

# National Audit Office Inquiry into Benefit Sanctions: Response from Citizens Advice Scotland



*June 2016*

*Citizens Advice Scotland (CAS), our 61 member Citizen Advice Bureaux (CAB), the Citizen Advice consumer helpline, and the Extra Help Unit, form Scotland's largest independent advice network. Advice provided by our service is free, independent, confidential, impartial and available to everyone. Our self-help website Adviceguide provides information on rights and helps people solve their problems.*

*In 2014/15 the Citizens Advice Service network helped over 323,000 clients in Scotland alone and dealt with over one million advice issues. With support from the network clients had financial gains of over £124 million and the Scottish zone of our self-help website Adviceguide received approximately 5.4 million unique page views.*

*Issues relating to benefits and tax credits are the most common area of advice provided by citizens advice bureaux in Scotland, with 220,000 new issues in 2014/15, representing 37% of their work.*

## **Summary**

If conditionality is to be used within the benefit system, CAS believes it must be part of a holistic system that supports, rather than compels, jobseekers into sustainable employment. Sanctions should be always proportionate to the "offence" and should be operated as a last resort to ensure that claimants are seeking employment in exchange for their benefit. This response covers the following:

- DWP sanction statistics and CAS statistics on sanctions advice provision
- Intended aims and outcomes of the sanctions regime
- Whether sanctions are being implemented in line with policy
- The impact of sanctions on Scottish CAB clients
- Sanctions early warning trial in Scotland

## **Recommendations**

- CAS strongly recommends that a full scale independent review of the sanctions regime is undertaken as a matter of urgency. This review should consider the effectiveness of the sanctions regime in getting people back to work and the impact that it has on individuals, families and services. In particular, the impact of sanctions on ESA claimants and JSA claimants with disabilities and health conditions should be taken into account.
- CAS recommends that the use of non-financial sanctions, particularly written warnings, is piloted.
- CAS recommends that Hardship Payments are available from day one of a sanction period in all cases, are paid automatically when a sanction begins and do not need to be repaid to the DWP.
- CAS recommends that the DWP publish the full findings of the Sanctions Early Warning Trial that is currently being conducted in Scotland and that, if there is a benefit to claimants, the further 14 days to provide evidence is introduced elsewhere in the UK.

## Sanctions statistics

The DWP official sanctions statistics show that both JSA and ESA sanctions peaked during 2014, but that the number of sanctions as a percentage of all claimants has decreased each quarter since summer 2014. An analysis of the official statistics by Dr Webster of Glasgow University has shown that the monthly rate of JSA sanctions appears to be stabilising at around 3.5% of claimants, but this is still higher than the average for the whole period from 2000 to 2010 which was 2.81%.<sup>1</sup>

