

Independent Review Service

February 2001 Issue 18

The Journal
and
Digest of Decisions

Inside:
Access to the Social Fund Review





Contents

February 2001 Issue 18

The Reduced Bundle	1
Protecting Our Customers' Data	2
IRS Approach to Budgeting Loans	3
Applications from Representatives	5
Direction 17	6
Points from The IRS Postbag	8
Digest of Decisions, Issue 13	Centre Pages

Editor's Letter

An important issue for the IRS is to ensure that individuals making the request for a review have easy access to our service. Once their review request is with us they need to be assured that we will respect the information they give us and will treat it with care.

We are constantly reviewing what we do to try to enable our customers to better engage with us. This issue of the Journal features some recent changes we have made, reducing the bundle of papers sent out to customers, our approach to budgeting loans, our treatment of applications made by representatives and our action to the changes in the data protection act.

We have also included an article on a specific direction of the Social Fund, direction 17. This direction is used in a minority of cases that we see but we felt the issue worthy of some research and comment. We have complemented the article by cases in the digest of decisions.

We hope you find this issue helpful and welcome any comments you may have.

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The Reduced Bundle

by Ann Greenshields, of the Commissioner's Support Team

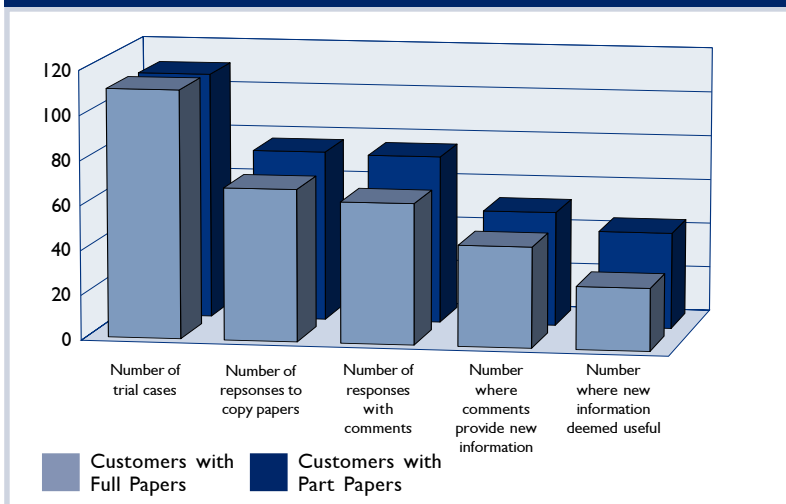
Procedural fairness demands that the aggrieved citizen knows the case he has to meet and has a fair opportunity to respond to that case. The principles of fairness and openness were the drivers for our long established practice of sending our customers a copy of all the papers relating to the decision to be reviewed. We invite the customer to comment on the papers.

We were concerned that the volume and content of the papers may hinder some customers' ability to

- Most focused on three documents - the application form, the Reviewing Officer's decision and the covering letter from the IRS.

This feedback indicated that it might benefit the customer if we send fewer papers. In particular, papers that focus on the essential issues. We conducted a trial of sending customers only the original application form and the Reviewing Officer's decision. It was important, however, that we should be able to compare the results against those for customers who get the full bundle of papers.

Summary of Customers' Response to Copy Papers



To facilitate this we set up a control group to receive the full bundle of papers and a test group to receive the experimental part bundle. We asked customers in both groups to complete a questionnaire to find out their views of the papers we sent. The trial results are shown in the graph on the left.

The results show that the test group responded to the part bundle of papers in greater numbers than the control group who received all the papers. In addition, more provided comment and new information. Perhaps most importantly the proportion who provided relevant

and useful information was significantly larger. Of those who provided new information in the test group (51) it was relevant and useful in 84% of cases, compared with 62% in the control group. It seems clear that customers who receive a small bundle of key papers are more likely to respond with comments that are focused and relevant to their case.

