



**Social Security Advisory Committee Response
- Consultation: The Social Security (Lone
Parents and Miscellaneous Amendments)
Regulations 2008.**

**A response from the Ingeus Centre
for Policy and Research**

June 2008



WorkDirections is a member of the Ingeus Group of Companies



Social Security Advisory Committee Response - Consultation: The Social Security (Lone Parents and Miscellaneous Amendments) Regulations 2008.

The Ingeus Group, of which WorkDirections is a subsidiary, has over 18 years' experience of delivering welfare-to-work programmes in the UK, France, Germany, and Australia. In the UK, WorkDirections currently operates six Pathways to Work contracts, four Employment Zones and two Private Sector Led New Deal contracts.

The Ingeus Centre for Policy and Research exists to provide policy makers with operational insights, and to ensure that the experiences of our clients and staff are central to decisions made about the future of welfare-to-work policy.

Since April 2004, WorkDirections has assisted over 4,000 lone parents into employment, with 76% sustainability at 13 weeks. WorkDirections engages voluntary lone parent clients on our Employment Zone and New Deal contracts, located in London, Birmingham and Nottingham. Our response to this consultation is based upon the expertise gained through this practical experience.

Lone parents and Jobseeker's Allowance

WorkDirections firmly believes that increasing the employment rates among lone parents is important and beneficial, both to the well-being of the families involved, and to achieving the Government's goals of eradicating child poverty by 2020. In order to maximise positive impacts, employment must be sustainable. It must also accommodate the caring responsibilities held by the parent, and ensure financial stability for the family.

WorkDirections has long argued for increasing levels of engagement with lone parents. We are, however, concerned that the existing proposals may be imposing conditionality beyond a level which is of benefit to the client group. This response reflects our experience of delivering employment support to this client group.

Our experience of working with lone parents has shown that mandating engagement, rather than activity, can be very effective. Compelling lone parents to attend Work-Focused Interviews (WFIs), enables them to learn about their options for engaging with voluntary employment support. This approach affords lone parents the option to choose what is in the best interests of both themselves and their children at any given point. We would like to see the piloting of additional conditionality attached to Income Support, by increasing the regularity of mandatory WFIs, and reassessing their content and delivery. Increasing the effectiveness of these interventions should reduce the numbers of lone parents for whom a claim for Jobseeker's Allowance (JSA) would become necessary.

Lone parents must be fully aware of, and prepared for, the forthcoming changes to their benefit. Our experience of 'Options & Choices' sessions is that they are helpful and



informative, but poorly attended¹. Low attendance levels are attributed to the voluntary nature of participation. Particular attention should be paid to those who fail to attend, to ensure that all individuals receive the same information and are equally prepared for the benefit changes.

Proposed changes to Jobseeker's Allowance

WorkDirections welcomes the changes that are being made to the JSA regime in order to prepare for the benefit changes starting in November 2008. The right to specify hours of availability for work is key to ensuring that the employment secured is sustainable. Unreasonable, inflexible, or irregular hours of work may result in a decision by a parent to leave employment to ensure family stability. It is vital that all this policy initiative is successfully converted into everyday practice by front-line Jobcentre staff, to ensure that lone parents benefit from the regulations designed to protect them.

In addition to the proposed regulations, we suggest a guarantee for lone parents, enabling them to specify the kind of work they would like to do. Currently, JSA claimants are entitled to nominate and pursue a specific job goal if they have recent work experience in this area. Many lone parents moving onto JSA will have been out of work for a significant number of years. Going back to work provides the opportunity to look at new career goals related to skills they may have gained since becoming a parent.

Operational experience has taught us that lone parents respond well, and achieve better employment outcomes, when supported by a specialist advisor within a generalist programme, with sufficient flexibility allowed to tailor support to meet individual needs. Having a dedicated team of advisors for lone parents is particularly effective in building links with local employers and childcare providers who are sympathetic to the constraints to work faced by this group. We would strongly recommend that Jobcentre Plus create teams of dedicated lone parent advisors to work with the new JSA claimants, rather than having mixed caseloads. These teams should receive training in order to prepare them to assist their customers with the specific issues that lone parents may face. Not only would this lead to individual claimants benefiting from accrued specialist experience and knowledge, but should also lead to consistency in decisions regarding 'reasonable' behaviour.

Issues of implementation

There are high levels of apprehension amongst lone parents regarding their forthcoming benefit changes. This is not a result of a desire not to work. Rather, it comes from a number of contributing factors including; previous negative experiences of Jobcentre Plus, fear of sanctions, concerns for the welfare of their children, and diminished confidence in their own ability to secure work. These fears are compounded where information transfer has been poor. We are concerned that lone parents may choose to 'disappear' from the system, and not claim their benefit entitlement, rather than participate in the JSA regime. These actions could have undesirable outcomes for the

¹ Author attended two 'Options & Choices' sessions in Elephant & Castle, London, on 10th June 2008. Out of 50 individuals invited to the sessions, only 16 attended.



individuals and the children they support, and the Government must be cautious to ensure that there is not a rise in hidden poverty as a result of these initiatives.

