

# Amendments to payment on account provisions

Equality impact assessment

March 2011

# Equality impact assessment for amendment to payment on account provisions

## Outline of the existing policy

1. Section 5(1)(r) of the Social Security Administration Act 1992 enables regulations to make provision for the making of a payment on account of benefit in certain specified circumstances. Regulations made under that Section provide for the making of an interim payment of benefit, which allows a payment to be made when normal benefit cannot be paid, usually because the claiming process is delayed or because the claim has yet to be determined. An interim payment must be repaid in full from the first benefit payment.
2. The inflexibility of the provisions for interim payments means that Social Fund Crisis Loans are usually used where need arises to cover living expenses up to the first payment of benefit or wages. Crisis Loans made for these purposes are known as alignment payments.
3. Budgeting Loans are intended to help those in receipt of Income Support (IS), income-based Jobseekers Allowance (JSA(IB)), Pension Credit (PC), and income-related Employment and Support Allowance (ESA(IR)) to spread the cost of intermittent expenses over a longer period. They represent an interest-free credit facility for those in need of financial assistance to cope with such expenses.
4. Budgeting Loans are not limited to people facing special difficulties arising from special circumstances. However, awards are still subject to an overall cash-limit.

## Rationale for reform

5. Replacing crisis loan alignment payments and interim payments with a single system will streamline administration and reduce costs. Similarly replacing budgeting loans with a system of advance payments integrated into Universal Credit and Pension Credit will improve administration, reduce costs, and be simpler for customers to access. Our intention is that the same group of customers who can access this provision currently will still be eligible. The new system will be more flexible to take account of the structure of Universal Credit.

## Outline of the new policy

6. As part of the Government's wider plans for welfare reform, it was announced in the November 2010 White Paper *Universal Credit: welfare that works* that the Social Fund will be reformed. Aligned with one of the key elements of the coalition government's agenda to devolve power and localise services where appropriate, local authorities in England will be responsible for the administration and delivery of much of the reformed scheme, whilst the devolved administrations will determine the most appropriate arrangements for Scotland and Wales.
7. It would not be appropriate to require local authorities and the devolved administrations to deal with alignment payments or advances of benefit under the reformed scheme because the Department for Work and Pensions is responsible for benefits throughout Great Britain. Consequently, from the point at which the Social Fund Crisis Loans and Budgeting Loans are abolished in April 2013, the Department will replace interim payments of benefit, Crisis Loan alignment payments, and Budgeting Loans with a simple system of payments on account. Additionally, the introduction of Universal Credit, which can be payable to people in work as well as those out of work, means that the need for an alignment payment could arise during a benefit claim, rather than solely at the outset of a claim as now.
8. Access to a payment on account under the new provisions will be available to benefit claimants where it is impracticable for a benefit claim to be made or determined immediately, or for an award to be determined or paid in full immediately. Those are the same conditions that currently apply to interim payments and Crisis Loan alignment payments. It will also be available to benefit claimants who have been receiving Universal Credit or Pension Credit for 26 weeks, and who require an advance of their benefit. This is the condition that currently applies to Budgeting Loans.
9. The amendments to the payment on account provisions in the Social Security Administration Act 1992 therefore build on existing provision by providing additional flexibilities. The powers will be brought into force to co-ordinate with the abolition of Social Fund Crisis Loans for alignment, and Budgeting Loans, in advance of the introduction of Universal Credit in October 2013. As now, the amended powers will enable the making of regulations to make the required provisions, the specific details of which will be developed during the intervening period.

## Consultation and involvement

10. Jobcentre Plus is responsible for administering and paying benefits on behalf of the Department. The proposed amendments to the payment on account provisions have therefore been developed in conjunction with Jobcentre Plus.
11. A formal consultation was held on Social Fund reform under the previous administration in March 2010 following the publication of the Green Paper *Social*

*Fund: credit, debt and low-income families.* Those consulted were internal stakeholders, as well as organisations from the third sector that represent the views of Social Fund customers. The majority of the proposals in that consultation were not taken forward by the coalition government, but important points were raised that are of interest when considering the impact on protected groups. There was support for a fast, consistent application of decision making around the country. Several of those consulted welcomed a simplified application process, but expressed concern about the accessibility of an online scheme. We would be careful to address these concerns by assuring customers that there will be provision for those who do not have access to the internet, or who cannot use it for any reason. Alternative application options will be available.