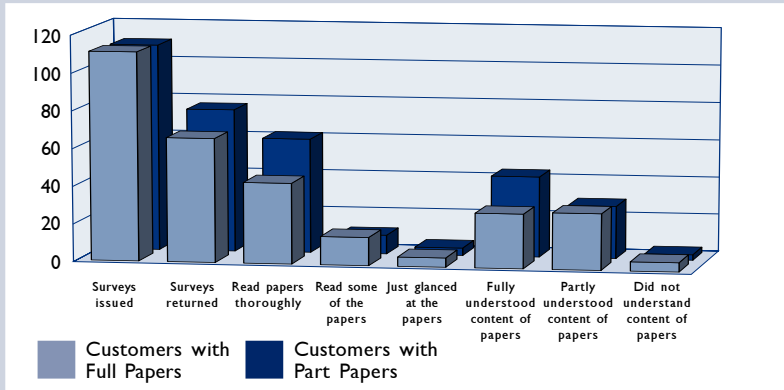
participate effectively in the review process. The only way to find out for certain was to ask them. The Centre for Urban and Regional Studies at Birmingham University undertook some initial research on our behalf. They talked face to face and on the telephone to a small group of customers. Of the customers who took part:

- Most found the volume of papers off putting.
- Some found the order and content of the paper confusing.
- Few read all the papers.
- Most found the Reviewing Officer's decision the most useful document in the papers.

The graph on page two shows the survey results on how customers read and understood the papers.

This reveals that significantly greater numbers read all the papers thoroughly and fully understood their content when faced with a smaller bundle. Of those in the test group who returned the questionnaire, 80% read the papers thoroughly and 56% fully understood them. This compares with 65% and 44% respectively for the control group.

Reading and Understanding the Papers



or part bundle. A proportion of the cases we receive from the Benefits Agency contain a hand-written review decision. The part bundle cannot in itself resolve the problems of legibility. However, it goes some considerable way to increasing the numbers of people who can participate actively and effectively in the review. From 2 October we have been sending a part bundle to all customers, giving them the opportunity to see all of the papers if they wish.

Our questionnaire asked those who did not understand the papers to explain what made it difficult. The single biggest difficulty was in reading hand-written documents. This was true whether the customer had received a full

The part bundle is a first step towards improving the process. We are actively considering how we can tackle the legibility issues and find the most effective way of bringing the essential issues of the case to the customer's attention.

Protecting Our Customers' Data

by David Saville, of the Research & Development Team

We have recently taken the opportunity given by changes in the Data Protection Act 1998, which came into force on 1 March 2000, to review our processes and procedures.

We are seeking to respect the spirit of the Act, to ensure that customers genuinely have the rights and protections that it seeks to guarantee. We have therefore tried not to take an over legalistic approach to the various exemptions in the Act, or to the rules allowing delayed implementation of certain parts of it.

The Data Protection Act protects people who have information from which they could be identified ("personal data") stored about them, either on a computer or on a relevant manual filing system. It works in two ways; by providing principles that govern the storage and use of personal data, and by giving people about whom such data is held, the right to see it.

Customers already have the right to see all the information we hold about them, as part of the review process. This part of the Act therefore largely reflects what we already do. However, the principles it lays down about the storage and use of data have led us to make some changes.

Procedural measures we have taken

Sometimes customers have issues with which they need professional help, e.g. from a probation officer or social worker. They often show who these people are on the application form. Some applications take a while to go through the review process before they arrive at the IRS. We have reconsidered what our approach should be in obtaining further information from the

'Inspectors need to obtain written permission from the customer before contacting any third party'

professional quoted on the application form as a source of help. We understand that contacting these people without the customer's written permission to do so, could potentially be

encouraging this third party to disclose information in breach of the Data Protection Act. We have therefore advised Inspectors that they need to obtain written permission from the customer before contacting any third party mentioned on the application form.

Secondly, the Act has caused us to look at how we

retain information about customers. One of the principles of the Act is that we should not retain personal data for longer than is necessary for our purposes. We have decided that we will not usually keep copies of decisions that were made more than two years ago. This seems a reasonable period given that there is no expressed time limit on a customer requesting a review of an Inspector's decision.

