5 working days to give their reasons for non-participation, the Employment Service Adviser will inform the JSA Decision Maker by completing form S2S4(Fail to Participate).

Where a referral for potential sanction has been made the JSA Decision Maker will take into account all of the circumstances and evidence presented and will determine whether or not there was good reason for failing to participate.

Impact on Housing Benefit

Northern Ireland Housing Executive (NIHE) which administer Housing Benefit payments in Northern Ireland receive a vast number of automated notifications (Over 3 million in 2014/15) from the Social Security Agency via the 'ATLAS' system ('Automated Transfers to Local Authority Systems'). These notifications can be generated when any change (no matter how significant / insignificant) is made on the system of the particular benefit in payment, whether this be Job Seekers Allowance, Disability Living Allowance, tax credits or any other benefit.

Therefore any decision to impose a sanction on a claimant's JSA will result in notification being forwarded to NIHE and may result in suspension of Housing Benefit.

This problem has been raised in the House of Commons where a Question was asked regarding what safeguards are in place to ensure that a person who loses their Employment and Support Allowance (ESA) as a result of a sanction will not also lose their housing benefit because of a misunderstanding by the local authority. Minister for Employment, Ester McVey, responded by saying⁹ :

"Following Matthew Oakley's report we have implemented a number of improvements to communications to ensure that claimants understand the sanctions process and can take the necessary action. An investigation of housing benefit with local authorities showed that the IT solution is working to specification and correct notifications are being sent. As a safeguard we have also improved guidance to ensure that staff advise all claimants, when sanctioned, to inform their local authority so that their housing benefit is not inadvertently stopped. We will continue to monitor the position in cooperation with local authorities."

This appeared to contradict previous DWP guidance (HB Bulletin G8/2014). Published on 14 August 2014, this guidance stated that, when changes were made to the Electronic Transfer of Data notifications for the introduction of ESA, the system was also changed to send notifications of sanctions imposed on income-based JSA and income-related ESA claimants, and that –

'Although the majority of these notifications have no impact on the housing benefit entitlement, claims are being suspended while further enquiries are made. This in turn is creating additional work for the local authority as they have to check every notification to see whether the claimant is no longer entitled to benefit or benefit has ceased due to a sanction.'

The Guidance went on to say that DWP had introduced the interim solution of instructing staff to advise claimants to contact their local authority when sanctioned, and that a long term IT solution to 'inhibit the sanction notifications being created at source' would be introduced from Autumn 2014. This exchange highlights the wider serious issue of sanctions and their knock-on impact on Housing Benefit. Advice NI understands that there can be variation in the content of the notification sent by the particular benefit in payment to Housing Benefit in a sanction case which in turn can cause the Housing Benefit award to be unnecessarily suspended.

Significantly, more recent HB guidance issued by DWP on 30th September 2015 confirms that entitlement to housing benefit should continue without interruption during a sanction. Urgent HB Bulletin U1/2015 highlights - in response to concerns raised by customer representative groups - that when a sanction is applied entitlement to benefits will continue but will not be payable for a fixed period of time, and that, therefore, claimants who are receiving passported housing benefit should continue to do so without interruption. The notification from the Automated Transfer to Local Authority System (ATLAS) should display three awards

- Award No 1 - current award with award amount and an end date;
- Award No 2 - sanctioned period - the award amount for this award will still display the actual amount; however the award will be labelled 'Sanctioned'; and
- Award No 3 - a further award will follow this which will be £0.00 pending an entitlement review.

Stressing that no action should be taken on a housing benefit claim as a result of a sanction, the guidance further advises that, once the review action (after the sanctioned period) is undertaken by the DWP, the award is usually reinstated unless there has been a change in the claimant's circumstances.

The problem in Northern Ireland appears to be that sanctions notifications from SSA to HB are not always in the correct format – all too often the notification simply states that the JSA has stopped which means that Housing Benefit staff have no option but to also (incorrectly) suspend the Housing Benefit as the notification does not specify that it is sanctions related.