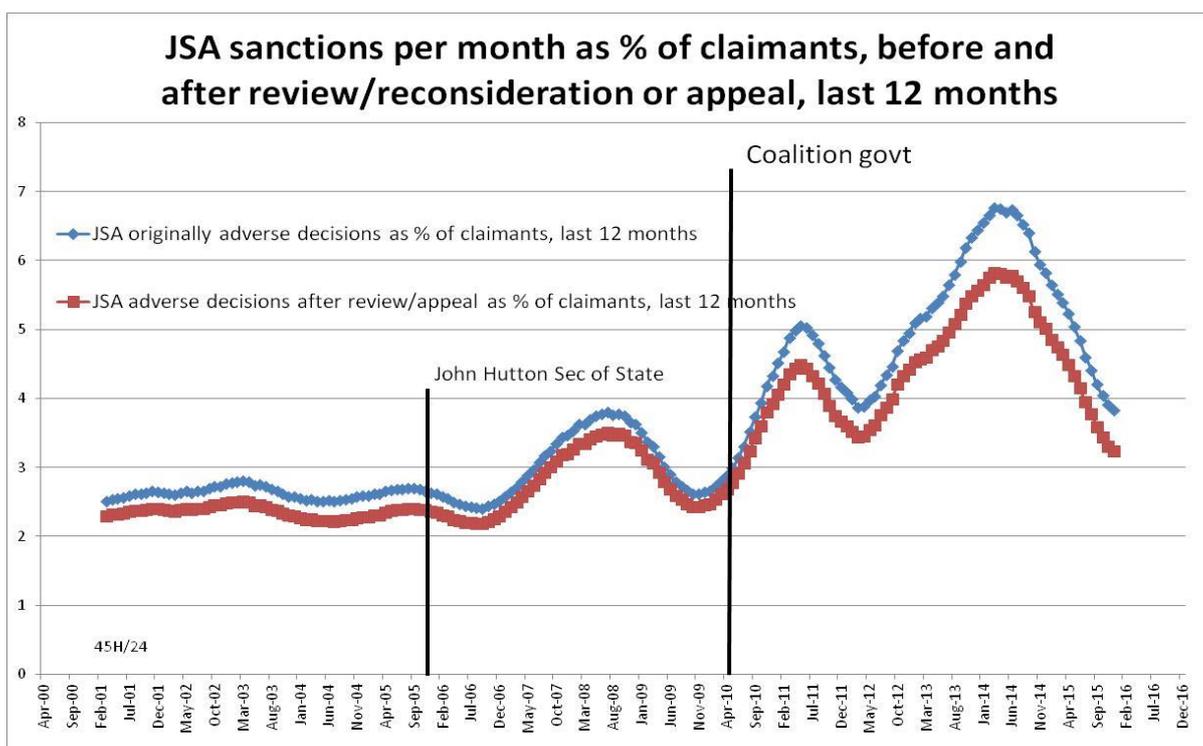


Figure 1: Source – Dr David Webster, *The DWP's JSA/ESA Sanctions Statistics Release, 18 May 2016*

<sup>1</sup> Dr David Webster, *The DWP's JSA/ESA Sanctions Statistics Release, 18 May 2016*  
<http://www.cpag.org.uk/david-webster>

