LLOYDS BANK FOUNDATION England & Wales

Central England Law Centre

Public Law Project

Sanctionable Failures:

Universal Credit's failing sanctions regime and the harm it causes

Contents

Introduction

In its 2024 Get Britain Working White Paper the Government signalled an intent to redress the balance in the approach to employment support, moving from a system focussed on monitoring compliance with sanctions backed conditions to one of personalised employment support. However, to date the number and rate of Universal Credit sanctions has continued unabated[1]. The number of sanctions issued in January 2025 alone (64,795)[2] represented the highest volume of sanctions issued in any month since the dataset began.

While sanctions are usually imposed for minor 'failings'[3], the consequences are severe. Sanctioned individuals ordinarily lose **all** of their Universal Credit standard allowance for between a week and 6 months (and in some cases longer).[4] These are severe penalties that exceed the average criminal fine. As has been repeatedly evidenced, they cause significant harm and push people further away from sustainable work.

Over a period of 18 months, caseworkers at Central England Law Centre (CELC), with funding from the Lloyds Bank Foundation, have been supporting people in Birmingham and Coventry who want to challenge those sanctions.

This report is about the experiences of these individuals, informed by the caseworkers supporting them. It looks at the:

- circumstances and context in which sanctions are being applied
- practicalities of trying to prevent and challenge them
- human cost of dealing with their consequences.

It finds a system characterised by failings at every stage of the journey: from the initial decisions about what conditions are imposed on people, through to the decision to apply sanctions for alleged failures to meet those conditions, through to the process for appealing them once they are imposed.

Government is currently consulting on whether, and in what, circumstances to apply sanctions backed conditions on disabled claimants and claimants with health conditions. It has stated that sanctions would be used 'only as a last resort' and that safeguards will be built in to ensure vulnerable people are properly protected.

1. Dr David Webster, Benefit Sanctions Statistics: August 2025 Release, 21 August 2025, available here: https://cpag.org.uk/policy-and-research/latest-policy-briefings-and-reports/david-webster-briefings; for the period between Labour taking office in July 2024 to May 2025 (the latest point where data is currently available), the monthly average number of sanctions imposed was 51,607. In comparison, the average number of sanctions in the 10 month period before they took office was 48,332. In the same period the sanctions rate was 2.46% – only slightly lower than the average in the preceeding 10 months of 2.51% .
2. DWP Benefit Sanctions Statistics to May 2025 2025 (published 12 August 2025) data tables, table 1.1: https://www.gov.uk/government/statistics/benefit-sanctions-statistics-to-november-2024. Figures refer to the number of original adverse decisions made (note I, stat-xplore dataset UC Full Service Sanction Decisions). Adverse decisions are decisions to apply a sanction.
3. For February 2024 to April 2025, 90.8% of sanctions were issued for missing or being late to an interview with a work coach
4. Regulation 111, the Universal Credit Regulations 2013

However as this report evidences, the system as currently designed and implemented does not sanction people as a 'last resort' as a result of 'refusals' to engage. Instead, sanctions are applied for first-time 'failures', often in circumstances or for reasons beyond an individual's control.

Further, it shows that the current checks and safeguards are not sufficient to prevent sanctions being imposed inappropriately or harmfully. Of the cases that have progressed to appeal so far, 86% were decided in favour of the claimant. These are sanctions that should never have been imposed at all, even within the terms of the current strict regime. It is likely that many were only challenged due to the temporary existence of dedicated support. And these sanctions were ultimately only overturned after a lengthy appeal process, by which time the damage was done.

The solution to this isn't to simply strengthen safeguards – no amount of checks and balances can address the significant risk that comes from removing the entirety of someone's standard allowance. This report demonstrates that the current regime is causing claimants serious harm and has failed on its own terms. It should therefore be revoked. In the absence of that, it should be fundamentally reformed to:

- address the disproportionate severity of the sanction imposed,
- ensure they are only applied in exceptional circumstances, following clear warning,
- taking steps to avoid sanctions being imposed in the first place,
- adding safeguards before sanctions decisions are made,
- improving access to appeals.

Summary of findings

A disproportionate system

Sanctions are imposed for first time 'failures' often for circumstances outside of people's control. Despite being imposed for relatively minor failings, they are severe penalties that exceed the average criminal fines. Due to the way they are calculated, sanctions for what the DWP deems to be a 'low-level' failure can be more severe than for more serious failures.

A harmful system

Sanctions cut people's standard allowance by 100% – unsurprisingly, then, they have a significant impact on people's lives. Research participants reported sanctions meant they needed to use food banks and/or incur debt. They also reported negative impacts on their physical and mental health, housing stability and on their ability to search for and undertake work.

An unsound system

The current checks and safeguards do not prevent sanctions being imposed inappropriately within the terms of the current regime. Our research found:

- failings at every stage of the process – from inconsistent use of interpreters, to incorrect information about appeal timelines, to policies and practices that failed to reflect the realities of people's lives,
- a high overturn rate on appeal, with 86% of cases resolved in favour of the claimant – worryingly, it is likely that many of these sanctions would not have been challenged if dedicated support had not been available,
- a lengthy appeals process – overturning sanctions on appeal did not adequately compensate people for the extreme financial hardship they had already endured.

An unequal system

- people are often sanctioned for reasons outside their control or due to barriers in engaging with the system,
- factors that increase the risk of being sanctioned also make it harder for people to challenge sanctions once they are imposed
- the current conditionality and sanction regime is likely to affect some claimants more than others – with claimants of non-white ethnicities being more likely to be in conditionality regimes where sanctions can be applied.

Recommendations

This report offers three sets of overarching recommendations. A more detailed set of actions, and how these should be taken forward, appear in Annex 1.

1 The current sanctions regime fails on its own terms and should be revoked. Failing that, it should be fundamentally reformed to:

a. **ensure that sanctions are only applied in exceptional circumstances, following clear warning**
b. **reduce their severity, for example, by introducing a minimum floor in line with the proposed 'essentials guarantee'.**[5]

2 Government must take urgent action to:

a. **strengthen the current pre-sanction safeguards**
b. **make the internal review and appeal processes more accessible**
c. **ensure that actions under a and b are informed by the realities of individuals who face additional barriers to engaging with the system – including those who speak English as a second language, are navigating an unfamiliar system (for example, as a refugee), and are on the wrong side of the 'digital divide'.**

3 Government must take urgent action to better understand and be more transparent about who is impacted by Universal Credit policies, including sanctions and conditionality.

5. Porter, I. and Tims, S. (2025) Protected minimum floor in Universal Credit: new policy targeting hardship. York: Joseph Rowntree Foundation, available here: https://www.jrf.org.uk/social-security/protected-minimum-floor-in-universal-credit-new-policy-targeting-hardship#how-to-cite-this-briefing

Methodology

This research is part of a partnership project between the Public Law Project (PLP) and Central England Law Centre (CELC), funded by Lloyds Bank Foundation.

The project applied an 'action research' approach: Public Law Project conducted research to understand the experience of sanctioned individuals in Birmingham and Coventry, while CELC provided casework solutions to any issues identified.

Cases were identified through client enquiries, referrals and caseworker outreach at local foodbanks. As at September 2025, CELC had recorded 316 sanctions casework enquiries.

Relevant and anonymised case details were recorded in a spreadsheet tracker completed by CELC caseworkers and shared with PLP. This resulted in data capture for 119 sanctions.

Fortnightly case-analysis meetings were held between PLP and CELC to discuss any emerging themes or trends in greater detail. These were supplemented by 14 semi-structured interviews conducted with CELC clients whose Universal Credit payments had been sanctioned.

Periodic whole-team reflection meetings were held over the course of the project to examine emerging themes, trends and casework approaches.

To identify relevant themes, PLP has undertaken a coding exercise on the information contained in the case tracker, case-analysis meetings and interview transcripts.

