



Work & Pensions Select Committee Inquiry into the role of Jobcentre Plus

Joint submission from DrugScope & Homeless Link – May 2013

Summary

1. DrugScope is the leading UK charity supporting professionals working in drug and alcohol treatment, drug education and prevention and criminal justice. It is the primary independent source of information on drugs and drug related issues. DrugScope has around 450 members, primarily treatment providers working to support individuals in recovery from drug and / or alcohol use, local authorities and individuals.
2. Homeless Link is the national umbrella organisation for frontline homelessness charities in England. Currently we have more than 500 member organisations. As the collaborative hub for information and debate on homelessness, we seek to improve services for homeless people and to advocate for policy change. Through this work, we aim to end homelessness in England.
3. Research suggests that around 80% of almost 300,000 problematic drug users (i.e. those using crack cocaine and / or heroin) in the United Kingdom are unemployed, and that they make up almost 7% of the working age population on benefits in England.¹ Other studies² have shown that the overwhelming majority of homeless people want to enter paid employment but that the percentages which succeed are tiny.
4. Both organisations welcome the commitment given by government to prioritise the role of paid employment as a sustainable route away from homelessness and supporting recovery from substance dependence in the 2011 Vision to End Rough Sleeping³, the 2010 Drug Strategy⁴ and the 2012 Social Justice Strategy⁵. Whilst we share the government's aspiration that disadvantaged individuals can lead active, healthy and fulfilling lives, more progress is needed.
5. In this response, we have not covered all the areas raised by the Committee, instead have concentrated on where we feel able to offer particular insight.

¹ <http://research.dwp.gov.uk/asd/asd5/rports2009-2010/rrep640.pdf>

² http://www.crisis.org.uk/data/files/admin_uploads/WILLOW/no_home_no_job.pdf

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6261/1939099.pdf

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118336/drug-strategy-2010.pdf

⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/49515/social-justice-transforming-lives.pdf

6. In this summary, we would like to raise some key points before the Committee which are elaborated on elsewhere in the document:

- The effective delivery of Jobcentre Plus (JCP) services is reliant upon front-line staff understanding the needs of, and being able to constructively engage with, vulnerable claimants. The evidence that they are consistently able to do so is limited and geographically variable.
- There is a particular issue around identification and disclosure of homelessness and/or substance dependent claimants. If this 'triaging' process does not function adequately, JCP will be unable to fully identify and respond to claimant barriers to employment.
- Resources which could help substance dependent and/or homeless claimants into work are failing to deliver for them. Although the Flexible Support Fund and the Work Programme are both supposed to particularly benefit individuals who are distant from the labour market, they have had limited impact for these client groups.
- The relationship between District JCP teams, local authorities and the voluntary sector varies greatly across the country. Where a joined-up approach exists, a much more holistic service to claimants is delivered. On occasion, we have seen examples which have positively impacted on vulnerable people's lives and could be replicated.
- We are extremely concerned around the delivery by JCP of a tougher sanctions and conditionality regime. The evidence is that this is likely to lead to increased homelessness and destitution amongst some of JCP's most vulnerable claimants.
- Most homeless and substance dependent claimants will find themselves receiving Universal Credit over the next few years. During the roll-out period it is vital that concerns around the implementation of Universal Credit (UC) such as monthly payments, direct payments and digital-by-default are monitored and addressed.

Jobcentre Plus Employment Services

7. **Identifying jobseekers' needs and barriers:** The Minister of State for Employment recently offered in a Parliamentary answer an optimistic analysis of the relationship between DWP front-line staff and vulnerable people stating: *"Jobcentre Plus advisers are equipped with the necessary guidance and training to identify and provide an appropriate level of tailored support for the homeless, as well as other disadvantaged groups."*⁶
8. However, the evidence from those working in the front-line is does not reflect this confidence. The experience of our member agencies is that JCP staff are often unable to identify the needs and barriers of vulnerable claimants such as those who are substance dependent and/or homeless.