WorkDirections has been involved in some of the 'Options & Choices' sessions that Jobcentre Plus is now running for lone parents who will be moving onto JSA in November 2008. In our Employment Zone delivery areas we have seen a significant number of lone parents choosing to access voluntary employment support before the benefit changes take place.

Many of those who are taking this option have said that they were previously unaware that specialist employment support was available for them. Of those now participating, the majority have told us that they were also previously unaware of the in-work support available, including in-work housing benefit and in-work credit. A recent Department for Work and Pensions research paper has also recorded the positive impact that effective communication of entitlement to return-to-work support can have:

'Many lone parents were surprised by the volume of support that is available to them and, once they were aware, became more enthusiastic and confident in their ability to return to work in a job that fits their needs.'²

Better communication of existing support available may have increased the participation rates to existing voluntary welfare-to-work programmes.

Delivery of 'Options & Choices' sessions vary between Districts. We have observed changes in referral rates of lone parent clients to our programmes since the 'Options & Choices' events started earlier this year; some have increased, whilst others have declined, which is indicative of the inconsistent messages that lone parents are receiving. Consistency of communication and opportunity is necessary to ensure that all lone parents are receiving the information required on the support available.

Rights and responsibilities

'Ready for work' states that:

'Lone parents moving onto Jobseeker's Allowance will have to be actively seeking and available for work and with these increased obligations will come increased support. This will consist of quality and affordable childcare, suitable and flexible jobs and services which will help lone parents find, remain and progress in work'³.

WorkDirections recognises the numerous support mechanisms in place to assist lone parents into sustainable employment. However, while additional conditionality has been introduced swiftly, some key support mechanisms are taking longer to implement.

² Dr. Sarah Jenkins (2008) 'Extension of the New Deal Plus for Lone Parents Pilot to Scotland and Wales: Qualitative Evaluation'. Available at: www.dwp.gov.uk/asd/asd5/rports2007-2008/rrep499.pdf

³ Taken from www.dwp.gov.uk/welfarereform/parents.asp accessed on 5th June 2008.



One of the key initiatives intended to facilitate the move of parents into sustainable employment is access to the proposed Adult Advancement and Careers Service (AACCS). This service is not anticipated to be rolled out nationally until 2010; two years after the benefit changes commence.

WorkDirections supports the proposals to give lone parents a Skills Health Check when their youngest child reaches the age of five. This will give lone parents two years during which to access skills training appropriate to their needs while still claiming Income Support, and will provide an opportunity to increase their chances of securing good quality employment significantly. This is particularly important as many lone parents have low qualification achievement. Those who do hold qualifications may find that they are now out-dated, or irrelevant to the career they now wish to, or are able to, pursue. It is our experience that this is most true for those who have been out of employment for longer, and therefore will be a particular issue for individuals moving onto Jobseeker's Allowance first, 58% of whom have been claiming Income Support for five years or more⁴.

Forty per cent of the lone parents we have spoken to for this response perceive themselves to have a skills need, or have cited a desire to access training prior to seeking employment. The proposals included in 'Work Skills', published jointly by the Department of Work and Pensions and the Department for Innovation, Universities and Skills, are very encouraging⁵. Skills Accounts need to be made accessible to lone parents as quickly as possible, with sufficient childcare support and benefit flexibilities in place to aid and encourage parents in their learning.

We understand that lone parents currently accessing skills training through New Deal for Lone Parents (NDLP) will be permitted to continue to claim Income Support 'for a period' until this training is complete. We would like to see all lone parents on JSA given the opportunity to utilise extended training allowance periods in order to access high quality work-focused learning opportunities.

Childcare

WorkDirections is encouraged by the understanding that childcare needs to be available, and convenient, and also affordable as a percentage of net income. This is particularly relevant for the many lone parents who enter part-time and low-paid employment. We endorse the proposed regulation which allows a lone parent up to 28 days to commence employment, rather than the current expectation that JSA claimants can start work immediately. Suitable childcare arrangements should be at the heart of considerations as to whether or not a job is suitable for a lone parent to accept. This is particularly the case for parents of children over the age of eight for whom there is a recognised lack of adequate out-of-school provision.

