WALES WOMEN'S BUDGET GROUP

Far From a Vital Safety Net: Benefit Conditionality, Sanctions and Women in Wales

Introduction

In the current context of a continuing cost of living crisis, a worsening housing crisis and the greatest fall in living standards on record, more women in Wales are turning to the UK social security system as a vital form of support. However, Universal Credit, the primary working-age benefit in the UK, has long been regarded as problematic from a gender equality perspective. Policy measures such as its benefit cap, two-child limit and payment at a household level do not work for women, and risk pushing them further into debt and poverty as costs continue to rise.

Rather than addressing these issues, the Universal Credit reforms announced in this year's Spring Budget only stand to make matters worse. By expanding sanction-backed conditionality to the most vulnerable claimants, the reforms risk depleting incomes to the extent that claimants can no longer afford basic human essentials. Far from forming a vital safety net, these changes endanger the very human dignity and equal respect that social security is designed to protect. Problematically, in failing to account for differences between childcare support in Wales and that in England, the welfare-worsening, inequality-entrenching impacts of the reforms will fall disproportionately on women in Wales.

As the cost of living and housing continues to soar, women in Wales need a social security system that truly supports them in times of crisis. To ensure this, we urge the UK Government to reconsider some of the welfare reforms announced in the Spring Budget, and to implement, as a matter of urgency, the other recommendations of this paper.

WALES WOMEN'S BUDGET GROUP

1

Women and Social Security in Wales

1.1. Due to deep-rooted gender inequality, women in Wales - particularly lone mothers, disabled women, ethnic minority and racialised women - are more likely to be working in part-time, insecure and low-paid jobs, bear a disproportionate share of caring responsibilities and have lower wealth and savings overall.

1.1.1. In 2022, 39% of women in Wales were working part-time, compared to 12.1% of men.[1]

1.1.2. In the same year, 24.7% of economically inactive women in Wales were out of work due to looking after the family/home, compared to 8.6% of men.[2]

1.1.3. 13% of jobs held by women in Wales are paid below the real Living Wage, compared to 10.6% of men's.[3]

1.1.4. In the UK, women are 1.8 times more likely to be in insecure work than men, with women of colour being almost twice as likely to be on zero-hour contracts than white men, and 30.2% of disabled women being trapped in severely insecure work in 2022.[4]

1.2. These structural inequalities mean that women occupy an unequal position in the Welsh and UK economy, leaving them more vulnerable to economic precarity. In the context of a continuing cost of living crisis and a worsening housing crisis, women are being hit harder by rising costs and inflation.

1.3. As a result, women in Wales are more likely to be living in poverty as the prices of food, energy and transport continue to rise.

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[1] Chwarae Teg (2023), *State of the Nation 2023* https://chwaraeteg.com/wp-content/uploads/2023/02/State-of-the-Nation-2023.pdf [accessed 10.08.23]

[2] Ibid.

[3] Living Wage Foundation (2022), *Employee Jobs Paid Below the Real Living Wage* https://www.livingwage.org.uk/sites/default/files/2022-11/Employee%20jobs%20below%20the%20real%20Living%20Wage%202022_1.pdf [accessed 11.07.23]

[4] Chwarae Teg (2023), *The gendered impacts of the cost of living crisis* https://chwaraeteg.com/policy/areas/poverty-social-security/ accessed 10.08.23]

1.3.1. 38% of lone parents in Wales, the majority of whom are women, are currently living in relative income poverty.[5]

1.3.2. Over a quarter of single female households with no children in Wales are living in relative income poverty.[6]

1.3.3. The situation is even starker for ethnic minority women. From 2018-22 there was a 40% likelihood of people whose household is headed by a Black, Asian or minority ethnic group to be living in relative income poverty in Wales. This is compared to a 22% likelihood for households headed by white people.[7]

1.4. Consequently, women in Wales are increasingly more reliant on the UK social security system, in the hopes that it will provide a vital safety net, and prevent them falling further into debt and poverty as the cost of living continues to soar.

1.4.1. Currently, 57.1% of Universal Credit claimants in Wales are women. This is a noted increase from the previous year, during which women accounted for 54.5% of claimants.[8]

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[5] Welsh Government (2023), *Relative income poverty: April 2021 to March 2022* https://www.gov.wales/sites/default/files/pdf-versions/2023/3/4/1679567757/relative-income-poverty-april-2021-march-2022.pdf [accessed 10.08.23].

