

No one written off: reforming welfare to reward responsibility

A consultation response from Cymorth Cymru

October 2008

Cymorth Cymru is the representative body for supported housing and homelessness providers in Wales, and as such has two overarching objectives:

- To improve the links between policy and practice by ensuring that those working in frontline service delivery understand the wider policy context, and those working in policy development understand and are influenced by the experiences and knowledge of those working on the ground
- To ensure that the housing-related support sector maximises its contribution to the lives of service users and the communities in which they live, by helping to build and develop the sector's capacity and professionalism

1 Introduction

Cymorth Cymru welcomes the opportunity to contribute to the national discussion on the relationship between rights and responsibilities with regards to benefits entitlements in the UK, and shares a number of the key principles informing the proposals put forward within the current Green Paper. In particular, we fully agree that active engagement with training and employment opportunities can bring about substantial benefits to individuals

- including financial independence, improved self esteem and long-term improvements in health and wellbeing - and that prolonged, unchecked dependencies on benefits can be detrimental to individuals, families and society as a whole.

To this end, many Cymorth Cymru members are actively involved in programmes designed to support their service users in accessing training and employment opportunities. For example, Tai, Dysgu a Gwaith (Housing, Training and Work) Cymru operates within a number of agencies across Wales, supporting homeless people in developing the vocational skills and confidence needed to move towards greater independence and more fulfilling, secure futures.

Cymorth members include organisations supporting people affected by a wide range of personal circumstances, including mental health problems, learning disabilities, personality disorders, difficulties with drugs and/or alcohol, poor physical health, and homelessness. Our members work with young people leaving the care system or difficult family backgrounds, women and children fleeing abusive or violent relationships, and older people in need of long-term support. A proportion of our members' service users have relatively poor educational backgrounds, and many will have had limited experience of employment or independent living. Crucially, many service users are affected by conditions such as learning disabilities which are *enduring* – that is, they may be managed, but will not fundamentally change.

Given these factors, and the experiences of agencies over many years, our members emphasise the critical importance of support being genuinely tailored to the circumstances of the individual, and that expectations with regards to taking up employment must always be both realistic and practical. In many cases, the support needs of service users are, at a given time, highly complex, requiring multidisciplinary interventions delivered in partnership across statutory and voluntary sector services.

We do not feel that the proposals put forward in the Green Paper take full account of these subtleties, and we therefore have serious concerns that the support, opportunities and long-term welfare of many vulnerable people will be fundamentally undermined if the policies currently described are enacted.

The Green Paper places too great an emphasis on the protection of the state from cases of individuals' wilful abuse of the welfare system, and pays too little attention to safeguarding and protecting the rights of the most vulnerable people in society. This imbalance must be addressed.

We fear that the proposals, as described, would lead to increased poverty and homelessness, and that this will be associated with significant costs in both human and financial terms – including impacts on health, crime, homelessness, education and, perhaps ironically, employment.

2 General comments

We have three general areas of concern:

- We are unclear as to how the proposals will sit within the context of powers devolved to the Welsh Assembly Government. In particular, elements of the Welsh Supporting People Strategy, the 10-year Homelessness Plan and the Supporting People Strategy would appear difficult to accommodate within a number of the proposed changes to the benefits system.
- The proposals describe a highly regulated and largely 'blanket approach' to managing benefits claims and entitlements, with significant reductions in the capacity of staff to make decisions based on the specific and changing circumstances of individuals. The absence of a more person-centred approach, particularly in light of the proposed penalties and benefits sanctions, is likely to lead to a range of serious unforeseen consequences as vulnerable people 'fall through the net'. We fear these consequences will include greater levels of poverty and destitution in Britain.
- The current national economic context would appear inconducive to widening employment among some of those likely to be affected by the proposals. The Green Paper appears not to account for this.

Reduced job security and increasing levels of unemployment across society generally are leading to more competitive job-seeking environments. Employers who may previously have been cautious about (or unprepared to) take on a person with a criminal record, or in receipt of drugs treatment, or homeless, may now more than ever be able to turn these people away. Levels of rent arrears, mortgage defaults and evictions/repossessions are increasing as the current economic downturn impacts on personal finances, and it is anticipated that this will continue, at least in the short to medium term.

These are matters of great concern to Cymorth members, and impact fundamentally on the availability of employment for their service users. They also emphasise the critical importance of a fair and accessible welfare system in Britain, and the role it plays in supporting families and individuals during such adverse times.

