

Written evidence from the *Sanctions, Support & Service Leavers: Welfare Conditionality and Transitions from Military to Civilian Life* Project (ANC0036)

Dr Lisa Scullion*, Professor Peter Dwyer, Dr Katy Jones*, Philip Martin* and Dr Celia Hynes***

*University of Salford

**University of York

1. Introduction

- 1.1 This response draws on new evidence from a study called *Sanctions, Support & Service Leavers: Welfare Conditionality and Transitions from Military to Civilian Life* funded by the Forces in Mind Trust (FiMT)¹. The two-year study (2017-2019) is a collaboration between the University of Salford and the University of York. This study represents to first research to focus upon the experiences of military veterans within the UK social security system.
- 1.2 The project involves qualitative longitudinal research with 68 veterans living in the North West, North East, Yorkshire and London, along with consultation with 19 key stakeholders representing government departments, local authorities and third sector organisations.
- 1.3 This submission was prepared by Dr Lisa Scullion, Dr Katy Jones and Professor Peter Dwyer on behalf of the research team. This submission is based on the first wave findings of the study, which were published in April 2018².
- 1.4 The study is linked to the ESRC-funded *Welfare Conditionality: Sanctions, Support & Behaviour Change* project³, for which there is a separate submission to this Inquiry.

2. Background

- 2.1 In 2011, the UK Government published The Armed Forces Covenant⁴ (hereafter referred to as the Covenant), a 'statement of the moral obligation which exists between the nation, the Government and the Armed Forces in return for the sacrifices they make'⁵. The Covenant asserts that no member of 'The Armed Forces Community' (defined as current and former Service personnel and reservists and their families, including families of deceased Service men and women) should face disadvantages when accessing public or commercial services, with 'special consideration' deemed appropriate in some cases.
- 2.2 In relation to social security benefits, the Covenant states that 'Members of the Armed Forces Community should have the same access to benefits as any UK citizen, except where tailored alternative schemes are in place'⁶. The Department for Work and Pensions (DWP) has made a series of adjustments to Jobcentre Plus

¹ *Sanctions, Support and Service Leavers: Welfare Conditionality and Transitions from Military to Civilian Life* has been funded by the Forces in Mind Trust (FiMT), a £35 million funding scheme run by the FiMT using an endowment awarded by the Big Lottery Fund.

² <http://www.fim-trust.org/wp-content/uploads/2018/04/20180410-FiMT-Sanctions-Support-Service-Leavers-Interim-Report.pdf>

³ <http://www.welfareconditionality.ac.uk/>

⁴ Ministry of Defence (MoD) (2011) *The Armed Forces Covenant*, UK: HM Government.

⁵ Murphy, C., Brooke-Holland, L., Thurley, D., Wilson, W., Kennedy, S. and Bellis, A. (2016) *Support for UK Veterans*, House of Commons Library Briefing Number 7693, 2 September 2016, online at:

<http://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7693#fullreport>

⁶ MoD (2013) *The Armed Forces Covenant: Today and Tomorrow*, online at:

(JCP) services to support current and former Service personnel and their families. This includes locating an Armed Forces Champion (AFCs) in every JCP district, whose role is to facilitate ‘joint working’ between JCP and the Armed Forces community in their district; informing JCP staff about specific Armed Forces initiatives; providing an understanding of the issues faced by the Armed Forces community that can present barriers to employment, and identifying ways to overcome these; and promoting the skills, knowledge and experience of the Armed Forces community⁷. AFCs are not ‘customer’-facing; rather, they provide advice and guidance to JCP advisors on issues of relevance when working with the Armed Forces community.