Thirdly, we have used the changes to the Act as an opportunity to revisit and review our procedures for storing information about customers. We have delivered training sessions to all our staff on the provisions and changes in the Act and how this affects the way they work and store information. These sessions have helped reinforce the correct ways of working. They will ensure we maintain the high level security

that is required when holding personal data to maintain confidentiality.

Conclusion

We feel that it is important that we do not look upon legislation such as the Data Protection Act as simply imposing additional duties on us. We have approached the changes in a way that focuses on the benefits it is intended to deliver to the citizen.

Dealing with review requests often involves using very sensitive and personal information. It is therefore imperative that we deal with this as respectfully as we would wish personal information about ourselves to be treated. We have treated our implementation of the Data Protection Act as an opportunity to do this, and to enhance the rights of the citizen.

IRS Approach to Budgeting Loans

by **Debbie Russell & Jennifer Saunders, Budgeting Loan Practitioners**

The new budgeting loan scheme started in April 1999 and contained major changes to decision-making on applications to the Social Fund for budgeting loans. A new separate application form, specifically designed for applying for this type of loan only, was introduced, along with an automated decision-making system at the Benefits Agency. The new scheme also introduced a fact based decision-making process. The Decision-Maker takes into account specific facts only and unlike the previous scheme the nature, extent and urgency of the need for the loan does not have an impact on the likelihood of an award being made.

An applicant's priority for a loan is now based on, primarily how long they have been receiving a qualifying benefit and how many people, in receipt of the qualifying benefit, live in their household. Any outstanding debt to the Social Fund, in respect of previously awarded budgeting loans, is taken into account when deciding upon the maximum amount of a new loan a customer can have. An applicant's particular personal circumstances including any health problems are no longer taken into account.

The scheme remains discretionary, although the scope for discretion is narrower than previously. Each Benefits Agency district office has an annual budget allocation and the Area Decision-Maker

gives guidance on the maximum amount of a loan that can be awarded for each applicant, taking account of the considered facts. However, the Decision-Maker does have the discretion to decide what amount to award, giving consideration to the Area Decision Maker's guidance, and the budget position at the time of his decision.

Why change our approach to budgeting loans?

With over 5,000 applications for budgeting loan reviews received each year, we are committed to ensuring that our customers are satisfied with the service that we provide and that they are able to engage with the review process as far as possible. Following the changes introduced by the new scheme, we recognised that our approach to budgeting loan decisions needed developing to ensure that the decisions that customers received, explained clearly how the outcome had been reached.

How have we changed our approach to budgeting loans?

During the first year of the new scheme, we took time to examine our processes and decision letters to ensure that these were meeting the needs of our customers. We conducted a customer survey to establish our customer's views on budgeting loan decisions and to identify any areas in which they could be improved. The survey involved issuing questionnaires to a sample of customers and

face-to-face discussions with small customer focus groups.

The results showed that a significant number of our customers did not understand the new scheme and had difficulty understanding how the decision on their application had been made. This made it difficult for them to participate in the review process. Therefore, we needed to address how to:

- Deal with the issues and concerns raised by the customer.
- Explain why, the reason for and urgency of need, is not taken into account.
- Make the calculations less complicated.
- Explain technical terms.
- Provide better explanation of how outstanding debts are taken into account.
- Use plain English when writing decision letters.
- Explain how discretion is incorporated into decision-making.

Using this research, work continued to develop our approach to budgeting loan decision-making. The IRS has sought legal opinion on the discretionary nature of the budgeting loan scheme and evolved our approach to address the advice given. We looked at how the spending of the local district office budget is a factor in deciding the amount of a potential award of a budgeting loan and how this needed to be addressed when making a decision.

In April 2000, we introduced a revised format for budgeting loan decision letters. The decision letters incorporated the issues which resulted from our customer research and explained clearly how the decision had been made, taking into account all factors. The new decisions include a concise explanation of how each customer's individual priority rating has been calculated and addresses any issues or concerns that are raised by the customer. The decision also includes an explanation of the impact of the district office budget spending on each customer's case, if this applies. Consideration is given to whether the Reviewing Officer, at the Benefits Agency, has exercised his discretion.