An additional concern for Cymorth is that the proposals are likely to have significant resource implications for housing-related support providers. Time and effort will need to be spent assisting vulnerable people through the changes to the benefits system, and in many cases addressing situations where benefits are cut because vulnerable people have not done what is required of them.

There is concern that people who have previously been exempt from capability assessments due to a permanent and ‘incurable’ disability (such as a learning disability) will be required to undergo assessment and/or medical examination. Providers working with these client groups fear that assessments and examinations may give rise to serious problems for some individuals affected – including unnecessary stress and trauma - especially where conditions such as Aspergers Syndrome, Autistic Spectrum Disorders and early onset dementia are involved.

The proposals have a narrow focus on disability and incapacity for work, frequently implying that all conditions are “medical” – that is, that they may be treated or cured. In the case of learning difficulties, for example, this view is fundamentally mistaken.

Cymorth Cymru and its members would welcome the opportunity to work with the DWP in developing more informed and realistic approaches to supporting people with learning disabilities as they access training, voluntary positions, and other work-related activities.

3 Specific comments

The Consultation Questionnaire asks a number of specific questions which are responded to below.

Responses were prepared in consultation with Cymorth members and written up by two members of staff – one with a focus on homelessness and drug/alcohol-related services, and the other considering other support provision, such as accommodation providers working in the fields of mental health and learning disabilities.

Question 1: How long should ‘work for your benefit’ last at different stages in the claim?

If the Green Paper’s proposals are implemented, we would anticipate that a great proportion of our members’ service users will in future receive JSA or fail the Limited Capability for Work-related Activity Assessment.

Given these circumstances, and in acknowledgment of the benefits that work-related activities can bring about, we do not believe that it is appropriate to establish across-the-board time limits in the manner proposed. The complexities of some people’s support needs, coupled with the emotional and practical ramifications of coping with life in short-term accommodation (such as direct access homelessness hostels, women’s refuges, or nightshelters) - or, indeed, sleeping rough – render fixed and prescriptive timescales unrealistic and unworkable.

Benefits staff, in consultation with claimants and (as appropriate) support service providers, must be allowed the flexibility to work with individuals on a case-by-case basis, according to their particular and changing circumstances.

Question 2: How could capacity and capability to provide full-time work experience in the community sector be provided and incentivised to produce the best employment outcomes for participants?

The support and education of potential employers will be essential if work experience opportunities are to be made available to all. At present, it is understood that some individuals (for example, those in receipt of medication such as methadone, those with no permanent address, or those with criminal records) may experience particular difficulties assessing work experience programmes due to the apparent preconceptions or, in some cases, prejudices, of employers. These barriers and the ideas that inform them must be challenged.

At the same time, however, it must be understood that ‘pushing’ people too hastily into work experience (or requiring them to take part in programmes which they consider inappropriate) may in itself lead to a deterioration of health and people’s capacity to work.

It must also be recognised by JobCentre and Benefits Agency staff, as well as by potential employers, that the support needs and capabilities of many vulnerable people are liable to fluctuate. For example, a number of mental health conditions (such as depression) may vary in their severity from day to day or week to week, with extended periods of stability and apparent ‘wellness’ being followed by bouts of acute debilitation. Similarly, individuals may over time be affected by other circumstances – such as changing housing status – which may fundamentally impact on their capacity to engage in full-time employment or work experience.

All of these factors must be understood and designed into work experience programmes so that individuals’ circumstances may be responded to in an informed and fair manner.

Question 3: Is full-time ‘work for your benefit’ as an alternative to a sanction of loss of benefit for repeated non-compliance with work search requirements an effective option for some jobseekers? How should it be targeted?

We do not believe that withdrawing or reducing a person’s benefits entitlement, as a sanction, is ever likely to lead to positive outcomes for either that individual, their family, or to society as a whole. With the possible exception of some “benefits cheats”, the overwhelming majority of people in receipt of support are, by definition, living on minimal income, and many households receiving benefits already struggle to make ends meet; imposing sanctions on these people is likely to simply push them further into poverty (and, in some cases, perhaps crime or other harmful behaviours), whilst at the same time increasing social and financial exclusion, and undermining the long-term objectives of the welfare reform agenda.

As discussed above, it is essential that individuals’ support needs, vulnerabilities and other circumstances are fully understood by those making judgements concerning possible sanctions, and that claimants are not penalised for failing to comply with unreasonable expectations or requirements.