- 2.3 Additionally, a number of specific ‘employment and benefits initiatives’ form part of the DWP commitment to the Covenant, including certain exemptions and easements. For example, those receiving Armed Forces Compensation Scheme (Guaranteed Income payments) or War Pension Scheme payments (this includes war widow’s/widower’s pension and war disablement pension) are exempt from the Benefit Cap, and those looking to claim income-based JSA who have served overseas are exempt from the three-month residency requirement of the Habitual Residency Test (exemption extended to cover spouses/partners and children in 2015).
- 2.4 Specific easement rules on voluntary unemployment conditionality also apply, which allow veterans’ spouses/partners to claim JSA if voluntary unemployment has arisen as a result of them moving to follow their serving partner⁸. Furthermore, Armed Forces Service leavers and their families appear in the DWP *Vulnerability Guidance* on a designated list of ‘life events or personal circumstances’ that may ‘indicate that an individual requires additional support’⁹. However, the provision of additional support requires a claimant to *disclose* their circumstances to JCP. For those injured in Service resulting in severe disablement, it is suggested that evidence from the Service Medical Board should be used to determine their eligibility for ESA and Universal Credit, instead of requiring them to undergo a WCA¹⁰ as required for other claimants¹¹. The recent *Work, Health and Disability Green Paper* suggests that such evidence could be used more widely in the assessment of *all* veterans’ claims¹².
- 2.5 Although there are no specific welfare-to-work programmes for Armed Forces veterans who enter the benefits system, those who have served in the Armed Forces at any point (and for however long) within the past three years were entitled to early access to the Work Programme. However, evidence from the DWP suggests that ‘only a very small proportion of Work Programme providers offered specialised support for veterans’¹³. At the time of writing, the Work Programme is being replaced by the new Work and Health Programme, where ‘former members of the Armed Forces’ and ‘Armed Forces Reservists’ are listed as eligible for early referral to the Programme¹⁴.
- 2.6 For the majority of Armed Forces Service leavers the transition to civilian life is relatively unproblematic, with many drawing on the available resettlement services to support their transition. However, research

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/49470/the_armed_forces_covenant_today_and_tomorrow.pdf

⁷ DWP and MoD (2016) *Guidance: Armed Forces access to Jobcentre Plus services and armed forces champions*, online at: <https://www.gov.uk/government/publications/jobcentre-plus-services-for-the-armed-forces-and-their-families/armed-forces-enhanced-access-to-jobcentre-plus-services-and-armed-forces-champions>

⁸ *Ibid.*

⁹ DWP (not dated) *Vulnerability Guidance: Additional Support for Individuals*, London: DWP, online at: <https://www.whatdotheyknow.com/request/259586/response/635763/attach/4/Vulnerability%20guidance.pdf>

¹⁰ MoD (2013), *op. cit.*

¹¹ The DWP stated that for the most severely disabled military personnel there is currently a process in place whereby DWP uses evidence from the Service Medical Board.

¹² DWP and DoH (2016) *Improving Lives: The Work, Health and Disability Green Paper*, online at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/564038/work-and-health-green-paper-improving-lives.pdf

¹³ Murphy, C. et al. (2016), *op. cit.*

¹⁴ Powell, A. (2018) *Work and Health Programme*, Briefing Paper Number 7845, 8 January 2018, online at: <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7845#fullreport>

recognises the significant issues that can occur in the transition process, with concerns raised around the financial hardship faced by some veterans, which is further exacerbated by difficulties in accessing employment and benefits¹⁵. Although these issues often apply to the general UK population, it is suggested that they can be amplified by the distinctive characteristics of active Service and Service family life (e.g. the impact of injuries and trauma, issues relating to continuity of employment, and pressures on relationships).

- 2.7 Despite the DWP commitments to the Covenant, no research to date has explored the experiences of veterans and their families within the UK social security system. With the introduction of UC and the development of the new Work and Health Programme, it is vital to ensure not only that the experiences of veterans and their families are acknowledged and understood, but that their needs are met as the UK benefits system continues to develop. To address this significant policy and knowledge gap, our research focuses on veterans' pathways into, and subsequent experiences of, the benefits system, with consideration of the impact of some of the exemptions and easements relating to the Covenant.

3. Our response to the Inquiry

- 3.1 The following provides our response to some of the key questions posed by the Inquiry, drawing upon the evidence from our first wave findings with 68 veterans and 19 key policy and practice stakeholders. The veterans who took part were claiming Employment and Support Allowance (ESA), Jobseekers' Allowance (JSA) and Universal Credit (UC).

To what extent is the current sanctions regime achieving its policy objectives?