A step further

Further work on our approach was to look at how the customer engaged with our process. We knew that the first contact, a customer applying for a review of their budgeting loan, had with the IRS was when they received the Inspector's decision. We recognised that this did not provide our customers with an opportunity to engage with the scheme as fully as they may wish to.

In order to address this issue, we looked at how we could involve the customer in the review process and help them to fully understand

'Consideration is given to whether the Reviewing Officer, at the Benefits Agency, has exercised his discretion'

the important issues in their individual cases. In October 2000 we trialled a process in which our customers were issued with a facts list within two days of us receiving their

application for review. This list states facts relevant to their case. The customer was then asked, and given time to comment on whether the listed facts were correct.

To enable them to focus on the most important facts of their case, they were advised, that by law, Social Fund Inspectors could not increase the priority of their application by taking account of circumstances such as the reasons for their needs, or any health problems they may have.

An information letter tailored to each case, explaining how budgeting loan decisions are made, accompanied the facts sheet. This informed the customer how their individual priority rating was worked out and how the other factors including their outstanding budgeting loan debts, the local district budget spending and the suggested guidance from the Area Decision-Maker affected any amount that they may have been able to have as a loan

Customers were then asked to return the facts list, saying whether or not the facts were correct, and why. If the form was not returned, the decision was made based on the information available. Once the customer had responded, the Social Fund Inspector then made the decision. The new process helped to fulfil the principles of natural justice by

liaising with the customer before the decision was made on his case. Once the decision had been made, a concise letter, informing the customer of the outcome and the reason why, was issued to the customer.

Evaluation

To monitor the processes effectiveness, we have looked at post decision correspondence, complaints and feedback from customers and representatives, received

by our Customer Service Team. We wanted to establish whether the new process was aiding our customers in increasing their levels of understanding about the scheme.

Our early indications are that the new process is helpful to the customer. We have therefore decided to continue working on budgeting loan review applications in this new way. Evaluation will continue to ensure we are responding to customer needs.

Applications from Representatives

by David Saville, of the Research & Development Team

At the IRS, we recognise that representatives, such as Welfare Rights units, Citizen's Advice Bureau and solicitors, play a vital role in helping some customers to present their cases. In the 1999-00 business year, 11% of all our customers were helped by representatives. In respect of applications for reviews on community care grants, 17% of our customers were helped by representatives.

Representatives play a number of roles when helping customers to make their applications. Sometimes, their role is informal, advising and helping the customer "behind the scenes". This does not raise any particular issues when applying our procedures. However, in many cases, the representative makes the application on behalf of the customer. This does raise some issues because:

'this consent needs to be dated at some time after the Benefits Agency's Reviewing Officer's decision'

- We need to be sure that the customer both wants a review and wants the representative to act for him or her; and
- We need to be sure that the customer is content that his personal details are sent out to the representative.

The need for consent

The Social Fund (Applications for Review) Regulations

1988 sets out the rules that must be complied with, if an application for review is to be valid. It includes a requirement that, if an application is made by a representative on behalf of a customer, that customer must "signify in writing" his or her consent to that application being made.

For this reason, the IRS cannot accept review applications made by a representative unless they do include the customer's written consent. Because we need to be satisfied that the customer actually wants an IRS review, this consent needs to be dated at some time after the Benefits Agency's Reviewing Officer's decision.

The customer's papers

A crucial issue for us, is maintaining the confidentiality of the customer's personal information. This is a very strong ethical obligation, which has been given additional legal force by the Data Protection Act 1998.

When we receive a valid review request from a customer, it is our practice to send that customer (or his or her representative) a copy of the most important papers connected with his or her case. This process meets the requirements of natural justice, because it gives the customer the chance to see why the Benefits Agency made their decision, and the evidence on which that decision was based. It is right that we send this information to the customer or, if requested, to his or her representative.

However, much of the information in a customer's file is personal and sensitive. Because of this, we have adopted procedures to ensure that we do not send this information to anyone (including a

representative), other than the customer, without that customer's explicit consent.