⁴ Author's own analysis. Figures taken from the DWP tabulation tool, available at: www.dwp.gov.uk/asd/statistics.asp

⁵ We particularly support the move to fund retraining for unemployed individuals up to Level 3 qualifications. DWP and DIUS (2008) 'Work Skills'. Available at: <http://www.dius.gov.uk/publications/workskills.pdf>



It must remain the right of the parent to decide at what age a child is old enough not to require childcare arrangements to be made. Consultations have shown that lone parents would not be happy for their 12 year-old child to go back to an empty home alone after school, and also feel that their older teenage children would be at risk if left alone:

“I want to raise a healthy, balanced child, not a 12-year-old latchkey kid who does not see enough of his mother and consequently turns to delinquency, drugs, gangs in the absence of good parenting.”⁶

“At the age of 11, you can’t leave them. You shouldn’t really be leaving them until they’re 14. So what am I supposed to do? So do I now accept that I can’t work for the next three years?”⁷

Whilst it is not illegal to leave a child at home alone, parents can face charges of ‘wilful neglect’ for any child under the age of 16. Concerns for the safety and well-being of children must be considered equally valid, regardless of their age.

The Government stated that all parents would be assisted in securing employment by the roll-out of extended hours in schools. By 2010, all primary and secondary schools will be required to provide year-round activities for children between 8 am and 6 pm, five days a week. However, the target for 2008 is for a third of schools to achieve this level of support. Existing childcare options for older children are often not meeting the needs of parents who wish to work⁸. Without a comprehensive, reliable, affordable and trusted network of quality childcare for school-age children, many lone parents will continue to feel unable to work outside of school hours. This, in turn, will significantly restrict the type of work they can do.

Communication and integration of services

Fragmentation, unclear signposting, duplication and poor communication between services can lead to real issues for users:

“For example, a client has a child with a statement of SEN and the child needs to be taken to a counsellor every Tuesday lunchtime. The school has relied on the mother - my client - to do this. She has told the school that she needs to get a job and that alternative provision needs to be discussed but the school is not cooperating. My client feels she cannot work Tuesdays and, for her job goal, this is going to be a big barrier.”

- *WorkDirections Lone Parent Advisor, Westminster New Deal.*

Jobcentre Plus needs to take the lead in liaising with local organisations such as schools, health professionals and others, to ensure that they are correctly informed about the forthcoming policy changes.

⁶ Individual response to ‘In work, better off’ cited in ‘Ready for Work’

⁷ Lone parent from Birmingham cited in Daycare Trust (2007) ‘Listening to lone parents about childcare’. Available at: www.daycaretrust.org.uk/mod/fileman/files/Listening_to_lone_parents_about_childcare_-_final_web.pdf

⁸ Ibid.



WorkDirections clients have experienced difficulties when moving from Income Support to Jobseeker's Allowance once their youngest child reaches the age of 16. This has led to significant debt acquisition in order to retain existing housing, as local authorities have assumed that because Income Support payments have stopped, all benefit entitlement has been lost. In order to minimise incidents of this nature when the benefit changes are implemented, Jobcentre Plus staff must begin working with local authorities to ensure that the transition of benefits is as seamless as possible; and that out-of-work-dependent benefits, such as free school meals, are not lost in the interim.

Sanctions

Increased conditionality inevitably carries an increased risk of benefit sanctions. Over the past few years there has been a significant rise in the number of benefit sanctions faced by lone parents. This has not, however, been accompanied by a comparable rise in the number of lone parents in employment.

Sanctions for lone parents are currently capped at a 20% reduction of benefit. This is to ensure that, despite the actions of the parent, there is continued provision to allow for the needs of the child(ren) involved. For individuals claiming JSA, 100% of benefit can be removed during a sanction. It is currently unclear whether the cap on benefit sanctions for lone parents will remain under the JSA regime.

The regulations concerning a lone parent's opportunity to explain missed appointments within a set period of time allows some of the necessary flexibility that lone parents will require. Our experience has shown that, despite the very best intentions of the parent, appointments occasionally have to be cancelled and rearranged at short notice due to caring commitments. For this system to provide the desired flexibility, the process for reporting missed appointments must be quick, efficient and reliable. We would recommend allocating a designated contact at each Jobcentre Plus, preferably with a dedicated phone number. This should ensure that parents are able to call to report their absence, knowing that their call will be answered promptly. If the system for recording absence is too confusing, unreliable, or badly organised, there is the risk that families will face unnecessary sanctions.

Lone parents with younger children

On our Employment Zone programmes, lone parents can self-refer for specialist employment support, regardless of the age of their youngest child. The new regulations have focused very heavily on lone parents of older children, but have not accounted for the needs of lone parents with pre-school children. Whilst for some, contemplating work before their child starts school would not be right, and we support that choice. For others, work is the right option and should be encouraged. We have had lone parents come to us with children as young as six months old, fully committed to returning to work. We urge the Government to consider allowing lone parents with younger children the opportunity to access the support of Flexible New Deal providers voluntarily, in order to ensure that this group is not left without access to specialist provision until the point where their youngest child reaches seven.