Scale of the Issue

The scale of the issue was highlighted in the response to a written Assembly Question¹⁰ (Friday 5th June 2015). The Minister for Social Development responded to Steven Agnew MLA with the following information:

- For the period 1.04.12 to 31.01.15, a total of 24,555 Job Seekers Allowance sanctions were imposed;
- For the period 1.04.12 to 31.01.15, a total of 4,132 Job Seekers Allowance sanctions were imposed specifically in relation to the Jobseekers (Northern Ireland) Order 1995 (Article 21) (5) refusal to take up / failure to attend / lost due to misconduct their place on the employment programme.

Furthermore in terms of the current and future impact of the issue of sanctions, it is worth noting that according to the NI Benefits Statistics Summary (May 2015)¹¹ the number of Job Seeker's Allowance claimants was 41,150. And in terms of future changes, the number of Employment and Support Allowance claimants was 118, 140 (of which 19,180 were in the Work Related Activity Group).

Further information on the current sanctions regime – as operational in GB – can be found on the Department for Work & Pensions website¹², including official statistical information¹³ highlighting that 1.75m sanctions had been applied to jobseeker's allowance claimants since October 2012 and that almost 67,000 sanctions had been applied to employment and support allowance claimants under the new regime - and of these -

- 10,548 were applied for failure to attend a mandatory interview; and
- 56,304 were applied for failure to participate in work related activity.

Numerous other Briefing Papers have been written on the GB situation for example CPAG¹⁴.



Current Impact

Current Impact

A claimant's story

Northern Ireland: *JSA claimant contacted Advice NI in a state of distress after receiving a letter dated Friday 29th May which arrived on Saturday 30th May stating that his Job Seekers Allowance was not payable from 30th May to 12th June. Claimant said that he was in a state of distress all weekend, that he remembered a mix-up regarding a single Steps to Success appointment in February, that he thought that his explanation had been accepted and that he did not know how he would survive as he had no money and no savings. The claimant then received a letter dated Friday 5th June which arrived on Saturday 6th June stating that his Housing Benefit was suspended because "your entitlement to JSA is due to end on the 12/6/15". JSA claimant described his life as being "in tatters and I now live in constant fear of what will happen next".*

Great Britain: *"I started on Jobseekers Allowance in mid-December last year. I got sanctioned on 29 January because I was 15 minutes late for my appointment. I was homeless at the time, and on that day I was moving from a centre in Dundee up to the Salvation Army. The sanction made me totally broke. I have epilepsy and one of the rules of my tablets is to take them with meals, never on an empty stomach. When I was sanctioned, that all went haywire. Because I didn't have money for food, I was taking fits left, right and centre. I was relying on handouts from my pals, family and foodbanks - it was a nightmare. It feels like if you make any mistake you're going to get sanctioned."*

Media interview on sanctions issue

[Link to interview by Kevin Higgins, Head of Policy Advice NI for BBC Radio Ulster](#)

Other Impacts

It is important to highlight a clear view that sanctions as envisaged under welfare reform are more punitive and harsher than what is currently in place. Impacts such as hunger, stress, increased risk of suicide¹⁵, increased indebtedness, increased use of illegal money lending and crime are all potential consequences of the sanctions regime.

There have also been concerns expressed that staff in DWP in GB may be under pressure to reach targets in terms of imposing sanctions; some claimants serving the sanction may not count towards the claimant count; and much debate as to how claimants survive during a sanctions period.

A number of reports have been published in Northern Ireland in relation to the use of food banks, all of which highlight income adequacy as a key driver of food poverty in Northern Ireland:

(i) Advice NI: Turning the Tide: The Growth of Foodbanks in NI¹⁶:

(ii) Enough is Enough: Food Poverty Scoping Exercise¹⁷:

"Our research highlights the increasing frequency at which people are presenting to front-line services at a crisis point where they cannot afford to buy food. The most common reason behind a client's need for food support is low income. This was followed by benefit delays, cuts and sanctions."

(iii) DSD report: An insight into Foodbanks in Northern Ireland¹⁸:

“Good Cause”

“Good Cause”

Good cause is not defined in legislation. Decision makers must take account of all the circumstances of the case including in particular the claimant’s physical or mental health condition and their reasons for any failure to participate when considering whether to impose a sanction. DSD’s Decision Makers Guide (DMG) (Job Seekers Allowance - Steps to Success)¹⁹ provides further information on the issue of sanctions and “good cause”.

