



Welfare Reforms: The Effect on Women in Wales

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Introduction

The Welfare Reform Act 2012 contains some of the most fundamental structural changes to the British welfare system since 1945¹. Its possible impact has therefore been a topic of considerable analysis and debate. However while recent studies have focused upon the potential effects of the reforms on Wales, and on women nationally, there has to date not been an extended study in to the impact of the changes on women in Wales.

This paper attempts to assess the impact of these changes on women in Wales in the context of the particular economic and demographic profile of Wales.

The primary reform contained in the Act is the consolidation of several means-tested benefits, and their incorporation in to a single monthly payment known as the Universal Credit (UC). Housing Benefit (HB), Income Based Job Seeker's Allowance (JSA), Income Based Employment and Support Allowance (ESA), Income Support (IS), Working and Child Tax Credits will all be incorporated in to the new benefit. The Act will also include major changes to the Disability Living Allowance (DLA), although its replacement will not be merged in to the UC.

New and existing claimants of affected benefits will be progressively transferred on to the UC from October 2013 until October 2017². While the precise impact of this amalgamation, particularly on the behaviour of claimants is therefore difficult to assess at this stage³, it is preceded by a series of reforms intended to streamline the system for the eventual emergence of the UC. Many of these are already being implemented, or will be initiated prior to the launch of the UC. These include significant changes to the ESA, DLA, IS and HB. These represent some of the most widely claimed benefits in Wales and an analysis of the specific impact of these reforms on women in Wales will therefore be the focus of this study. However while the primary emphasis of this study will be on the changes currently underway, it will also analyse some of the potential implications of the transition to the UC for current female claimants of these particular benefits.

¹ Department for Work and Pensions, *Welfare Reform Act 2012*. Accessed September 18th 2012

<<http://www.dwp.gov.uk/policy/welfare-reform/legislation-and-key-documents/welfare-reform-act-2012/>>

² Department for Work and Pensions, *Universal Credit-Frequently Asked Questions*, 9th July 2012. Accessed 19th September 2012 <<http://www.dwp.gov.uk/docs/universal-credit-faqs.pdf>>, Page 3

³ Knowledge and Analytical Services (Welsh Government), *Analysing the Impact of the UK Government's welfare reforms in Wales-Stage 1 analysis*, Welsh Government, February 2012. Accessed 19th September 2012 <<http://wales.gov.uk/docs/dcells/publications/120228welfarereformen.pdf>> Page 36

This study expands upon the extensive research of the Bevan Foundation on the potential impact of welfare reforms on Wales, as well as the Welsh Government's Stage 1 analysis of the reforms. Unfortunately, the task of predicting gender specific effects is complicated by the unavailability of detailed information for each affected benefit in Wales.

A series of recommendations are made at the end of the report, summarising the possible actions the Welsh Government could take in order to alleviate some of the most negative effects of welfare changes on women in Wales.

Background

Wales has one of the lowest levels of disposable household income in the UK⁴, and one of the highest proportions of the working age population receiving state benefits. Its labour market suffers from greater difficulties than many other areas of the UK, with some of the highest rates of unemployment and economic inactivity.

Women of working age in Wales have a lower employment rate (63.9%)⁵ and higher rate of economic inactivity (30.1%)⁶ than women in the UK as a whole (66.1%)⁷ and (28.5%)⁸ respectively. The percentage of economically active women in Wales who are unemployed is at its highest levels since records began⁹, currently standing at 8.4%, having risen 2.7% in the last year alone¹⁰. Between 2008 and 2010, the proportion of full-time jobs held by women decreased by 10 percent, while those held by men fell by less than 2 percent¹¹, indicating the initial recession rendered significant damage to the position of women in the Welsh labour market. This surge in female unemployment underestimates the difficulties women have to contend with when seeking work, some of which will be analysed in greater depth further on.

There is therefore justification for assuming that the Welsh labour market, for women in particular is more constrained than in other regions of the UK. This has the effect of immediately complicating a series of reforms which are

⁴ Source: Office for National Statistics, *Household Disposable Income across the UK*, July 2012. Accessed 18th September 2012. < http://www.ons.gov.uk/ons/dcp171776_270749.pdf>, Page 2

⁵ Source: Office for National Statistics-NOMIS, *LFS Headline Indicators- Females - Economically active – In Employment-Wales*, August 2012. Accessed 18th September 2012, http://www.nomisweb.co.uk/reports/lmp/gor/2013265930/subreports/nrhi_time_series/report.aspx?

⁶ Source: Office for National Statistics-NOMIS, *LFS Headline Indicators-Female-Economically Inactive-Wales*, August 2012. Accessed 18th September 2012, <http://www.nomisweb.co.uk/reports/lmp/gor/2013265930/subreports/nrhi_time_series/report.aspx?>

⁷ Source: Office for National Statistics-NOMIS, *LFS Headline Indicators- Females - Economically active – In Employment-Wales*, August 2012. Accessed 18th September 2012, http://www.nomisweb.co.uk/reports/lmp/gor/2013265930/subreports/nrhi_time_series/report.aspx?

⁸ Source: Office for National Statistics-NOMIS, *LFS Headline Indicators-Female-Economically Inactive-Wales*, August 2012. Accessed 18th September 2012, <http://www.nomisweb.co.uk/reports/lmp/gor/2013265930/subreports/nrhi_time_series/report.aspx?>

⁹ BBC News Wales, *Female unemployment rises to a 20-year high of 8.3%*. 31 May 2012. Accessed 18th September 2012, < <http://www.bbc.co.uk/news/uk-wales-politics-18268294>>

¹⁰ Source: Office for National Statistics-NOMIS, *LFS Headline Indicators- Females - Economically active – Unemployed-Wales*, August 2012. Accessed 18th September 2012, <http://www.nomisweb.co.uk/reports/lmp/gor/2013265930/subreports/nrhi_time_series/report.aspx?>

¹¹ C Campos, A Dent, R Fry & Reid A, *Impact of the Recession*, Office for National Statistics, July 2011. Accessed 18th September 2012, < www.ons.gov.uk/ons/rel/regional-trends/regional-trends/regional-trends--july-2011-edition/impact-of-the-recession.pdf> Page 29

largely structured around the central principle that benefits claims result in significant part from the absence of adequate work incentives in the welfare system, rather than intrinsic difficulties with the functioning of the labour market itself.