[6] Ibid.

[7] Ibid.

[8] Chwarae Teg (2023), *State of the Nation 2023*

2 Universal Credit

2.1 As the primary working-age benefit in the UK, Universal Credit (UC) is the main source of support for women who are out of work, unable to work or on very low incomes.

2.2 Under UC, all claimants are entitled to a monthly standard allowance (see Table 1 below), paid at a household level on a monthly basis.

2.3 A claimant's standard allowance may be supplemented with additional payment depending on their individual circumstances, for example if they have children (child entitlement; childcare entitlement), if they are disabled or have a health condition (limited capability for work entitlement; limited capability for work related activity entitlement) or care for someone who does.[9]

How much you'll get	Monthly standard allowance
If you're single and under 25	£292.11
If you're single and 25 or over	£368.74
If you live with a partner and you're both under 25	£458.51 (for you both)
If you live with a partner and either of you are 25 or over	£578.82 (for you both)

Table 1 - UC Standard Allowance Amounts 2023[10]

2.4 In order to receive this standard monthly allowance, UC claimants who are out of work or on low earnings, who are not disabled and do not have certain caring responsibilities, are subject to a policy of conditionality. Under conditionality, claimants agree to a 'claimant commitment,' by which they agree to undertake a number of work search, work preparation or work availability requirements in order to prove that they are actively looking for work and are therefore eligible for UC payment.[11]

[9] Department for Work and Pensions (2023), *The Impact of Benefit Sanctions on Employment Outcomes: Evaluation Report* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1148982/the-impact-of-benefit-sanctions-on-employment-outcomes.pdf [Accessed 11.07.23].

[10] 'Universal Credit,' Gov.uk https://www.gov.uk/universal-credit/what-youll-get [accessed 10.08.23].

[11] Department for Work and Pensions (2023), *The Impact of Benefit Sanctions on Employment Outcomes: Evaluation Report*

2.5 Conditionality, in turn, is enforced by a regime of sanctions by which a claimant's UC allowance is reduced or stopped for a period of time. Sanctions are applied under UC when a claimant fails to comply with one or more of their conditionality requirements, without a 'good reason,' for doing so. Good reasons for non-compliance are assessed on a case-by-case basis by UC Work Coaches.[12]

2.5.1 Reduction in payment is calculated in reference to a claimant's standard allowance and can apply to 20%-100% of their allowance, depending on what labour market regime they are in, whether they are a single or a joint claim and whether they are under or over 18.[13]

2.5.2 The duration of a sanction depends on the requirement unmet and the number of transgressions.

- For lowest level sanctions such as failure to attend or participate in job centre plus appointments, a UC sanction will last indefinitely until the claimant has met their compliance condition.
- For low level sanctions, including failure to undertake work preparation, the sanction will last 7, 14, or 28 days in addition to the open ended period before compliance, depending on the number of other low level sanctions a claimant has received in the last 365 days.
- For medium to high level sanctions ranging from failure to be available for work to refusing employment, the sanction can last from 4 weeks to 6 months after compliance, depending on the number of other sanctions for the same failure.[14]

2.6 The rationale behind UC's sanction-enforced conditionality is that its intensified work search requirements and financial penalties reduce the value of being unemployed. This, in theory, encourages UC claimants off benefits and into paid employment, where they can earn higher wages and contribute more to the UK economy.[15]

[12] Ibid.
[13] Ibid.
[14] Ibid.
[15] Ibid.

2023 Universal Credit Reforms

3.1 In the 2023 Spring Budget, the UK Government announced a range of policy measures designed to tackle economic inactivity and grow the UK economy.[16] Amongst its reforms, the Budget included a number of changes to UC provision.

3.2 *Reforms to UC childcare support*

3.2.1 A welcome change introduced by the Spring Budget was the reform of UC childcare support. Under the UC childcare entitlement, claimants can claim back up to 85% of the childcare costs they incur. Previously, this payment was made in arrears with low income households having to cover high upfront costs, pushing them further into financial hardship.

3.2.2 In the Spring Budget, the Chancellor of the Exchequer announced that for parents who are moving into work or increasing their hours, these UC childcare support costs will now be paid upfront, rather than in arrears.[17]

3.2.3 The Government also announced an uprating of the UC childcare entitlement, increasing the support available from £646 to £951 for one child and £1108 to £1630 for two.[18]

3.3 *Extending conditionality*

3.3.1 **In-work claimants:** To encourage UC claimants to increase their working hours, the UK Government is increasing the Administrative Earnings Threshold (AET)[19] from 15 to 18 hours at National Living Wage per week. This reform will extend job search requirements and support, as well as sanctions, to more in-work claimants on low earnings.