Specifically this guidance refers to Commissioners Decision CS 371/49(KL)²⁰:

“ Good cause ” means some fact which, having regard to all the circumstances (including the claimant’s state of health and the information which he had received and that which he might have obtained) would probably have caused a reasonable person of his age and experience to act (or fail to act) as the claimant did.”

It also refers to Chapter 34 of the DMG²¹ which provides further clarification including:

[34691] *“Even if the decision maker can show that the claimant has given up or failed to attend a place on a scheme or programme, the decision maker cannot impose a sanction if the claimant shows good cause.”*

[34736] *“The decision maker should consider all matters put forward by the claimant and decide in the light of all the evidence whether or not the claimant had good cause.”*

The following Commissioner’s Decision CJS4/4684/2014²² (*Arriving ten minutes late for an appointment does not, in isolation, amount to a failure to carry out a jobseeker’s direction*) provides further guidance in relation to what constitutes “good cause”.

Judge Knowles allowed the appeal and substituted her own decision that the late arrival did not amount to a failure to carry out the jobseeker’s direction. Her reasoning was as follows:

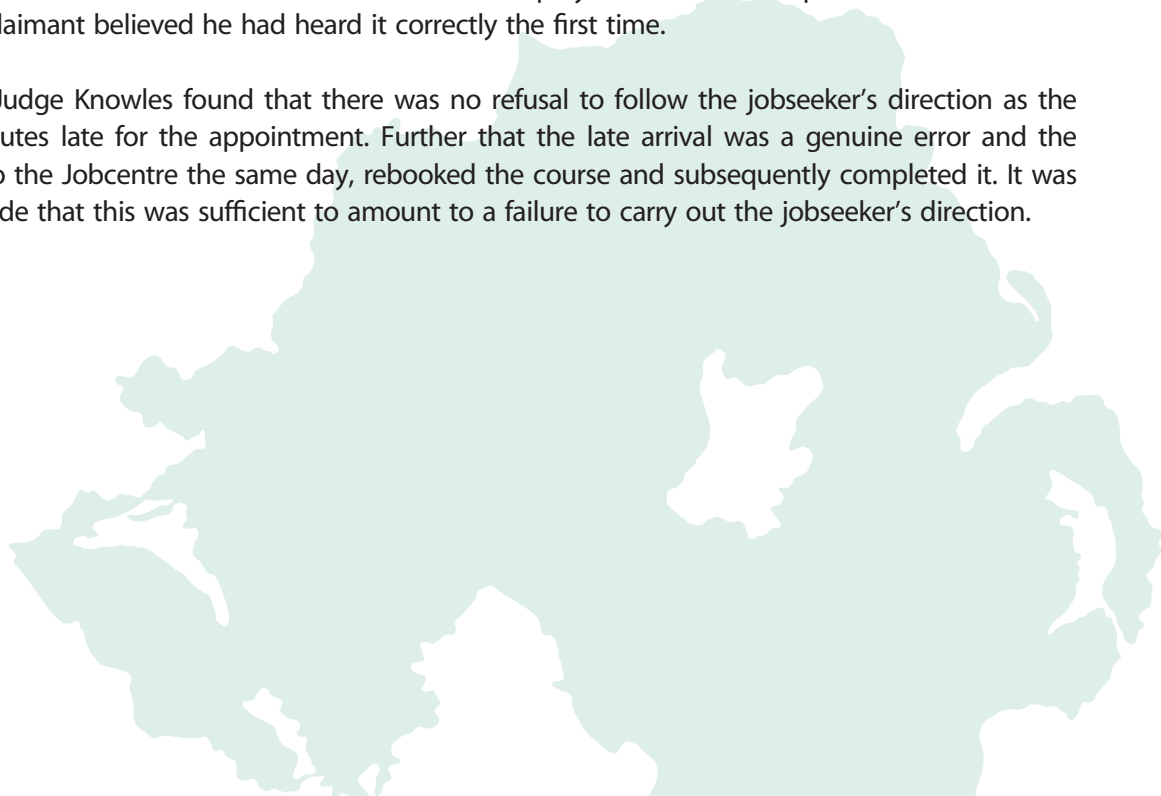
Section 19A(2)(c) of the Jobseeker’s Act 1995 provides that a claimant will be subject to sanction if he - ‘without good reason refuses or fails to carry out a Jobseeker’s Direction which was reasonable having regard to his circumstances’