Desktop research has also been conducted to identify relevant DWP policies and guidance, and to analyse available DWP data. Further detail on the analysis of DWP data can be found in Annex 2 to the report.

316
total recorded sanctions casework enquiries

119
sanction data recorded

14
semi-structured interviews

Limitations

The research reflects the experience of claimants who either approached CELC for advice or received advice after being referred by other agencies or contacted through outreach. As such, their experience may not reflect that of the sanctioned population as a whole.

Information about sanctions cases, particularly when disclosed through semi-structured research interviews, depended to some extent on self-reporting by sanctioned individuals. This was mitigated where casework support was provided, and it was possible for caseworkers to verify and, where applicable, evidence case facts. However, the extent to which this was possible depended on the level of client engagement and the quality of information available, such as entries in a client's Universal Credit journal.

Although the research sits alongside casework support to challenge sanctions, it was not always possible to verify the outcome of cases. When the DWP issues a Mandatory Reconsideration Notice (the outcome of a DWP internal review of a sanction decision) it is delivered directly to the subject of that decision. It has only been possible to verify the outcome of these cases where the client contacted CELC to inform them of it. Clients may be less likely to get in touch when a challenge is successful, because they would not require further support to appeal the decision at Tribunal.

In addition, due to the lengthy duration of the challenge process, not all cases had concluded by the time this report was published.

The Universal Credit sanctions and conditionality regime

This section explains how the current Universal Credit conditionality and sanctions system works.

For many people who receive Universal Credit, payments are conditional on taking steps to look for, or prepare for, work (or more or better paid work). These conditions are called **work-related requirements**.[6] These requirements include, for example, attending meetings with DWP work coaches or spending a certain number of hours each week applying for jobs.

If the DWP determines someone has failed to undertake a mandatory work-related requirement **'for no good reason'**, they are sanctioned.[7] A sanction means the DWP will deduct 100% of someone's standard allowance for a period of time (see further the section on a Disproportionate System below).[8]

Imposing and communicating work-related requirements (conditions)

Whether, and to what extent, work-related requirements can be imposed on a claimant depends on their circumstances. This includes the extent to which a health condition or disability has been assessed by the DWP as affecting their ability to work. This should determine what 'conditionality regime' a claimant is placed in and therefore the nature and extent of mandatory commitments that can be imposed on them.

Universal Credit conditionality regimes[9]

Conditionality Regime	Description	Conditionality Group	Labour Market Regime
Searching for work	Not working, or working very low earnings. Claimant is required to take action to secure work - or more or better paid work. The Work Coach supports them to plan their work search and preparation activity. Typical examples of people in this regime include jobseekers and gainfully self-employed in start-up period. Claimants are only in this regime if they do not fit into one of the other regimes.	All work related requirements	Intensive Work Search

6. Section 13, Welfare Reform Act 2012
7. Ss. 26 and 27, Ibid
8. Regulations 110 and 111, Universal Credit Regulations 2013, the exception is where a claimant is aged 16 or 17 or if their only requirement is to attend appointments to discuss work. In these circumstances, the sanctions rate is 40% of the Universal Credit standard allowance.
9. DWP, Universal Credit statistics: background information and methodology, 7 October 2025, available here: https://www.gov.uk/government/publications/universal-credit-statistics-background-information-and-methodology/universal-credit-statistics-background-information-and-methodology

Conditionality Regime	Description	Conditionality Group	Labour Market Regime
Working – with requirements	In work, but could earn more, or not working but has a partner with low earnings.	All work related requirements	Light touch
No work requirements	Not expected to work at present. Health or caring responsibility prevents claimant from working or preparing for work. Examples of people on this regime include those in full time education, over state pension age, have a child under 1 and those with no prospect for work.	No work related requirements	No work related requirements
Working – no requirements	Individual or household earnings over the level at which conditionality applies. Required to inform DWP of changes or circumstances, particularly at risk of earnings decreasing or job loss.	No work related requirements	Working enough
Planning for work	Expected to work in the future/ Lead parent or lead carer of child aged 1 (aged 1 to 2, prior to April 2017). Claimant required to attend periodic interviews to plan for their return to work.	Work focused interview	Work focused interview
Preparing for work	Expected to start work in the future even with limited capability to work at the present time or a child aged 2 (aged 3 to 4, prior to April 2017). Claimant expected to take reasonable steps to prepare for working including Work Focused Interview.	Work preparation	Work preparation

Currently, if someone has a health condition or disability, they can ask for a **work-capability assessment (WCA)**. If the WCA finds the claimant has **limited capability for work (LCW)** they are placed in the preparing for work conditionality regime. Claimants in this regime are subject to more limited conditions than claimants who are out of work and have not been assessed as having Limited Capability for work. If someone is assessed as having limited capability for work-related activity (LCWRA) no mandatory conditions for receiving Universal Credit are imposed on them.

In March 2025, the UK government published a Green Paper[10] which included proposals to replace the WCA with a new single assessment for both Personal Independence Payments and Universal Credit. It also proposes moving to a new 'baseline expectation of engagement' for all claimants. It states that 'there will be the ultimate backstop of sanctions' to underpin those baseline expectations, but those sanctions 'should be used only as a last resort'.[11]

The **Claimant Commitment** is a record of the requirements a claimant needs to comply with.[12] Claimant Commitments should be generated through a conversation with a claimant at the start of their claim (and amended should their circumstances change). The requirements contained in the Claimant Commitment should be reasonable and achievable, taking into account the claimant's individual circumstances.

Once the Claimant Commitment is in place, claimants should be contacted about specific activities they're required to undertake on a given date at a specific time. For example, if the Claimant Commitment requires a claimant to take part in interviews with their work coach, they should receive a notification setting out the time, date, location and reason for that interview.[13] Often this notification will take the form of a 'to-do' in a claimant's Universal Credit journal.[14]

Sanctionable failure and decisions to impose a sanction

A 'sanctionable failure' occurs when a claimant doesn't meet a work-related requirement – for example, if they miss or are late to an appointment, or don't carry out an agreed work-search activity.

Except in cases where a claimant loses a job or pay due to misconduct, sanctions should only be imposed if the failure occurs for "no good reason".

What constitutes 'good reason' is not defined in legislation. However, DWP decision-makers are provided with examples illustrating what does and does not constitute one.[15]

Where a sanctionable failure occurs, for example, if a claimant misses an appointment with their work coach, they should receive a 'Tell Us Why' 'to do' in their Universal Credit account, giving them seven days to explain why they didn't comply with the requirement.

If a claimant misses an interview, in some circumstances, if the reason matches one of the examples in a prescribed list, a work coach can accept it 'locally'. In these circumstances, the claimant won't be sanctioned. However, if the reason doesn't match a reason on the list or if it has been accepted on three or more occasions locally, it must be referred to a separate DWP decision-maker.[16]

10. DWP, Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper, 18 March 2025, available here: https://www.gov.uk/government/consultations/pathways-to-work-reforming-benefits-and-support-to-get-britain-working-green-paper; Green Papers are consultation documents produced by the Government seeking feedback on its policy or legislative proposals.
11. Paras 246 and 257, Ibid
12. Section 14 Welfare Reform Act 2012
13. Para K1171, DWP, Advice For Decision Makers Guide.
14. A 'to do' refers to a feature within claimant's online Universal Credit accounts that lists tasks they need to complete
15. DWP, Advice for Decision Makers, Chapter K2: Good Reason: https://assets.publishing.service.gov.uk/media/6798c7f94686aac1586063e0/adm-chapter-k2-good-reason.pdf
16. DWP, Universal Credit Guidance 2025: Failure to Attend: Good Reason Guidance, deposited in the House of Commons, committed 9 June 2025, available here: https://data.parliament.uk/DepositedPapers/Files/DEP2025-0364/067._Failure_to_attend_-_good_reason-Guidance_V10.0.pdf

The DWP decision maker should then decide whether to impose a sanction. The claimant should be notified of that decision, usually via their Universal Credit account.

