

In Confidence

Office of the Minister for Social Development and Employment

Cabinet Legislation Committee

Social Security Amendment Bill: Approval for Introduction

Proposal

1 This paper seeks approval for the Social Security Amendment Bill (the Bill) to be introduced before the end of 2024.

2 s 9(2)(ba)(ii)

Relation to government priorities

3 Having 200,000 New Zealanders on the Jobseeker Support benefit means too many people are dependent on the State for their primary source of income. The Coalition Government is committed to encouraging those who are able to work to do so. Supporting jobseekers into work gives them financial independence, a sense of purpose, and further opportunities which contribute to the Coalition Government's commitment to help more New Zealanders get ahead. This legislation is a Quarter 4 priority.

Policy

4 The Bill amends the Social Security Act 2018 (the Act) and the Social Security Regulations 2018 (the Regulations) to ensure the welfare system is focused on enhancing and extending welfare settings to support people off benefit and into employment.

5 The Bill implements the policies agreed by Cabinet in August 2024 to enhance and extend welfare settings to support people off benefit and into employment [SOU-24-MIN-0096 and CAB-24-MIN-0295.01 refer]. These policies follow commitments made through coalition agreements and by the National Party in their pre-election 'Reducing Benefit Dependency' manifesto. A Bill is necessary as amendments to existing legislation are required to implement the proposed policy changes.

6 The objectives of this Bill are to:

6.1 support reductions in the number of people receiving Jobseeker Support and increase exits into employment with a Government target of 50,000 fewer people on the Jobseeker Support benefit by 2030

6.2 reduce costs to the government by reducing benefit numbers

6.3 enable welfare system settings that reinforce expectations to work

- 6.4 lift economic outcomes for people and their families through exits into work.
- 7 This Bill introduces Phase 2 of the Traffic Light System. Phase 1 was implemented on 12 August 2024 and consisted of changes that did not require amendments to legislation, such as the introduction of traffic light colours to give MSD clients a clear indication of their compliance with their obligations. Since June 2024, MSD has also been introducing a work check-in at six months for clients on Jobseeker Support with full-time work obligations who are not in employment case management.
- 8 This Bill includes four key policy amendments:
- 8.1 introduction of non-financial sanctions, specifically Money Management and Community Work Experience, as an option in response to a client's first failure of a work-related or social obligation¹
 - 8.2 introduction of a requirement for applicants for certain benefits to complete a Jobseeker Profile (referred to in the Bill as a questionnaire) as a mandatory pre-benefit activity
 - 8.3 changing the expiry date for Jobseeker Support from 52-weeks to 26-weeks and requiring recipients (and any partner included in their Jobseeker Support benefit) to reapply in order to continue to receive a benefit, including provisions to support implementation of this policy through the use of Automated Decision-Making
 - 8.4 extending the period that work-related and social obligation failures are counted against a client from 12 months to 24 months².
- 9 Following Cabinet's authorisation for delegated decision-making to me as the Minister for Social Development and Employment, I have made several policy decisions to finalise draft legislation to implement the proposals in line with the overall aims of the Traffic Light System and 26-week reapplications. These decisions are outlined in **Appendix 1**.

The Bill introduces two non-financial sanctions as part of the Traffic Light System

- 10 This Bill expands the tools available to MSD by introducing non-financial sanctions, specifically Money Management and Community Work Experience. These will act as alternative options to a Grade 1 financial sanction following a client's first obligations failure.
- 11 These non-financial sanctions will be targeted at clients with dependent children or in active case management. When someone in these cohorts fails their obligations for the first time, contacts MSD, and has an appointment within five working days of the notice of sanction, a case manager will have discretion to impose a non-financial

¹ Non-financial sanctions will not apply to clients with youth activity obligations, as the majority of clients are already subject to Money Management as a condition of receiving their income support (e.g. Youth Payment or Young Parent Payment).

² Note that this change does not apply to clients who fail a youth activity obligation, due to the significantly different services they receive from MSD and the focus on education and training outcomes.

sanction instead of a financial sanction if they consider doing so to be appropriate for the client. Youth clients under the age of 19³ are not included in this aspect of the Traffic Light System.

The Bill also introduces mandatory Jobseeker Profiles as part of the Traffic Light System

- 12 Cabinet previously agreed to make Jobseeker Profiles (JSPs) a mandatory pre-benefit activity for applicants of certain main benefits, as well as their spouses and partners (if applicable).
- 13 The legislative changes in this Bill will only apply to the mandatory assignment of JSPs as a pre-benefit activity and not to other pre-benefit activities or the assignment of JSPs on a discretionary basis.