## Impact of the amendments to payment on account provisions

12. This section analyses the impact of the amendments to the payment on account provisions for alignment and advance purposes in terms of gender, age, race and disability. No data is collected on the gender reassignment of Crisis Loan/Budgeting Loan applicants or benefit claimants. However, we believe that there are no grounds to suggest that the payment on account provisions will adversely affect people based on gender reassignment.
13. The Department has examined data relating to Crisis Loan alignment payments in the latest year for which data are available (2009/10). These data will not correspond precisely to applications for a payment on account in future because the introduction of Universal Credit will streamline and simplify the benefits system, which is likely to reduce the occasions when the need for a payment on account arises because there will be fewer people moving between benefits in future. However, as Universal Credit will also be payable to people in work, it is likely to generate a small increase in the need for a payment on account during a benefit claim (for example, if someone leaves work and becomes entitled to an increased amount of Universal Credit, a need may arise between the dates of their final wage or salary payment and the first increased payment of Universal Credit). Universal Credit being payable to people in work may also have the effect of reducing the need for a payment on account at the start of a claim, as fewer people will be making a very first claim to benefit. Overall the need for payments on account should not increase, and may be reduced slightly.
14. On balance therefore, the numbers of recent Crisis Loans made for alignment purposes provides a reasonable basis on which to assume the likely numbers of payments on account to be made in future.
15. The Department does not maintain Crisis Loan data that would allow an analysis of discrimination on grounds of gender reassignment, sexual orientation, pregnancy and maternity, or religion and belief. However, the nature of Crisis Loan alignment payments and the broad proposals for the amendments to the

payment on account provisions suggest that discrimination on those grounds is unlikely to occur. That is supported by the analyses of gender, age, disability and ethnicity, which, as detailed below, provide no evidence of discrimination on those grounds. As the detailed policy and supporting regulations are developed in due course, the Department will continue to take into account any risks of discrimination against any group or characteristic.

16. It is not possible to monitor the exact impact of advance payments on account on specific groups as the Universal Credit policy design is still in development. However we can look at the profile of those people who currently access Budgeting Loans as this will form the basis of those eligible for an advance of benefit although Universal Credit is likely to widen the group who can access this provision. We do not have sufficient information to comment on the impacts (of the current scheme or proposed reforms) based on sexual orientation, gender reassignment, pregnancy and maternity, and religion and belief

## Gender

### Crisis Loans

17. In 2009/10, 29% of decisions on Crisis Loan alignment payments were given to single females, 64% to single males and 7% to couples.
18. This is a reflection of the profile of customers who currently claim Jobseeker's Allowance as 28% of claimants on the Jobseeker's Allowance caseload are female<sup>1</sup>. The Jobseeker's Allowance caseload has been used as a comparator because more than half of all Crisis Loans for alignment purposes are made in respect of a Jobseeker's Allowance.

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<sup>1</sup> Based on DWP data from May 2010 using the online tab tool at <http://research.dwp.gov.uk/asd/index.php?page=tabtool>

**Table 1: All Crisis Loan Alignment final decisions<sup>2</sup> for major partners<sup>3</sup> in 2009/10 which can be linked to the National Benefits Database**

<b>Category</b>	<b>Number of decisions on alignment loan applications</b>	<b>% of total</b>	<b>% for all Crisis Loans</b>
Couple	94,080	7%	8%
Single Female	366,370	29%	34%
Single Male	801,330	64%	58%
<b>Total</b>	<b>1,261,770</b>	<b>100%</b>	<b>100%</b>

Source: Analysis of social fund data scan September 2010 and June 2010 National Benefits Database

19. The success rate of applications was 85% for both single females and single males, and 83% for couples. Success rates for Crisis Loans for alignment are higher than those for all Crisis Loans, which is to be expected because of the specific circumstances in which alignment payments are available. So, in the current system there are no differences between male and female success rates. There is no indication that this would change using a system of payments on account.

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<sup>2</sup> In this and all subsequent tables, “final decisions” refers to the total decisions made on applications for a Crisis Loan for alignment including, where relevant, all those after any review of the initial decision has been completed.