Challenging a sanction decision

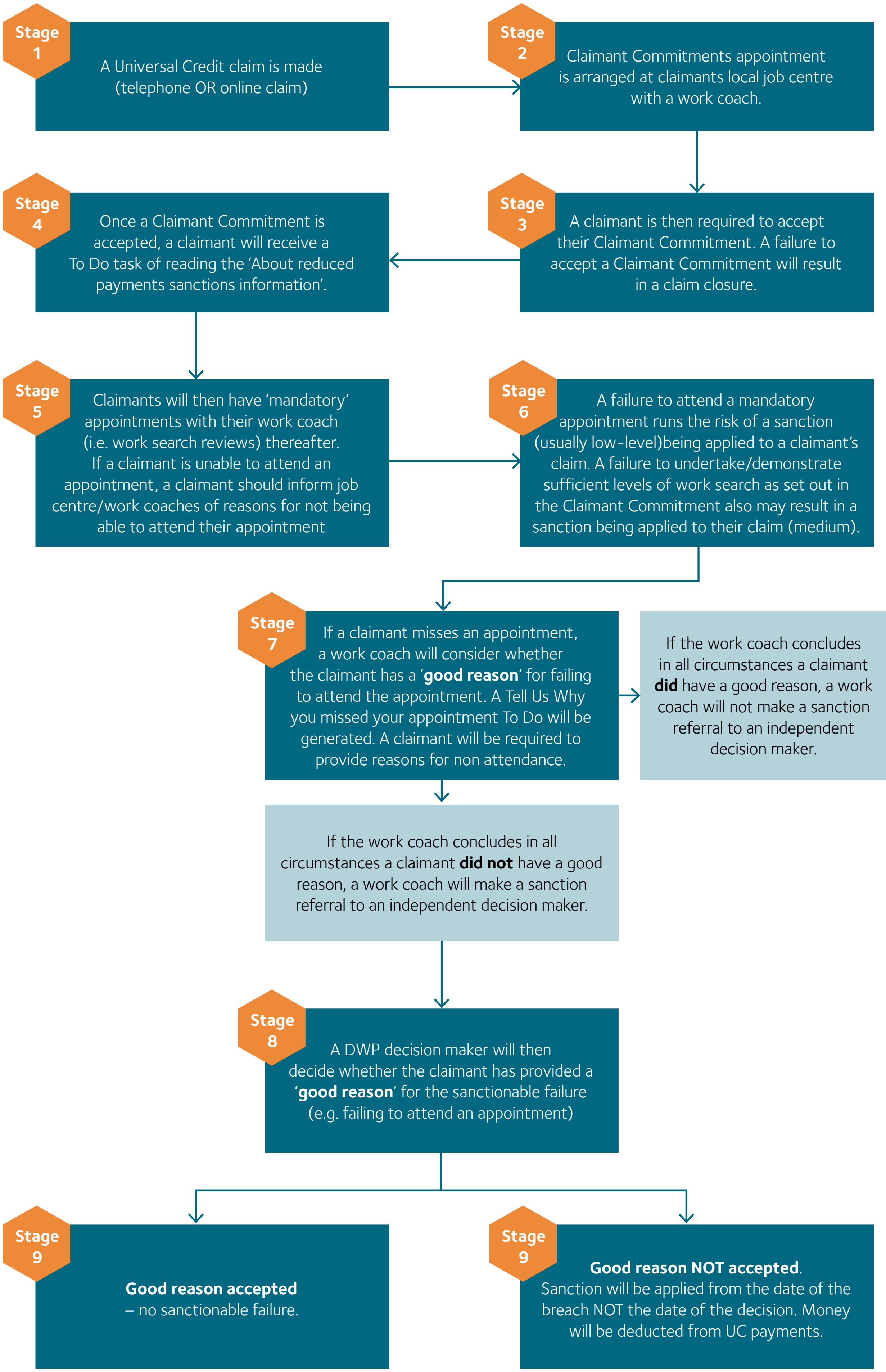
If a claimant thinks a sanction shouldn't have been imposed, they can appeal it.

However, before they do so, they must first ask the DWP to review the decision internally.[17] The DWP refers to this internal review as a **Mandatory Reconsideration**.

Once a mandatory reconsideration decision has been made, the claimant should be sent a **Mandatory Reconsideration Notice** notifying them of the outcome. If they remain unhappy with the decision, they can **appeal** it to an independent tribunal.

After the appeal is lodged, the DWP has 28 days to either **lapse an appeal** or issue an appeal paper. Lapsing an appeal refers to when the DWP revises the sanction decision in favour of the claimant without an appeal hearing. If a decision isn't lapsed, or otherwise withdrawn, it is considered by an independent Tribunal judge at an appeal hearing.

17. Regulation 7, The Universal Credit, Personal Independence Payment, Jobseeker's Allowance and Employment and Support Allowance (Decisions and Appeals) Regulations 2013


Stage 1
A Universal Credit claim is made (telephone OR online claim)
Stage 2
Claimant Commitments appointment is arranged at claimants local job centre with a work coach.
Stage 3
A claimant is then required to accept their Claimant Commitment. A failure to accept a Claimant Commitment will result in a claim closure.
Stage 4
Once a Claimant Commitment is accepted, a claimant will receive a To Do task of reading the 'About reduced payments sanctions information'.
Stage 5
Claimants will then have 'mandatory' appointments with their work coach (i.e. work search reviews) thereafter. If a claimant is unable to attend an appointment, a claimant should inform job centre/work coaches of reasons for not being able to attend their appointment
Stage 6
A failure to attend a mandatory appointment runs the risk of a sanction (usually low-level)being applied to a claimant's claim. A failure to undertake/demonstrate sufficient levels of work search as set out in the Claimant Commitment also may result in a sanction being applied to their claim (medium).
Stage 7
If a claimant misses an appointment, a work coach will consider whether the claimant has a '**good reason**' for failing to attend the appointment. A Tell Us Why you missed your appointment To Do will be generated. A claimant will be required to provide reasons for non attendance.
If the work coach concludes in all circumstances a claimant **did** have a good reason, a work coach will not make a sanction referral to an independent decision maker.
If the work coach concludes in all circumstances a claimant **did not** have a good reason, a work coach will make a sanction referral to an independent decision maker.
Stage 8
A DWP decision maker will then decide whether the claimant has provided a '**good reason**' for the sanctionable failure (e.g. failing to attend an appointment)
Stage 9
Good reason accepted – no sanctionable failure.
Stage 9
Good reason NOT accepted. Sanction will be applied from the date of the breach NOT the date of the decision. Money will be deducted from UC payments.

Stage 10

A claimant can challenge a sanction decision (UCD140, UCD537, UC537a) by requesting their decision be considered by a DWP decision maker 'at any time'. A claimant is NOT restricted to the usual 1 month time limit for challenging a Universal Credit decision.

Stage 11

Mandatory Reconsideration Notice issued. A claimant's good reason has been accepted and all money owed to them should be returned for the period the sanction applied.

Stage 11

Mandatory Reconsideration Notice issued. DWP decision maker has not accepted claimant's good reason. No money owed/returned.

Stage 12

Appeal must be lodged with HM Courts and Tribunals Services within 1 month of the date of the Mandatory Reconsideration Notice (in exceptional circumstances this can be extended up to 13 months).

Stage 13

A DWP decision maker has 28 days from lodging of the appeal to do the following (i.e. reconsider the decision and lapse the appeal in the Appellants favour OR issue appeal papers (First-tier Tribunal will hear the appeal).