Question 4: What penalties do you think would be most appropriate to deter more people from committing benefit fraud?

We are unaware of any evidence that significant levels of benefit fraud occur amongst this population – indeed, on the contrary, it is not uncommon to find that homeless people or those with mental health problems or other support needs are in fact *under-claiming* benefits.

The processes involved in making and sustaining a claim – for example, the need to provide formal identification, to be informed of rights and entitlements, to complete forms, attend appointments, answer questions, etc – deter many from claiming what otherwise would rightfully be theirs. Pride, literacy difficulties or limited self-confidence may also undermine people’s willingness or ability to fully pursue benefits claims, as may the perceived stigma of being homeless and having to discuss this, and other sensitive issues, with a benefits advisor.

Many vulnerable people do not understand the complexities of the benefits process and may not recognise when mistakes have been made, whether on their part or on the part of benefits departments. It would be wholly unreasonable to reduce or withdraw benefits in these circumstances, and doing so could have a seriously detrimental effect on the health, security and wellbeing of an individual – including the loss of accommodation.

We recognise that benefit fraud certainly occurs in the UK, though understand that official figures include genuine errors - by officials as well as claimants – and may therefore not properly reflect actual levels of calculated acts of deception. Investigations into alleged or possible fraud must be conducted on a case by case basis, though we believe that deliberate offenders should ultimately be dealt with through the criminal justice system, and not the welfare system.

Question 5: Do you think it would be appropriate to reduce or withdraw entitlement to benefit after a first offence? How long should the sanction period be?

Imposing sanctions on individuals appears predicated on the belief that:

- All benefits rules are fair in all circumstances
- All claimants understand the rules and are capable of compliance, *and*
- Pushing households deeper into poverty will bring net benefits

We are unconvinced that any of these assertions are valid, and are gravely concerned of the likely impacts of benefits sanctions on individuals, families and wider communities.

As well as the devastating personal costs associated with poverty and destitution (the inevitable consequences for many of those dependent on benefits as their only source of income), the financial costs are also likely to be substantial, particularly in terms of the policy’s impact on homelessness, crime, healthcare and other areas of public spending.

We strongly oppose this element of the Green Paper proposals.

Question 6: Do you agree with the proposed approach for identifying problem drug use? How should it be implemented? Do you think that everyone claiming a working-age benefit should be required to make a declaration of whether or not they use certain specified drugs?

The proposed approach to identifying problem drug use appears unreasonable, unnecessary, inconsistent, unworkable and pointlessly punitive. We do not support it.

Whilst drug use may have a significant impact on some people's abilities to find or maintain employment, many drug users have no difficulties in these areas. Apart from defining 'problem drug user' as a person who is drug dependent and in receipt of benefits, the Green Paper gives little explanation as to why the proposals make such emphatic links between drug use and employment. Nor does not explain the reasoning behind the proposal to 'screen' all applicants, and there is similarly no explanation as to why the proposals do not apply to alcohol or prescription drugs, etc, or to other dependencies, such as gambling addictions. In short, for no apparent or compelling reason, users of illicit drugs appear to have been singled out as a special case.

We fully agree that many people with drug-related problems could benefit immensely from improved access to drugs interventions, healthcare, and, in many cases, rehabilitation. We also firmly believe that undertaking training or work experience programmes, and finding long-term, sustainable employment, can bring tremendous benefits to people who are currently drug dependent and living on benefits. However, we do not believe that it is reasonable to require drug users to declare themselves as part of a benefits application, and nor can we see the advantages of threatening individuals with financial sanctions if they are found to have withheld information, or do not comply with a treatment programme they may be unhappy with.

Given the stigma and criminality associated with drug use (and the context of talking to a benefits advisor with little or no training in the field of drug dependencies) we would expect a proportion of drug users to be very reluctant to reveal incriminating information about themselves to JobCentre Plus staff. The sharing of information with the Police and Probation Service - about which we have separate ethical and practical concerns - is likely to compound this, and we are concerned that this will put already vulnerable people in an impossible position - deterring many from applying for benefits in the first place, and leaving others exposed to potential sanctions.

We believe that for some people the consequences of this exclusion will include more risky drug-related behaviour and subsequent deteriorations in health. As with many of the most excluded and marginalised drug users in society, we would also anticipate that for some the removal of benefits will directly lead to greater involvement in, or initiation into, more desperate approaches to raising money, such as begging, prostitution and acquisitive crime.