<sup>3</sup> In this and all subsequent tables, “major partners” refers to the way data are maintained on the Social Fund Computer System. Where a Crisis Loan applicant has a partner, one person in the partnership is designated the “major partner” (normally the main claimant in a joint claim for benefit or the claimant in a sole claim, if there is a claim to benefit) and the other partner is designated the “minor partner”. For Crisis Loan applications made by the “minor partner”, the Crisis Loan scan does not record the National Insurance number of the applicant, so such applications cannot be linked to the National Benefits Database or the Client Extract. In 2009/10, 2.3% of Crisis Loan applications for alignment purposes were made by the “minor partner”. In addition, some applicants designated as the “major partner” have never been on benefit and so cannot be linked to the National Benefits Database. The data are therefore incomplete.

**Table 2: All awards after Crisis Loan Alignment final decisions for major partners in 2009/10 which can be linked to the National Benefits Database**

<b>Category</b>	<b>Number of awards made</b>	<b>Success rate</b>	<b>Success rate for all Crisis Loans</b>
Couple	78,220	83%	74%
Single Female	310,300	85%	76%
Single Male	679,940	85%	76%
Total	1,068,450	85%	76%

Source: Analysis of social fund data scan September 2010 and June 2010 National Benefits Database

## **Budgeting Loans**

20. In 2009/10 56% of initial decisions for Budgeting Loans were made in respect of single females, 30% were made in respect of single males and 14% were made in respect of a couple. Single females and couples are also more likely to be successful in getting a loan (78% and 73%) than single males (59%). We do not see this changing once the new payments on account process is in place.

**Table 3. Budgeting Loan initial decisions by gender**

<b>Category</b>	<b>Number</b>	<b>% of total</b>
Couple	242,430	14%
Single Female	933,250	56%
Single Male	503,930	30%
Total	1,679,600	100%

Source: Analysis of social fund data scan September 2010 and June 2010 National Benefits Database

**Table 4. Budgeting Loan award success rates based on initial decision by gender**

<b>Category</b>	<b>Number</b>	<b>Success Rate</b>
Couple	176,030	73%
Single Female	728,720	78%
Single Male	299,760	59%
Total	1,204,500	72%

Source: Analysis of social fund data scan September 2010 and June 2010 National Benefits Database

## Age

### Crisis Loans

21. In 2009/10, 40% of decisions on Crisis Loans for alignment purposes were given to people aged 18 to 24; 27% were given to people aged 25 to 34; and 18% to people aged 35 to 44.
22. The lowest rates of decisions on applications were for people aged over 65 (0% after rounding) and under 18 (4%), with similarly low proportions for those aged between 50 and 64.
23. The overall profile of decisions by age group is similar to that for the total Jobseeker's Allowance caseload, but there are proportionally more Crisis Loan alignment decisions for younger age groups, particularly those aged 18 to 24, who represent 27% of the Jobseeker's Allowance caseload. This difference is to be expected as younger people are less likely to have savings or access to credit, or to have a partner on whom they can rely for short-term financial assistance.



**Table 5: All Crisis Loan Alignment final decisions for major partners in 2009/10 which can be linked to the National Benefits Database**

<b>Age band</b>	<b>Number of decisions on alignment loan applications</b>	<b>% of total</b>	<b>% for all Crisis Loans</b>
Under 18	44,730	4%	3%
18 to 24	499,630	40%	37%
25 to 34	341,700	27%	29%
35 to 44	223,210	18%	19%
45 to 49	74,760	6%	6%
50 to 54	44,260	4%	4%
55 to 59	25,510	2%	2%
60 to 64	6,940	1%	1%
65 to 69	740	0%	0%
70 to 79	290	0%	0%
80 to 89	20	0%	0%
<b>Total</b>	<b>1,261,770</b>	<b>100%</b>	<b>100%</b>

Source: Analysis of social fund data scan September 2010 and June 2010 National Benefits Database

24. The lowest success rate for applications was in the 18 to 24 age group, with 83% of decisions being successful. The rate of successful decisions for the under 18 age group was 84% and for all other age groups was between 86% and 88%.
25. The similarity of success rates across the age groups suggests that there is no age bias in the current system, and there is no indication that this would change using a system of payments on account.