3.3.2 **Non-working or low earning partners**: The UK Government has also announced the complete removal of the couple's AET, which had previously meant that a second member of a household may not be asked to look for work if their partner is

[16] HM Treasury (2023), *Spring Budget 2023* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1144441/Web_accessible_Budget_2023.pdf [Accessed 08.08.23]

[17] Ibid.

[18] Ibid.

[19] The Administrative Earnings Threshold is the minimum amount a UC claimant can earn before being subject to conditionality requirements.

working.[20] This reform will extend job search requirements and support, as well as sanctions, to non-working or low earning partners.

3.3.3 **Lead carers**: Employment support, conditionality and sanctions will now also be extended to the lead carers of very young children (1-2years), who previously had no or limited requirements to search for work.

3.4 *Tightening and automation of sanctions*

3.4.1 The Spring Budget also included the plans to strengthen the UC sanctions regime by increasing Work Coach training, to ensure sanctions are being routinely and effectively applied in instances of non-compliance.

3.4.2 Certain administrative elements of the sanction process will also now be automated (i.e., messages to claimants who fail to meet with their Work Coach) to reduce error rates and free up Work Coach time.[21]

3.5 *Removal of the LCWRA element and Work Capability Assessments*

3.5.1 Finally, the Government have also announced major changes to disability entitlements under UC. For example, the Budget included commitments to end use of Work Capability Assessments, which have been used to assess eligibility for the 'limited capability for work and work-related activity' (LCWRA) element of UC.

3.5.2 The LCWRA element is being replaced by a new UC 'health element,' eligibility for which will be passported automatically if the claimant also receives, or is eligible for, another disability benefit; Personal Independence Payment (PIP).[22]

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[20] HM Treasury (2023), *Spring Budget 2023*
[21] Ibid.
[22] Ibid.

4

Gendered Impacts of UC Reforms

4.1 The unequal position of women within the labour market means that they dominate low-paid, low-hour and precarious work. Due to this inequality, and their reliance on social security, women across the UK will be disproportionately impacted by the latest changes to UC eligibility and provision. Thus, rather than addressing the existing inequality-entrenching problems of UC- for example, payment to a single head of household and the lack of a work allowance for second earners - these reforms will reinforce and recreate gender inequality. Furthermore, due to an oversight on behalf of the UK Government, women in Wales will be hit harder by the expansion of conditionality to lead carers of very young children, a clear inequitable outcome of the announced policy reforms.

4.2 *Reforms to UC childcare support*

4.2.1 The recently announced changes to UC childcare support are both much needed and long overdue. By uprating the benefit amount in line with true costs and paying childcare support upfront rather than in arrears, these reforms will help prevent low-income households falling further into debt and poverty by fitting the bill for high upfront childcare costs. From a gendered perspective, they will provide vital support to mothers, particularly single mothers, who bear the majority of caring responsibilities and tend to act as shock absorbers of poverty in crises such as the current cost of living crisis.[23] If implemented correctly, the extra support afforded will abet over 6000 households who are currently claiming the UC childcare entitlement in Wales.[24]

4.3 Expanding conditionality

4.3.1 While the reforms to UC childcare support are welcome, the extension of conditionality and sanctions to wider groups of UC claimants is highly concerning.