⁶ <http://www.theyworkforyou.com/wrans/?id=2013-05-15a.155296.h&s=speaker%3A24763#g155296.q0>

9. In 2012 Homeless Link and others published a report into the Work Programme which found that Job Centre Plus staff were unable to identify homeless people, even including those sleeping on the streets.⁷ Similarly a DrugScope event in 2010 facilitated by JCP Drug Coordinators⁸ concluded that frontline JCP staff urgently need more training to allow them to engage with claimants who may be substance dependent.
10. We acknowledge that there are barriers faced by JCP advisers trying to identify vulnerable claimants who may find substance dependency or homelessness uncomfortable subjects to raise. Claimants may be reluctant to disclose their own circumstances for fear of recriminations or stigmatisation, something the different psychopharmacological effects of some drugs can play a part in.
11. Sadly, the lived experience of many claimants is that JCP staff, and people in positions of authority in general, do not always respond supportively to histories of substance use and homelessness/rough sleeping, but may actually respond negatively or even with hostility. More effort needs to be made to ensure claimants feel safe and are communicated with in a way that encourages them to be open. There are practical things that can make this more likely. For example, one aspect of the move from the traditional Job Centre to the Jobcentre Plus model was a change in the layout of many offices. Something as simple as more privacy may encourage claimants to disclose issues of a highly personal and sensitive nature.
12. **JCP's role as a gateway to Work Choice and the Work Programme:** Amongst many homelessness organisations there is disenchantment about the lack of input they have had into the referral of their clients into contracted-out provision. Many only become aware that their clients have been referred to the Work Programme sometime after it has happened. This may be because JCP staff do not realise that claimants in hostels, for example, are homeless for the purposes of WP referral. This means that people are not placed in the correct claimant group and WP providers are not incentivised at the enhanced rate to work with them. A similar situation exists with substance dependent individuals: often their dependency only comes to light after referral to the Work Programme.
13. For claimants with substance dependency, there has been some encouraging joint working further on in the Work Programme / Work Choice customer journey, although fewer signs of this at the point of referral. Supported by the National Treatment Agency (now Public Health England) and DWP, Work Programme providers have made some progress⁹ in improving joint working between the Work Programme, Jobcentre Plus and treatment providers, but

⁷ <http://homeless.org.uk/news/work-programme-not-working-homeless-people>

⁸ <http://www.drugscope.org.uk/Resources/Drugscope/Documents/PDF/Policy/DSResponse2010DrugStrategyConsultation.pdf> p.70

⁹ <http://www.nta.nhs.uk/uploads/employmentandrecovery.final.pdf> & <http://www.idan.org.uk/PDFs/WorkProgrammeSPOC.pdf>

there is a sense that there are constraints on the effectiveness caused by a lack of staff time and capacity to engage.¹⁰

14. **JCP's use of the (FSF) Flexible Support Fund (individual):** DrugScope and Homeless Link have seen limited evidence of the use of the FSF supporting vulnerable clients become closer to work. There is little to suggest that the Fund is actively promoted to clients to access training, although we are aware of instances where it has been used to provide (for instance) ESOL classes for individuals whose primary barrier to employment is language related or accredited vocational training for individuals with an identified route to employment.
15. **JCP's use of the Flexible Support Fund (supporting partnership working):** We are aware of a few organisations supporting substance dependent and/or homeless clients that are being funded to support JCP in addressing local priorities. In one London borough a homelessness provider has been recently resourced to work in partnership with the local authority to try and increase employment rates amongst households affected by the Benefit Cap. However, the reality is that many services working with vulnerable people are not even aware the fund exists. District Managers do not generally appear to promote opportunities or to publicise local priorities. Even the Commons Library Standard Note¹¹ on the FSF pointed out that *"there is limited information in the public domain"*.
16. Despite this general lack of publicity, we are aware that there have been instances where specialist organisations have been encouraged to apply for FSF funding to deliver training to JCP advisors. Whilst this may be in keeping with the aim of partnership working to achieve common goals, it is surprising that in at least a small number of cases, the FSF may be being used to augment JCP's own training budget.
17. **JCP'S relationship with key stakeholders:** DrugScope and Homeless Link are both aware of instances where highly motivated, specialist staff have been successful in transforming the relationships between JCP and local voluntary sector agencies, broadening the opportunities available to job seeking claimants. In one example from the North-East, resources were made available to provide an outreach service from JCP to a hostel for homeless people where partnership working had been poor and sanctioning levels high. As a result of this improved communication, sanctions reduced by 90% over a relatively short period of time.
18. In April 2009, DWP introduced Drug Co-ordinators using £9m from the Department of Health. This welcome introduction of specialist posts made a substantial contribution to promoting much closer working, including co-location and feeding into commissioning decisions, between JCP and treatment providers. These posts were later converted to Partnership Managers, who have a significantly broader remit. Where the original post