**Table 6: All awards after Crisis Loan Alignment final decisions for major partners in 2009/10 which can be linked to the National Benefits Database**

<b>Age band</b>	<b>Number of awards made</b>	<b>Success rate</b>	<b>Success rate for all Crisis Loans</b>
Under 18	37,580	84%	75%
18 to 24	413,850	83%	73%
25 to 34	292,420	86%	77%
35 to 44	192,580	86%	79%
45 to 49	64,630	86%	79%
50 to 54	38,310	87%	79%
55 to 59	22,120	87%	79%
60 to 64	6,040	87%	75%
65 to 69	650	88%	69%
70 to 79	250	86%	64%
80 to 89	10	87%	59%
<b>Total</b>	<b>1,068,450</b>	<b>100%</b>	<b>76%</b>

Source: Analysis of social fund data scan September 2010 and June 2010 National Benefits Database

## **Budgeting Loans**

26. In 2009/10 the lowest rate of initial decisions for Budgeting Loans are those made in respect of applicants under 18 and those over 45 and this has remained stable for the last two years however those over 50 are more likely to be successful in their application.

**Table 7. Budgeting Loan initial decisions by age**

<b>Age band</b>	<b>Number</b>	<b>% of total</b>
Under 18	10,020	1%
18 to 24	350,690	21%
25 to 34	477,570	28%
35 to 44	396,610	24%
45 to 49	144,040	9%
50 to 54	100,480	6%
55 to 59	72,510	4%
60 to 64	51,640	3%
65 to 69	37,500	2%
70 to 79	33,380	2%
80 to 89	4,870	0%
90 and over	300	0%
<b>Total</b>	<b>1,679,600</b>	<b>100%</b>

Source: Analysis of social fund data scan September 2010 and June 2010 National Benefits Database

**Table 8. Budgeting Loan success rates based on initial decisions by age**

<b>Age band</b>	<b>Number</b>	<b>Success rate</b>
Under 18	5,780	58%
18 to 24	218,590	62%
25 to 34	335,910	70%
35 to 44	292,210	74%
45 to 49	106,520	74%
50 to 54	76,240	76%
55 to 59	57,550	79%
60 to 64	43,340	84%
65 to 69	33,500	89%
70 to 79	30,210	90%
80 to 89	4,390	90%
90 and over	270	90%
Total	1,204,500	72%

Source: Analysis of social fund data scan September 2010 and June 2010 National Benefits Database

## Ethnicity

### Crisis Loans

27. In 2009/10, 81% of decisions on Crisis Loans for alignment purposes were given to people of white ethnic origin (although for 9% of decisions the applicant preferred not to state their ethnicity or their ethnicity was unknown). Across the ethnic groups, the data for decisions on Crisis Loans for alignment corresponds closely to that for the Jobseeker's Allowance caseload, 78% of whom are white.

**Table 9: All Crisis Loan Alignment final decisions for major partners in 2009/10**

<b>Ethnic group</b>	<b>Number of decisions on alignment loan applications</b>	<b>% of total</b>	<b>% for all Crisis Loans</b>
White	1,025,180	81%	79%
Mixed	26,630	2%	2%
Asian or Asian British: Indian	8,030	1%	1%
Asian or Asian British: Pakistani	13,010	1%	1%
Asian or Asian British: Bangladeshi	3,990	0%	0%
Asian or Asian British: Other Asian	4,260	0%	0%
Black or Black British: Black Caribbean	29,670	2%	2%
Black or Black British: Black African	27,210	2%	2%
Black or Black British: Other Black	8,370	1%	1%
Chinese or Other Ethnic Group: Chinese	470	0%	0%
Chinese or Other Ethnic Group: Other Ethnic Group	12,680	1%	1%
Prefer not to say	58,980	5%	5%
Unknown	53,560	4%	6%
All	1,272,030	100%	100%

Source: Analysis of social fund data scan September 2010 and September 2010 Client Extract

28. The lowest success rate by ethnic group was for people of Bangladeshi origin at 75%, followed by people of Chinese origin at 78%. The highest success rates were for those who identified themselves as white at 85%; mixed and black Caribbean ethnic groups' success rates were each 84%, as was those whose ethnic group is unknown and those who opted not to specify an ethnic group.