Clients on Jobseeker Support will be required to reapply for their benefit every 26-weeks

- 14 The Bill also introduces a range of amendments to reflect Cabinet’s decision to change the expiry of Jobseeker Support from 52 to 26 weeks, which means that clients (and any partner included in their benefit) will have to reapply every 26 weeks in order to continue receiving their benefit (referred to as “26-week reapplications”). The expiry date for Sole Parent Support will remain at 52 weeks, as will the requirements for regrant.
- 15 A number of changes are being made to the design of the reapplication process for Jobseeker Support to efficiently manage the increase in volume of reapplications and to enable high-quality employment engagements. This includes counting previous specified engagements towards a client’s requirements for regrant.⁴ This will reduce duplication of effort for clients and staff.
- 16 To align with the change to a 26-week benefit expiry, it has been necessary to remove annual income charging and the full-time employment exemption period for Jobseeker Support clients. This has been replaced with the introduction of a weekly income charging requirement for all Jobseeker Support clients.
- 17 Cabinet also agreed to a set of transitional arrangements (dependent on a client’s current expiry date in relation to the go-live date) to move clients from a 52-week expiry (and reapplication) to the new 26-week expiry and reapplication as soon as practicable after implementation on 1 July 2025. These arrangements will see most clients moving into the new reapplication process within seven months of implementation.
- 18 Automated decision-making⁵ (ADM) can support MSD to deliver efficient and modern services at scale. The Bill expands the current partial enabling provision to

³ Clients receiving a Youth Payment or Young Parent payment, or who are young partners of Jobseeker Support or Supported Living Payment clients

⁴ Requirements for regrant for the 26-week reapplication are: an eligibility check, an employment engagement and the setting and confirmation of obligations (as appropriate).

⁵ A decision within an automated process where there is no substantial human involvement in making the decision (including statutory decisions).

support the use of automated decision-making to implement 26-week reapplications. For 26-week reapplications, ADM will be used when the system determines that all of the client's reapplication requirements have been satisfied (including confirming that they want to apply and that they agree to their obligations). MSD will then automatically regrant the benefit unless a change in circumstances is identified. ADM will not be used in the administration of any other matter outlined in this Bill, but enabling provisions have been included in the Bill in case a need arises in future.

- 19 Any use of ADM will be assessed against MSD's ADM Standard prior to its implementation as part of a full Privacy, Human Rights and Ethics review. This is to ensure that ADM is being used in a responsible way and with appropriate safeguards.

Additional items also included in the Bill

- 20 There are a number of other minor policy matters included in the Bill that reflect the intent of policy changes through the Traffic Light System and 26-week reapplications and allow for their more efficient administration, as outlined in Appendix 1. I have agreed to amend the Act to:
- 20.1 increase the obligation failure count period to 24 months (previously agreed to by Cabinet as 104 weeks). This will mean that clients who repeatedly breach their obligations are more likely to move through to benefit cancellation if they remain on benefit longer than a year. This change will not apply to clients who fail a youth activity obligation (those clients will retain an obligation failure count period of 12 months);
 - 20.2 not require MSD to impose a sanction where a client has re-complied within the five working day dispute period for their first or second obligation failure, and the failure is not a failure to accept an offer of suitable employment which will be equivalent to a third failure and result in MSD imposing a Grade 3 sanction;
 - 20.3 allow MSD to cancel a client's benefit 13 weeks after the date of their Grade 1 or Grade 2 sanction taking effect if they do not re-comply within this timeframe;
 - 20.4 include work-preparation obligations in the provision allowing MSD to set a 'same as, or substantially similar' re-compliance activity if it is impossible for a client to complete the same activity they failed;
 - 20.5 not require a notice of sanction under section 252 of the Act prior to a non-financial sanction being imposed. Instead, MSD will be required to give a written notice when a non-financial sanction is imposed specifying the type of non-financial sanction to be imposed, the duration and requirements of the non-financial sanction, and the date on which the non-financial sanction is to take effect;
 - 20.6 require a replacement sanction (being a Grade 1 financial sanction) imposed in lieu of CWE, to take effect on the day that the replacement sanction is imposed;

- 20.7 change the information that is required to be communicated to clients when MSD gives a notice of a sanction under section 252 of the Act.