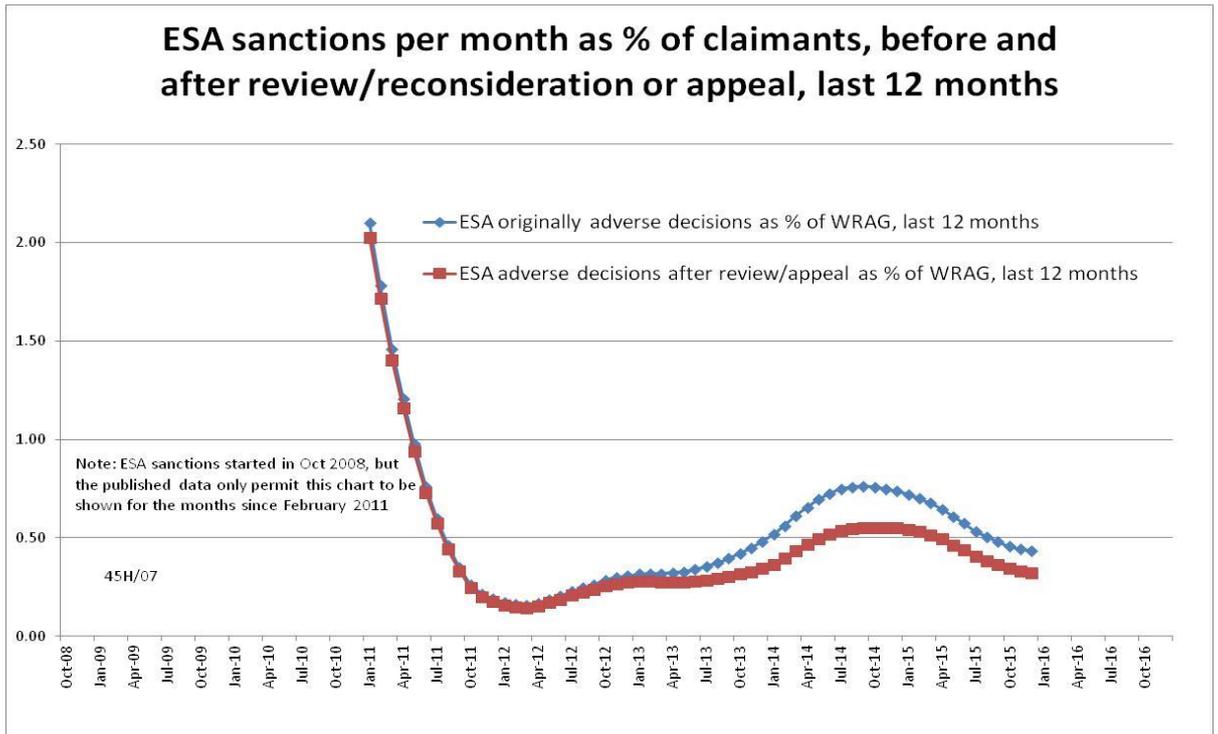
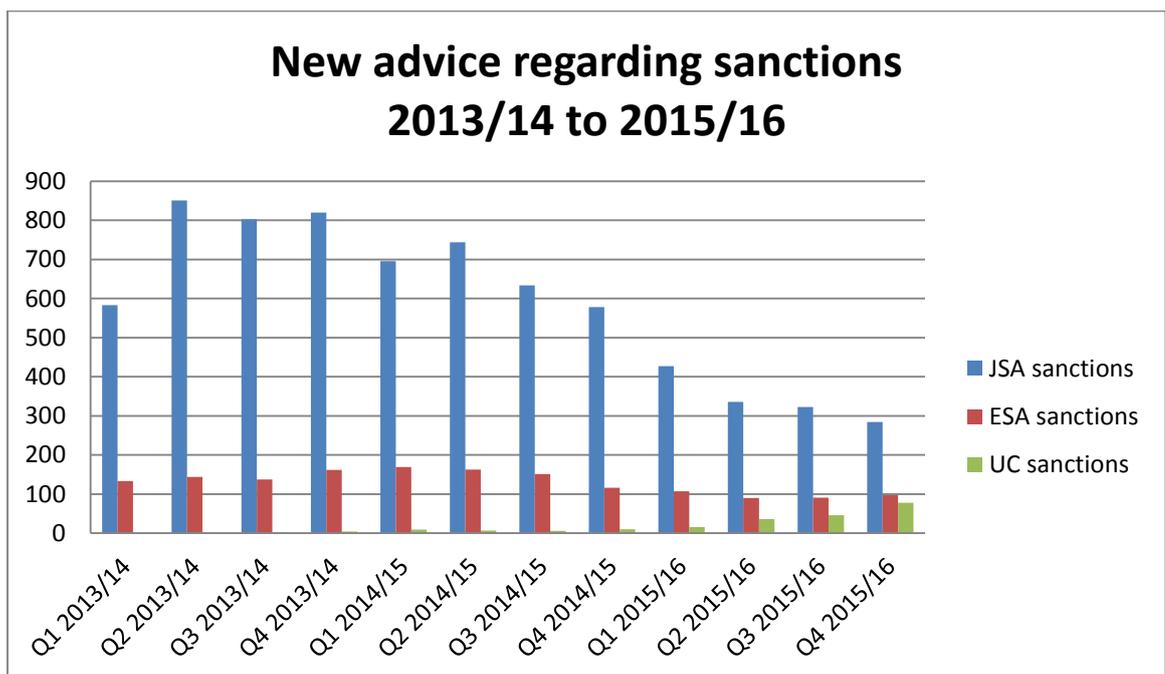


Figure 2: Figure 1: Source – Dr David Webster, *The DWP's JSA/ESA Sanctions Statistics Release*, 18 May 2016

The statistics on advice provided in relation to sanctions gathered by citizens advice bureaux in Scotland also reflect this trend. As figure 3 shows, advice need in relation to JSA sanctions peaked in 2013/14 and has been steadily declining each subsequent quarter. This is with the exception of advice relating to Universal Credit sanctions, which has been gradually increasing as the Universal Credit caseload increases, with the most recent statistics showing that during the last quarter of 2015/16 the CAB Service in Scotland provided advice in relation to Universal Credit sanctions on 78 occasions.



Although advice on sanctions has been decreasing, Citizens Advice Scotland collects data on advice provided in relation to over 2,500 issues, and advice on JSA sanctions has remained in the top five percent of these issues for three years running.