Wales has a higher proportion of benefit claimants than any other nation in the UK, with around 19% of the working age population receiving some form of state support¹². This does not in and of itself indicate that it would suffer disproportionately from major restructuring of the welfare system. However the comparatively high level of benefit claimants in Wales is largely a function of higher proportions of claimants for sickness, incapacity and disability benefits - primarily DLA and ESA, which Wales has a significantly higher percentage of¹³. More than 10% of working age adults in Wales receives ESA or Incapacity Benefit alone¹⁴. The high proportion of individuals receiving these benefits, targeted towards those with the greatest impediments to employment does indicate that Wales is likely to be affected disproportionately by the reforms.

These reforms are not occurring during a period of significant job growth or even moderate recession, but in the context of a deep and sustained recession. It is questionable whether there will be sufficient jobs exist for claimants to move in to, or that there are many indications that the labour market in Wales will be receptive and adaptable to the needs of female benefit claimants, some of whom will be entering the labour market after a period of extended absence, due to child-rearing, illness or disability¹⁵.

Certain factors complicate the situation of women in the labour market and the potential impact of changes to the welfare system further. While Wales was the hardest hit nation in the UK by the recession in terms of the rise in unemployment, a slowly recuperating private sector may not be able to sustain the emergence of large groups of benefit claimants on to the labour market. A weak jobs market is rendered even more precarious by massive public sector job cuts, many of which are on-going.

¹² Research Service, National Assembly for Wales. *Welfare in Wales series: Welfare Statistics*. September 2011. Accessed 18th September 2012 < <http://www.assemblywales.org/gg11-0033.pdf>> Page 1

¹³ Ibid

¹⁴ The Bevan Foundation, *Wales on the Edge: An overview of the current and predicted impact of welfare reforms on people and communities across Wales*, February 2012. Accessed 19th September 2012 <<http://www.bevanfoundation.org/wp-content/uploads/2012/02/Wales-on-the-edge2.pdf>> Page 17

¹⁵ The Bevan Foundation, *Wales on the Edge: An overview of the current and predicted impact of welfare reforms on people and communities across Wales*, February 2012. Accessed 19th September 2012 <<http://www.bevanfoundation.org/wp-content/uploads/2012/02/Wales-on-the-edge2.pdf>> , P 14

Given the high percentage of women employed in the public sector, it is not unexpected that they have suffered more than men from these staffing cuts as the sector reduced jobs. The scale of female job losses in recent years has been immense. In Powys for example, women accounted for 100% of all council job reductions between 2010 and 2011ⁱ¹⁶, the first full year of austerity measures. Most Local Authorities saw less severe but still significant reductions in female employment during this period. With the exceptions of Pembrokeshire and Conwy, both of which added staff, only two Local Authorities had a female percentage of total job reductions which was under 50%, while the average was 69%ⁱⁱ.

The primary focus of the welfare reforms, which is to incentivise claimants to gain employment and away from benefits, may therefore be fundamentally ill-suited to the realities of the current Welsh economy. For example, there are currently 4.9 JSA claimants for every unfilled Jobcentre vacancy in Wales¹⁷. In deprived Local Authorities the ratio is even higher, rising to 12.8 claimants for every unfilled vacancy in Blaenau Gwent¹⁸.

The effect of the reforms will be to direct more claimants away from sickness and disability benefits and on to the job seeking component of the UC. Barring a sustained recovery, more people risk being transferred on to benefits with requirements which they are poorly suited for and which carry a corresponding risk of disallowance and sanctions, while their chances of gaining employment at this time and with economic conditions as they are will be considerably weaker¹⁹.

¹⁶Source: Office for National Statistics, *Quarterly Public Sector Employment Survey Quarter 1, 2010*, Local Government Association & Office for National Statistics, *Quarterly Public Sector Employment Survey Quarter 2, 2011*, Local Government Association. Accessed 18th September 2012.

<http://www.local.gov.uk/c/document_library/get_file?uuid=20dffbf4-28f2-4971-983d-811b126a0ee0&groupId=10171>

<http://www.local.gov.uk/c/document_library/get_file?uuid=7765389d-f5a5-487f-b47c-fc89a16045f6&groupId=10171>

¹⁷ Source: Office for National Statistics, *NOMIS, Jobcentre Vacancies-JSA Claimants per unfilled jobcentre vacancy (Wales)*, August 2012. Accessed 18th September 2012.

http://www.nomisweb.co.uk/reports/lmp/gor/2013265930/subreports/gor_vacs_time_series/report.aspx?

¹⁸ Source: Office for National Statistics, *NOMIS, Jobcentre Vacancies-JSA Claimants per unfilled jobcentre vacancy (Blaenau Gwent)*, August 2012. Accessed 18th September 2012.

https://www.nomisweb.co.uk/reports/lmp/la/2038432100/subreports/vacs_time_series/report.aspx?

¹⁹ The Bevan Foundation, *Wales on the Edge: An overview of the current and predicted impact of welfare reforms on people and communities across Wales*, February 2012. Accessed 19th September 2012,

<<http://www.bevanfoundation.org/wp-content/uploads/2012/02/Wales-on-the-edge2.pdf>>, Page 2

Universal Credit

Universal Credit has been designed to encourage one-earner households, as its aim is “to ensure that as many households as possible have at least someone in work and that work will pay for that household”.

The consequence of this is a considerable disincentive for second earners in a family. Universal Credit does not proscribe who are primary and secondary earners within a household but evidence is that women will remain the primary carers at home particularly since the gender pay gap persists.

The payment structure of the Universal Credit is therefore a potential cause for concern. A recent study conducted by the Social Market Foundation in to this aspect of the transition found significant unease among current benefit claimants regarding the move to a monthly payment and the impact it would have on household budgeting²⁰ the transition to a monthly payment could involve a major change for payment schedules of women and their families, particularly with regard to rent and debit payments, difficulties which may only be amplified with the shift away from direct payment of Housing Benefit to providers.