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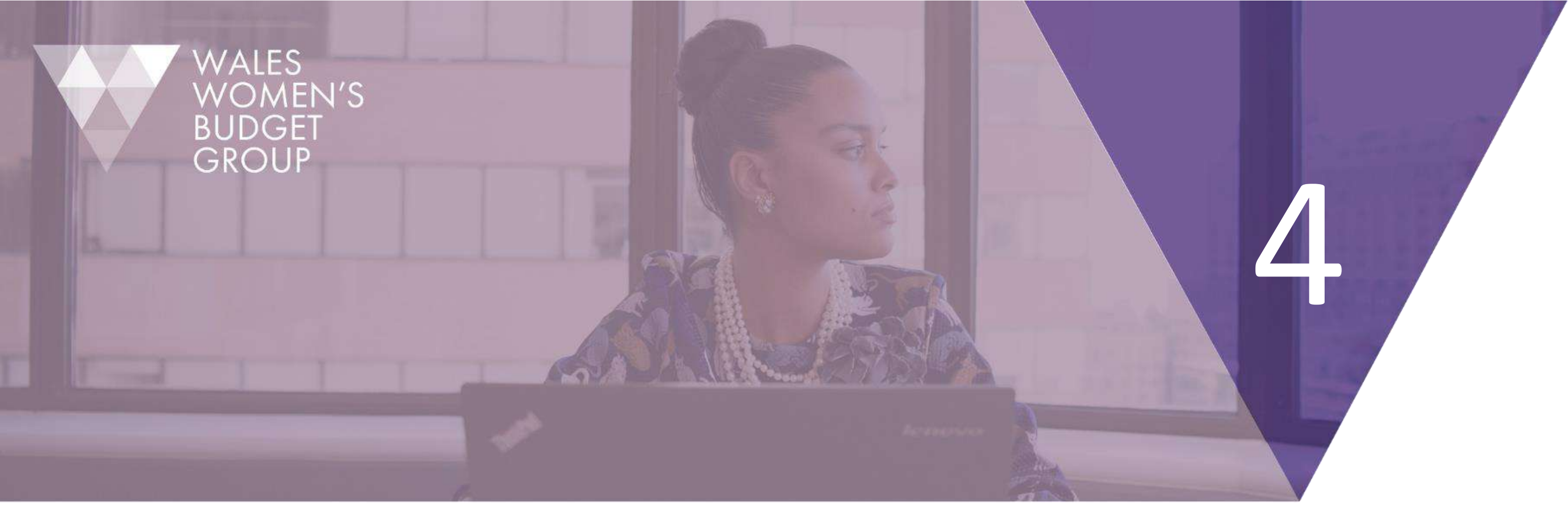
[23] UK Women's Budget Group (2022), *The gendered impact of the cost of living crisis* https://wbg.org.uk/wp-content/uploads/2022/03/The-gendered-impact-of-the-cost-of-living-crisis.pdf [accessed 10.08.23]

[24] Department for Work and Pensions (2023), Households on Universal Credit February 2022-23 statistics via Stat-Xplore



Despite a potential deterrent effect,[25] conditionality and sanctions have been found to be ineffective at improving the employment outcomes of claimants. They have also been found to trigger a number of negative personal, financial and health-related outcomes, which will now fall upon the most vulnerable UC claimants as a result of the Spring Budget reforms. In light of their limited fiscal savings and considerable negative impacts, the justifiability of further extending UC conditionality and sanctions, as announced by the UK Government, is questionable.

4.3.2 An ineffective policy tool

4.3.3 There is ample evidence that increased conditionality and the application of punitive sanctions are largely ineffective at moving claimants off benefits and into long-term, sustainable employment.[26]

- A longitudinal study conducted by the Welfare Conditionality Project (2018) found that the most common outcome following the application of sanctions was stasis, a lack of significant and sustained change in employment.[27]
- Furthermore, a report recently published by the UK Department for Work and Pensions found that while applying sanctions increased claimant exit rates off UC, this was mostly driven by exit of claimants onto non-PAYE earnings rather than paid employment.[28]

4.3.4 For the minority of claimants who do find work after being sanctioned, the employment obtained is predominantly part-time, precarious and low-paid, with sanctioned claimants earning on average £34 less per month than their non-sanctioned counterparts.[29] This is likely due to claimants having lowered their

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[25] Department for Work and Pensions (2023), *The Impact of Benefit Sanctions on Employment Outcomes: Evaluation report*

[26] See, for example: Department for Work and Pensions (2023), *The Impact of Benefit Sanctions on Employment Outcomes: Evaluation report* and Welfare Conditionality (2018), *Final Findings Report: Welfare Conditionality Project 2013-2018* http://www.welfareconditionality.ac.uk/wp-content/uploads/2018/06/40475_Welfare-Conditionality_Report_complete-v3.pdf [Accessed 11.08.23]

[27] Welfare Conditionality Project (2018), *Final Findings Report: Welfare Conditionality Project 2013-2018*

[28] Department for Work and Pensions (2023), *The Impact of Benefit Sanctions on Employment Outcomes: Evaluation report*

[29] Ibid.

reservation wage i.e. the lowest wage offer they will accept, in order to secure employment and avoid further sanctions.[30] These outcomes are concerning from a gender equality perspective, as they will serve to further entrench women's dominance in part-time, precarious and low-paid work, a critical factor in women's risk of poverty and persistent inequality.