The main reason for the overall fall in the number of JSA sanctions is a fall in the number of JSA claimants, partly as a result of the rollout of Universal Credit, and partly as a result of people gaining employment due to the recovery of the labour market. However, CAS is concerned that the decrease in the number of JSA claimants may be partially a result of people leaving the benefits system altogether, not through finding employment but because they are struggling to keep up with the claimant commitment and the conditions placed upon them as jobseekers. Some CAS case studies show evidence of clients who are considering ending their claims because they find the jobseekers conditions and the prospect of being sanctioned too stressful.

An East of Scotland CAB reports of a client who is very stressed about the activities she has to complete for her JSA Claimant Commitment. Before Christmas, she was instructed to work in a charity shop but felt she was unable to stay there due to it being too cold. The client was concerned that she might be sanctioned and is now finding the whole process of claiming JSA so stressful that she is having panic attacks. The client would like to stop claiming JSA.

A South of Scotland CAB reports of a client who had been sanctioned for not attending an interview when he was at hospital with his pregnant girlfriend for an ultrasound. He has been living with friends as he had no money for electricity. His phone is broken so he cannot receive calls from DWP regarding appointment times. The client called seeking a food parcel for him and his girlfriend. In his words, he has 'given up' on Universal Credit as he has experienced difficulties in complying with Universal Credit conditions, and getting appointment times at the Jobcentre without a working phone and has been sanctioned as a result. He now has huge rent arrears and is relying on the good will of friends to manage without income. The client is taking up matters with his local MP.

### **Intended aims and outcomes of the sanctions regime**

When announcing the changes that would be brought in under the Welfare Reform Act 2012, the DWP stated that there would be a “strengthened sanctions regime”<sup>2</sup> which would be “tougher but fairer.”<sup>3</sup> When the new sanctions regime was introduced, with longer and more severe sanctions, it was unclear what evidence was available to support the premise that greater conditionality and harsher sanctions encourages people into work, and research published since 2012 has

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<sup>2</sup> DWP Press Release <https://www.gov.uk/government/news/detail-behind-welfare-reforms-revealed>

<sup>3</sup> DWP press release <https://www.gov.uk/government/news/choosing-a-life-on-benefits-is-no-longer-an-option>

called into question the fairness and effectiveness, of the sanctions regime at supporting people into employment.

The Welfare Conditionality Sanctions, Support and Behaviour Change Project recently published their first wave findings of research into the effects of conditionality on service users in Scotland. The research has found that “there is limited evidence to date of welfare conditionality bringing about positive behaviour change” and that “the cessation of problematic behaviour was not so much the threat or experience of a sanction, but the availability of appropriate individual support.”<sup>4</sup> Following his independent review of the sanctions regime in 2014 Matthew Oakley’s Report, whilst generally supportive of conditionality, also warned against the unintended consequences that sanctions can have if applied inappropriately.<sup>5</sup>

CAS is concerned that there are aspects of the regime which are not well suited to encouraging effective job seeking. For example, in order for a sanction to act effectively as a deterrent or an incentive, it needs to be made clear to the claimant what the reason for the sanction is and what aspect of their behaviour needs to be modified. CAS case evidence suggests that there are still occasions when the claimant does not know why they have been sanctioned; all they know is that their benefit payments have stopped.

The length of sanctions has increased, and a high level sanction can now last for up to three years. It is questionable whether stopping someone’s benefit for three years is really a measure to encourage effective job seeking when it is likely that by the time their benefit is reinstated, the claimant may not even remember the reason the sanction was imposed in the first place. A three year sanction might be more accurately described as a harsh penalty for non-compliance than an aspect of conditionality aimed at encouraging people into work. If the current sanctions regime was effective at encouraging behaviour change one would expect that repeat sanctions to be relatively uncommon. However, figures released in a response to a Freedom of Information request (2015-2187) have shown that one quarter (24.4%) of JSA claimants sanctioned were sanctioned more than once during 2014/15 and almost one-in-ten were sanctioned three times or more.<sup>6</sup> These figures suggest that for a quarter of JSA claimants, sanctions do not act as an incentive or a deterrent, and may in fact act as a barrier to effectively seeking employment.