The behavioural response to the introduction of the Universal Credit, which so much will depend upon cannot be predicted with certainty at the current time, and it remains an area of active research. Therefore with the aforementioned concerns in mind, it may be necessary to withhold definitive judgement on the specific amalgamation of benefits and change in payment structure until the proposals come in to force, while making the utmost effort to ensure that information regarding the changes is made readily available to those likely to be affected.

²⁰ Dr N Keohane & R Shorthouse, Sink or Swim? The Impact of the Universal Credit. Social Market Foundation. September 2012. Accessed 23rd November 2012
<http://www.smf.co.uk/files/1913/4779/2202/20120916_Sink_or_Swim_web_ready2.pdf>

Employment and Support Allowance (ESA)

The Employment and Support Allowance (ESA) is one of the key drivers of the high percentage of benefit claimants in Wales. Of the ten UK constituencies with the highest claimant rates for ESA and Incapacity Benefit (IB), five were in Wales²¹ and “64 per cent of ESA and IB claimants in Wales (117,770 people) had been claiming for five years or more”²². Replacing IB for new claimants in 2008, the allowance is payable to those who are generally incapable of working due to sickness or disability. Claimants must undergo a medical assessment known as the Work Capability Assessment (WCA) and are then placed in to one of two categories: the Work Related Activity Group (WRAG) for those who may be capable of training or similar activities or the Support Group (SG) for the severely incapacitated, for whom this would not be practical. It is available in two forms.

Contribution Based ESA

This is a non means-tested benefit which can be claimed by individuals incapable of work who have made sufficient NI contributions to qualify.

Income Based ESA

The means-tested benefit is payable to individuals incapable of work who meet eligibility criteria. Claimants must have household savings of under £16,000, and their partner cannot be in employment for more than 24 hours per week.

As a result of the Welfare Reform Act, Contribution Based ESA is being time limited to one year for those who are not in the Support Group. Only 11% of all Welsh ESA claimants to date have been placed in this group following medical assessments²³, a lower percentage than in Scotland and every English region²⁴. With eligibility criteria being tightened the likelihood of many recipients being able to continue claiming it on the grounds of being in the Support Group is low; therefore there is a real risk that many claimants will face a complete loss of eligibility for ESA upon exhaustion of the time limit.

²¹ R McInnes *ESA and Incapacity Benefit Statistics*, Standard Note SN01420, House of Commons Library, July 2012. Accessed 18th September 2012, < <http://www.parliament.uk/briefing-papers/SN01420.pdf>> Page 6

²² Research Service, National Assembly for Wales. *Welfare in Wales series: Impact of Reforms*, September 2011. Accessed 18th September 2012< <http://www.assemblywales.org/gg11-0033.pdf>>, Page 2

²³ Department for Work and Pensions, *Employment and Support Allowance: Work Capability Assessment-Statistical Release, July 2012-Tables*. July 2012. Accessed 18th September 2012,

http://research.dwp.gov.uk/asd/workingage/esa_wca/esa_wca_jul2012_tables.xls, Table 1a

²⁴ Ibid

The stringent requirements which have to be met in order to claim Income Based ESA is likely to disqualify many recipients. Claimants whose partners are in employment for more than 24 hours per week will be hit worst. 62% of ESA claimants at the UK level who are ineligible for the Income Based component are disqualified because they have a partner who is in employment for more than 24 hours per week, yet whose savings are below £16,000²⁵. Those in this group will be faced with a complete loss of entitlement to ESA, despite having savings which are unlikely to provide the level of support needed. The impact this could have on the work incentives of recipients' partners will be explored later in this document.

Table 1 summarises the characteristics of Welsh ESA claimants. As of February 2012, 61,570 people in Wales claimed ESA²⁶. Of these 22,620 claimed Contribution Based ESA, 4,360 claimed it with Income Based ESA and 29,990 claimed Income Based ESA alone while 4,600 claimed Credits Only.

- 45.8% of all ESA claimants in Wales are women
- 44.8% of Contribution Based ESA claimants are women
- 35.7% of joint Contribution Based and Income Based ESA claimants are women
- 47% of Income Based ESA claimants are women
- 4,300 women who claim ESA are in the Support Group, representing just 15% of all female claimants
- Only 1,490 women who receive Contribution Based ESA are currently in the Support Group. 86% of women who receive Contribution Based ESA therefore may stand to lose their entitlement if they have claimed it for more than a year²⁷ⁱⁱⁱ.

²⁵ Department for Work and Pensions, *Time limit Contributory Employment and Support Allowance to one year for those in the Work-Related Activity Group: Impact Assessment*, April 2011. Accessed 18th September 2012 <<http://www.dwp.gov.uk/docs/esa-time-limit-wr2011-ia-revised-apr2011.pdf>>. Page 9

²⁶ DWP Tabulation Tool, Employment Support Allowance <http://83.244.183.180/100pc/tabtool.html>

²⁷ Source: Office for National Statistics- NOMIS, *DWP Benefits-Benefit Claimants, Employment and Support Allowance*, August 2012. Accessed 18th September 2012. <http://www.nomisweb.co.uk/query/134.1/advanced.aspx>

Table 1: Numbers of ESA claimants in Wales by gender and payment type

Total claimants	Contribution Based (Men)	Contribution Based (Women)	Income Based (Men)	Income Based (Women)	Contribution and Income Based (Men)	Contribution and Income Based (Women)	Credits Only (Men)	Credits Only (Women)
61,570	12,470	10,150	15,840	14,150	2,800	1,560	2220	2380

Source: DWP Tabulation Tool, Employment and Support Allowance

While 40% of all claimants nationwide are estimated to lose all entitlement to ESA²⁸, it is difficult to predict the number of these at the Welsh level. A loss of all entitlement will depend not only on the outcome of medical assessments, but also on whether or not those who lose entitlement to Contribution Based ESA will be able to claim the Income Based component. As this will depend on the level of claimants' assets and the employment status of partners, among other factors, more detailed information on Welsh ESA claimants is needed to predict the specific percentage of those who will lose all eligibility.

It is however unlikely that given the percentage of women who are claiming Contribution Based ESA in isolation that a majority would automatically qualify for the Income Based component. Given the stringent nature of medical assessments, the strict documentation needed to claim the Income Based component and the low number of claimants in the Support Group, there is a plausible risk that many of these female Contribution Based ESA claimants stand to lose their entitlement to the benefit.