Stage 14

If the appeal is lapsed and good reason accepted (no Tribunal hearing will take place) and all money owed to the claimant should be returned for the period the sanction applied.

Stage 14

Hearing before a Tribunal comprised of a legally qualified judge. Appeal will be allowed or refused.

Stage 15

If the appeal is allowed, all money owed to the claimant should be returned for the period the sanction was applied.

A disproportionate system

Sanctions: a severe punishment with serious implications

Sanctions explainer

- Sanctions are applied to people who have limited or no savings[18] – and in a context where the rate of standard allowances pre-sanction is already inadequate to meet essential needs.[19]

- The severity of a sanction is impacted both by its duration and the proportion of payment deducted.

- Sanctions ordinarily involve a deduction of **100%** of someone's Universal Credit standard allowance for a period of time. This is usually expressed as a daily rate (for 2025/26 the daily rate for a single adult aged 25+ is £13.10.[20]

- The duration of a sanction depends on the nature of the claimant's failure and whether they have been sanctioned in the past year:

    - **high-level sanctions:** are applied for a **fixed period of 91 days** (three months) or **182 days** (six months) if there's been a previous sanction in the past 365 days
    - **medium-level sanctions:** are applied for a **fixed period of 28 days** or **91 days** if there's been a previous sanction in the past 365 days
    - **low-level sanctions:** are applied for a **compliance period** (the number of days from the date of the sanctionable failure to the day before the claimant meets a **'compliance condition'**, such as scheduling a new appointment) plus a **fixed period of between seven and 28 days**, depending on the number of sanctions in the past 365 days
    - **lowest-level sanctions:** are applied for a **compliance period**.

18. To claim Universal Credit, you must usually have no more than £16,000 in money, savings and investments. If you have between £6,000 and £16,000 in money, savings and investments, your Universal Credit payments are reduced.
19. Research by the Trussell Trust and Joseph Rowntree Foundation has found that the current rate of benefits is not sufficient to cover the essentials, see further: Bannister, Matejic, Porter, Sands, Schmuecker, Wenham, Bull, Ferrer, Hughes, An Essentials Guarantee: Reforming Universal Credit to ensure we can all afford the essentials in hard times, February 2024. Available at: https://www.jrf.org.uk/report/guarantee-our-essentials.
20. DWP, Universal Credit sanctions, available here: https://www.gov.uk/guidance/universal-credit-sanctions

The research found that the rate at which sanctions are applied (100% of the standard allowance), and the length of time for which they were applied, they were on average significantly more severe than the average criminal fine.

Some of the longest, and therefore most severe sanctions, were the supposedly 'low level sanctions'. This was due to the open-ended nature of these sanctions, where their length depends on whether and when a compliance condition is met.

Of the CELC cases where sanction length is known,[21] the median length of a sanction was 35 days.

80% of these were 'low-level' sanctions.
The median length of low-level and lowest-level sanctions was 36 days. This is eight days longer than the fixed-term period applied for medium-level sanctions. The longest low-level sanction recorded lasted for around five months.

The median compliance period was 26 days.
The length of that compliance period varied from 0 days to 132 days.

36 days
median length of low-level and lowest-level sanctions

26 days
median compliance period

The research found that reasons for long, or prolonged, compliance periods included:

- DWP errors concerning when a compliance period had come to an end,
- clients being unclear about what they needed to do to bring a compliance period to an end
- clients facing barriers to meeting a compliance condition – for example, due to English being their second language or difficulties accessing the device they use to access their universal credit journal or receive calls from the DWP.

21. 75 cases

Comparison with court fines

The rates and periods over which individuals are sanctioned are such that sanctioned amounts are higher and more severe than the average criminal court fines (see further details in Annex 2).

£524

Total sanction amount for a single UC claimant aged 25+ sanctioned for median sanction period in May 2025

£283

Average court fine issued in 2024 (excluding. companies)

Not only are total sanction amounts high relative to criminal fines, the loss of 100% of a claimant's standard allowance is likely to be more damaging than criminal court fines, which can commonly be paid in instalments.

£91.70

Weekly sanction amount for a single UC claimant aged 25+

£10

Recommended weekly instalment for court fine for someone receiving benefits

Hardship payments

Sanctioned individuals can apply for a hardship payment – a loan of 60% of the standard allowance. This is then paid back through deductions from future Universal Credit payments when they are reinstated following the sanction.

However, research participants – particularly those facing language barriers – were not always aware they could apply for a hardship payment. Others faced difficulties or delays accessing them. Some participants said the fact that hardship payments had to be repaid – prolonging the period where they faced reduced payments – acted as a deterrent to claiming them.

Not a last-resort measure

Recent DWP guidance states that sanctions are a 'last resort'[22]. But this is not the case under the current sanctions regime, either in legislation or, this research found, DWP practice.[23]

This was reflected in this research, which found individuals who had been engaging with the DWP, and attending its appointments, were sanctioned for first-time 'failures'.

The research also found individuals were often sanctioned for reasons outside their control – an issue examined in more detail in the Unequal System section on p28.

22. Department for Work and Pensions, Guidance: Universal Credit: further information for families, updated 17 September 2025, available here: https://www.gov.uk/government/publications/universal-credit-and-your-family-quick-guide/universal-credit-further-information-for-families
23. ss. 26 and 27 Welfare Reform Act 2012 require payments to be reduced where there is a failure for no good reason; CELC cases included sanctions being imposed for first time failures where claimants had previously been engaging with the DWP and meeting their requirements.

A harmful system

Given the severity of sanctions, and the context in which they are imposed, research participants unsurprisingly reported that they have a significant impact.

Insufficient food

A consistent theme across interviews was that sanctions made it more difficult for people to afford food.

> “I was hungry and I did not have money to eat.”

Individuals with dependent children reported cutting back on their own food so that their children would not go hungry or could continue to take part in extra-curricular activities.

> “She said there was a time when she was not eating herself, she was just saving it for her children, she was just thinking if she eats this food there will not be enough for the children, and that’s why she was not eating and she was giving that food to the children.”
> (via an interpreter)

> “They had no food obviously or not enough of everything... because the price of everything has gone up and the money was not enough for her, for the family, and they were really struggling, all of them, all the family were struggling.”
> (via an interpreter)

One interviewee said her children were distressed at seeing her not having enough to eat.

> “It was a big impact on her family, especially for the children, her oldest son, the children were seeing everything.”
> (via an interpreter)

Debt

Interviewees reported that sanctions pushed them into debt – either because they were forced to borrow money or couldn’t meet existing commitments. Some interviewees had also pawned important belongings.

> “I kept on borrowing money from here and there, whoever I knew, and then I said ‘I’ll pay you soon’, and then they kept on asking for their money and I could not pay them back and it really affected me mentally a lot.”

One said sanctions forced them to rely on credit for their electricity, which they then had to pay back with interest, prolonging their financial difficulties.

Some research participants referred to the strain their financial situation put on their relationships with loved ones.

Housing instability

Falling into rent arrears – and the associated risks to their housing situation – were among sanctioned individuals' debt-related concerns.

Some Universal Credit claimants are eligible for extra payments towards housing costs, on top of their standard allowance. While sanctions are only applied to the standard allowance, research participants renting informally from family or friends explained how sanctions had put their housing situation at risk.

One participant reported writing in their journal about their fears of being evicted by their relative because they couldn't pay the rent following their sanction. They said they didn't receive a response to this concern.

> " It's only when [you are actually evicted] that they are interest in you isn't it... that they have a pair of ears to listen to you."

Mental and physical health

Interviewees referred to the psychological impact of sanctions and the resulting stress and financial strain.

> " I was completely hopeless about life."

> " She was so stressed that while she was walking in the street she was crying. She was basically depressed, anxious and stressed."
> (via an interpreter)

Some interviewees described how the consequences of sanctions were detrimental to their physical health. For example, one interviewee described having stomach problems they attributed to sanction-related stress and lack of food.