This requires a decision maker to have regard to three matters -

1. was the Jobseeker’s Direction reasonable having regard to the claimant’s circumstances;
2. was there a failure or refusal to carry out the Jobseeker’s Direction; and
3. was there good reason for such failure or refusal.

In this case the first was not in dispute so Judge Knowles turned her attention to the second. The First-tier Tribunal had failed to consider whether what had occurred amounted to a failure or refusal and had thus erred in law. Additionally, the tribunal’s expectation that the claimant should have asked the employment officer to repeat what he had said was unreasonable as the claimant believed he had heard it correctly the first time.

In remaking the decision Judge Knowles found that there was no refusal to follow the jobseeker’s direction as the claimant was just ten minutes late for the appointment. Further that the late arrival was a genuine error and the claimant had reported it to the Jobcentre the same day, rebooked the course and subsequently completed it. It was disproportionate to conclude that this was sufficient to amount to a failure to carry out the jobseeker’s direction.



The Future

(welfare reform proposals re sanctions)

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(welfare reform proposals re sanctions)

The Welfare Reform Bill²³ failed to pass Final Stage in May 2015. However, in terms of sanctions, the Social Development Minister Mervyn Storey set out very clearly the impact of the new proposed sanctions regime as amended at Consideration Stage of the Bill:

"I wonder if it might be helpful if I provided an example of how escalation up the higher-level sanctions ladder might work in practice. If a claimant refuses to participate in the Steps 2 Success programme and cannot show good reason, he will receive a three-month sanction. If, four months later, he is asked to apply for a job and refuses to do so, he will — again, so long as there is no good reason — be sanctioned for six months.

These are clear sanctions that are critical to incentivize claimants to meet their responsibilities. Only in the most extreme cases of non-compliance will claimants face an 18-month sanction. In the example that I have given, the claimant would have to refuse another job or fail to meet another important requirement within 12 months of his second failure. Only then would an 18-month sanction be imposed."

Significantly, the sanctions regime will extend to Employment & Support Allowance (ESA) claimants in the Work Related Activity Group for failure to carry out work-related activity (including participating in an employment programme). To put this into context, the following information highlights the additional numbers of claimants in the ESA (WRAG)²⁴ that could be affected.

Date	MAY 15				Total
	Claimants				Claimants
Phase of ESA Claim	Unknown/Credits only	Assessment Phase	Support Group	Work Related Activity Group	
Total	3,780	11,440	83,740	19,180	118,140

The most recent debate on record in relation to sanctions took place in the House of Lords²⁵, where a quite heated exchange saw questions asked in relation to sanctions and: hardship, hunger, impact on mental health, rural-specific issues, the need for discretion to allow the flexible application of the sanctions regime, errors in relation to sanctions decision making, 50% success rate in overturning sanctions decisions at appeal, evidence of effectiveness of sanctions and the need for a review in relation to the ESA sanctions regime.

To quote Baroness Sherlock (Lab):

"... Real people's experience of sanctions is very different. Food banks repeatedly see desperate people sanctioned for trivial or, frankly, mystifying reasons, and the scale of sanctions is now such that a fifth—no, almost a quarter—of all JSA claimants were sanctioned in the last five years ..."