Our previous policy

In the past, we have distinguished between those cases where the representative makes the review request on the customer's behalf, from those where the customer makes it him or herself, and asks us to deal with a representative. In the former situation, we would send the papers to the representative, but in the latter we would send them to the customer only.

This approach had the advantage of being simple and straightforward. However, it may not have been as customer-focused as it might be. We have therefore recently reviewed the process, to see whether we could adopt procedures that better empowered our customers, while maintaining the confidentiality of their information.

Our new policy

We felt it would be more empowering and customer-focused to **meet the customer's wishes about how we carry out the review, where possible**. A customer may have made the application for a review him or herself, but may still want the papers to go to a representative. Similarly, he or she may have asked a representative to make the application on his or her behalf, but not want them to have all his or her confidential information. The point is that the customer should have the choice.

We have, therefore, adopted new procedures from December 2000. Briefly, these are:

- We will comply with the customer's wishes about where he or she wants the papers to go.
- If it is unclear from the review request where the customer wants the papers to go, we will contact him or her to try and find out. If we are unable to do this, we will send the papers to the customer. This avoids our disclosing confidential information without his or her consent.

It would therefore be helpful if representatives, when assisting customers with review requests, advise the customer to make it clear where he or she wants us to send the papers. We will also amend our own forms in order to give customers the chance to make this clear.

Conclusion

By changing our process, we are seeking to better meet our customer's wishes and to preserve the confidentiality of the information they give us.

We hope the new processes will also help representatives obtain the information they need at the earliest stage. Our new processes are fundamentally designed to give customers a greater say in how their review is carried out.

Direction 17

by Social Fund Inspector, Peter Calvert.

Direction 17 is intended to define who is eligible for a crisis loan and under what circumstances. Its specific purpose is to restrict the availability of crisis loans to applicants who have failed to meet or fully abide by the conditions for receiving Jobseeker's Allowance (JSA). The intention is that where this has resulted in their benefit being stopped or reduced, they should not be able to get round their cash-flow problem by claiming a crisis loan.

Dealing with direction 17 cases

At the IRS we receive cases where Direction 17 is an issue, only rarely. However we have noticed that when they do come, they cause decision-makers at all levels, an amount of difficulty. We consider this is partly because of the complexity of the wording of the direction

and partly because it requires a basic knowledge of legislation and regulations that Social Fund practitioners do not normally have to deal with. The following is a list of some of the more common problems of which we are aware.

Deciding which part of the direction to apply

The most common confusion is over whether to apply Direction 17(b), 17(c) or 17(d). The terms sanction and disallowance tend to be used interchangeably, which muddies the waters. The best way through the confusion is to discover why benefit has been stopped or reduced and what section of the Jobseeker's Act, 1995 was used to do this. Digest cases 14.9 and 14.10 deal with this issue.

Direction 17(b) only applies where JSA has been disallowed because the applicant has failed to meet one of the three basic labour market conditions of entitlement to JSA. These conditions are: that the applicant must be available for employment; that he must have entered a jobseeker's agreement that is still in force; and that he must be actively seeking employment. (There are other reasons why JSA might be disallowed, but Direction 17(b) does not apply to these.)

Directions 17(c) and (d) apply to cases where the applicant has been sanctioned under section 19(5) or (6) of the Jobseeker's Act. There are a variety of reasons why this might have happened. For example, he might have failed to apply for a place on a training scheme. Or he might have been dismissed from a job for misconduct. If the misdemeanour for which he is being sanctioned relates to a New Deal programme then 17(d) applies. If not, then 17(c) applies.

Working out the dates of the Crisis Loan restriction period

Direction 17 never absolutely prevents the award of a crisis loan to an applicant. Instead it restricts the expenses for which crisis loans can be awarded for certain specified periods. The period concerned is different for each part of the Direction. In cases to which 17(a), (d) or (e) applies, the dates of this restriction period are relatively easy to determine. Where 17(b) or (c) is an issue, more factors are at issue.

With 17(b), the first key fact is to identify the date that the Secretary of State's decision to disallow benefit, was made. Difficulties can arise here where an interim decision is made to suspend benefit pending a formal disallowance decision by the Secretary of State. In these cases, the important date with regard to 17(b) is the later, formal decision. If no formal decision has yet been made, then benefit has not truly been disallowed and 17(b) does not apply at all. Digest case 14.9 deals with this issue.