The 8,660 women who receive Contribution Based ESA in isolation and who are not in the Support Group are therefore placed at a significant risk of its withdrawal as soon as the time limit is exhausted. It is likely that many of them will lose their entitlement to ESA altogether.

The potential difficulties caused by these changes are not limited to the claimants themselves. As recent research in to the potential impact of changes to non means-tested benefits has noted, they are likely to have a behavioural

²⁸ Department for Work and Pensions, *Time limit Contributory Employment and Support Allowance to one year for those in the Work-Related Activity Group: Impact Assessment*, April 2011. Accessed 18th September 2012 <<http://www.dwp.gov.uk/docs/esa-time-limit-wr2011-ia-revised-apr2011.pdf>>, Page 8

effect on family members and partners as well²⁹. This is seen either through a loss of benefit income, which could result in serious emotional and financial strain or through reduced work incentives. As the DWP acknowledges, the time-limiting of Contribution Based ESA increases the likelihood of partners of claimants reducing work hours in order to retain their eligibility³⁰. This weakens rather than enhances incentives to work.

Therefore around 8,600 women who currently receive Contribution ESA and are not in the Support Group could lose their entitlement. There will also be an indirect effect on women who are partners of Contribution Based ESA recipients, and many could face reduced work incentives as a result of the changes.

While the disparity between the percentages of male and female claimants who are likely to lose eligibility is relatively small, attention will have to be paid to the added difficulties sick and disabled women may face when being transitioned on to alternative benefits with separate requirements or in to the workforce, particularly as it may relate to their responsibilities with regard to child-care.

²⁹ F Bennett & H Sutherland. 2011. *Institute for Social and Economic Research Working Paper: The importance of independent income: understanding the role of non-means-tested earnings replacement benefits*. March 2011. Accessed 18th September 2012. <<https://www.iser.essex.ac.uk/publications/working-papers/iser/2011-09.pdf>>, Page 3

³⁰ Department for Work and Pensions, *Time limit Contributory Employment and Support Allowance to one year for those in the Work-Related Activity Group: Impact Assessment*, April 2011. Accessed 18th September 2012 <<http://www.dwp.gov.uk/docs/esa-time-limit-wr2011-ia-revised-apr2011.pdf>> P, 11

Disability Living Allowance (DLA)

Disability Living Allowance is a non means-tested benefit payable to those who are disabled who may or may not be in employment. It therefore covers care and living expenses. As would be expected given that “almost 16 per cent of adults aged 16 to 64 had disabilities”³¹, Wales does have an above average proportion of DLA claimants compared to the rest of the UK. 243,620 claimants are receiving DLA in Wales³², of whom slightly more than half, 122,790 (50.4%) are women³³.

As a result of reforms contained in the Act, the DLA is being phased out and replaced with the Personal Independence Payment (PIP). From June of 2013, all new applicants for the DLA will instead have to claim PIP. Claimants will have to undergo a more rigorous medical assessment and will be judged by stricter criteria. Those who are found to be eligible for the new benefit will also face reassessments in order to determine whether they remain eligible. It is highly likely that considerable numbers of current claimants may fail to meet these new requirements, which have already been the subject of considerable criticism from disability groups³⁴.

Existing difficulties with the assessments risk being compounded by what appears to be the primary objective of reducing expenses. There is a significant danger that other stated objectives of the reform, such as ensuring more accurate diagnoses and securing the more targeted provision of care will be inevitably compromised by an emphasis on cost reduction. The DWP Impact Assessment in to the reforms itself anticipates that the change will result in 500,000 fewer claimants than if the current trajectory of the programme’s growth was maintained³⁵.

Given that women constitute a slight majority of DLA claimants, there is a risk that the changes will affect female claimants in slightly higher numbers; however there is additional cause for concern. The possibility of new medical

³¹ Office for National Statistics, *Country Profiles-Key Statistics-Wales- August 2012*, August 2012. Accessed 18th September 2012 <http://www.ons.gov.uk/ons/dcp171780_275347.pdf>3, Page 2

³² DWP Tabulation Tool, Disability Living Allowance (Cases in Payment) <http://83.244.183.180/100pc/tabtool.html>

³³ Ibid

³⁴ Disability Rights UK. *PIP assessment criteria and thresholds consultation Disability Rights UK response*. May 2012. Accessed 18th September 2012 <<http://www.disabilityrightsuk.org/pipconsult.pdf>> , Page 3

³⁵ Department for Work and Pensions, *Disability Living Allowance Reform: Impact Assessment*, May 2012. Accessed 18th September 2012. <http://www.dwp.gov.uk/docs/dla-reform-wr2011-ia.pdf>, Page 9

assessments making it harder for those with certain, less observable conditions to qualify for the PIP is likely to disadvantage female claimants as well. For example, a particular concern lies with the reliability of the new assessment in terms of evaluating mental health, psychiatric and behavioural disorders.

A statement by a coalition of mental health charities as well as the Royal College of Psychiatrists voiced serious concerns pertaining to the fairness and potential accuracy of the proposed assessments for those with psychiatric and mental illnesses³⁶. Due to the varied clinical presentations of these conditions as well as the intermittent courses that they can take, even assuming that medical assessments are being conducted as rigorously as would be needed, they could still fail to accurately gauge the severity of these conditions. Despite the government's assurances that mental health will have parity with physical disabilities in terms of assessment for living expenses, it is essential to note that a failure to properly assess these conditions could have serious consequences for the approximately one in seven (13.9%) female DLA recipients in Wales who receive it, to cope with one of six disorders which can be broadly characterised as psychiatric or behavioural illnesses as well as addictions (alcohol and drug abuse, hyperkinetic syndrome, behavioural disorder, personality disorder, psychoneurosis and psychosis)³⁷. Women make up more than 46% of all Welsh DLA recipients for this group of illnesses³⁸. This group, which includes over 17,000 women are therefore likely to be at an increased risk of having their eligibility for the DLA or the PIP withdrawn

³⁶ Centre for Mental Health, Hafal, Mental Health Foundation, Mind, Rethink Mental Illness, Royal College of Psychiatrists and the Scottish Association for Mental Health, *Personal Independence Payment: Assessment Thresholds and Consultation*, April 2012. Accessed 19th September 2012

<<http://www.rcpsych.ac.uk/pdf/PIP%20-%20assessment%20thresholds%20consultation%20response%20V%20FINAL.pdf>> Page 3

³⁷ DWP Tabulation Tool, Disability Living Allowance (Cases in Payment)
<http://83.244.183.180/100pc/tabtool.html>

³⁸ DWP Tabulation Tool, Disability Living Allowance (Cases in Payment)
<http://83.244.183.180/100pc/tabtool.html>

Housing Benefit

The current benefit, designed to assist low-income individuals and families with housing costs will eventually be merged in to the UC for new and existing claimants. However this transition is being preceded by a number of fundamental changes to the benefits, many of which are already underway, some of which are separate from the Welfare Reform Act.