29. Those ethnic groups with a lower success rate are far smaller in number than other groups that appear more successful (for example, there were 470 decisions on applications from Chinese applicants and 3,990 from Bangladeshi applicants). In the absence of any other evidence to the contrary, this combined with the facts that the difference between the most and least successful groups is ten percentage points and that the profile for Crisis Loans for alignment broadly matches that for all Crisis Loans suggest that the differences do not present a cause for concern.

The ten percentage point difference is due to the fact that small numbers of people can skew the percentages and the Chinese and Bangladeshi figures here are quite low. This means percentages can be quite different, as even a small change can affect the percentage that are successful. This difference can also be seen in the overall Crisis Loan success rates.

30. There is no indication that a system of payments on account would impact upon the number or success of decisions on alignment payments.

**Table 10: All awards after Crisis Loan Alignment final decisions for major partners in 2009/10**

<b>Ethnic group</b>	<b>Number of awards made</b>	<b>Success rate</b>	<b>Success rate for all Crisis Loans</b>
White	871,280	85%	77%
Mixed	22,340	84%	75%
Asian or Asian British: Indian	6,540	81%	71%
Asian or Asian British: Pakistani	10,390	80%	68%
Asian or Asian British: Bangladeshi	3,000	75%	64%
Asian or Asian British: Other Asian	3,440	81%	70%
Black or Black British: Black Caribbean	24,780	84%	74%
Black or Black British: Black African	22,300	82%	71%
Black or Black British: Other Black	6,900	82%	73%
Chinese or Other Ethnic Group: Chinese	370	78%	68%
Chinese or Other Ethnic Group: Other Ethnic Group	10,230	81%	70%
Prefer not to say	49,610	84%	75%
Unknown	45,100	84%	74%
All	1,076,270	85%	76%

Source: Analysis of social fund data scan September 2010 and September 2010 Client Extract

## **Budgeting Loans**

31. In 2009/10 70% of Budgeting Loan initial decisions are made in respect of white customers with some ethnic groups receiving less than 1% of the initial decisions and this remains consistent with previous years. Overall success rates are slightly higher for white customers.

32. In table 12, the success rates for Budgeting Loans by ethnicity, Chinese people seem to have a higher success rate. However, as previously discussed, this is due to a low number of awards being made. A percentage taken from a small group can vary depending on the outcome of just a few actual cases. This higher percentage of success is related to the size of the small group, not the ethnicity of the applicants.

33. Anyone who comes under the ethnic group of “unknown” has had no interaction with the labour market at all, and so we have no information on them. This means that the high rate of successful Budgeting Loan awards for this group cannot be commented on, as there is no information available to show why they might be more successful.

**Table 11. Budgeting Loan initial decisions by ethnicity**

<b>Ethnic group</b>	<b>Number</b>	<b>% of total</b>
White	1,177,780	70%
Mixed	23,700	1%
Asian or Asian British: Indian	5,160	0%
Asian or Asian British: Pakistani	10,250	1%
Asian or Asian British: Bangladeshi	3,470	0%
Asian or Asian British: Other Asian	3,530	0%
Black or Black British: Black Caribbean	30,240	2%
Black or Black British: Black African	25,870	2%
Black or Black British: Other Black	7,340	0%
Chinese or Other Ethnic Group: Chinese	520	0%
Chinese or Other Ethnic Group: Other Ethnic Group	15,390	1%
Prefer not to say	75,260	4%
Unknown	302,790	18%
All	1,681,310	100%

**Table 12. Budgeting Loan awards and success rates based on initial decisions by ethnicity**

<b>Ethnic group</b>	<b>Number</b>	<b>Success rate</b>
White	816,030	69%
Mixed	15,580	66%
Asian or Asian British: Indian	3,380	66%
Asian or Asian British: Pakistani	6,690	65%
Asian or Asian British: Bangladeshi	2,110	61%
Asian or Asian British: Other Asian	2,120	60%
Black or Black British: Black Caribbean	19,320	64%
Black or Black British: Black African	16,770	65%
Black or Black British: Other Black	4,580	62%
Chinese or Other Ethnic Group: Chinese	390	75%
Chinese or Other Ethnic Group: Other Ethnic Group	9,970	65%
Prefer not to say	51,590	69%
Unknown	256,260	85%
All	1,204,790	72%

## Disability

### Crisis Loans

34. In 2009/10, 70% of decisions on Crisis Loans for alignment purposes were given to non-disabled people. The lowest success rate was for those whose disability status was unknown, at 83%; the highest was where disability was not considered, at 86%.
35. The similarity of the different success rates suggests that people do not suffer discrimination on the grounds of disability, and the comparison with the data for all Crisis Loans suggests no evidence that there is any bias in applications or success rates on Crisis Loans for alignment. There is no indication that this would change under a system of payments on account in future.