NICVA (Northern Ireland Council for Voluntary Action) and NIASC (Northern Ireland Advice Services Consortium) produced a Briefing Paper on the issue of sanctions in May 2015 in which they stated the belief that sanctions will not be effective in achieving their stated objectives of encouraging employment and altering claimant behaviour²⁶. The Briefing Paper highlighted evidence from the implementation of sanctions in the UK which suggested that claimants rarely understand why they have been sanctioned, and these sanctions cause little change in claimant behaviour ; in addition, recent research by multiple universities and charities has established that benefit sanctions do not demonstrably reduce unemployment amongst claimants²⁷. Finally, data recently released by the Department for Work and Pensions has indicated that sanctions can have a disproportionate effect on claimants suffering mental health problems: this data revealed that ESA claimants who suffer from long-term mental health problems are being sanctioned at a rate of more than 100 per day.²⁸

Given such significant barriers to claimant understanding of the sanctions process, and the serious impact which any benefit sanction would have upon a claimant, the Briefing Paper recommended that the Assembly should focus on ensuring that the benefit sanctions process is fully understood by all decision-makers and claimants. The Paper suggests that this would ensure that claimants are fully aware of the sanction process, and their rights in relation to it – this would, in turn, reduce the number of “unsuccessful” or wasteful sanction referrals, and significantly reduce public expenditure on the sanctions system.²⁹

These findings chime with both the Oakley Review and the Commons Work & Pensions Committee reports into sanctions. Oakley recommended (i) improvements to letters sent to claimants; (ii) broader communication improvements; (iii) improving claimants’ understanding of conditionality requirements; & (iv) improvements to the referral; process from Work Programme providers.

The Commons Work & Pensions Committee recommended that DWP (i) commission a broad independent review of benefit conditionality and sanctions, to investigate whether sanctions are being applied appropriately, fairly and proportionately; (ii) allow contracted Work Programme providers formally to accept “good cause” for a claimant not fulfilling a benefit condition; (iii) introduce pre-sanction written warnings and non-financial sanctions; (iv) clarify the extent to which Housing Benefit payments have been incorrectly impacted by Jobseekers Allowance sanctions; (v) review ESA sanctioning in relation to the Work Programme, accelerating development of more effective support for this group.



Recommendations

Recommendations

1. Communications: Review and address the fragmented communications process and quality issues in relation to non-participation on the Steps 2 Success programme;
2. Delays: Review and address the delay between transgression and sanction. Introduce and monitor timescales for communicating information within the sanctions process as this relates to: (i) Job Seekers Allowance (JSA) decision makers within the Social Security Agency (SSA); (ii) Personal Advisers within the Department for Employment and Learning (DEL); (iii) staff within the three Lead Contractors across Northern Ireland (Ingeus for the Belfast Region; EOS for the Northern Region; Reed in Partnership for the Southern Region); & (iv) staff within local S2S providers;
3. Housing Benefit: Address the sanctions double whammy where Housing Benefit can be suspended as a consequence of sanctions to other benefits. JSA (and potentially in future ESA) decision makers need to review how they update the ATLAS system to ensure that the correct notification is sent to Housing Benefit and that Housing Benefit is not suspended during a sanctioned period as per Urgent HB Bulletin U1/2015;
4. "Good Cause": The sanctions system must give reasonable weight to individual claimants having "good cause" for failure to participate in work programme activities (Steps to Success). In addition to automatically notifying Job Seekers Allowance (JSA) decision makers within the Social Security Agency about the failure to participate, it should be ensured that no sanction is applied where the claimant has not been given a reasonable opportunity to demonstrate "good cause";
5. Challenging: Claimants should be informed clearly on how to challenge a benefit sanction decision; reconsiderations and appeals should be expedited given the seriousness of sanctions decisions;
6. Impact of sanctions: The Department should conduct extensive and regular research into the impact of benefit sanctions on benefit claimants in Northern Ireland;
7. Pre-sanctions: Implement a "Pre-sanction" warning in place of immediate financial sanctions for claimants deemed not to have fulfilled their duty of looking for work. This measure has already been recommended in GB by the House of Commons Work & Pensions Committee;
8. Severity: The NI Assembly should reconsider the severity of the proposed changes to the sanctions regime as set out in the Welfare Reform Bill – in particular the Assembly should consider reducing the draconian 3 month sanction for a first failure to meet work programme requirements;
9. Independent advice: Work providers, along with all statutory agencies involved in the sanctions process should inform the claimant of the availability of independent advice, and provide details of independent advice centres in their area.
10. Department for Communities³⁰: The opportunity presented by the creation of the Department for Communities should be utilised to the full in terms of irradicating the problems associated with sanctions.

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