Early changes have contained three key measures - focusing on measures to deter under-occupancy of properties, calculating entitled benefits differently and reforming eligibility as well as general reductions in benefit payments. As these changes are comparatively minor compared to what is to come, these may underestimate the full impact of changes to HB.

There are reasons to believe that women will be hit by the changes in significant numbers. For example, women represent a majority (54%) of tenants in social housing³⁹ - a key measure of housing benefit, as 66% of those who claim HB in Wales reside in social housing⁴⁰. The measures aimed at social housing can therefore be expected to affect a greater proportion of female claimants. Of these measures, the under-occupancy prevention element, the so-called 'Bedroom Tax' will have most impact. This penalises HB claimants in socially rented properties which are classified as containing more rooms than is considered necessary for their needs with reductions in the amount of benefit to which they are entitled⁴¹.

The DWP estimates around 40,000 Welsh HB claimants in Social Housing will be hit by the changes, with an estimated loss of £12 a week⁴². As with many of the changes to this benefit, a gender breakdown is difficult to produce, however the high percentage of female claimants in social housing suggests that many of those affected are likely to be women. However a full analysis

³⁹ Statistics for Wales, Welsh Government, *Statistical Bulletin: Equalities Data for Social Housing Tenants*, 2012, May 2012. Accessed 19th September 2012 <<http://wales.gov.uk/docs/statistics/2012/120529sb452012en.pdf>>, Page 7

⁴⁰ Department for Work and Pensions, *Housing and Council Tax Benefit Release August 2012, Table 3 Housing Benefit recipients by Region and Local Authority*, August 2012. Accessed 19th September 2012 <http://statistics.dwp.gov.uk/asd/asd1/hb_ctb/hbctb_release_aug12.xls>

⁴¹ W, Wilson, *Under-occupation of social housing: Housing Benefit entitlement*, Standard Note SN06272, House of Commons Library, July 2012. Accessed 19th September 2012 <<http://www.parliament.uk/briefing-papers/SN06272.pdf>>, Page 1

⁴² Department for Work and Pensions, *Housing Benefit: Under occupation of Social Housing, Impact Assessment*, June 2012. Accessed 19th September 2012, <<http://www.dwp.gov.uk/docs/social-sector-housing-under-occupation-wr2011-ia.pdf>>, Page 10

would require the data by age as well as sex since the under-occupancy sanctions will not impact on women over the State Pension age.

The imposition of a cap on the amount of selected benefits households are entitled to has been one of the most notable features of the Act. It is estimated that comparatively few, only 1,500 of the approximately 56,000 affected households will be in Wales⁴³. The numbers are still significant however; approximately 2,500 adults and 6,000 children in the affected households will see reductions in payments⁴⁴, with an average loss at the national level of £93 per week⁴⁵. As with other changes to HB, it is likely to have both a primary and secondary impact on women. Female claimants will face greater housing insecurity whilst female family members of affected claimants will also face hardship.

There are a number of potential difficulties with how the housing component of the UC will be delivered to claimants. One of the most substantial changes will be a shift to direct payments for housing costs to claimants themselves, rather than to housing providers. There is a risk that women and their families will have to allocate housing payments to landlords out of reduced payments, compromising their housing security and increasing their cost of living pressures.

Data on Housing Benefit recipients which is disaggregated by gender is not readily available at the Welsh level. This is indicative of a broader difficulty which the Welsh Government is currently experiencing in compiling its Stage Two Analysis in to the likely impact of the reforms; that is a lack of sufficient data on the benefits to effectively and accurately model the effect of the changes Housing Benefit is only one of many passported benefits for which the data necessary for in-depth analysis and modelling of the likely behavioural impact induced by the changes is simply not available.

⁴³ Department for Work and Pensions, *Benefit Cap: Equality Impact Assessment*, July 2012. Accessed 19th September 2012, <<http://www.dwp.gov.uk/docs/eia-benefit-cap-wr2011.pdf>>, Page 9

⁴⁴ Department for Work and Pensions, *Benefit Cap (Housing Benefit) Regulations 2012: Impact assessment for the benefit cap*, July 2012. Accessed 19th September 2012 <<http://www.dwp.gov.uk/docs/benefit-cap-wr2011-ia.pdf>>, Page 8

⁴⁵ Department for Work and Pensions, *Benefit Cap (Housing Benefit) Regulations 2012: Impact assessment for the benefit cap*, July 2012. Accessed 19th September 2012 <<http://www.dwp.gov.uk/docs/benefit-cap-wr2011-ia.pdf>>, Page 10

Income Support

Income Support is payable to certain individuals on low incomes. Many women are eligible for IS on the grounds of being a lone parent, with 51% of all women who receive IS in Wales receiving it on these grounds.

One of the earliest features of the Welfare Reform Act to go in to implementation is a significant change to Income Support for lone parents. As of this year, lone parents whose youngest child is over the age of 5 will no longer be able to claim IS solely on the grounds of being a lone parent. Some will be transferred to other benefits, such as JSA and IS claimants in the future will have to apply for the Universal Credit.

As women are overwhelmingly more likely to be lone parents, this is therefore one of the reforms which will impact women the most. Women represent 97% of all of those who claim IS on the grounds of being a lone parent in Wales⁴⁶. This adds up to 29,740 women at risk of the withdrawal of this support if their youngest child is over the age of 5 years. Any change to this system, before addressing the specifics will, almost by definition, not only disproportionately but primarily target women. Given the nature of the changes, the effects can be reasonably presumed to be disruptive and potentially harmful to lone parents and their children.