**Table 13: All Crisis Loan Alignment final decisions for major partners in 2009/10**

<b>Disability status</b>	<b>Number of decisions on alignment loan applications</b>	<b>% of total</b>	<b>% for all Crisis Loans</b>
Not disabled	886,660	70%	66%
Disabled	360,030	28%	31%
Not considered	1,660	0%	0%
Unknown	23,680	2%	2%
All	1,272,030	100%	100%

Source: Analysis of social fund data scan September 2010 and September 2010 Client Extract

**Table 14: All awards after Crisis Loan Alignment final decisions for major partners in 2009/10**

<b>Disability status</b>	<b>Number of awards made</b>	<b>Success rate</b>	<b>Success rate for all Crisis Loans</b>
Not disabled	747,320	84%	76%
Disabled	307,800	85%	77%
Not considered	1,430	86%	75%
Unknown	19,730	83%	71%
All	1,076,270	85%	76%

Source: Analysis of social fund data scan September 2010 and September 2010 Client Extract

## **Budgeting Loans**

36. In 2009/10 30% of BL initial decisions are made in respect of disabled people which represents a 10% increase on the previous year. This increase is thought to be linked to the introduction of Employment and Support Allowance. Overall success rates are slightly higher for non-disabled customers (71%) than disabled customers (69%).

**Table 15. Budgeting Loan initial decisions by disability**

<b>All BL decisions in 2009-10</b>		
<b>Disability status</b>	<b>Number</b>	<b>% of total</b>
Not disabled	1,028,960	61%
Disabled	503,900	30%
Not considered	15,250	1%
Unknown	133,190	8%
All	1,681,310	100%

**Table 16. Budgeting Loan initial awards and success rates based on initial decisions by disability**

<b>Disability status</b>	<b>Number</b>	<b>Success rate</b>
Not disabled	728,320	71%
Disabled	348,530	69%
Not considered	13,570	89%
Unknown	114,360	86%
All	1,204,790	72%

## Monitoring and evaluation

37. DWP is committed to monitoring the impacts of its policies and we will use evidence from a number of sources on the experiences and outcomes of the protected groups.
38. We will use administrative datasets to monitor trends in the benefit caseloads for the protected groups and in the level and distribution of benefit entitlements. The administrative data will provide robust material for age and gender although not, as a rule, for the other protected groups.
39. We will use survey data (for example the Family Resources Survey and Labour Force Survey) to assess trends in the incomes of the protected groups and in the employment outcomes.

40. We will use qualitative research and feedback from stakeholder groups to assess unintended consequences for the protected groups, and the policy consequences for particular groups.
41. We will utilise feedback from Departmental employee networks and internal management information. For example we will monitor the level of appeals and complaints in order to assess the broader impact of the policy.
42. We will draw on broader DWP research where appropriate, as well as any research commissioned specifically as part of the evaluation of the measure.
43. The material in this Equality Impact Assessment covers the equality groups currently covered by the equality legislation, i.e. age, disability, gender (transgender), and ethnicity. For the disability, age and gender strands we have good quality information from both the administrative and survey data, while for ethnicity we have reasonable information from the survey data. From 2011 sexual orientation, religion and pregnancy/maternity will also be covered by the equality legislation; with the exception of maternity, these groups will not be captured in the Departmental administrative information. We have requested for information on religion and sexual orientation to be included in the main survey used for low income and poverty analysis from April 2011. Also, as part of our actions in the context of the data requirements under the Equality Act, we are looking across DWP activities to identify and address further gaps in data provision wherever reasonable.

## Next steps

44. It is intended that the amendments to the payment on account provisions will come into force by April 2013, alongside the abolition of Social Fund Crisis Loans and Budgeting Loans. The detailed policy will be in regulations and has yet to be developed. This Equality Impact Assessment will be kept under review as the detailed policy is developed and will be updated as necessary when the relevant regulations are published.

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