Fear of sanctions

Two interviewees explained how the fear of being re-sanctioned persuaded them to agree to requirements they didn't feel were appropriate. One reported taking her children to interviews when they were unwell because she was concerned she would be sanctioned if she didn't attend.

> " Even though her children were unwell, she was saying she would take her to the job centre, in the fear that they do not stop her money because obviously if they stop she'll not have anything to eat."
> (via an interpreter)

One interviewee's compliance interview clashed with an important medical appointment. When he communicated this to the DWP, he reported being told he still had to attend the compliance interview or risk further sanction. As a result, he had to cancel the medical appointment and wait a considerable time for it to be rescheduled.

Impact on work

Some of the interviewees said sanctions had hampered their ability to look for work. This ranged from not having the travel money to go out and find work to having to pawn their laptop – their main means of searching for work.

Two interviewees also explained how the stress of the sanction had affected their ability to think and therefore do their job.

Another two interviewees said they felt they were conducting ineffective work-search activities to avoid sanctions, rather than developing the language and IT skills they needed to enter the workforce.

One participant said they couldn't make the calls they needed to search for work because they couldn't afford credit for their phone. They explained the frustration of missing a call from a job agency and being unable to call them back.

The same interviewee also described how not being able to afford food meant they sometimes only consumed cups of tea. They said this disrupted their sleep, making it harder for them to effectively search and apply for jobs.

An unsound system

As set out at page 9 above, there are several stages in the sanctions 'journey' – with a corresponding number of points where things can (and do) go wrong. This research found failings at every stage of the journey. Here we set out some of the key themes, problems and issues.

A. A miscarriage of justice

Of the 77 CELC cases where a DWP internal review (mandatory reconsideration) was requested and the outcome was known, 39% (30) saw the decision reconsidered in the claimant's favour, while 61% (47) saw the sanction decision upheld.

As at September 2025, 36 cases that had progressed beyond the Mandatory Reconsideration stage had concluded at appeal stage. Of these:

- 20 (55.5%) were lapsed[24] in the claimant's favour
- 11 (30.5%) were revised in the claimant's favour at a tribunal hearing
- 5 (14%) were upheld at a tribunal hearing.

This means that 86% of concluded appeals resulted in a successful outcome for the claimant.

While this figure comes from a relatively small sample size, it is consistent with the national data on sanctions appeals formerly published by the DWP. This showed that between 1 August 2015 and 31 October 2017, 81% of decisions at appeal were decided in favour of the claimant.[25] The DWP no longer publishes this data set.

86%

of concluded appeals resulted in a successful outcome for the claimant

In appeals concluded in favour of a claimant, a DWP decision-maker (in the case of lapsed appeals) or an independent tribunal judge (in the case of tribunal hearings) has determined that a sanction should not have been imposed. However, by the time that verdict has been reached, this research found that the damage was already done.

B. Tip of the iceberg

It is likely that many of these sanctions would not have been appealed without the temporary existence of CELC outreach and casework support.

Several research participants emphasised they would not have appealed if they had not received CELC support. Some referred to encountering CELC 'by chance' as a result of proactive caseworker outreach, which prompted them to challenge their sanction.

24. Lapsed refers to the circumstances where the DWP revises its original decision in favour of the appellant before the appeal hearing
25. Page 4, DWP, Universal Credit Sanctions Experimental Official Statistics (February 2018), available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/682635/benefit-sanctions-statistics-to-october-2017.pdf

The research found access to legal advice and support significantly improved outcomes for claimants. Of the 30 successful Mandatory Reconsideration requests (where the outcome is known), only two (7%) were submitted by the client without CELC support. In contrast, of the 47 unsuccessful requests, 19 (40%) were submitted by the client without support from CELC. As at September 2025, 14 of those unsuccessful requests had been successfully challenged on appeal with support from CELC.

Overall, at mandatory reconsideration stage, **unsupported clients had a 10% success rate, while CELC-supported clients had a 50% success rate.**

The CELC caseworker resource, funded by a Lloyds Bank Foundation grant, was only temporarily in place for the duration of the research project. While the team responded to a relatively large number of enquiries, it represents only a small proportion of the total number of sanctions in Birmingham and Coventry during this period.

The high success rate of claimants with access to advice raises concerns that there may be many unchallenged sanctions that should not have been applied but have been allowed to stand.

C. Justice delayed is justice denied

While many of the challenged sanctions were overturned, the process for doing so was a lengthy one. The main source of delay was the time between lodging an appeal and an appeal being heard at tribunal.

The median period between an appeal being lodged and it reaching a tribunal hearing was 132 days (4.3 months) – with the longest case taking 447 days (14.6 months).

The median period between a mandatory reconsideration being requested, and a Mandatory Reconsideration Notice being issued was 48 days. While this is shorter than the length of time between Mandatory Reconsideration and appeal, the length of time taken means that even if a decision is overturned at this stage, it is too late to have prevented significant financial harm being incurred. There was also significant variation, with some decisions being reached within a week while others took months. The longest delay was 14 months.

Combining all stages of the challenge process (mandatory reconsideration) and appeal, with the period taken to obtain advice, the median period between sanction and appeal was **7 months**.

D. Sanction first – ask (more) questions later

The research found that the system backloads the level and quality of scrutiny applied to the decision whether to impose, or maintain, a sanction decision.

At the initial decision-making stage, individuals are given limited opportunities to provide representations relevant to whether a sanction should be imposed. They ordinarily have no direct contact with the decision maker. The research found that claimants had usually not received external advice or support at this stage.

In contrast, at the appeal Tribunal stage (the last stage in a lengthy process), claimants had the opportunity to make representations directly to the judge, and to answer any questions the judge had directly. For the appeals involved in this research, all clients were supported by CELC at this stage.

The research identified the following limitations at each of the stages that are intended as check both before sanctions are applied (the provision of good reason) and after (Mandatory Reconsideration and appeal).

1. Providing a good reason

Following a sanctionable failure, claimants should have the chance to give their reasons why they failed to comply with a work-related requirement.[26]

The research found that this usually took the form of a '**Tell Us Why'** 'to-do' in someone's Universal Credit journal. It found the following problems with this approach:

- **A Tell Us Why to-do may be missed:** research interviews and feedback from caseworkers suggested that the Tell Us Why to-do was not always noticed or responded to. Sometimes the 'good reason' for a claimant's initial sanctionable failure also prevented them accessing the journal to submit a reply – for example, if they were in hospital or their device was broken.

- **It doesn't encourage a full response:** the nature of the Tell Us Why journal request encouraged people to provide short responses without the full context or circumstances relevant to their case. Interviewees contrasted the Tell Us Why to-do with providing information as part of a 'back and forth' discussion. For example, one interviewee felt a phone call with the DWP, where they could have explained what had happened, would have been better. They believed it would have helped them provide more context than the explanation they provided in their journal. They also said they found the process of giving a written explanation harder than providing information verbally.

> "That's one of my problems about filling in forms. You ask me a question...I don't go round the mulberry bush explaining this, that and the other and sometimes it's not the right answer they want. I have the question, I answer the question, if you ask me to explain more, I'll explain."

> "If they'd have phoned me, I could have... explained the situation."

People not having the chance to properly explain themselves also caused problems at a later stage in the process. The research found examples of the DWP doubting the veracity of fuller explanations made at a later stage.

26. K2005, DWP Advice for Decision Makers Guidance, Chapter K2: Good Reason, available here: https://assets.publishing.service.gov.uk/media/6798c7f94686aac1586063e0/adm-chapter-k2-good-reason.pdf

- **Providing a written response is not accessible for some claimants:** this was a bigger barrier for people who also faced language barriers or had limited digital literacy. One interviewee felt that if there had been a conversation, supported by an interpreter, she would have been able to provide a better explanation. Instead, she felt that a decision had been taken without the DWP fully understanding her circumstances.