Stopping someone’s benefit means that they have no money to pay for essentials including food, gas and electricity, toiletries, clothes and transport. When someone has no money for essentials, they must focus their attention on finding some kind of emergency crisis support, whether in the form of a benefit advance, a Crisis Grant from the Scottish Welfare Fund, emergency gas and electricity payments or charitable food aid. These conditions do not lend themselves to productive job seeking, and can in fact act as a barrier if, for example, a claimant has no money to

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<sup>4</sup> <http://www.welfareconditionality.ac.uk/wp-content/uploads/2016/06/WelCond-Findings-Scotland-June-16.pdf>

<sup>5</sup> Oakley report 2014, page 28

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/335144/jsa-sanctions-independent-review.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/335144/jsa-sanctions-independent-review.pdf)

<sup>6</sup> Dr David Webster, *The DWP’s JSA/ESA Sanctions Statistics Release, 18 May 2016*  
<http://www.cpag.org.uk/david-webster>

pay for a bus to the jobcentre, or to pay for broadband or mobile internet access to search for jobs online, or buy clothes appropriate for a job interview. The cases presented below provide examples of how difficult it can be for people to find work when they have no money whatsoever.

An East of Scotland CAB reports of a client who came to the bureau having just had an altercation with a staff member at the jobcentre when he went to sign on for JSA that morning and was told that his money would be stopped because he had not complied with his claimant commitment for job searching. The client stated that he was removed from the premises for telling staff "how can I look for work when I've not had anything to eat for over a week!" The client had previously been in receipt of ESA but has since been found fit for work and is now a JSA claimant. He wants to find a job but finds the claimant commitment difficult as he is dyslexic and finds it difficult to read and write; he is attending the Learning Shop at the library for help with this. The client currently has no food or electricity in the house and was referred for a food parcel.

A West of Scotland CAB reports of a client who was sanctioned on the 11th of April and states he is not sure why. The client had a Universal Credit appointment on Monday 23 May, however failed to attend this meeting as he stated he had no finances to travel to the Jobcentre.

Aside from the difficulties of searching for work with no income, the conditionality associated with out of work benefits can also sometimes mean that claimants are forced into work that is not appropriate for them, whether because it offers too few hours, is a temporary contract or simply not a good fit for that individual. Rather than expecting claimants to apply for any job regardless of its suitability, the Jobcentre might achieve improved claimant outcomes if there was more flexibility in their approach and claimants were allowed to give priority to jobs which were full time, longer-term and well suited to the skills and interests of the individual.

A West of Scotland CAB reports of a client who was on JSA. The client was offered a job at 16 hours a week and felt pressurised to accept the job as he would have been sanctioned if he did not accept. After accepting the job, the client was told that he had to end his JSA claim as he was working 16 hours a week. This job was paid at minimum wage and was below the amount to pay national insurance contributions. The client now does not qualify for contributions-based JSA as he has not paid or been credited with enough national insurance contributions and will also have a gap in record for pension purposes. The client states that he was told at the Jobcentre that employment was not all about money but about "the self-esteem of working". The client appreciates this but thought that no one should be worse off working than they would be on benefits.

CAS case evidence also shows occasions in which clients are sanctioned for leaving jobs which are unsuitable and do not offer enough hours or job security. For example, in the case below the client has been sanctioned for leaving a zero hours contract despite the fact that he was only able to secure ten hours work per week.

A West of Scotland CAB reports of a client who had been on a zero hours contract. He left his job due to being given an average of only ten hours per week which had gone down since he started the job at Christmas. The client then started on Universal Credit but was sanctioned for 91 days for leaving his job voluntarily. He received his last wage of £200 and then took an advance of his Universal Credit. These two payments have been used by the client to pay his bills and pay back money to friends and relatives he had borrowed while on a low wage. The client thought he would be able to cover his rent with his remaining Universal Credit but the shortfall has meant he has accumulated six weeks' rent arrears.

Finally, it is questionable whether sanctions target those they are intended to target. DWP statistics show that, since the new regime came into force in 2012, almost one in five adverse JSA and ESA sanctions decisions (19%) are applied to claimants who have a disability, and a further 22% of non-adverse sanctions (those which are overturned on reconsideration or appeal) are applied to claimants who have a disability.<sup>7</sup> CAS evidence also suggests that sanctions disproportionately affect those with disabilities and learning difficulties, and that in many cases they are applied to those who are unable to fulfil their claimant commitment, as opposed to those who are reluctant to fulfil it. CAS is of the belief that those who have learning difficulties, literacy difficulties, are unable to use computers or struggle to keep up with work related activity due to ill health or disabilities should have a claimant commitment that reflects their capabilities as well as receiving suitable support and guidance to help them into suitable employment.