4.3.5 The poor employment outcomes of conditionality and sanctions not only impact the income and career trajectory of claimants, but they also arguably undermine the UK Government's growth agenda. As noted by the IFS, the resultant part-time and low paid work produces very little with regards to tax liabilities and only marginal reductions in benefit receipts.[31] As a result, the net fiscal contribution of sanction-backed conditionality is low.[32] Notwithstanding its potential deterrent effect, the limited fiscal contribution of the policy arguably undermines the UK Government's rationale for its implementation i.e., to encourage more UC claimants to secure paid work and contribute more to the UK economy.[33]

4.3.6 Welfare worsening

4.3.7 As noted in the Welfare Conditionality Project, extreme pressure as a result of intensified work search requirements and the looming threat of sanctions 'triggers high levels of stress, anxiety and depression,' amongst UC claimants.[34] Alongside disengagement from the social security system altogether, these effects also lead to the exacerbation of existing physical and mental illnesses.[35] By expanding conditionality to low-paid, non-working claimants and lead carers of very young children, the reforms announced in the Spring Budget risk endangering the wellbeing of the most vulnerable UC claimants, many of whom are women.

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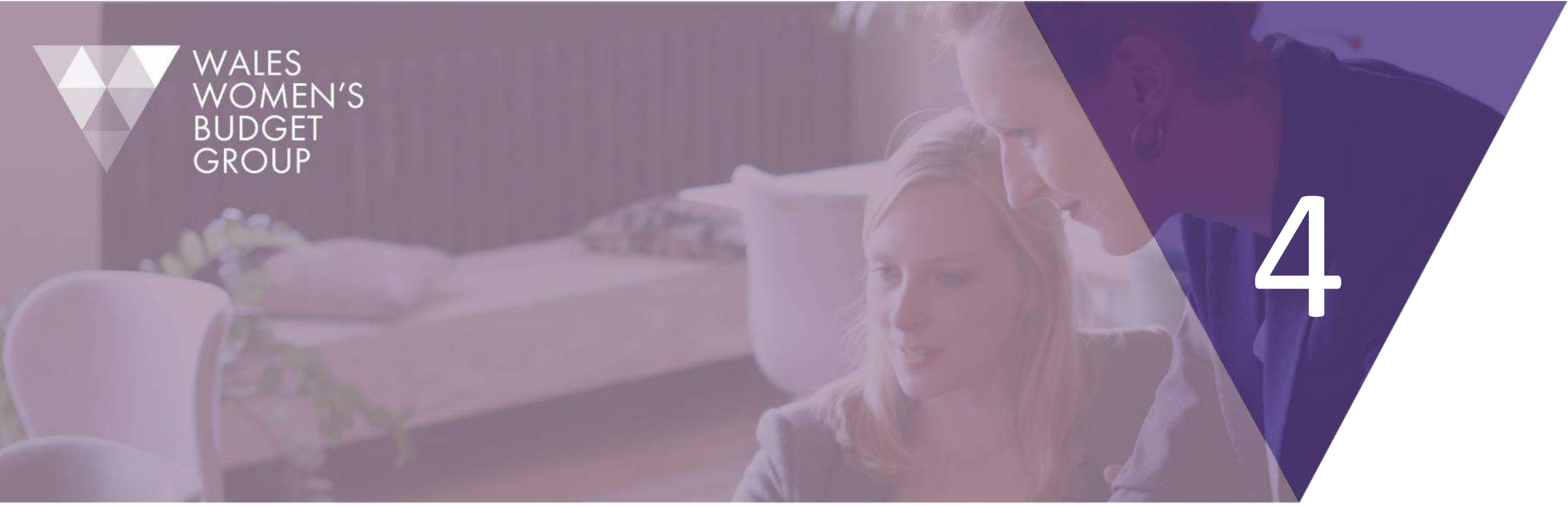
[30] Ibid.
[31] Institute for Fiscal Studies (2023), *Do work search requirements work? Evidence from a UK reform targeting single parents* https://ifs.org.uk/sites/default/files/2023-02/WP202302-Do-work-search-requirements-work-evidence-from-a-UK-reform-targeting-single-parents_1.pdf [Accessed 10.08.23]
[32] Ibid.
[33] HM Treasury (2023), *Spring Budget 2023*
[34] Welfare Conditionality Project (2018), *Final Findings Report: Welfare Conditionality Project 2013-2018*
[35] Ibid.