Having identified the date of decision, the next key fact to find out is what day the applicant's benefit week commences. This will be the day after he signs on. The 14-day restriction period will begin on the first Benefit Week Commencement (BWC) day following the disallowance decision (or on the decision day itself, if this is also the BWC day).

With 17(c) cases, the first key date to identify is the end of the period during which JSA was not payable. This "non-payable" period ends either when

the applicant becomes entitled to hardship rate JSA, or, if he does not receive hardship payments, when the sanction period comes to an end. The 14-day restriction period begins on the next BWC day after the end of this period.

Expenses that fall outside this restriction period, whether before it begins or after it ends, should be

'Expenses that fall outside this restriction period, should be considered for payment'

considered for payment subject to the normal conditions for crisis loan awards. In living expenses cases, this may result in partial awards, where Direction 17 prevents an award for the

majority of the period claimed for, but permits an award for, say, a day at the end of the period. Digest cases 14.11 and 14.12 provide examples of such partial awards.

Missing the exceptions

It is important to remember that Direction 17(f) exempts people who automatically get hardship payments, because they fall into a vulnerable group (pregnant women, carers and families with children, for example) from the restrictions imposed by 17(b) to (d).

On the other hand, it is also important to realise that not everyone who receives hardship payments comes under the scope of Direction 17(f). It is only those who are receiving "vulnerable group" hardship. Digest case 14.11 deals with this issue.

Anomalous cases

The CL restriction period in Directions 17(b) and (c) is intended to cover the period during which the applicant feels the effect of the disallowance or sanction. In some cases, however, this intention is not achieved.

For example, where the crisis loan decision is made after the sanction period has ended, Direction 17(c) does not apply. 17(c) only applies "where jobseeker's allowance is not payable to an applicant" because he has been sanctioned. This means that it cannot apply after the sanction period has ended, because at this point, full JSA is once again payable to the applicant. This may be the point when he is feeling the effect of the sanction, but he nevertheless has full access to crisis loans. Digest case 14.13 is an illustration of this.

Points From The IRS Postbag

Anne-Marie Nicholls & Richard Plant take a look at more issues from the IRS Postbag

Crisis loans

This approach from a customer illustrates the issue of a lack of household items presenting serious damage or serious risk to health or safety in the foreseeable future.

The customer was living in a flat and had access to his 15 month old daughter who had health problems. She had an operation within two hours of her birth and was still very small. She needed careful monitoring. The customer applied for a crisis loan for a cot and cot bedding so that his daughter could stay with him overnight. The Inspector refused an award because the daughter had a permanent home with her mother, explaining that a crisis loan would not be the only means of preventing serious damage or serious risk to the daughter's health or safety.

The customer wrote in to state the courts had granted him overnight access to his daughter. He was having difficulty looking after her properly because he did not have the items.

The Customer Service Team Inspector awarded a crisis loan for a cot and cot bedding. The customer's daughter was staying overnight with him and she did not have adequate sleeping facilities. The effects of not having these could well be serious in the foreseeable future. A crisis loan was the only means of preventing this.

Direction 17

In the following cases, queries from the Reviewing Officer raised the issues of how the customer's crisis loan payment should be affected by the Job Seekers Allowance sanction he was under.

In the first case the Reviewing Officer had accepted the customer had run out of money and so did not have a means to provide food or power for himself. He decided the customer qualified for a crisis loan as the only means of preventing serious damage or serious risk to his health or safety. He awarded living expenses to cover a two day period because a Job Seekers Allowance sanction prevented a crisis loan for a longer period. The customer did not accept this was sufficient.

The Inspector contacted the Benefits Agency and was informed the customer was entitled to vulnerable group hardship payments. This meant the restrictions previously

preventing the award of a crisis loan no longer applied. The Inspector increased the award accordingly. The Reviewing Officer contacted the Customer Service Team to point out that although the applicant was receiving hardship payments, he was not a member of a vulnerable group. He did not fit into any of the criteria. The Inspector had not been given the correct information.