The review conducted by Matthew Oakley in 2014 was limited in scope, not least because it did not include ESA sanctions and its focus was on communication with claimants rather than the impact and effectiveness of the sanctions regime. CAS strongly recommends that a full scale review of the sanctions regime is undertaken as a matter of urgency which considers the actual effectiveness of the sanctions regime in getting people back to work and the impact that it has on individuals, families and services. In particular, this should consider the impact of sanctions on ESA claimants and JSA claimants with disabilities.

### **Whether or not sanctions are being implemented in line with policy**

Dr Webster has shown that a quarter of JSA sanctions are challenged and that the proportion of JSA sanctions overturned is now almost one in five. For ESA, half of ESA sanctions are challenged and more than half are overturned.<sup>8</sup> The fact that these figures are so high suggests that in 20% of cases for JSA and 25% of cases for ESA, sanctions are being applied inappropriately or that the decision maker has made a decision to sanction the claimant without adequate evidence.

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<sup>7</sup> DWP official statistics: Jobseeker's Allowance and Employment and Support Allowance sanctions: decisions made to December 2015 (Table 1.6). [www.gov.uk/government/statistics/jobseekers-allowance-and-employment-and-support-allowance-sanctions-decisions-made-to-december-2015](http://www.gov.uk/government/statistics/jobseekers-allowance-and-employment-and-support-allowance-sanctions-decisions-made-to-december-2015)

<sup>8</sup> Dr David Webster, *The DWP's JSA/ESA Sanctions Statistics Release*, 18 May 2016  
<http://www.cpag.org.uk/david-webster>

CAS evidence suggests that in some cases sanctions are applied inappropriately because the DWP have made an error, for example thinking that the claimant has not presented for an appointment when in fact they did present but spoke to a different work coach, or the claimant has experienced difficulties in communicating with the DWP or a work programme provider either by phone or by post. The cases below demonstrate some of the circumstances in which sanctions are applied due to a DWP official error.

A West of Scotland CAB reports of a client who received a low level sanction for not attending the Jobcentre. He had in fact attended, but was seen by the wrong person who took him through the steps that he had already gone through when he first claimed UC and then sent him away. The client had to claim hardship payments and put in a reconsideration which although successful put him under additional strain.

A West of Scotland CAB reports of a client who is claiming Universal Credit and was sanctioned earlier this month. When he phoned to enquire about his claim they said he was sanctioned because he had failed to reply to a letter that was sent. The client stated that he had replied to the letter, to which the DWP responded that they could see that he had replied and that the sanction would be sent back to the decision maker to see if it could be lifted. When the CAB adviser asked the DWP call handler why the client is being penalised for a DWP error, they were advised that the new rules make it impossible to reverse a decision without it first being approved by a decision maker.

An East of Scotland CAB reports of a client who attended drop-in on Friday 8th January. He had received a letter from Learn Direct employability service sent on 15th December saying he had been referred for Mandatory Work Activity. The letter says that it is likely that it will take place over the next seven to ten days and gave him a phone number to call. The client kept trying to phone the number on the letter but never got an answer, presumably because it was over the holiday period. On 30th December the client received a letter saying his JSA had been sanctioned. This is a vulnerable client who is homeless and has health conditions which make looking for a job difficult.

CAS evidence suggests that another reason so many sanctions are overturned on reconsideration or appeal is that due diligence is not taken to capture the personal circumstances of that individual and any reasons why they may struggle to meet the requirements laid out in the Claimant Commitment. Certain jobseekers' requirements or training courses may not be appropriate for those with health conditions, learning difficulties or caring responsibilities, and this should all be reflected in the Claimant Commitment and the expectations placed on JSA, ESA or UC claimants.

An East of Scotland CAB reports of a client who did not receive a JSA payment yesterday and is unaware of the end date of the sanction. The client has literacy difficulties and consequently cannot use a computer and thinks that the Jobcentre have not taken this into account when drafting his Claimant Commitment. He has been referred to the learning shop by the Jobcentre. A food parcel referral was made as he has insufficient funds for food.