I intend to introduce additional non-financial sanctions through Select Committee

- 21 In addition to the two non-financial sanctions currently included in the Bill, I intend to include a further two through an amendment at the Select Committee stage of the Bill:
- 22 requiring a client to report on their job search on a weekly basis (Report Job Search);
- 23 requiring a client to complete a set amount of employment-related activities every week (Upskilling).
- 24 As these are still under development, I intend to introduce them through the Departmental Report at the Select Committee stage of the Bill. To facilitate this, I am seeking delegated authority to take policy decisions on behalf of Cabinet in relation to these two additional non-financial sanctions. I note that Cabinet has previously delegated authority for me to take decisions related to Money Management and Community Work Experience as part of the drafting process [CAB-24-MIN-0257.01 refers].

Please note: Paragraph 24 contains an error. The reference in the brackets should be read as [CAB-24-MIN-0295.01]

Contentious items

- 25 On 14 August 2024, I announced the commencement of Phase 1 of the Traffic Light System and signalled further changes to the obligations and sanctions regime from 2025 through Phase 2.
- 26 Following my announcement, there was a large degree of media attention around the incoming non-financial sanctions, in particular the potential implications of Money Management. There was also a range of commentary and questions about how these changes would affect those with health conditions or disabilities. I expect MSD to explain the changes contained within this Bill to affected clients, and that their messaging clearly communicates to clients how they will be affected.

Impact Analysis

- 27 In accordance with the necessary requirements, a Regulatory Impact Statement was prepared for the policy items in the Bill (Regulatory Impact Statement: Changes to welfare settings to support people into employment and off benefit, dated 31 July 2024). This was submitted in August 2024 when Cabinet approval for the policy items was sought.
- 28 The Regulatory Impact Statement was reviewed by a panel of representatives from the Ministry of Social Development. It received a 'partially meets' rating against the quality assurance criteria for the purpose of informing Cabinet decisions. This assessment recognised that there were constraints on the range of options able to be considered by the authors and no public consultation on the proposals.

Compliance

- 29 The Bill complies with the following:
- 29.1 the disclosure statement requirements (the disclosure statement is attached to this paper);
 - 29.2 relevant international standards and obligations;
 - 29.3 the Legislation Guidelines (2021 edition), which are maintained by the Legislation Design and Advisory Committee.⁶
- 30 MSD will carry out a comprehensive risk assessment prior to implementation to ensure that the operationalisation of the policies within the Bill comply with the principles and guidelines set out in the Privacy Act 2020.
- 31 My officials have advised me that the Bill is unlikely to comply with the principles of the Treaty of Waitangi. However, my view is that Māori are more likely to benefit from the policies contained within the Bill, due to their disproportionate representation in the affected cohort, and that these changes will help support them into employment.
- 32 I note that the Ministry of Justice will complete vetting of the Bill with respect to its consistency with the rights and freedoms contained in the New Zealand Bill of Rights Act 1990 and the Human Rights Act 1993. I consider that there are no significant implications to rights and freedoms under these Acts. s 9(2)(h)
- [REDACTED]
- [REDACTED]

Consultation

- 33 This paper and the attached Bill were circulated to the following government departments for consultation: Department of Internal Affairs, Health New Zealand – Te Whatu Ora, Inland Revenue, Office for Seniors, Office of the Privacy Commissioner, Oranga Tamariki, Ministry for Ethnic Communities, Ministry for Pacific Peoples, Ministry for Primary Industries, Ministry of Business, Innovation and Employment, Ministry of Education, Ministry of Housing and Urban Development, Ministry of Justice, Ministry of Youth Development, Social Investment Agency, Te Arawhiti, Te Puni Kōkiri, The Treasury, Whaikaha – Ministry of Disabled Peoples. The Department of the Prime Minister and Cabinet was informed.
- 34 The Office of the Privacy Commissioner has requested the inclusion of the following comment: “The Privacy Commissioner was not consulted during the policy development of the 26-week re-application and non-financial sanction initiatives as required by the Cabinet Manual. Automated Decision Making (ADM) can provide significant efficiencies, but we also know from overseas experience that it needs to be used judiciously and with care to avoid privacy and other harms to individuals. It is

⁶ In the drafting of this Bill, officials met with the Legislation Design and Advisory Committee (LDAC) to discuss the legislative design of non-financial sanctions. Following LDAC’s advice, the Bill has been drafted with significant policy matters and details of non-financial sanctions in the Act, with minor and technical matters of the non-financial sanctions set out in the Regulations.

not clear from the documentation that privacy risks were assessed as part of the policy development process. The Privacy Commissioner expects to see privacy risk analysis built into all phases of a policy initiative life cycle (from inception to implementation), and see that analysis reflected in the Cabinet papers and supporting documentation to ensure decision-makers are well informed.”