Table 3: Lone parents receiving Income Support in Wales by gender

Total IS recipients (Lone Parents)	Male	Female	Female % of total
30,550	810	29,740	97%

Source: DWP Tabulation Tool, Income Support

At the UK level, 96% of all claimants for IS on the grounds of being a lone parent with a youngest child aged 5-6 years were women⁴⁷, it is likely that the respective percentage in Wales is comparable, given the similarly high percentage of women who receive IS as lone parents. Almost all lone parents in this category will therefore be transferred on to job seeking benefits. With

⁴⁶ DWP Tabulation Tool, Income Support <http://83.244.183.180/100pc/tabtool.html>

⁴⁷ Department for Work and Pensions, *Removing Income Support eligibility for lone parents with a youngest child aged five or over: Equality Impact Assessment*, March 2011. Accessed 18th September 2012 <<http://www.dwp.gov.uk/docs/eia-lone-parent-conditionality-wr2011.pdf>>, Page 8

this in mind, it should be noted that in spite of the many difficulties lone parents face within the labour market, a majority are employed. Almost 57 percent of IS lone parent claimants in the UK were employed in 2009⁴⁸, indicating that work incentives for lone parents may therefore be stronger than is assumed. However if the percentage of lone parents with a youngest child aged between 5 and 6 years is analysed, it soon becomes apparent that as the DWP Impact Assessment notes, this group in particular “tend to fare worse in terms of employment outcomes”⁴⁹. At a national level, the percentage of lone parents in this group who are in employment is 18% lower than the average rate for lone parents⁵⁰. Lone parents with a youngest child aged 5-6 years are also more likely to be classified as disabled, with 22% of lone parents in this category suffering from a disability⁵¹

Even if a majority of lone parent IS claimants are in employment, removing support for almost all lone parents with a youngest child over 5 years and transferring many on to job-seeking benefits with specific, and more stringent requirements carries major risks to these women’s financial and emotional well-being. Lone parents will be most affected by this change and are a group which already face more barriers in accessing work. The group with the youngest children and a higher likelihood of disabilities risk entering the labour market at a further disadvantage to other lone parents. The possibility that employment for lone parents in this category, which will be compatible with school hours and other demands can be obtained in sufficient numbers may be very low, particularly with economic conditions as they are. In combination with the increased severity of sanctions, even for minor infractions which will be discussed at length further on, there is a genuine danger that lone parents may not only be unable to find suitable employment, but also face a complete loss of benefits for extended periods of time.

⁴⁸ Department for Work and Pensions, *Removing Income Support eligibility for lone parents with a youngest child aged five or over: Equality Impact Assessment*, March 2011. Accessed 18th September 2012, <<http://www.dwp.gov.uk/docs/eia-lone-parent-conditionality-wr2011.pdf>>, Page 2

⁴⁹ Department for Work and Pensions, *Removing Income Support eligibility for lone parents with a youngest child aged five or over: Equality Impact Assessment*, March 2011. Accessed 18th September 2012 <<http://www.dwp.gov.uk/docs/eia-lone-parent-conditionality-wr2011.pdf>>, Page 11

⁵⁰ Ibid

⁵¹ Ibid

Additional Concerns

In addition to the major structural changes to the benefits outlined above, there are further concerns regarding the negative impact that features of the Welfare Reform Act could have on Welsh women. How the transition to the UC will be accomplished and how the requirements of job seeking benefits will affect women are the primary causes for additional concern.

1. The transition to the Universal Credit could pose major difficulties for female claimants. For example, the internet based nature of the applications for UC may not make a significant enough allowance for those who lack these means. As more than one third of the adult population of Wales is estimated to be digitally excluded⁵², this aspect of the transition could prove extremely problematic. Those who are digitally excluded are most likely to be the most vulnerable to the negative effects of the reforms, and there is good reason to assume that women in these groups will be some of the most disadvantaged and inconvenienced by this aspect of the transition. This is particularly the case for women in the groups most likely to be impacted by these changes such as those on low incomes and that single parents are considered “particularly vulnerable to digital exclusion”⁵³. It will be necessary for sufficient provision to be made for these groups in order to prevent even further disruption for claimants.
2. Sanctions imposed for noncompliance with benefit regulations have already increased substantially over the past 2 years. This is particularly the case with Jobseeker’s Allowance. There have been repeated instances across various authorities of claimants being sanctioned for minimal violations of the requirements, many of which are poorly explained to claimants initially. For example, Citizen's Advice Bureaux in England and Wales have noted increased enquiries regarding sanctions- these increased by 33% between 2010/11⁵⁴.

⁵² Welsh Assembly Government, *Delivering Digital Inclusion: A Strategic Framework for Wales*, December 2010. Accessed 19th September 2012

<<http://wales.gov.uk/docs/dsijg/publications/comm/101208deliveringdien.pdf>>, Page 1

⁵³ C, O’Byrne. *Get the Girls Online: Why Wales Needs a Gendered Strategy To Tackle Digital Exclusion*, Women in Society, Volume 1, Spring 2011. Accessed 19th September 2012

<www.newport.ac.uk/research/Journals/wis/vol1/Documents/WIS.1.6.docx> Page 1

⁵⁴ Citizens Advice et al, *Conditionality and Sanctions in the Welfare Reform Bill*, November 2011. Accessed September 18th, 2012 <www.citizensadvice.org.uk/conditionality_and_sanctions-2> , Page 2

3. Increased conditionality has not been accompanied by greater awareness of certain flexibilities for claimants. There is evidence that single parents, many of whom will be unable to take work which does not provide the flexibility needed to care for their children, are not informed of provisions which enable them to restrict the hours which they are available for work to their children's school hours. A DWP study noted that only 12% of lone parent JSA recipients surveyed had been made aware of this provision⁵⁵. Lone parents who are not aware of provisions such as these may reject or fail to apply for jobs which they should not be expected to take because they have failed to specify the specific hours which they are available for work, as Jobcentre staff may have failed to inform them of this provision. As turning down a 'reasonable offer of employment' can merit severe, higher level sanctions this is particularly serious. Taken in conjunction with the increased number of sanctions this lack of information could have potentially harmful consequences for lone parents and their children.
4. Statistics on JSA sanctions are cumulative and it is not possible to estimate the proportions of men and women sanctioned compared to their respective proportions of the JSA population at any given time, particularly as the JSA population has historically been disproportionately male. Despite this, it is probable that female claimants, owing to specific responsibilities may be at elevated risk of being sanctioned - it is imperative therefore that requirements are transparent, and that allowances be made for extenuating circumstances-the current guidelines for what does and does not constitute good cause may therefore require clarification. There are various potential causes for this increased risk:
 - Women may be more reliant on public transportation in order to reach Jobcentres for interviews and meetings
 - Coping with the demands of childcare may result in women failing to complete all required tasks