4.3.8 Expanding in-work conditionality

- The increase of the AET from 15 to 18 hours at National Minimum Wage, extends conditionality to in-work claimants in low-paid or low-hour employment. Given the dominance of women in low-paid, part-time work as well as the fact that 43% of in-work UC claimants in Wales are women,[36] this reform, and its health deteriorating effects, will fall more heavily on women and mothers in Wales.

4.3.9 Expanding conditionality to non-working or low-earning partners of claimants

- As a result of persistent gender stereotypes, women tend to bear an unequal share of caring responsibilities within the household and therefore are more likely than men to be unemployed or working part-time/in low-paid employment. Consequently, the UK Government plans to remove the couple's AET under UC will also disproportionately impact women, by extending sanction-backed job search and preparation requirements to those who are out of work as a result of unpaid caring responsibilities. In Wales, this accounts for 24.7% of economically inactive women, compared to 8.6% of men.[37]

4.3.10 Extending conditionality to lead carers of very young children

- The expansion of sanction-backed conditionality to lead carers will disproportionately impact lone parents in the UK, 84% of whom are women.[38] Without a co-parent to share childcare with, single mother claimants will struggle to meet intensified work search requirements alongside their childcare responsibilities. This will lead to an increased risk of sanctioning and therefore, probable harm to their mental, physical and financial well-being.
- These negative impacts are evidenced in a recent report by the Institute for Fiscal Studies (IFS) which highlighted a notable deterioration in the mental

[36] Chwarae Teg (2023), *State of the Nation 2023*
[37] Ibid.
[38] Office for National Statistics (ONS), Families and Households in the UK: 2022

health and wellbeing of UK single mothers following the application of conditionality and sanctions.[39]

- Such effects are likely to be even more acute for single mothers who experience further intersectional disadvantage in Wales, including ethnic minority, racialised and disabled women, who experience additional barriers to workforce participation.[40]

- Extending the UC conditionality to lead carers of very young children (aged 1-2) is particularly problematic within a Welsh context, where the newly announced England Childcare Offer does not apply. Amongst the suite of measures designed to tackle unemployment in this year's Spring Budget, the UK Government announced long overdue investment in the Early Years Education and Childcare sector in England. As a result, by September 2025, working parents of children aged 9 months to 3 years in England will be entitled to 30 hours of government-funded childcare provision per week. Despite its slow rollout, this reform will provide vital support to mothers, particularly in the context of rising childcare costs and intensified UC conditionality for lead carers of young children.
- As a devolved issue, England and Wales have different Childcare Offers. In Wales, while the expansion of funded childcare provision to parents of 2 year olds is currently underway through the Flying Start programme, this is restricted to 12.5 funded hours per week, and there are no firm plans to extend provision to parents of under 2 year olds.
- Unlike childcare, social security policy is a reserved matter and applies equally in England and Wales. The practical effect of this discrepancy is that lead carers of very young children in Wales, the majority of whom are women, will be disproportionately affected by the newly announced ramping up of UC conditionality and sanctions.