Binding on the Crown

- 35 The principal Act and secondary legislation this Bill amends – the Social Security Act 2018 and Social Security Regulations 2018 – are binding on the Crown.

Allocation of decision-making powers

- 36 The Bill does not involve the allocation of decision-making powers between the executive, the courts, and tribunals.

Associated regulations

- 37 The current Social Security Act 2018 includes provisions empowering the making of regulations (the Social Security Regulations 2018).

- 38 The Bill amends the Regulations by:

38.1 setting out minor and technical matters relating to non-financial sanctions (i.e. Money Management and Community Work Experience);

38.2 updating references to the existing money management regime (for youth services), to ‘youth money management’;

38.3 changing the expiry date for Jobseeker Support;

38.4 setting out the reapplication requirements for Jobseeker Support including exceptions from and extensions to the requirements, and for the conditional payment of specified benefits and other assistance during any extension period. These same changes are also made in respect of the requirements for regrant of specified benefits (currently is Sole Parent Support).

- 39 To allow for the effective implementation of the policies within the Bill, I am also seeking agreement to the inclusion of new regulation-making powers in the Act. These are in relation to Phase 2 of the Traffic Light System, and relate to:

39.1 the required manner of payment for Money Management (e.g. the proportion of a person's main benefit on Money Management or the definition of participating supplier);

39.2 the duration of Money Management and Community Work Experience;

39.3 the required hours per week of Community Work Experience.

- 40 s 9(2)(h) the Bill also includes an empowering provision to make regulations prescribing transitional or savings provisions related to amendments within this Bill. This includes a sunset

provision, to enable any regulations made under it to cease to have effect on 1 July 2028.

Other instruments

41 The Bill does not include any provision empowering the making of other instruments that are deemed to be legislative instruments or disallowable instruments (or both).

Definition of Minister/department

42 The Bill does not contain a definition of minister, department, or chief executive.

Commencement of legislation

43 The Bill comes into force on 26 May 2025 for changes relating to the Traffic Light System and on 1 July 2025 for changes relating to 26-week reapplications.

Parliamentary stages

44 I propose the Social Security Amendment Bill be introduced to the House of Representatives on 10 December 2024 to be passed by May 2025.

45 I propose that the Bill be referred to the Social Services and Community Select Committee for consideration to report back on 22 April 2025.

Communications

46 I will make an announcement about the proposals in the Bill when it is introduced.

Proactive Release

47 I intend to proactively release this Cabinet paper and associated minutes with appropriate redactions when the Social Security Amendment Bill is introduced. The expected introduction date for this Bill is 10 December 2024.

Recommendations

I recommend that the Cabinet Legislation Committee:

1 s 9(2)(ba)(ii) [Redacted]

2 **note** that in August 2024, Cabinet agreed to [SOU-24-MIN-0096 and CAB-24-MIN-0295.01 refer]:

2.1 introduce the Traffic Light System for benefit recipients and their partners (supporting the existing graduated sanctions regime) to communicate that clients must comply with their obligations or risk being sanctioned;

2.2 introduce a 26-week benefit expiry and reapplication requirement for clients on Jobseeker Support.

