
Director General for Regulation

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Dear Tom

DWP Benefit Sanctions Statistics – update on developments

Thank you for your letter of 15 February in which you outlined the developments DWP has made to statistics on benefit sanctions.

It is encouraging that the developments you have made (see Annex A) are each underpinned by the pillars of trustworthiness, quality and value:

- *Trustworthiness* – the statistical commentary is objective and impartial, and your publication strategy is transparent.
- *Quality* – the new ‘Background Information and Methodology’ document clearly explains the strengths and limitations to users.
- *Value* – you have published new statistics to meet user needs and improved clarity and insight within the statistical bulletin.

I welcome your acknowledgement that there is always more to do. A process of continuous improvement is central to ensuring that the statistics continue to meet user needs.

I encourage you to maintain your dialogue with users, both on these developments and to identify any further gaps in benefit sanctions statistics. This feedback should be used to inform your publication strategy, to maintain and further enhance the value of the statistics to users.

I invite you to provide a further update on your publication strategy for benefit sanctions statistics in the near future.

Yours sincerely



Ed Humpherson
Director General for Regulation

Annex A: Recommendations, DWP progress update and OSR comments

	Recommendation (2015)	DWP progress update (2018)	OSR comments (2018)
1	Provide users with benefit sanction statistics based on the actual number of sanctions applied, making clear the numbers of reviews, reconsiderations and appeals	Users are provided with JSA and ESA benefit sanction breakdowns of the different stages of a sanction, under both the old and new rules and IS from October 2016. Included in the statistics are the numbers of decision reviews, mandatory reconsiderations and appeals. Since May 2017 DWP has produced sanctions statistics on Universal Credit (UC) that cover sanction decisions, reasons for sanction and decisions to apply a sanction by stage. Sanctions data are also available for users in DWP's dissemination tool Stat-Xplore, including additional breakdowns of the data.	<i>Met</i> - We welcome the improvements made to the availability and accessibility of benefit sanctions statistics. We encourage DWP to seek feedback on these developments to maximise the value of these statistics to users.
2	Make clear the limitations associated with the statistics	DWP developed a 'Background Information and Methodology' main document to support the sanctions statistics with advice from a number of stakeholders including policy, and operational colleagues. The document has a section providing information on the limitations of the statistics and, as a living document, is updated each time we publish. DWP also published a further three supporting documents to explain the different complex areas (durations, destinations and rate).	<i>Met</i> - We welcome the publication and ongoing update of the Background Information and Methodology documents. The statistical release now highlights the main limitations of the statistics, and thus helps users better understand the quality of the statistics. We suggest developing the guidance further to advise users on appropriate use of these statistics.
3	Include in the quarterly benefit statistics bulletin a statement of the proportion of JSA claims subject to a sanction, as well as the proportions of claimants who have been sanctioned during the most recent one-year and five-year periods, and the numbers on which these proportions are based	In 2017, for JSA, ESA and UC, DWP introduced a new measure which is the proportion of people on benefit at a point in time with a deduction from their benefit due to a sanction. DWP only intends to publish this single measure to avoid confusing users with various measures and hence won't be publishing a one year or five year rate.	<i>Partially met</i> – We welcome the introduction of this new measure and encourage DWP to monitor user satisfaction with these statistics. While we appreciate DWP's concerns regarding the one-year and five-year measures, these would be helpful for evaluating long-term changes to the level of sanctions. We would encourage DWP to consult users on the value of these additional measures which should then be used to inform and prioritise their publication strategy.
4	Ensure all statements made using the official statistics are objective and impartial and appropriately apply the definitions of the variables underpinning the data, including 'actively seeking work'	The content and style of the sanctions statistics within the Quarterly Benefits Summary (QBS) were given their first revamp in August 2015 following feedback from users. The statistics and commentary for each benefit, JSA and ESA, were extended and definitions expanded to help users understand the figures and context. A further revamp has just taken place with the production of the Benefit Sanctions Statistics publication. This was	<i>Met</i> – We welcome DWP's developments in this area, particularly its engagement with the Good Practice Team. We encourage DWP to seek feedback from users on these improvements to ensure they are meeting their needs, and to involve them in future innovations to the dissemination of these statistics.

		done with advice and guidance from the GSS Good Practice Team.	
5	Extend the range of benefit sanction data available by addressing the gaps in information on repeat sanctions and hardship payments, alongside the development of sanction data from the Universal Credit system.	The sanctions strategy published in April 2016 outlined future development of the sanctions statistics and included a number of improvements like the publication of Universal Credit and Income Support sanctions. DWP considers that, since the strategy was published, everything in it has been developed.	<p><i>Partially met</i> – DWP has demonstrated transparency by publishing its benefit sanctions statistics publication strategy, and progress against the strategy is encouraging. However, while it is encouraging that DWP publishes data via Stat-Xplore on the number of individuals that received repeated sanctions for a number of benefits, it could go further by reporting more detailed information about repeated sanctions, for example, the number of repeated sanctions per year. In an April 2017 letter from DWP it mentioned that it was looking into developing these aspects of the statistics, and we urge DWP to continue their efforts to publish more detailed information on this topic.</p> <p>We also recommend that DWP uses further user feedback on gaps within the statistics to help inform updates to the publication strategy.</p>