Question 7: What elements should an integrated system of drug treatment and employment support include? Do you agree that a rehabilitation plan would help recovering drug users to manage their condition and move towards employment?

As above, it appears that the principle of requiring drug users to engage in a rehabilitation plan is based on a number of assumptions:

- That drug services are widely available to all who could benefit from them
- That drug users will not access support unless threatened with benefits sanctions, and
- That compelling people into rehabilitation, rather than making services available which individuals may access freely, is effective and should be welcomed

Again, we would argue that none of these assertions apply.

In Wales there remain significant problems for many drug users wanting to access support, with waiting list for *assessments* running to many months (some up to two years) in much of the country, with available treatment options often limited. Far from being unwilling to access support, many drug users are desperate to get help, but it simply isn't available. Given that, we believe that emphasis must be placed on improving the range and accessibility of drugs services to those who need and want them (particularly treatment services such as substitution prescribing, and detox and rehabilitation – both residential and community), rather than creating an arbitrary link between engagement with a drugs rehabilitation plan and entitlement to benefits.

As acknowledged above, we agree that for many drug users training and employment can bring real, lasting benefits, and can be an integral component in a long-term rehabilitation plan. However, we are not aware of evidence which demonstrates that compulsory treatment is associated with successful outcomes (in fact, the reverse appears to be the case), and do not believe that accessing employment should be the key driver behind any treatment plan.

For many people using the services of Cymorth members, stabilising, reducing, or ending drug use is a daunting proposition requiring considerable planning and support. This support must be sensitive to individuals' needs - with the flexibility to allow for slips, crises and changing timescales - and must often involve a range of services, including mental health, drugs and housing services across the statutory and third sectors. Regimes of drugs testing and threats of benefits sanctions are not compatible with this approach.

Question 8: When is the right time to require ESA claimants to take a skills health check?

As discussed, the 'right time' for a skills health check will vary greatly among individuals, and it is impossible to stipulate an appropriate or optimum moment at which it would be suitable for all.

Recipients of ESA are judged to be unsuitable for work at the time of assessment and therefore (assuming that it is indeed appropriate to conduct such a check in the future) the suitable timing is likely to range from a matter of weeks to a number of years, according to circumstances. Conducting such a check at an inappropriate time could be detrimental.

Question 9: Should ESA customers be required to attend training in order to gain the identified skills they need to enter work?

Not in all cases. Again, staff must be allowed the discretion to make judgements based on individual circumstances and not on blanket policies applied to huge numbers of people.

Cymorth endorses the principle that many people currently unable to take up employment must be offered opportunities to address their difficulties - to develop skills, build self-confidence and ultimately secure employment, wherever possible - but this must not be on a compulsory basis. Of those deemed to be *unsuitable for work*, a proportion will also be *unsuitable for training*.

In addition, support provided by health providers and other support services may impact on services users' availability to take part in training, and this must be accommodated.

Question 10: In view of the need to help lone parents develop the skills they need to find work, are we right to require lone parents to have a skills health check and training as a condition of receiving benefit?

And

Question 11: Should we pilot extra benefit payments for lone parents in return for training, and if so, when the youngest child is at what age?

Again, Cymorth agrees that help must be available to support those lone parents who wish to develop skills and access employment, though we strongly disagree with the proposal to impose financial penalties and hardship on those who are unable or unwilling to comply with expectations and timescales that they may not agree with. The point at which a lone parent returns to work is a personal matter, and not one for the state to determine on a wholesale basis.

Childcare is prohibitively expensive or simply unavailable in many parts of Wales, and the proposals take no account of this fundamental and practical issue. In addition, single parents housed in emergency accommodation, and women and children supported in women's refuges across the country, are often affected by acutely difficult personal circumstances, and many will be dependent on benefits as their only source of income during these periods.

Reducing or removing this income on the grounds that an individual is considered 'undeserving' - having failed to meet a condition such as attending a training course - is shockingly disproportionate. It raises serious child welfare issues and other ethical questions, and is likely to inflict both immediate and enduring harm on vulnerable adults and children. Cymorth strongly opposes this proposal.

Question 12: Are there any other circumstances where customers cannot get the skills they need to enter employment under present and planned arrangements?