- 3 **note** that the Bill amends the Social Security Act 2018 and Social Security Regulations 2018 to:
 - 3.1 introduce non-financial sanctions of Money Management and Community Work Experience at the red level of the Traffic Light System for a first obligation failure;
 - 3.2 extend the period that obligation failures are counted against a client from 12 to 24 months, unless they are a client with youth activity obligations;
 - 3.3 require applicants of certain benefits (and their spouses or partners) to complete a Jobseeker Profile as a mandatory pre-benefit activity;
 - 3.4 introduce a 26-week expiry for Jobseeker Support and require recipients and their partners (if they have a partner included in their Jobseeker Support benefit) to reapply for their benefit every 26-weeks, replacing the current 52-week reapplication;
 - 3.5 remove annual income charging, and the full-time employment exemption period, for Jobseeker Support clients and introduce a weekly income charging requirement for all Jobseeker Support clients to align with the 26-week benefit expiry;
 - 3.6 introduce transitional arrangements for 26-week reapplications, with specific transitional arrangements for those clients on Jobseeker Support receiving a sole-parent or grand-parented rate of benefit or who have their income assessed over 52-weeks to manage the change to weekly-income charging;
 - 3.7 expand the current limited enabling provision to allow for automated decision-making to deliver the proposals in this Bill;
 - 3.8 introduce technical amendments to ensure the effective operation of the obligations and sanctions, and exception and extensions, regimes;
- 4 **agree** for the Minister for Social Development and Employment to introduce two additional non-financial sanctions of Upskilling and Report Job Search at the Select Committee stage of the Bill;
- 5 **authorise** the Minister for Social Development and Employment to take policy decisions on the two additional non-financial sanctions to finalise draft legislative amendments that would implement these proposals in line with the overall aims of the Traffic Light System;
- 6 **agree** for the inclusion of regulation-making powers in the Bill that enable:
 - 6.1 transitional and savings provisions concerning amendments made by the Bill to address any unintended outcomes from implementation, with a sunset provision to revoke this power after three years;
 - 6.2 minor and technical details for non-financial sanctions;

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- 7 **note** that the Minister for Social Development and Employment made a number of decisions under delegated authority to finalise draft legislation (see **Appendix 1**);
- 8 **authorise** the Parliamentary Counsel Office to make editorial corrections, or other non-substantive (policy neutral) drafting changes, to the Bill in preparation for introduction to the House of Representatives;
- 9 **approve** the Social Security Amendment Bill for introduction, subject to the final approval of the Government caucus and sufficient support in the House of Representatives
- 10 **agree** that the Bill be introduced before the end of 2024;
- 11 **agree** that the Government propose that the Bill be:
 - 11.1 referred to the Social Services and Community Select Committee for consideration;
 - 11.2 reported back to the House by 22 April 2025; and
 - 11.3 enacted by 26 May 2025 for changes relating to the Traffic Light System and 1 July 2025 for changes relating to 26-week reapplications.

Authorised for lodgement

Hon Louise Upston

Minister for Social Development and Employment

Appendix 1: Policy decisions made under delegated authority

Money Management as a non-financial sanction

- 1 Cabinet has previously agreed to several settings of Money Management. I have taken the following further decisions in line with this agreement to finalise drafting of the Bill:
 - 1.1 The payment card for Money Management can only be used for groceries, transport, healthcare-related items, and education-related items;
 - 1.2 Existing references to Money Management for the youth service in the Social Security Act 2018 will be renamed as ‘Youth Money Management’ to create distinction from the Money Management non-financial sanction;
 - 1.3 Providing MSD the ability to transfer any money remaining on a payment card to a client after they have recompiled with their obligations, completed Money Management and returned to the Green setting of the Traffic Light System, noting that clients will be encouraged to continue using the payment card until the balance is depleted.

Community Work Experience as a non-financial sanction

- 2 Cabinet previously agreed to the high-level settings, but not the specific policy design, of Community Work Experience (CWE) as a non-financial sanction. As such, I have made the following decisions under my delegated authority to finalise draft legislation:
 - 2.1 Clients who are given CWE as a non-financial sanction have up to two weeks to search for a position(s) with a suitable community or voluntary sector organisation. The position(s) must be for a total period of at least five hours per week over a duration of four weeks. To re-comply with their obligation failure, the client must (instead of remedying their original obligation failure) find and complete their position for the hours and duration specified above.
 - 2.2 If a client fails to find a position within the two-week search period or complete the position for the hours and duration specified, without good and sufficient reason, they will be deemed to have failed to re-comply. At this point, clients will be subject to a non-compliance pathway which includes a 100 percent suspension of their benefit, except for clients with dependent children who retain 50 percent payment protection. Clients who are noncompliant will have their benefit cancelled if they do not re-comply within 13 weeks of the initial sanction being imposed. To re-comply, the client will need to complete an activity that is the same or substantially similar to the obligation they failed, rather than complete CWE, in order to return to Green.
 - 2.3 If the client does have a good and sufficient reason for not finding a position within the two-week search period or completing the position for the hours and duration specified, MSD will replace CWE with a replacement sanction, being a Grade 1 financial sanction. The client will then be required to remedy their original obligation failure by completing an activity that is the same or

substantially similar, rather than being required to complete CWE, to reapply and return to Green.