Regardless of the precise causes, an expansion in the scope and severity of sanctions, in the absence of more specific safeguards may result in a

⁵⁵ N Coleman & L Lanceley, *Lone Parent Obligations: supporting the journey into work* Research Report No 736, Department for Work and Pensions, May 2011. Accessed September 18th 2012 <<http://research.dwp.gov.uk/asd/asd5/rports2011-2012/rrep736.pdf>> Page 86

disproportionate number of female claimants being sanctioned, and for far more extended periods of time.

5. There have been troubling reports regarding intentional sanction targets that Jobcentre staff are pressured in to meeting - this would consist of sanctioning a minimum number of claimants per week⁵⁶. While none of the Jobcentre groups implicated were in Wales, and the DWP has stated that this process which emerged out of a misinterpretation of regulations was immediately cancelled,⁵⁷ there are still major concerns.

Lone parents have been some of the most at risk of being sanctioned due to being given insufficient or partial information regarding certain provisions which are open to them - it is likely that a lack of information on flexibilities could result in them receiving sanctions that were completely avoidable.

6. The UC's emphasis on work vastly increases the severity of all sanctions. Even shorter suspensions of benefits, imposed for lesser infractions of JSA requirements, are now set at potentially hazardously extended periods of time. For example, claimants can be sanctioned for a period of 4 weeks if they fail "to attend an adviser interview at the Jobcentre"⁵⁸. This is at least twice as long as the maximum existing sanction for this type of violation. Furthermore, repeated violations warrant sanctions for such an extended period of time as to risk causing serious deprivation and hardship to those sanctioned, as well as their families. A further violation of this kind can result in a 13-week sanction if it occurs within a year of the previous infringement⁵⁹. As female claimants are significantly at risk of being sanctioned for these kinds of violations, any heightening of existing sanctions could result in hardship. The failure to adequately publicise these new penalties, and the offences which can trigger them could result in increased numbers of sanctions.

⁵⁶ J, Domokos, *Government admits Jobcentres set targets to take away benefits*, The Guardian, April 8th 2011. Accessed 17th September 2012 < <http://www.guardian.co.uk/politics/2011/apr/08/jobcentres-benefits-sanctions-targets>>

⁵⁷ C, Miller, *Welsh job-seekers more likely to have benefits stopped*, April 29th 2011. Western Mail. Accessed 17th September 2012 <http://www.walesonline.co.uk/news/local-news/ebbw-vale/2011/04/29/welsh-job-seekers-more-likely-to-have-benefits-stopped-91466-28602503/#ixzz26Z2uE4Ye>

⁵⁸ Department for Work and Pensions, *Explanatory Memorandum to The Jobseeker's Allowance (Sanctions)(Amendment) Regulations 2012*, July 2012. Accessed 17th September 2012 < <http://www.dwp.gov.uk/docs/jsa-sanctions-draft-regs-2012-memorandum.pdf>> Page 4

⁵⁹ Ibid

7. Once off benefits - either by sanctions or disallowance - there are few contingency measures that may be judged adequate enough to cope with the situation of individuals who have lost most of their household income. With few avenues left to them, there are concerns that, as many people in Wales have begun to⁶⁰, women who have lost benefits will turn to loan sharks. There is a serious need for emergency and crisis provision that is sufficiently equipped to sustain people who find themselves in dire need but who have lost their eligibility for state assistance.

8. There are a number of additional benefits which will also undergo restructuring and be incorporated in to the Universal Credit, namely Working and Child Tax Credits. A gender breakdown for these benefits is, as with others, not available at the Welsh level. It has therefore not been possible to estimate the impact of the scheduled changes to these programs, however close attention must be paid to the reforms which will be going ahead, in order to assess the impact on low-income families who receive them.

⁶⁰ BBC News, *Number using loan sharks in Wales up 40% in four years*, BBC News, 4 August 2011. Accessed September 18th, 2012 <<http://www.bbc.co.uk/news/uk-wales-14408885>>

Conclusions

The long term impact of the reforms can not be predicted accurately at this time, however they are likely to refashion the safety net programmes women rely on in way not previously attempted by any British Government in living memory. This means disruption and fundamental changes for women already claiming needed support from these programmes at a time of rising unemployment and economic insecurity. It also ensures that future female claimants will face greater uncertainty with regard to potentially less financial support from social safety net programmes.

From the available evidence, the concerns regarding the current reforms and the implementation of Universal Credit on women and their families in Wales can therefore be summarised in the following way:

1. That female benefit claimants in Wales and their families will face significant disruption owing to reforms currently underway, and that this is likely to intensify as the number and pace of changes increases with the implementation of the UC.
2. Wales's higher percentage of ESA and disability benefit claimants renders it intrinsically more vulnerable to the negative effects of these reforms and, as a result of this, women in the most difficult circumstances risk being impacted most severely.
3. Changes to Income Support will primarily affect women, with lone mothers hardest hit. Almost 30,000 stand to lose Income Support because their youngest child is over five years old.
4. It is not the movement of lone parents off Income Support and on to job seeker's benefits which is an intrinsic concern. If sufficient provisions were made with regard to sanctions, and allowances were made regarding the specific financial pressures that lone parents face, this would be less problematic.
5. Changes to ESA will affect women both directly - through the potential loss of benefits for more than 8,600 women, or indirectly as the partners of claimants who may face incentives to reduce working hours or leave employment in order for partners to become eligible for the means-tested component.