Many vulnerable people do not respond well to 'generic' skills training, and require specialist support to develop, for example, literacy and numeracy skills, and to build self-confidence. This support is often most effectively provided by third sector organisations, such as housing-related support providers or those with specific areas of expertise - for example, in working with young people, or those experiencing mental ill health. However, in Wales the availability of these programmes is not universal and is often limited according to the funding available. The proposals, which appear to have been drawn up in the light of the English rather than Welsh context, do not take these circumstances into account.

Cymorth would welcome greater investment in the provision of training opportunities for people Wales, and would stress the crucial role that third sector organisations can play in supporting people in developing the skills needed to access education, work-related activity and employment. It is important that this is recognised in funding agreements.

Question 13: How might we build on the foundations of the current rules so that they do not discourage unemployed people from volunteering as a deliberate back-to-work strategy, while retaining a clear focus on moving off welfare into paid employment?

Volunteering can be a very effective way of engaging vulnerable people, offering a flexibility of approach that paid employment cannot always accommodate, and, for some, providing a practical step towards employment. However, many people – including a proportion of those engaged with housing-related support services – may benefit from voluntary work *for its own sake* and *on a long-term basis*, and not as a time-limited intervention centred on participants ultimately securing paid employment.

Some individuals engaging in voluntary work may simply be unready to access long-term employment, whilst for others (including some with, for example, severe learning disabilities) the suggestion of finding and maintaining paid employment in wholly unrealistic. It is essential that these people are not discouraged or exempted from accessing voluntary work opportunities by too firmly linking such programmes with paid employment as the only, or most important, goal.

Question 14: Do you agree that the WCA and WFHRA should be re-focused to increase work-related support?

The focus on medical assessments is not appropriate for a proportion of people who are not currently working. People with learning difficulties will not get better, the suggestion for medical assessments assumes that their condition will improve, but this is not the case. Their condition is permanent and there must be recognition that medical assessments will not help them access employment. They require support to gain the skills to access work or work-related activity, and this support must be delivered by skilled organisations who have experience with working with the client group. Seeing as many third sector providers are already actively doing this, it would be in the interests of the welfare reform agenda to provide resources which would allow these third sector organisations to continue to do this.

Question 15: What expectations should there be of people undertaking the personalised support we will now be offering in the Work Related Activity Group? Could this include specific job search?

A common expectation for individuals within the work-related activity group will ignore the support needs of individuals and there is a danger that those marginalised individuals will become even more marginalised with this approach. Expectations should be based on an individual's ability and with a number of incapacity benefit claimants, support should be provided through the organisations that already help them to develop skills and training in preparation for volunteering, placements and employment.

Question 16: How can we make Access to Work more responsive to the needs of claimants with fluctuating conditions – including mental health conditions?

and

Question 17: What additional flexibilities in the system or forms of support would claimants with multiple and complex problems need to enable them to meet the work-focused requirements proposed in this Green Paper?

Claimants with fluctuating conditions and multiple and complex problems require support from well placed providers, often from the third sector. These providers already work with vulnerable individuals and support them to fulfil their potential, which can include supporting them to access skills training and employment. The DWP can help these specific claimants by supporting the organisations that already work with and support these individuals, whilst also refraining from putting unnecessary pressure on these individuals and enforcing sanctions when instead resource should be put in to understanding and supporting these clients to engage with the welfare to work agenda.

Question 18: What are the key features of an action planning approach that would be support employees and employers to take the steps for the employee to make a swifter return to work?

Greater emphasis in supporting employers and employees in identifying when difficulties which may later impact of job retention first arise, and developing appropriate responses and safeguards.

Question 19:

There is no Question 19.

Question 20: What approach might be suitable to assist partners of benefit claimants who can work into employment?

Partners of benefits claimants may well need help accessing support or care for their partners, as they may themselves have taken up this role themselves. Provision of childcare must also be accounted for in this circumstance if the partner of a claimant is unable to cope with this themselves. The Green paper offers little solution where people

are unable to work due to other commitments, such as childcare or support and care for a family member. These people are entitled to expect 'something for something' if they are being pushed into accessing employment.

Question 21: What are the next steps in enabling disabled people, reliably and easily, to access an individual budget if they want one? Should they include legislation to give people a right to ask for a budget or will the other levers the Government has got prove sufficient? What are the safeguards that should be built in? How can this be done?

There are no 'next steps' in terms of enabling disabled people to access individual budgets in Wales. This is a devolved area of policy and the Deputy Minister for Social Services, Gwenda Thomas, has already made a statement that Wales will not be adopting the Individual Budgets model.