- 3.2 A total of 21 veterans (out of our sample of 68) said that they had experienced a benefit sanction at some point during their interaction with the benefits system. The reasons given by respondents for being sanctioned ranged from being late for or missing a prearranged appointment; incorrectly completing their online job search journal; failure to undertake their specified required number of hours of job search; and, on occasions, administrative errors on the part of DWP staff.
- 3.3 We understand that the key policy objectives underpinning the use of sanctions are to encourage 'positive behaviour change' and encourage welfare claimants to look for work and/or engage in work-related activity. However, in line with existing research¹⁶ the regular application of compulsory full-time work search/training requirements under the threat of benefit sanctions sometimes led to a counterproductive 'culture of compliance' amongst our veteran participants that got in the way of more meaningful and effective attempts to secure employment. For example, some respondents indicated that they only used Universal Jobmatch to comply with the conditions attached to continued receipt of their benefits and avoid a sanction, and that they then used other sites that were more likely to help them find an appropriate job:

Every day logging on to Universal Jobmatch, which to me isn't appropriate for me because there's a lot of recruitment companies out there that do ex-Forces, which is better for me. So Universal Jobmatch is a bit of a pain in the backside, because sometimes you log on to apply for a job just so it covers you to show them in the Jobcentre you've been looking for work... You have to log on to Universal Jobmatch even though it's no good to you (JSA claimant).

- 3.4 Furthermore, veterans described how the emphasis on taking 'any job' – reinforced by the threat of sanctions – gave no consideration to their previous work experience or skill set from their time in the Armed Forces:

¹⁵ Herritty, H., Hudson, M. and Letts, M. (2011) *Health, welfare and social needs of the Armed Forces community: a qualitative study*, London: The Royal British Legion, online at:

<https://www.britishlegion.org.uk/media/2285/welfare2010qualitativestudy.pdf>

¹⁶ Wright, S., Dwyer, P., McNeill, J. and Stewart, A. B. (2016) *First Wave Findings: Universal Credit*, online at:

<http://www.welfareconditionality.ac.uk/wp-content/uploads/2016/05/WelCond-findings-Universal-Credit-May16.pdf>

They [Jobcentre Plus] just said I couldn't choose, I couldn't turn down jobs, so I'd have to go with anything that was offered, if I did turn down jobs I'd get sanctions... it's not as easy as that. I've got to do certain types [of work], security jobs are perfect for me because it suits my skill set from the Army, from being a Guardsman... But you put me in a factory and I'm no good... [I'm] going to end up back on the dole in three months' time, if not earlier (UC claimant).

- 3.5 For some of our veteran respondents – and running counter to the purpose of conditionality – the removal of conditionality was perceived to have a more positive impact on the ability to prepare for employment. For example, a veteran with a respiratory impairment had initially been placed in the WRAG of ESA. His ex-wife had helped to challenge this decision with reference to his deteriorating health:

She challenged it because I was getting worse. I was having at least two attacks a month, and they were hospitalised, every one of the... Then you get the phone call [from Jobcentre Plus], and it's, 'Why aren't you coming in to do your job search'. 'Well, I'm in hospital' (ESA SG claimant).

Following the provision of additional medical evidence, he was subsequently reassigned to the Support Group. In addition to his physical health condition, he stated that he also had PTSD as a result of his time in Service. The removal of the expectation of having to go to the Jobcentre and the associated threat of sanctions had enabled him to focus on his health but also take steps towards returning to the labour market.

- 3.6 Overall, across our veteran sample, evidence that compulsory job search activities under threat of sanctions were effective in helping people to move into work was extremely rare. The exception was one respondent who suggested that being sanctioned had given him more of a 'push' to find work. However, he indicated that the sanction had also made him more likely to be *dishonest* about his job search activities in the future:

I was just more determined to get into work as soon as possible, because I don't want to experience that [sanction] ever again... If I was totally honest, and I was having my son – no, I wouldn't do a job search on Boxing Day, but I'd fill something in on the book and put it down as the 26th December. I wouldn't make the mistake of being honest and saying, 'Look, I've been looking for work apart from Boxing Day, because I had my son' – I wouldn't make that mistake again (Recently moved from JSA into paid work).

- 3.7 For some of our participants difficulties meeting the conditions of their claim and the experience of sanctions had led to decisions to disengage from the benefits system. This resulted in a reliance on the support of family, friends and charitable provision:

'Right, we've got to do this for you, we've got to do a CV for you, we've got to do this for you, we've got to do that... you can't get this unless you've done that'... I thought I've had enough of that. I mean, my mind was going totally, and I thought, I've had enough of this crap, and I just didn't sign on again. I went for nearly six months without a penny... because of all the hassle and the crap, I came off it and I was living off my sister, my daughters... I wouldn't take a penny off them [DWP] because I couldn't handle all the aggravation I was getting (ESA claimant).