6. There is a likelihood that the cumulative impact of these changes will be that women in Wales face, on average, a combination of reduced benefits, stricter compliance measures and in certain cases weakened work incentives.
7. Not all reforms will have comparable effects - the withdrawal of Income Support may leave women with increased incentives to work, but with far more stringent compliance measures arising from claiming the UC and the possibility of severe penalties if they do not meet them.
8. That women have already been at higher risk of sanctions, and that the more severe penalties introduced under the terms of the Act are likely to entrench this disproportionate effect and simultaneously amplify the financial risk to women.
9. Sickness and disability benefits are being reformed with the explicit intention of limiting the number of individuals eligible for them - the criticisms which have been raised regarding the objectivity of the assessment process make this even more problematic.
10. That many female claimants who will now be expected to seek work in order to continue claiming support will include some of the groups most isolated from the labour market, and their potential for gaining employment in current economic conditions is therefore far more limited.

Recommendations

Acknowledging that welfare provision is in general not a devolved area, and that the Welsh Government is operating under immense financial constraints, we realise that little can be done in order to modify the changes which have been and will be implemented. However given that Wales could be severely affected by the reforms going ahead, that this impact would be most keenly felt at the most vulnerable levels of society and that the impact on women, children and the disabled is of particular concern, it may become necessary to find ways to ameliorate the sharpest edges of the reforms. It would help alleviate the most detrimental impact of elements of the reforms if certain targeted provisions were made for those likely to suffer most from their implementation

The Welsh Government already makes significant efforts to assist low income families with cost of living pressures. The School Uniform and Pupil Deprivation Grants, Income Maximization schemes as well as its campaign against Fuel Poverty to name only a few, are exceptional indicators of this commitment. Putting in place schemes to assist those who face reductions or losses of benefits in their time of need would be building upon already extensive efforts aimed at assisting some of Wales' most disadvantaged groups, and provide vital support for those who could find themselves in dire need. What is needed therefore is a second layer to the safety net, in order to insulate those affected from real deprivation

With these issues in mind, and with the conclusions reached in this report it is possible to make the following recommendations for what actions the Welsh Government could take in order to mitigate the negative effects of recent and forthcoming welfare on women and their families in Wales:

1. To release well-publicised and timely delivered warnings about changes to benefits, including instructions with regard to what actions to take about the changes, may help to reduce the informational difficulties associated with the reforms. This would be especially important for Contribution Based ESA claimants who are not in the Support Group and lone parents who claim Income Support. If claimants are forewarned, and are fully aware of the changes, this at least enables them to apply for alternative benefits, or to seek employment. These could be publicised in a variety of ways, through posters, social media, television

and radio advertising as well as initiating some targeted direct mail campaigns to those likely to be affected.

2. To monitor the impact of the transfers to UC programmes closely, paying specific attention to information on sanctions, as well as appeals regarding medical assessments and make appropriate queries to the DWP
3. To carefully evaluate the provisions which will be made for claimants without regular internet access or effective computer skills and make extra provisions if this is deemed necessary. If dedicated terminals can be placed in public services such as libraries, community centres and other public buildings, such as the three Citizen Hubs in Cardiff, and if staff can receive information on the basic features of the system, this would at least provide women without internet access at home, or sufficient internet skills, to have some recourse for support.
4. To take advantage of the devolution of the Social Fund - the first area of welfare policy to be devolved to the Assembly. As other organisations such as Cuts Watch Cymru have argued, augmenting its programmes such as Crisis Loans with as much funding as possible, and a more accessible and less punitive application process, could offer the bolstered safety net necessary to prevent cases of serious hardship as a result of benefit changes⁶¹
5. The voluntary sector will be on the front line of these changes, as they will play a key role in addressing immediate and specific needs such as homelessness or a lack of food. Churches, charities and other voluntary organisations will be among the first places women and their families will turn to if faced with a suspension of benefits. Cardiff Food Bank reports that half of all of those who receive aid require it because of a loss of benefits⁶². Charities cannot provide individuals with a replacement income; however they can provide assistance for urgent needs with the level of immediacy that is needed. If the Welsh Government partnered with these voluntary organisations, for example by establishing some line of communication between them and the departments responsible for administering the Crisis Loans, they could

⁶¹ BBC News, *Cuts Watch Cymru urge crisis loans to be more accessible*. BBC News, 13 April 2012. Accessed September 17th, 2012 <<http://www.bbc.co.uk/news/uk-wales-17680315>>

⁶² Cardiff Food Bank, *About Us*. Accessed September 17th 2012 <<http://www.cardifffoodbank.org.uk/#/about-us/4552481615>>

alert those who require emergency assistance of their availability more effectively. This would ensure that those who are most likely to be at risk - those in need of hardship assistance - will be able to avoid extreme deprivation.

6. With demand for their services very likely to increase, these charities will need greater funding, and they must be publicised to those facing severe hardship. The Welsh Government could either provide some direct funding to these charities or it could provide them with a more visible profile, through promoting donations and advertising their availability to those in need.
7. Acknowledging the difficulties that female claimants can face with regard to meeting the new demands placed on claimants for Universal Credit, a scheme could be launched to provide free or subsidised travel for job interviews, appointments at the Jobcentre, as well as other work related activities. This could take the form of a concessionary travel pass. It would give them the flexibility as well as the means that may be needed to navigate the new demands and help them avoid sanctions.
8. Similar consideration should be given to providing childcare.

Spending cuts and limited revenues ensure that the funding which would be necessary to implement these recommendations may not be readily available. However in order to effectively ensure Welsh women and their families are protected from the hardship and deprivation which could result from aspects of these changes, there is a clear social imperative for contingency plans such as these to be pursued as far as is possible.

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ⁱ These figures were obtained from data which is collected and assessed by the Office for National Statistics as part of the ONS Quarterly Public Sector Employment Survey and published by the Local Government Association. A summary of employment reductions by Local Authority is also provided by the GMB, using these statistics. See GMB, *Women Hit by Job Cuts-Related Release for Wales*, October 2011. Accessed 18th September 2012, <<http://www.gmb.org.uk/pdf/Wal%20Women.pdf>

ⁱⁱ As above

ⁱⁱⁱ Also includes the Assessment Phase, which counts towards the time limit unless claimants are placed in the Support Group. Given the small number of claimants who ultimately enter the Support Group, and the stricter eligibility requirements coming in to force, it can be reasonably assumed that few of these will therefore remain eligible