Question 22: Is a system based on a single overarching benefit the right long-term aspiration? How could a simpler system be structured so as to meet varying needs and responsibilities?

There are some considerable concerns about the abolition of income support. There is a huge variation in the needs of individuals in receipt of income support, and whilst some may cope well with being moved onto another benefit, clearly some client groups require the protection that income support can offer.

For example, there is a scheme known as ISMI (Income Support Mortgage Interest). This is an additional payment that can be claimed to help pay mortgage interest for people who are, or become, incapable of work and receiving income support. However it can also be used to facilitate home ownership for people with learning difficulties (and presumably others who are 'permanently' incapacitated) and dependent on benefits. It can apply in shared ownership arrangements as well as straightforward purchase.

If income support is to be abolished, how will this affect the scheme? Will ISMI go as well, thereby removing a support for vulnerable home owners, (which has attached risks of increased repossession, homelessness, health issues etc) as well as restricting the housing choices of aspiring home owning people with learning difficulties. If not, how will the scheme work alongside ESA?

Question 23: Would moving carers currently on IS onto JSA be a suitable way of helping them to access the support available to help combine caring with paid work or preparing for paid work?

We are unclear of the reasoning behind moving carers onto JSA without expecting them to work, just for the sake of moving them off of Income Support. Many carers cannot combine caring with paid work or preparing for paid work because respite care is simply not available. It is insulting to associate carers with those people who are able to enter employment, but choose not to. Carers already have a full time job, and until they are supported and relieved of some of this responsibility, it is unacceptable to expect them to seek paid work.

Question 24: How might we reform Bereavement Benefit and IIDB to provide better support to help people adjust to their new circumstances while maintaining the work focus of the modern welfare state?

No comment

Question 25: Are lump sum payments a good way of meeting people's needs? Do they give people more choice and control? Could we make more use of them?

No comment

Question 26: What information would providers need to make the Right to Bid effective? How would the evaluation process need to work to give providers confidence that their ideas would be evaluated fairly and effectively? How do we get the balance right between rewarding those who come up with new ideas and the obligation to tender projects?

We welcome the opportunities that Right to Bid may bring to people in Wales, and, as discussed, believe that in many cases Third Sector organisations may be well placed to deliver innovative, effective provision. We hope that evaluations and other processes will fully acknowledge the benefits that small, local providers can bring to new initiatives, and that these organisations will be able fairly to compete with larger, national bodies.

Question 27: What would the processes around contributing to commissioning and performance management look like in a range of different partnership areas? How might they best be managed to achieve the desired outcomes?

This must be considered in the context of devolution and the developing powers and role of the Welsh Assembly Government.

Question 28: How could a link be made to the radical proposals for the pilots set out in Chapter 3, which seek to reward providers for outcomes out of the benefit savings they achieve?

We welcome the focus on addressing some of the more challenging barriers to employment, though are concerned that rewarding providers for outcomes, as described, will lead to 'cherry-picking'. That is, by focussing on outcomes instead of individuals, there is a clear risk that some providers may be tempted to avoid or reduce engagement with those most in need of support, and instead work only with those they consider to have the greatest chance of securing employment for in the shortest period of time - thereby optimising their income. Similarly, providers may be tempted to too speedily move people into employment, or to move people into jobs which are unsuitable.

Clearly these activities would undermine a central ethos behind the Green Paper proposals, and effective measures to protect against them will need to be put in place.

Question 29: How effective are current monitoring and evaluation arrangements for City Strategies?

No comment

4 Conclusion

Whilst welcoming the professed intentions of the Green Paper *No one written off: reforming welfare to reward responsibility* – that is, to provide more personalised, tailored responses to people currently in receipt of benefits and support them in accessing suitable employment – we are gravely concerned that in many cases the proposals would have the opposite result. The Green Paper describes a regimented system through which (with a number of tightly controlled exceptions) huge numbers of people will be expected to progress, under threat of losing their benefits.

We believe that the system outlined will **not** provide support which is in any meaningful way sensitive to the needs and potentials of many vulnerable people, and that this will be acutely detrimental to their security and wellbeing, and will harm society as a whole.

We strongly urge that the proposals, as described, are reconsidered.

Thank you again for the opportunity to contribute to this important consultation.

If you should require any further information, please contact the Director of Cymorth Cymru Joy Kent.

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