The Customer Service Team Inspector changed the decision. As the customer was not a person in hardship, a crisis loan for the longer period was not appropriate. However, as the crisis loan had been paid, the Customer Service Team Inspector did not disturb the award.

Budgeting loans

A common enquiry from Reviewing Officers concerns the use of discretion and when to apply it. Direction 53 provides for the Decision-Maker, not the Area Decision-Maker, to determine the maximum amount the applicant can borrow as a budgeting loan. If budget spending is not on target, the maximum loan available to the applicant may be increased or decreased by the respective under or over spend. These powers apply to the Decision-Maker, Reviewing Officer and Inspector.

An application for a budgeting loan was made on 26 June. The Decision-Maker made an award. This was increased by an Inspector because the guidance had increased on 1 August.

The Customer Service Team Inspector confirmed that the Decision-Maker, Reviewing Officer and Inspector have the power to take into account any relevant change in circumstances in the relevant allocation and the local guidance issued by the Area Decision-Maker.

Although this power must be exercised, the officer making the decision, decides whether the new guidance figure is used.

Reviewing Officers regularly query whether Social Fund Inspectors can update an applicant's circumstances such as increased time on benefit and a lower debt. Unlike Reviewing Officers, Inspectors, under the Social Security Act 1998, have the power to take updated circumstances into account where they are replacing the Reviewing Officer's decision because it is incorrect.

Trade Disputes and JSA Disallowances/Sanctions - Direction 17

The Secretary of State directs that

Trade Disputes

- (a) Where the applicant or his partner;
 - (i) is disentitled from receiving a jobseeker's allowance pursuant to section 14 of the Jobseekers Act 1995 (referred to in this direction as 'the Act') or would be so disentitled if otherwise entitled to that allowance; or
 - (ii) is in receipt of a reduced rate of jobseeker's allowance pursuant to section 15 of the Act (trade disputes - effect on other claimants)

the expenses for which a crisis loan may be awarded are limited to those specified in (f) until the date when the applicant is no longer disentitled from receiving jobseeker's allowance under section 14 of the Act or until the date when the applicant is no longer in receipt of a reduced rate jobseeker's allowance under section 15 of the Act.

Disallowances

- (b) Subject to paragraph (e), where an applicant's claim for jobseeker's allowance has been disallowed under section 1(2)(a) to (c) of the Act (conditions of entitlement to jobseeker's allowance), the expenses for which a crisis loan may be awarded are limited to those specified in (f) for 14 days starting on the first day of the benefit week immediately following the disallowance decision, or the benefit week commencement date if the disallowance decision is made on that day.

Sanctions

- (c) Subject to paragraph (e), and except in a case to which paragraph (d) applies, where jobseeker's allowance is not payable to an applicant on the basis that one or more of the circumstances specified in section 19(5) or (6) of the Act applies to him, the expenses for which a crisis loan may be awarded are limited to those specified in (f) for 14 days starting on the first day of the benefit week immediately following the end of the period during which jobseeker's allowance was not payable.

New Deal Sanctions

- (d) Subject to paragraph (e), where it is determined that a jobseeker's allowance is not payable to the applicant on the basis that either or both of section 19(5)(b) or (c) of the Act apply in relation to an employment programme specified in regulation 75(1)(a)(ii) of the Jobseeker's Allowance Regulations 1996 or in relation to a training scheme specified in regulation 75(1)(b)(ii) of those Regulations, the expenses for which a crisis loan may be awarded are limited to those specified in (f) throughout the period when he is not a person in hardship pursuant to regulation 140A(1) of those Regulations.
- (e) Paragraphs (b) (c) and (d) shall not apply where the applicant is in receipt of income-based jobseeker's allowance by virtue of his being a 'person in hardship' as defined in regulation 140(1) of the Jobseeker's Allowance Regulations 1996.
- (f) The specified expenses are -
 - (i) expenses which are the consequences of a disaster; and
 - (ii) expenses, outside (i), in respect of items required for the purpose only of cooking or space heating (including fireguards).

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