  > “What they did was, without knowing the reason, without understanding what I was going through, they just sanctioned.”

  Other claimants, whose first language was English, explained that they found providing written responses harder than providing explanations in English.

- **It is not clear to claimants what information they need to provide:** what constitutes a ‘good reason’ is not defined in legislation. It is a question of judgment based on what the decision-maker deems is reasonable in the claimant’s circumstances. The guidance that informs that judgment is 111 pages long and not readily available to claimants. This makes it difficult for claimants, who often don’t have access to advice, to know what information they should provide.

2. Sanction decision

In some circumstances work coaches can accept ‘good reason’ provided it meets one of a prescribed list of ‘good reasons’. If the reason given doesn’t meet the list of good reasons, the work coach must refer the case to a separate DWP decision-maker to decide whether to impose a sanction. The research found the following problems with this approach:

- The individual making the decision does not have direct contact with the person they are considering sanctioning. Instead, the information they use to make a decision is mediated through the work coach.

- Other than providing a ‘good reason’, it does not appear individuals have the opportunity to directly input on other factors relevant to the sanction decision, such as whether the condition that was imposed was appropriate.[27]

3. Mandatory reconsideration

Once the decision has been taken to impose a sanction, the claimant should receive a decision notice. If they disagree with the sanction, they can ask a DWP decision-maker to consider revising the decision. The DWP refers to this process as ‘mandatory reconsideration’. The research found the following problems at this stage:

- The decision notices we reviewed didn’t explain why the ‘good reason’ provided had not been accepted – this meant some claimants did not know what else they could say or provide to help change the decision,

- As with the initial decision, there did not appear to be direct contact between the decision-maker and the claimant.

27. DWP guidance suggests that work coaches should have a discussion with claimants to determine if the agreed work-related requirement is still appropriate (DWP Sanctions Assurance Framework Spotlight, published in response to a Freedom of Information Act Request, 22 March 2024: https://www.whatdotheyknow.com/request/sanctions_assurance_framework?utm_campaign=alaveteli-experiments-87&utm_content=sidebar_similar_requests&utm_medium=link&utm_source=whatdotheyknow). It was not apparent from the research that such a discussion was routinely happening – or if it was, that claimants understood its significance or relevant to their sanction.

4. Appeal

If the claimant disagrees with the decision, an appeal can be lodged with the HM Court and Tribunal Service within one month of the date of the Mandatory Reconsideration Notice (in exceptional circumstances, this can be extended to 13 months). After the appeal is lodged, the DWP has 28 days to either lapse an appeal, or proceed with the appeal. As detailed above, a large proportion of sanction decisions are overturned in the claimant's favour at this point. Where a decision proceeded to appeal, claimants tended to be supported by a CELC adviser. Unlike the earlier stages, appeal gives claimants an opportunity to respond directly to any questions the judge has. As one research participant described it:

> “[T]here was a judge, there was an interpreter and there was my solicitor [from CELC], my representative... and everybody could hear each other and they could talk to each other. We could ask questions. So I could speak, but also my representative could speak for me as well, and you know I prefer to speak via interpreters, so everything is really translated properly, that I could express myself properly.”

An unequal system

This section looks at the circumstances under which individuals were sanctioned, drawing out the key themes from CELC casework and research interviews. The research found claimants were often sanctioned due to barriers or circumstances outside of their control, rather than a reluctance to engage with the system.

A. Language barriers

Analysis of casework themes and research interviews found that language barriers were a potential risk at all stages of the sanctions process.

1. They affected an individual's understanding of the how the Universal Credit system operates, what is expected of them and the consequences of failing to comply with requirements.

   > “They gave her some paperwork [the claimant commitment] for signing, but she didn't know what was on that paperwork, so she just signed that one, and she was so stressed.”
   > (via interpreter)

2. They could contribute to the sanctionable failure itself. For example, two of the interviewees explained how language barriers (intersecting with other factors including digital literacy) made it harder to both conduct and demonstrate they had met their work-search requirements.

3. They hampered people's ability to communicate with the DWP following the sanction itself – for example, to provide a 'good reason' or to challenge the sanction. Interviewees referred to using online translation tools to both interpret DWP messages and draft responses. In these instances, interviewees were unsure the resulting translation was sufficiently accurate.

   > “I don't know how the translation might have been. I think the Google translation is not that great, but I don't know whether they understood my point.”

   > “I did have a phone conversation – but when I said basically '[I don't speak] English, I speak Arabic', the telephone hung up on me.”

   Interviews suggested some people facing language barriers were also grappling with a lack of digital literacy and with their refugee status – confronting a new system, in an unfamiliar country.

   > “I was left in limbo because I didn't know what to do. I was not understanding the rules.”

   > “Nothing was explained to me...they had not explained [how Universal Credit worked] to me.”

Research interviews and caseworker feedback also suggested inconsistent use of interpreters, including for important conversations.

> “Sometimes they were providing her with an interpreter, sometimes they would say there is no interpreter.”
> (via interpreter)

One interviewee reported that she was provided with her Claimant Commitment at her initial Claimant Commitment interview, but was not clear what it said or its relevance. She reported asking to call her sister to help translate it, but was told ‘It’s nothing to worry about, you have to sign the document’. She reported remaining unclear about the significance of the document and the consequences of being sanctioned until a social worker explained this to her after she was sanctioned.

> “When she first went to the job centre, they gave her a contract [the Claimant Commitment], but obviously she can’t speak English, she didn’t know what to do, they haven’t provided her with an interpreter”
> (via interpreter)

Some interviewees suggested this was more than just about access to interpreters. It was a fundamental communication issue which they felt was linked to whether there was a willingness to understand.

> “It’s not just a language barrier, it’s a communication barrier.”

> “They don’t let you explain, they don’t understand, even if you explain something to them they will not understand you...or maybe they don’t want to understand you.”

B. An unfamiliar system

Research participants with refugee status emphasised the difficulties of navigating an unfamiliar Universal Credit system – often compounded by the challenges of using other new systems. For example, one participant said they did not know how to register with a GP, which meant he couldn’t request a fit note explaining his limited capability to work.

C. Ill health

A further common theme was unanticipated ill health of either claimants or a close family member as a reason for a sanctionable failure occurring. This included incidents of serious illnesses involving hospitalisation, sometimes linked to existing long-standing health conditions.

This could also make it difficult for some people to respond to a request for a ‘good reason’, for example, if they were hospital and unable to access their account.

D. Device issues

Universal Credit is designed to be 'digital by default'. The main way claimants manage their claim, get information about it and communicate with the DWP is through an online Universal Credit account. In some cases, people can arrange a 'telephone claim', where updates are received by phone or post instead.

Work-focused interviews are often conducted as telephone appointments. A recent government White Paper has suggested the possibility of increasing the use of telephone, rather than face-to-face, appointments.[28]

Issues with people's phones – such as them breaking, malfunctioning or being temporarily unavailable – featured in a number of cases. There were instances when these issues meant people were unable to receive their appointment call.

> "I don't have an iPhone, it's a cheap phone... and you know, a cheap phone, you have to expect that it may get broken."

> "[The DWP is] expecting you to have a nice phone that works 100%, expecting internet connection, all the money that involves."

Phone problems could also affect people's ability to send and receive messages from the DWP, both before a sanction (getting a reminder of an appointment or notifying the DWP that they would be unable to attend an appointment) and after a sanction (to provide their good reason or to challenge the sanction).

Interviewees who had missed telephone appointments referred to their frustration about how easy it was to unintentionally miss a call.

When calls are missed, claimants cannot phone the work coach back directly. Instead, they can only leave a note on their journal or contact the Universal Credit general helpline to ask them to pass on a message.