- 3.8 In addition to those who had experienced a sanction, a number of people described living in constant fear of the application of a benefit sanction for non-compliance with the conditions attached to their claim:

I'm waiting for them [Jobcentre Plus] at any minute just to say, 'No, you've not done enough, right, we're sanctioning you. That's it, you're getting nothing'... they're not pushing people into work, they're sanctioning people and they're pushing people on the streets, which is different, do you know what I mean? (UC claimant).

Is the current evidence base adequate and if not, what further information, data and research are required?

- 3.9 There is a huge body of robust independent research demonstrating the universally negative impacts of benefit sanctions. Our project adds to this evidence base, from the unique perspective of veterans within the benefits system. Overall, our view is that the issue relates not to a lack of evidence, but to an unwillingness from the DWP to accept or engagement with the evidence presented through these robust studies.
- 3.10 As changes to the benefit system continue it is essential that independent robust research (both qualitative and quantitative) continues to monitor these impacts. In particular, the use and impact of sanctions as part of the policy of 'in-work conditionality' or 'in-work progression' requires further investigation. In addition, it is essential that research is conducted with frontline practitioners involved in decision-making and the application of sanctions (e.g. Work Coaches) to fully understand the operation of, and potential inequity created by, discretionary power.

What improvements to sanctions policy could be made to achieve its objectives better?

- 3.11 Given the strength of the evidence base demonstrating the profoundly negative impact of sanctions, and the lack of evidence demonstrating their effectiveness in moving people into sustainable work, we believe that the government should reconsider their use in the delivery of social security.
- 3.12 It was evident that the application of benefit sanctions had universally negative consequences for our veteran participants. It was also evident that sanctions had occurred as a result of difficulties in understanding the system or difficulties arising from ongoing mental health issues, often related to Service in the Armed Forces. As such, our Interim Report makes the following recommendation:

***Recommendation:** for the DWP to ensure that benefit sanctions are not applied to those experiencing mental and physical health impairments resulting from Service in the Armed Forces.*

Could a challenge period and/or a system of warnings for a first sanctionable offence be beneficial? If so, how should they be implemented?

- 3.13 As above, we believe the government should reconsider the use of sanctions in the delivery of social security. However, if sanctions are to remain a part of our social security system at present, it is essential that the rules about, and reasons for sanctions are clearly communicated to claimants, but also that a warning system is in place to ensure that people have the opportunity to discuss their circumstances and what may be preventing them meeting the conditions of their claim. In addition, appropriate signposting to enable people to challenge sanctions should be in place.

Are levels of discretion afforded to Jobcentre staff appropriate?

- 3.14 Our veteran interviews provided some examples of positive experiences of interactions with advisors/Work Coaches. It was evident that the experience was very much dependent on the particular advisor/Work Coach assigned to an individual, whether or not they fully understood a person's needs and circumstances, and how they subsequently exercised the discretionary powers and easements available to them (or indeed if they were aware of the easements). The following provide some positive examples of discretion:

[My] work coach in [area] was actually really, really good. He did take things into consideration, say I was late for an appointment, etcetera, he didn't go straight screaming upstairs [i.e. referring him for a sanction]. He knew that on paper it was one thing, but on a personal basis, he had more of a relaxed attitude towards me (ESA claimant).

He's fletted over it [referring to the Claimant Commitment]. He said, 'If you don't attend certain meetings or you don't do... If you're not seen to be active on the thing, then they could stop your

Universal Credit and all that stuff'. But he said, 'You haven't got to worry about that yet because I want you to get better before you start doing these things' (UC claimant).

- 3.15 However, it was evident that a change in advisor/Work Coach could impact on people's experiences. For example, one veteran described how he had been sanctioned for doing 27 rather than the mandated 35 hours' job search specified in his Claimant Commitment and also for missing an appointment. While he accepted that he had 'not done what was required', he explained the reasons behind this and suggested that it was also because his usual Work Coach, who he felt understood his particular circumstances, had been away:

I'm a little bit better now, but I've always struggled with computers, and I couldn't always get access to a computer, so I was doing it [job search] off my phone, and I was explaining this to the Jobcentre, and there's a couple of times I had to see another person because my Work Coach was, like, out on holiday or whatever. I got sanctioned once or twice because I'd done, like, 27 hours, not [35]... I do admit that, fair enough, I couldn't do my full [35] hours sometimes because I couldn't always get to a computer, and there is once or twice when my mum had one of her turns where we've had to ring an ambulance and stuff, and I've missed an appointment... I did ring the Jobcentre once and say, 'Listen, I'm waiting for an ambulance, I've got an appointment at such-and-such, I'm waiting for an ambulance'. 'Well, can you not get someone else to go with her?' (UC claimant).