A client suffers ongoing shoulder problems following surgery. The neurologist thinks c6 and c7 vertebrae are lying on major nerves so the client is awaiting an MRI of her cervical spine. The client is still on JSA and has had to cancel hydrotherapy which she was attending every Wednesday. She has also had to cancel appointments with her surgeon as she has been told by the job centre that if she does not turn up to sign on or attend back-to-work training, then she will be sanctioned. The surgeon told her that he has heard of this happening a number of times.

As well as ensuring that any relevant personal circumstances are reflected in the claimant commitment, the DWP should also take into account the impact that a sanction could have on particularly vulnerable individuals. CAS has seen a number of cases where a sanction has been applied to someone who has complex needs and is particularly vulnerable, for example those who are homeless, people with addiction issues or individuals who are suffering domestic abuse. To apply sanctions to people in these circumstances can have severe consequences for their mental and physical health, as well as their prospects of finding work.

An East of Scotland CAB reports of a client who has been told that she has been sanctioned. This client is a victim of domestic abuse, suffering from anxiety, depression and panic attacks and is currently homeless. The client has been asked to do everything online despite having explained that she is homeless and has very little money, and is not IT literate. The client has debts, and has borrowed from relatives to survive.

An East of Scotland CAB reports of a client who came to the bureau saying that he has nowhere to sleep tonight. The client thinks he has been sanctioned but has no paperwork. The client has not had access to any money as he does not have a bank account; the client was told that if he does not have an account he will not get any money.

### **Communication with claimants**

In 2014, the Oakley Report made important recommendations particularly around communication with claimants and access to hardship payments.<sup>9</sup> Evidence from citizens advice bureaux suggests that improvements have been made in communication with claimants. The majority of sanctioned clients do appear to have received letters explaining that they have been sanctioned, but the reason given for the sanction is never specific or personalised. For example, they may be told that they have been sanctioned for 'not actively seeking work' or 'non-attendance at an interview' but they would not always know what they had done to fail the criteria for actively seeking work. The intention is that the claimant would have a prior awareness of the sanction from their Work Coach, but in reality, this is not always the case.

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<sup>9</sup> Independent review of the operation of Jobseeker's Allowance sanctions validated by the Jobseekers Act 2013 Matthew Oakley, 2015.  
[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/335144/jsa-sanctions-independent-review.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/335144/jsa-sanctions-independent-review.pdf)

A West of Scotland CAB reports of a client who has had multiple sanctions for not following the directions of her work coach. The client says she has a bad relationship with her work coach and also does not feel it was explained to her that she could be sanctioned.

A West of Scotland CAB reports of a client who is 19, single, lives in social rented housing and is currently in receipt of Universal Credit. The client had multiple sanctions, however did not receive correspondence relating to them and she was not advised about them at her Jobcentre interview. The client could not challenge the reasons for the sanctions as she did not know that she had been sanctioned.

Oakley also recommended that, after sanction decisions have been made, the Department should consider how vulnerable groups might be identified, helped to claim hardship payments and/or access support services offered through Jobcentre Plus and contracted providers.<sup>10</sup> Although it may state in sanctions letters that a claimant may be eligible for hardship payments, bureaux in Scotland see clients who are unaware that hardship payments exist or how to apply for them.

An East of Scotland CAB reports of a client whose Jobseekers Allowance has been sanctioned. When asked if he had applied for a hardship payment the client said that he had never been successful in the past in getting a hardship payment. The client said that he had been told by the Jobcentre this time that he should apply for food parcels and get top-ups from his energy supplier.

An East of Scotland CAB reports of a client who was sanctioned for two weeks due to non-attendance at his work programme provider. The client was not advised that he could apply for hardship payments or was advised but did not understand what was involved (the client appears to have learning difficulties).

An East of Scotland CAB reports of a client who is a 55 year old man who suffered a stroke in 2011 and since then often feels muddled and confused. The client had been sanctioned for missing a Work Programme appointment. The CAB adviser explained to the client that he could apply for a hardship payment, and that an application is normally made by completing a form at the Jobcentre Plus office. The client said he had attended the Jobcentre the previous day but had not been informed he could make a hardship payment application. The client returned to the bureau a few days later and said that, despite attending the Jobcentre Plus office the day prior to coming to bureau and asking about a hardship payment, he was not given any information and not told how to apply. The client now has to attend another appointment at Jobcentre Plus but did not have money for the bus fares to the Jobcentre so would have to borrow it from his 81-year-old mother.