> "They phoned me up, got no answer, right, bang, sanction, no explanation and leave it to the next working day [to send a notification of a sanction]."

Interviewees also noted that DWP agents were often late for appointments with them.

28. Get Britain Working White Paper, published 26 November 2024 https://www.gov.uk/government/publications/get-britain-working-white-paper

E. Memory issues

Some clients reported memory issues, either related to underlying health conditions or medication. This could affect people's ability to both remember appointments and recall relevant information when challenging sanctions.

Some of these problems intersected with device issues. The standard way for the DWP to contact people about their Universal Credit is through their online account. Individuals can ask to be contacted by text message (SMS) or email to alert them that there is a message on their account. If problems with their device meant this message wasn't received, it could contribute to people forgetting about their appointment.

For example, one interviewee who reported having difficulties with their short-term memory noted the importance of these text messages to remind them of appointments they would otherwise forget. However, the notifications were sent one week before their appointment – too far ahead of time to be an effective reminder. They requested notifications the day before their appointments, but reported being informed that this wasn't possible.

F. Clashes with conflicting activities and priorities

Sanctionable failures sometimes occur where there is a clash between a Universal Credit interview and another important meeting or activity – for example, health appointments, work or training activities, or calls to deal with repair issues.

Who is being sanctioned?

Key findings:

- Claimants from racially minoritised backgrounds are:
  - more likely than white claimants to be in a conditionality regime where sanctions can be applied,
  - less likely to be in the more limited conditionality regimes that apply where someone has been assessed as having limited capability to work due to a disability or health condition.
- An area for further exploration is whether this reflects genuine differences in demographics, capability and circumstances between these claimant groups or if it reflects variations in the experiences of these groups in accessing the Work Capability Assessment,
- Within conditionality regimes where sanctions can be applied, claimants of mixed or multiple ethnicity are more likely to be sanctioned than white claimants – although in March 2025, for the first time, this difference was considered 'not notable'.
- Young and male claimants are also more likely to be sanctioned.
- Significant demographic data gaps remain – this includes a lack of sanction-related data on disabled individuals at a time when the UK government is proposing extending conditionality in relation to this group.

Data gaps and limits

Before this research project started, published DWP demographic data on Universal Credit sanctions was limited to age and gender.

This data is recorded as part of the Universal Credit claim process, when claimants are required to provide proof of identity.[29]

The DWP collects further data on Universal Credit claimants through optional equality questions they are asked when making their claim.[30]

Historically, the DWP has not published this additional data, stating the response rate was too low for the results to be reliable.[31]

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29. DWP Stat-Xplore, Dataset: Universal Credit Full Service Sanction Decision, Field: Age and Field: Gender, as at 11 March 2025, available here: https://stat-xplore.dwp.gov.uk/webapi/jsf/tableView/tableView.xhtml
30. See section 5 of the DWP's Benefit Sanctions Statistics to November 2024 (published 18 February 2025) https://www.gov.uk/government/statistics/benefit-sanctions-statistics-to-november-2024/benefit-sanctions-statistics-to-november-2024 The equality survey is an optional part of the Universal Credit claim process. It is not compulsory for claimants to complete this survey; their claim may be progressed without opening the survey.
31. DWP, Universal Credit Statistics: Background Information and Methodology, updated 17 May 2022

In May 2024, for the first time, the DWP published ethnicity data on claimants as part of its monthly Universal Credit statistical release.[32] Initially, this included data on the number and proportion of people receiving Universal Credit broken down by ethnic group and ethnic sub-group. A geographic breakdown of this dataset is provided by Local Authority area.

As of 12 November 2024, this dataset has also included the:

- number and proportion of people on Universal Credit by ethnic group and ethnic sub-group in conditionality regimes
- proportion of people on Universal Credit by conditionality regime in ethnic groups and ethnic sub-groups.[33]

In August 2024, the DWP published ethnicity data for Universal Credit sanctions for the first time. Initially, this was limited to data on the number of adverse sanction decisions (a decision to apply a sanction) broken down by ethnic group.[34]

As of 18 February 2025, this dataset also includes data on sanctioned Universal Credit claimants in conditionality regimes, broken down by ethnic group, allowing calculation of the 'sanction rate' (see details on p35).[35] This dataset does not include a breakdown by ethnic sub-group.

A DWP response to a Public Law Project Freedom of Information Act (FOIA) request states that the optional equalities questionnaire includes questions on:

- ethnic sub-group
- sexual orientation
- religion
- marital status
- disability – whether the respondent meets the definition of disability under the Equality Act 2010 (Great Britain) or the Disability Discrimination Act 1995 (Northern Ireland)
- disability – whether the respondent has any health conditions or illnesses that affect them in specified ways.[36]

Data on these characteristics is not currently published as part of DWP's benefit sanctions data release.

As set out on p11 above, the UK government is consulting on proposals that will affect the extent of sanctions and the circumstances in which they will be imposed on people with disabilities or health conditions. It is concerning that those decisions will be taken without information on the extent to which sanctions are currently being imposed on disabled people.

32. DWP, Universal Credit Statistics, 29 April 2023 to 11 April 2024 (published May 2024) https://www.gov.uk/government/statistics/universal-credit-statistics-29-april-2013-to-11-april-2024
33. DWP Benefit Sanctions Statistics to October 2024 (published 12 November 2024) https://www.gov.uk/government/statistics/universal-credit-statistics-29-april-2013-to-10-october-2024
34. DWP, Benefit Sanctions Statistics to May 2024 (published 13 August 2024) https://www.gov.uk/government/statistics/benefit-sanctions-statistics-to-may-2024
35. DWP Benefit Sanctions Statistics to November 2024 (published 18 February 2025) https://www.gov.uk/government/statistics/benefit-sanctions-statistics-to-november-2024
36. DWP response of 3 March 2025 to Public Law Project FOI request of 27 November 2024 (Reference: FOI2025/10292): https://www.whatdotheyknow.com/request/equalities_data/response/2936933/attach/3/Response%20FOI2025%2010292.pdf?cookie_passthrough=1

Conditionality regimes where sanctions can be applied

Not all Universal Credit claimants are subject to conditionality regimes where sanctions can be applied.

For the purposes of its statistics, the DWP categorises the following conditionality regimes as those where sanctions can be applied:

- 'searching for work'
- 'planning for work'
- 'preparing for work'
- and 'unknown'.

As set out in Annex 2, for analysis of DWP data shows that for the period covered by this research project (February 2024 to July 2025) claimants with an ethnicity other than white, male claimants and young claimants were more likely to be in conditionality regimes where sanctions apply. In July 2025:

- **Asian/Asian British** claimants were **44% more** likely to be in one of these regimes than white claimants,
- **Black/African/Caribbean/Black British** claimants were **64% more** likely to be in one of these regimes than white claimants,
- **Claimants of mixed or multiple ethnicities** were **44% more** likely to be in one of these regimes than white claimants,
- **Other ethnic groups** were **60% more** likely to be in one of these regimes than white claimants.
- **Male** claimants were **38% more** likely to be in a conditionality regime where sanctions can be applied than female claimants.
- Claimants in the 20-24 year old age band are **69% more** likely to be in a conditionality regime where sanctions can be applied than the population as a whole.

While planning for work and preparing for work are conditionality regimes where sanctions can be imposed, these are both fairly 'light touch' regimes (see further page 9 above). The searching for work conditionality regime is the most stringent conditionality regime. This is the regime that applies when someone is not currently working (or is earning very little) and doesn't fall into one of the other conditionality regimes. There is a much higher rate of sanctions in this regime than in the other conditionality regimes where sanctions can be applied.