- 3.16 Very few veterans felt that they had much influence over what went into their Claimant Commitment for UC, although it was clear that some had had their Claimant Commitment changed to reduce or remove job search expectations as a result of health conditions, and there was some evidence of Jobcentre advisors exercising their discretionary powers positively in relation to people's individual impairments:

She went, 'do you know something', she says, 'I'm not even going to ask you to the Jobcentre any more'. She says, 'you've had too many strokes and you've got a heart problem'. She said, 'we'll just leave that' [referring to the Claimant Commitment]. Basically, she just ripped it up, just put it in my folder (UC claimant).

- 3.17 Our Interim Report made the following recommendations:

Recommendation: *for the DWP to ensure that all JCP staff are provided with training on the adjustments and easements applicable to Armed Forces veterans and their families and, more broadly, around the mental and physical health impairments that may affect some veterans' fitness to undertake paid work and/or ability to engage in compulsory work-focused activities.*

Recommendation: *that each Jobcentre should have at least one designated individual who takes a leading role in supporting Armed Forces veterans and their families in their interactions with the social security system.*

Are adequate protections in place for vulnerable claimants?

- 3.18 As highlighted in paragraph 2.4, Armed Forces Service Leavers/veterans feature within the DWP list of vulnerable claimants. However, our Interim Findings suggests significant variation in the approach of advisors/Work Coaches in relation to veterans upon disclosure of their ex-Forces status. While some good practice was evident in certain geographical areas, in the majority of cases allowances for veteran's circumstances were absent. For example, one respondent indicated that he had had a 'disagreement' with his advisor over the Claimant Commitment, which related to the advisor's lack of understanding of the impact of his Service related mental health problems:

We had a bit of a disagreement over it [Claimant Commitment]... I was sat there with the support worker [from NGO] because they [Jobcentre advisor] were telling me that I had to job search in order to receive the benefits. I had to turn up to their appointments every two weeks in order to receive the

benefits and some other things. I didn't agree with any of them because [of] the mental state that I was going through, I already told her that I'd struggled going there, so why was I going to go there and sit on day courses and stuff like that, when I'm trying to sort myself out. But then, why would I be looking for work, when I know for a fact that I've got severe anxiety issues, severe PTSD (UC claimant).

- 3.19 It was evident that ill health and impairments had routine and significant negative impacts on ability both to meet the conditions attached to their benefit claim and to enter and sustain paid work. A number of veterans described how they needed time to address their mental health issues. Some questioned whether or not they would be able to find employment owing to their ongoing treatment for mental health issues. Our findings suggest that such issues were poorly understood by Jobcentre staff:

[The Jobcentre] say, 'Oh, we'll set you up for a job. If you refuse to do this we'll sanction you'. Okay, brilliant. Give me the telephone, 'This employer wants to talk to you'. 'Hello?' 'Hello. Blah, blah, blah. Your CV is fantastic. Come and work for us. Blah, blah, blah. Are you okay to drive?' 'Well, no, because I'm on lithium.' 'Bye', and put the phone down (UC claimant).

- 3.20 Such concerns extended to those with physical and sensory impairments as well. For example, a respondent with a visual impairment had taken employment at a nursing home because of the requirement, as a JSA claimant at that time, to take 'any job'. After experiencing difficulties in that job due to her impairment, she had experienced a panic attack. This veteran had not previously experienced any mental health issues (beyond describing herself as being 'on the anxious side'). However, she stated that her interaction with the benefits system had exacerbated her anxiety to the level that it now required treatment:

My mistake was going into the Jobcentre in 2015, and they were supposed to be helping me and they actually, it was more of a hindrance... I've always been on the anxious side, but since, and it was absolutely to the day that I walked into the Jobcentre that this anxiety's becoming a real problem and I'm currently seeing a counsellor (ESA SG claimant).

- 3.21 For some veterans, limited IT skills and an inability to use the online systems were perceived to have resulted in a benefit sanction being applied. This issue was more prevalent among, but not limited to, older veterans:

What happened was, because I was on the ESA and I went over to Universal Credit, everything was online... I'm 54 years old, I wasn't sure what to do, and things weren't made very clear. I forgot to go online, onto my account, apparently, and tick a box or put an X in the box or press the space bar in the box, so I was sanctioned (UC claimant).