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<sup>10</sup> Independent review of the operation of Jobseeker's Allowance sanctions validated by the Jobseekers Act 2013 Matthew Oakley, 2015.  
[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/335144/jsa-sanctions-independent-review.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/335144/jsa-sanctions-independent-review.pdf)

Hardship payments for ESA and JSA claimants are not currently repayable, but under Universal Credit, any hardship payments made are to be recovered, usually by means of direct deductions from benefits. CAS is concerned that this will in effect mean that the sanction lasts longer, and may cause further hardship for CAB clients.

### **The impact of sanctions on Scottish CAB clients**

While the effectiveness of the sanctions regime in achieving its purpose of getting claimants into sustained employment is unclear, the same cannot be said of the negative impact of sanctions on the finances and wellbeing of claimants and their families.

A single JSA claimant will typically receive £73.10 a week. Claimants will often have very little money left by the time of their next payment. If a sanctions referral is made shortly before the next benefit payment is due, this can leave claimants with no money at very short notice. They then have to survive without any money for the duration of the sanction. For the clients seen in bureaux this regularly leaves them in crisis, with no money to buy food, buy phone credit, to top up pre-payment meters for heating, to cover bills or debt repayments, or meet their Jobcentre obligations.

A West of Scotland CAB reports of a client who has no money due to a sanction and cannot buy food or pay for gas or electricity. A hardship payment might be agreed but this will not be paid until he next signs on. The client has been referred to a food bank and has made an application to the Scottish Welfare Fund for a Crisis Grant.

Sanctions may also put financial and other types of arrangement at risk, such as rent or council tax repayment plans, which can lead to serious consequences including court action and eviction.

A North of Scotland CAB reports of a client who is a 37 year old single parent with two young children. She was sanctioned because she did not attend the Jobcentre at the time they had on their system, but in fact she maintained that they had told her the incorrect time. She did not realise that her Housing Benefit would also be affected, and she had therefore fallen behind with her agreed payments of £14 per week to the Council housing department to pay off arrears. When her case for eviction called in the Sheriff Court, she was represented by CAB who told the sheriff that the client had been sanctioned, left with £10 to last her to the end of the month. Fortunately the Sheriff thought it was not reasonable that the client and her two children be evicted.

Not only do sanctions have serious consequences for the claimant and their family, they also impact on other services. As well as advice services, it is likely that the health and social detriment often caused by sanctions shifts costs onto other public services further down the line, whether this be crisis support such as the Scottish Welfare Fund, social services, the NHS, housing and homelessness services, debt and bankruptcy administration, and advice services.

## **Sanctions Early Warning Trial in Scotland**

On 25 April 2016, the DWP launched a new 'Early Warning' trial in Scotland within the JSA sanctions process. The trial gives jobseekers an extra 14 days to provide further evidence of reasons for non-compliance when a sanction is likely to be imposed. The trial began in March with the collection of baseline data, and in April the first letters were sent out to claimants.

The trial is being run in three of the four Scottish Jobcentre Plus Districts. The exception is the Jobcentres in the North of Scotland District as they will provide the control data for the trial evaluation. The trial includes JSA claimants only and covers both Jobcentre Plus referrals and Work Programme referrals. However, it only applies to those facing a high or low level sanction - intermediate disallowances and sanctions are not included.

During the trial, claimants who are referred for a decision have their case considered and if, based on the initial evidence, a Decision Maker thinks that the claimant should be subject to a sanction, they will send a letter warning the claimant that there is good case for a sanction to be applied and encouraging the claimant to send in any more information or evidence that they have of good reason for their failure to comply. The Decision Maker will allow 14 days for this new evidence to be produced, giving claimants an additional opportunity to present information, and allowing more vulnerable claimants to access support services to assist them.

CAS currently has inadequate evidence to say how this trial is affecting claimants, but welcomes the attempt to allow claimants more time to provide evidence. CAS recommends that the DWP publish the full findings of the trial and that, if there is a benefit to claimants, the further 14 days to provide evidence is introduced elsewhere in the UK.

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