- 2.4 The scope of organisations that will be appropriate to offer positions for clients sanctioned with CWE will be community organisations with established MSD relationships and other community or voluntary sector organisations (e.g. sports clubs).
- 2.5 Clients will be able to complete the requirements of CWE through multiple positions (e.g. three hours per week with one provider, and two hours per week with another). If a client intends to meet the requirements of CWE this way, they must confirm their intent and the placements during the initial search period.

Mandatory Jobseeker Profiles as a pre-benefit activity

3 Cabinet have previously agreed to several settings of mandatory Jobseeker Profiles (JSPs) as a pre-benefit activity. In addition, I have agreed to the following additional decisions on the settings of JSPs:

- 3.1 There will be no time limit specified in legislation in which MSD must assign a JSP on a mandatory basis, but MSD must do so before the benefit commences.
- 3.2 Spouses and partners of people applying for, or whom MSD considers the appropriate assistance is, Jobseeker Support, Sole Parent Support or Emergency Benefit, and their spouses or partners, will also be required to complete a JSP as part of the applicant's benefit application.
- 3.3 Applicants of relevant benefits (and their partners, if any) will be required to complete a mandatory JSP regardless of whether they have work-test or work preparation obligations, except for applicants for Emergency Benefit, who will only be required to complete a JSP if they will have work-test or work preparation obligations set as a condition of grant.
- 3.4 Applicants who are assigned a JSP on a mandatory basis will have 20 working days to complete it from the date the applicant first contacts MSD to have the benefit application considered.
- 3.5 MSD can extend the 20 working-day period to complete a JSP, before or after this period has elapsed, if the applicant or their partner has good and sufficient reason for not completing it within that original timeframe but is still required to complete one to have the benefit application considered.
- 3.6 MSD can revoke the requirement for an applicant or their partner to complete a mandatory JSP should it no longer be reasonable for them to complete one, at which point their application for a benefit may be considered without a JSP.
- 3.7 If the partner of the primary applicant does not provide their completed JSP within 20 working days from the date of the applicant's first contact with MSD, and the applicant has completed their JSP, then the applicant receives

Please note: Para 3.3 contains an error. applicants for Emergency Benefit will only be required to complete a Jobseeker Profile if they are likely to have work-test obligations (i.e. work preparation obligations would not be included in this cohort).

half the applicable rates of benefit or supplementary assistance until their partner provides a completed JSP, at which point they will receive the full rates of the benefit/supplementary assistance.

26-week reapplications

- 4 In addition to the decisions approved by Cabinet [SOU-24-MIN-0096 refers], I have made the following additional decisions on the settings of 26-week reapplications:
 - 4.1 The following clients can be exempt from the employment engagement component of the 26-week reapplication, reflecting that it would not be necessary and/or appropriate for their circumstances:
 - 4.1.1 those with a full exemption from all of their work obligations (full-time or part-time) or work-preparation obligations in the specific circumstances as described at the time of benefit expiry
 - 4.1.2 clients receiving Jobseeker Support on the ground of a health condition, injury or disability (JS-HCID) with a job to return to (and a confirmed return to work date).
- 5 In addition to Cabinet's agreement on the suite of transitional arrangements, I have agreed to align the removal of a client's temporary full-time employment exemption with the removal of annual income charging. This is because neither of these provisions are workable with the move to a 26-week expiry.
- 6 Cabinet previously agreed to apply the existing exemptions and discretionary timeframe extensions that apply to the 52-week reapplication process to the 26-week reapplication process. In order to ensure the framework is cohesive with the 26-week expiry and design, I have agreed:
 - 6.1 to remove MSD's discretion when granting an exemption from benefit expiry (and the reapplication process), and to allow an exemption to be granted automatically if a client meets the exemption criteria by factual determination for both JS and Sole Parent Support recipients (to achieve this, PCO recommending making this a statutory exception, rather than an exemption)
 - 6.2 to specify that the expiry date is reset to 26-weeks for JS and 52-weeks for SPS after an exemption is applied
 - 6.3 that when a client or partner (if any) is granted an extension to complete the reapplication process, their benefit (including supplementary assistance) is provisionally paid through the extension period while the client completes the requirements for regrant
 - 6.4 that when a partner has specific circumstances that align with an exemption reason (e.g. they are in residential care) and cannot complete the 26-week reapplication, they will not have any requirements for regrant, (noting that the primary client will still have to meet the requirements).