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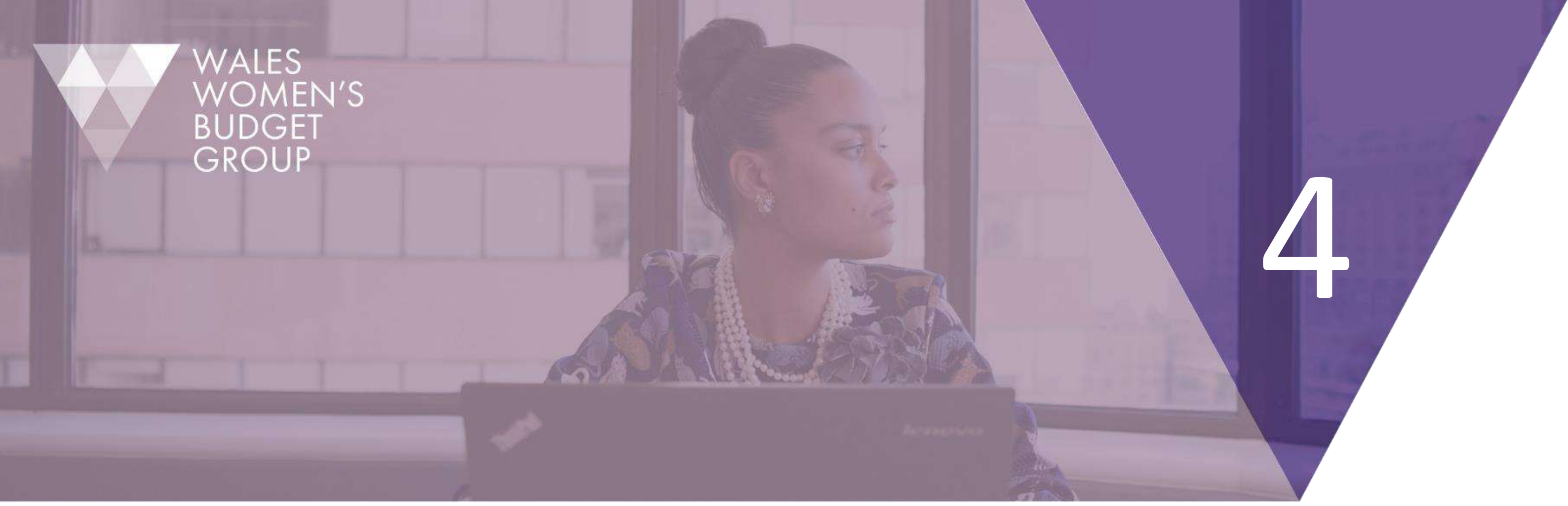
[39] Institute for Fiscal Studies (2023), *Do work search requirements work? Evidence from a UK reform targeting single parents*

[40] Women's Budget Group and Runnymede Trust (2017), *Intersecting Inequalities: The impact of austerity in Black and Minority Ethnic women in the UK*



- UC claimants in Wales who are lead carers of 1-2 year olds will now be subject to sanction-backed work search requirements, but unlike their counterparts in England, they will not be entitled to funded childcare provision to help assist meeting these requirements. Instead, the only form of support available to these claimants will be the UC childcare support, which amounts to 85% of the childcare costs they incur.
- Consequently, lead carers in Wales, particularly single mothers and those who experience additional intersectional disadvantage, will struggle much more to meet intensified conditionality requirements alongside inadequate and unequal support for their childcare responsibilities. This, in turn, endangers their financial and mental wellbeing.
- This oversight by the UK Government has clear inequitable outcomes, and strengthens the case for devolving the administration powers over social security to Wales, to ensure support is arranged in a way that works best for people in Wales.

4.3.11 Tightening and automation of sanctions

- In addition to worsening the mental health of UC claimants, the financial impact of sanctions, which apply to 20-100% of a claimant's standard income and can last up to six months,[41] is deeply problematic.
- From February 2022-23, 26% of sanctioned UC claimants in Wales were women.[42] Of that 26%, over 90%[43] of claimants belonged to the All Work Related Requirements or Work Preparation Requirements conditionality groups, meaning that as a result of being sanctioned, 100% of their standard allowance was removed for a period of time.
- In light of the Spring Budget reforms, this figure of sanctioned women claimants is likely to rise. In the current context of high inflation, a rental and

[41] Department for Work and Pensions (2023), *The Impact of Benefit Sanctions on Employment Outcomes: Evaluation report*

[42] Department for Work and Pensions (2023), Universal Credit Sanction Rates February 2022-23 statistics via Stat-Xplore

[43] Ibid.

mortgage crisis as well as the greatest fall in living standards on record, reducing or removing the (already low) incomes of vulnerable claimants risks pushing them further into debt and poverty and in worst cases, destitution.[44] Depleting incomes to the extent that claimants can no longer afford to meet basic human needs raises issues of human dignity and equal respect. Far from forming a vital safety net, these impacts challenge the underlying ethicality of imposing sanction-backed conditionality.[45]

- The newly announced plans to automate certain elements of the UC process are also concerning. Moving towards the automation of sanctions risks removing the Work Coach discretion used to determine 'good reasons,' for non-compliance with a conditionality requirement. This shift away from a people-centred approach threatens the necessary compassionate consideration of unavoidable individual circumstances, and will likely lead to an increase in inappropriate and unfairly applied sanctions.