Currently, if claimants are assessed following a work-capability assessment as having limited capability for work, they are placed in the Preparing for Work category and subject to lighter touch requirements. Claimants that are assessed as having limited capability for both work and work-related activity, are placed in the no work requirements conditionality regime. Claimants in this regime cannot be sanctioned.

As set out in Annex 2, for analysis of DWP data shows that for the period covered by this research project (February 2024 to July 2025) claimants with an ethnicity other than white were:

- More likely to be in the Searching for Work conditionality regime than white claimants.
  In July 2025,
  - **Asian/Asian British** claimants were **69% more** likely to be in this regime,
  - **Black/African/Caribbean/Black British** claimants were **99% more** likely to be in this regime,
  - **Claimants of mixed or multiple ethnicities** were **61% more** likely to be in this regime,
  - **Other ethnic groups** were **89% more** likely to be in this regime
- Less likely to be in the Preparing for Work conditionality regime (the regime that applies to people assessed as having LCW) – in July 2025:
  - **Asian/Asian British** claimants were **33% less** likely to be in this regime,
  - **Black/African/Caribbean/Black British** claimants were **41% less** to be in this regime,
  - **Claimants of mixed or multiple ethnicities** were **6% less** likely to be in this regime (considered to be within the 'zone of tolerance' - see further Annex 2),
  - **Other ethnic groups** were **31% less** likely to be in this regime
- Less likely to be in the No Work Requirements conditionality regime (the regime that applies to people assessed as having LCWRA) - in July 2025:
  - **Asian/Asian British** claimants were **32% less** likely to be in this regime,
  - **Black/African/Caribbean/Black British** claimants were **40% less** to be in this regime,
  - **Claimants of mixed or multiple ethnicities** were **16% less** likely to be in this regime (considered to be within the 'zone of tolerance' - see further Annex 2),
  - **Other ethnic groups** were **28% less** likely to be in this regime

This may represent differences in the demographics and circumstances of these groups. The Planning for Work and No Work Requirements conditionality regimes are not limited to claimants who have been assessed as having LCW or LCWRA (such as caring responsibilities or being in full time education). It may be that ethnic groups other than white include a smaller proportion of claimants falling within these categories. It is also possible that claimants in these groups have a smaller proportion of people that do in fact meet the criteria for LCW or LCWRA.

However, in light of the findings at page 27 of this report, an area for further consideration is whether these differences may instead reflect differences in the accessibility of the WCA.

Sanctions rates

The Universal Credit sanctions rate is the proportion of people sanctioned within conditionality regimes where sanctions can be imposed.

The Universal Credit sanctions rate refers to the proportion of people sanctioned within conditionality regimes where sanctions can be imposed.

The DWP published sanctions rates with a breakdown by ethnicity for the first time in February 2025. As set out in Annex 2, for the period covered by this research report for which data is available (September 2024 to May 2025), Asian/Asian British claimants and other ethnic groups were less likely to be sanctioned than white claimants. Claimants of mixed/multiple ethnicity were more likely to be sanctioned than white claimants – however between March and May 2025, this difference was not large enough to be deemed meaningful by the DWP.

Claimants who were male, or younger were more likely to be sanctioned.

Conclusion

As this research shows, Universal Credit sanctions are **harmful and counterproductive**. They can hamper peoples' ability to afford the very basics of life – notably, food and rent. They can put their housing situation at risk, push them into debt and worsen their physical and mental health. These consequences make it more difficult for people to engage with work.

These serious penalties are **not limited to 'last resort'** circumstances or repeated failures to engage. They can be imposed on claimants who have never previously missed an appointment or failed to meet a work-search requirement.

Many of these sanctions are being **imposed inappropriately** – worryingly, something that is often only established at the very final stage of a lengthy process. This comes at a severe cost to the claimant – and, presumably, to the DWP, which must fund decision-makers and lawyers to engage with the appeals process.

At a time when the UK government is considering measures to bring more claimants within the remit of conditionality, it is concerning that there are still **significant gaps** in its understanding of who is currently impacted by the sanctions regime. This includes a lack of data on claimants with disabilities and health conditions.

The DWP's **publication of ethnicity data** is a welcome development. One of the things this shows, however, is that claimants from racially minoritised backgrounds are more likely to be in conditionality regimes where sanctions can be applied. It is possible that this reflects genuine differences in the capabilities and circumstances of different population groups. However, an area for further research, supported by increased data transparency, should be understanding whether this reflects variations in the barriers different groups face in relation to the work capability assessment process.

The aspiration should be to avoid sanctions being imposed in the first place – by ensuring policy and practice **better reflects the circumstances** of people's lives and any barriers they face. **Safeguards should be improved and strengthened** to prevent the inappropriate application of sanctions at the outset.

Where sanctions are 'correctly' applied, serious concerns remain about their **disproportionate severity** – something emphasised by research participants. The harm stemming from the **loss of 100% of your standard allowance** is something that no amount of safeguards can properly address. The fact that individuals are penalised more heavily for a failure to attend a DWP interview than for a criminal act is wrong and should be addressed.

Annex 1 – Recommendations

Recommendation
Overarching Recommendations
1. The current sanctions regime fails on its own terms and should be revoked – failing that it should be fundamentally reformed to: **a. Ensure that sanctions are only applied in exceptional circumstances, following clear warning, and** **b. Reduce their severity, for example, by introducing a minimum floor in line with the proposed 'essentials guarantee'.**
2. Government should take urgent action to: **a. Strengthen the safeguards that are in place before sanctions are applied,** **b. Improve the accessibility of internal review and appeal processes.** **c. Ensure that actions under a and b are informed by the experience and realities of individuals who face additional barriers to engaging with the system, including those who speak English as a second language or who are navigating an unfamiliar system, for example as a refugee.**
3. Government must take urgent action to improve its understanding and transparency of who is impacted by Universal Credit policies (including sanctions and conditionality).
More detailed recommendations
1. Ensure that DWP's current policy that agents must use the Interpreter or Translation Service (whichever is right for the claimant) when communicating with claimants whose first language isn't English. 2. DWP and job centres should engage with individuals whose first language isn't English to improve the way they are supported and to ensure that DWP policy and practice takes into account the additional barriers experienced by this group 3. DWP and job centres should engage with individuals with refugee status to improve the way they are supported and to ensure that DWP policy and practice takes into account the additional barriers experienced by this group 4. DWP and jobcentres should engage with individuals to ensure its policies and practices reflect the reality of the 'digital divide'. 5. DWP should adopt a transparent and evidence led approach to its policies, including sanctions and conditionality. This should include: a. Taking urgent action to reliably capture, and publish data on benefit sanctions and protected and other relevant characteristics, b. Reinstate publication of Universal Credit Mandatory Reconsideration and appeals data c. Including conditionality and sanctions within the scope of its current review into Universal Credit. 6. The DWP should revert to the position that was in place prior to the Welfare Reform Act 2012, where claimants have the option to request an internal review (Mandatory Reconsideration) but without it preventing a parallel appeal to the Tribunal.

Recommendation
More detailed recommendations
7. The section of the template Sanction Notification letters that refer to the right to request a Mandatory Reconsideration and appeal should be revised to include information informing claimants that a request for Mandatory Reconsideration can be made at any time (while continuing to encourage claimants to apply sooner rather than later). 8. DWP should set out in full their reasons for imposing a sanction decision, including explaining why any good reason provided by the claimant wasn't accepted, within the initial sanction decision letter. 9. DWP should revise its template UCD172 letter to more clearly how it has calculated reimbursement amounts for sanctions that have been overturned. 10. The initial DWP sanction Decision Maker should always contact the relevant claimant before applying a sanction, to hear from them in their own words, rather than relying solely on the information provided by the Work Coach. This should be in the form that best suits the claimant. It should be supported by an interpreter where required. 11. Claimants should be clearly signposted to sources of advice and support to challenge sanctions – and provision should be made to ensure that this advice is funded to be in place.