- 3.22 This man explained that as a result of his sanction he had resorted to desperate measures in order to feed himself: *I was in food banks, I was in skips, I was behind Greggs in the bins.* He went on to describe a feeling of being 'let down by his country' at a time when he needed support:

*I can see why they do it [sanction], I just think that there's no room for error... F*** this country... These are the most vulnerable people in the country, what is the point? What is the point of installing a regime, when people who are struggling in the first place?... I've played by the rules all my life, thinking that this was the country, this is what it's all about... I've come in now, into the system after all these years, if I've just been very unlucky with this Universal Credit or what, I haven't got a clue what it was like before, I've got no idea. All I can do is judge it by what it is now. I am shocked and absolutely so let down and so deflated, if this is what they're doing... After 39 years working, paying National Insurance contributions, first time in my life, aged 54, need some help, no money, no food, no nothing. Is this country for me, is this country for you? (UC claimant).*

- 3.23 It was evident from our study that many veterans struggled to navigate the complex benefits system and extra support and signposting was required to help them understand their entitlements but also the conditions of their benefit claim:

There's no extra service to say, 'Okay, right, yes. You're applying for the benefit, maybe you should liaise with the Royal British Legion's benefits advice team'. I've spoken to quite a few guys that come to my Support Group, and we're just treated like anybody else that's applying for benefit... the DWP need to recognise that as a veteran we should be provided with help with navigating benefits because applying for benefits is not simple. I've looked at the DWP's website on numerous occasions. I'm thinking, my God, look at this... they need to make the benefit system a lot clearer to veterans, and also they need to say to the veterans, 'Okay, right, yes. You are applying for these benefits. We know of people that can give you assistance' (ESA SG claimant).

- 3.24 It was evident that the application of benefit sanctions had profoundly negative consequences, and could compound existing vulnerabilities amongst veterans. Frequently, sanctions occurred as a result of difficulties in understanding the system or difficulties arising from ongoing mental health issues. In our view, these experiences are at odds with the Armed Forces Covenant commitment, which aims to ensure that veterans are not disadvantaged. As such, our Interim Report makes the following recommendations:

Recommendation: for guidance on the UK social security system that clearly sets out an individual's rights and attendant responsibilities in respect of out-of-work benefits to be included as part of the transitional support provided to those leaving the Armed Forces.

Recommendation: for the DWP to ensure that benefit sanctions are not applied to those experiencing mental and physical health impairments resulting from Service in the Armed Forces.

What effects does sanctions policy have on other aspects of the benefits system and public services more widely? Are consequential policy changes required?

- 3.25 It was evident that the majority of people were diverted to receiving support from organisations *outside* the DWP (e.g. Armed Forces charities, other third-sector agencies and housing providers). This support was not just employment-related but also focused on wider issues ranging from health to housing. In many cases, these organisations had also been supporting veterans with their benefits claims or when they had experienced difficulties within the benefits system (e.g. when they experienced sanctions or were appealing Work Capability Assessment decisions). It was this external support that was described as being the most beneficial to them, as it was often tailored to their individual needs and based on an understanding of the transition issues facing those who leave the Armed Forces.

- 3.26 At present, the balance between sanctions and support within the benefits system appears to be tipped towards the more punitive sanctions regime. Overall, the quality of the support being provided by advisors/Work Coaches to our veteran respondents appeared to be highly variable. Furthermore, our Interim Findings raised concerns around the quality of the Armed Forces Champions (AFCs). Again there was significant geographical variation in this support. As such, our Interim Report made the following recommendation:

Recommendation: for the DWP to review the efficacy of the current AFCs, map geographical areas of good practice (i.e. where strong partnerships/relationships exist between AFCs and NGOs) and identify those areas requiring improvement. This review should include an assessment of the additional responsibilities that AFCs are undertaking and how these may affect their ability to effectively deliver the AFC role.

To what extent have the recommendations of the Oakley review of Jobseekers' Allowance sanctions improved the sanctions regime? Are there recommendations that have not been implemented that should be?

3.27 Our on-going study did not provide any evidence that the sanctions regime had improved. The impact remained overwhelmingly negative and was counter-productive to meaningful engagement with work related activity. In relation to those with Armed Forces Service related physical and mental health issues, we also feel that the sanctions regime runs counter to the Armed Forces Covenant commitments to ensure that veterans are not disadvantaged. Our Interim Report made a number of recommendations in relation to the treatment of veterans within the benefits system, which have been outlined above.

May 2018