4.3.12 Removal of the LCWRA element and Work Capability Assessments

- The reforms to disability entitlement eligibility under UC will also disproportionately impact and endanger vulnerable claimants. Alongside the 'overwhelming psychological distress,'[46] experienced by claimants who undergo PIP assessments, the replacement of WCA assessments with PIP eligibility risks excluding a number of claimants from vital support.
- As noted by Mind, a majority of disabled claimants who were previously eligible for the LCRWA under WCA may now find themselves ineligible for PIP and therefore, the new UC health care element.[47] As well as removing a vital source of support at a time of financial crisis, the changes may also expose a number of disabled claimants to punitive sanctions and conditionality requirements under the wider UC program.

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[44] Welfare Conditionality Project (2018), *Final Findings Report: Welfare Conditionality Project 2013-2018*
[45] Ibid.
[46] Mind (2023) Scrapping Work Capability Assessments could lead to an even more broken benefits system https://www.mind.org.uk/news-campaigns/news/scrapping-work-capability-assessments-could-lead-to-even-more-broken-benefits-system/ [accessed 10.08.23]
[47] Ibid.

4.4 Inequality-entrenching

4.4.1 As explained above, the newly announced Government plans to extend conditionality and sanctioning to more UC claimants will disproportionately impact lone parents and those in receipt of disability benefits in Wales, the majority of whom are women. These pressures will be felt even more acutely by single mothers from other marginalised groups who experience further intersectional disadvantage and additional barriers to workforce participation.

4.4.2 By encouraging exit rates into unemployment or into low-paid, temporary and insecure work,[48] intensified conditionality and sanctions risk exacerbating the issues that have led to women's unequal position in the economy. By pushing women further from well-paid, sustainable and long-term employment, the implementation of the Spring Budget UC reforms will further entrench gender inequality in Wales and throughout the UK. Thus, in addition to defecting on their stated aims of growing the UK economy, the reforms are likely to undermine UK Government commitments to advance equality.

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[48] Department for Work and Pensions (2023), *The Impact of Benefit Sanctions on Employment Outcomes: Evaluation report*

Conclusion

UC has long been regarded as problematic from a gender equality perspective. Policy measures such as the benefit cap, two-child limit, payment at a household level and the lack of a work allowance for second earners do not work for women, and risk pushing them further into debt and poverty as the cost of living continues to rise. Rather than addressing these issues, the reforms introduced by this year's Spring Budget only stand to make matters worse. While the changes to the UC childcare element are welcome, women in Wales are still likely to be unfairly disadvantaged due to a failure to account for differences between Wales' childcare support regimes and those in England. By extending conditionality and sanctions to in-work, low-earning claimants and lead carers of very young children, their welfare worsening and inequality entrenching impacts will fall disproportionately on women in Wales. By depleting the incomes of vulnerable claimants to the extent that they can no longer afford basic human essentials, the announced reforms endanger the human dignity and equal respect that social security is designed to protect. Far from forming a vital safety net, the overwhelmingly negative impacts and evidenced ineffectiveness of sanction-backed conditionality undermines its very ethicality, and therefore the justifiability of the UK Government reforms.

Recommendations

To address these issues and ensure that the UK social security system truly delivers for women and other vulnerable groups in Wales, we recommend that the UK Government implement the following changes;

1. The severity and length of UC sanctions should be reduced, and an adequate warning system implemented before punitive action is taken, so that no household is left destitute as a result of their application.
2. Sanctions should not be applied to disabled claimants.
3. Training and resources should be redirected to ensure that Work Coaches are providing high-quality, individualised and flexible employment support which will support women claimants and those from other marginalised groups to overcome the particular barriers they face when entering and progressing in work.
4. The plans to automate certain administrative elements of UC should be reconsidered and abandoned, unless it can be evidenced that their implementation will not disproportionately impact women and other marginalised groups, nor lead to an increase in punitive sanctioning.
5. The UC benefits cap and two-child limit should be abolished.
6. The 'no recourse to public funds' condition under UC should be removed completely.
7. To avoid exacerbating issues of financial dependency, a critical factor in women's poverty and domestic violence, payment of UC income should be split between adults in a household, rather than paid to one person at a household level.
8. A work allowance for second earners within households with children or limited capability to work should be introduced, as is the case for primary earners within families on UC.
9. Certain administrative powers over social security should be devolved to Wales, as in Scotland, to ensure that social security is delivered in a way that works best for people in Wales.
10. To avoid further entrenching gender inequality, going forward all social security policies and reforms should be developed and implemented using a gender mainstreaming approach, to ensure that they meet the needs of women.

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