New benefit claims made by lone parents with older children

According to the Department for Work and Pensions' most recent figures, in 2005 - 2007 over 36,000 new claims for Income Support had been made by families with a youngest child over the age of 11⁹. There are many reasons for fresh claims being made, although a significant number of parents become single once their youngest child has passed the age at which additional conditionality will be applied immediately.

Becoming a lone parent with children of this age inevitably involves some form of family trauma - be it relationship breakdown, bereavement, or otherwise losing a parental figure. Aside from the emotional strain that these events inevitably cause, they are often accompanied by the need to overhaul family life, including moving home and changing childcare arrangements. During such times, the focus of the parent is, and must be, to retain family stability as much as possible and to guarantee the welfare of the children involved.

WorkDirections does not believe it would necessarily be in the interest of these families to join the JSA regime initially. We therefore propose a three-path choice for new benefit claimants with older children. These options would be explained and the appropriate option determined at the first point of contact with the benefits system. These options must be offered with a 'no wrong door' approach.

- 'Option 1' would be for the lone parent to elect to go straight onto Jobseeker's Allowance from day one. We would advise that individuals who take this option were fast-tracked to a Flexible New Deal provider where they could receive flexible specialist assistance, tailored to their needs.
- 'Option 2' would offer a 'Stabilising Period'. We propose that new lone parents would be able to opt for a six-month period in which they could claim Income Support before moving onto JSA. This period would give them time to make any adjustments and preparations concerning housing and childcare, and would also allow added time to ensure the welfare of their children. During this period, lone parents would be expected to attend a WFI at three and five months into their claim. These would be conducted in the same way as the final quarterly WFIs before moving from Income Support to JSA in order to inform and prepare the individual for the benefit change at six months into the claim.
- 'Option 3' would refer the claimant to the Adult Advancement and Careers Service for a full Skills Health Check. Assuming that there is a skills need, they would be able to access the same options for training made available to lone parents whose youngest child reaches the age of five. These lone parents would be moved onto a training allowance for a maximum of two years, dependent on their continued participation in work-focused training, as recommended by their skills advisor. Once this training was completed or otherwise ended, the claimant would move onto JSA. We anticipate that, during this time, learners would still attend quarterly WFIs at Jobcentre Plus to maintain a focus of returning to work.

⁹ Author's own analysis. Figures taken from the DWP tabulation tool, available at: www.dwp.gov.uk/asd/statistics.asp



For all options, we would recommend the fast-tracking of individuals straight to Flexible New Deal provision once they became subject to mandatory job-seeking activities.

We would recommend that these options were only open to individuals who had not made a claim for out-of-work benefits in the previous two years, except in extreme circumstances, such as the death of a partner.

Conclusion

WorkDirections supports the principles behind the decision to move lone parents onto Jobseeker's Allowance as part of wider welfare reforms and increased rights and responsibilities. Whilst work is key to alleviating poverty amongst lone parent families, conditionality must be delivered alongside high quality flexible employment support which is tailored to the needs of each individual. We are encouraged by the regulations being considered, and the steps they take to accommodate the diverse and complex needs of lone parents. However, the Government must ensure that the real-life experiences that lone parents encounter as a result of benefit changes match the positive intentions of the policies implemented.



WorkDirections and the Ingeus Group

WorkDirections is a member of the international Ingeus Group of companies which provides effective, accountable welfare-to-work services. The Group, which has been operating since 1989, currently delivers services in the UK, France and Germany.

The Ingeus Centre for Policy and Research produces original position papers, responses to government consultations and business development activity in the countries in which we operate.

- Launched in the UK in November 2002, WorkDirections UK supports socially excluded and disadvantaged individuals to find suitable and sustainable employment.
- Our welfare-to-work operations assist people who have become long-term unemployed, as well as single parents, and those who are not working as a result of health issues.
- WorkDirections UK is delivering six three-year **Pathways to Work** programmes from December 2007 which will allow us to support over 98,000 Incapacity Benefit claimants in the London, Birmingham, Nottinghamshire and Edinburgh areas. In Birmingham, the Pathways to Work programme replaced our **New Deal for Disabled People** programme which we ran for over three years.
- We also deliver **Private Sector Led New Deal** programmes in Central and West London, and **Employment Zones** in Nottingham, Birmingham, Brent, Haringey and Southwark.
- In spring 2008, we were awarded contracts to deliver the **New Deal for Disabled People** programme in Dorset and Somerset, as well as programmes funded by the **European Social Fund** in Central London and Lambeth, Southwark and Wandsworth, and a programme funded by the **Tower Hamlets Primary Care Trust**.

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