¹⁰ The Committee report on 21/5/13 specifically identifies homeless and substance addicted claimants as two groups let down by the WP <http://www.publications.parliament.uk/pa/cm201314/cmselect/cmworpen/162/162.pdf>

¹¹ <http://www.parliament.uk/briefing-papers/SN06079.pdf>

holder, or an individual with similar interests and skills remains in place, much of this valuable work has continued.

19. Overall, where specialist knowledge is lost, or specialist support is not provided, the level of prioritisation given to vulnerable groups will naturally vary from location to location in keeping with the principles of Freedom and Flexibility¹². Unfortunately, in practical terms this means a different level of understanding and support to claimants based on where their claim is made.
20. In general, homeless and drug and alcohol services are often unaware of the exact role of Job Centre Plus and the external pressures within which JCP services are being delivered. At separate recent events run by both DrugScope¹³ and Homeless Link attended by DWP officials, providers were generally unaware of the service offer currently available for people with histories of drug and / or alcohol or complex needs. Voluntary sector agencies in attendance called for more information and promotion. Greater dissemination of information from DWP would hopefully lead to not only a better understanding on the part of support and/or treatment providers, but also to services being more joined-up for those in most need.
21. It should be noted that there is no direct equivalent in homelessness of the joint working protocols agreed between JCP and the National Treatment Agency (NTA) (now Public Health England). Whilst the effectiveness of this and the accompanying TPR1 & 2 treatment referral system varies by location, it at least makes a clear and unambiguous statement of policy intent.

JCP's Role in relation to rights and responsibilities

22. **Benefit conditionality and the appropriateness of JCP's use of sanctions:** Many clients with issues around drug / alcohol use and/or homelessness will have complicating factors such as mental health problems, poor physical health, cognitive impairment or a range of fluctuating conditions that may affect their ability to understand, remember or abide by benefit conditionality. The 2012 Social Security Advisory Committee report into Universal Credit and Conditionality endorses this view explicitly, stating: "*vulnerable claimants do not set out to be non-compliant but they often lead chaotic life-styles, have poor organisational skills and frequently forget the conditions they are supposed to fulfil*".¹⁴
23. The feedback from homelessness agencies and treatment providers is that benefit suspension is increasing but that many vulnerable claimants affected do not even have a basic understanding of the sanctions regime. People experiencing sanctions frequently fall

¹² DWP have recently described key principles under Freedom and Flexibility as including, "greater local autonomy" and "increased opportunities for Jobcentre Plus services to be delivered in a more flexible way," <http://www.dwp.gov.uk/docs/jpeg/freedom-and-flexibilities.pdf>

¹³ <http://www.ldan.org.uk/employment.html> - event, 3rd May

¹⁴ <http://ssac.independent.gov.uk/pdf/universal-credit-and-conditionality.pdf> p.11

into arrears of rent and bills, face eviction or actually become homeless, in part due to the lack of advice from Jobcentre Plus about potential eligibility for Housing Benefit or Local Housing Allowance. There is a concern amongst voluntary sector agencies that benefit sanctioning will drive disengagement rather than compliance. A 2010 study questioned the value of such blunt instruments in creating behavioural change, stating that evidence suggested that *“sanctions themselves do little to change motivation to work”*.¹⁵

24. In October 2012, the Department for Work and Pensions introduced a new sanctions regime for Job Seeker Allowance (JSA) claimants¹⁶ that provides for significantly longer sanctions, up to 3 years for a third breach of conditionality. This reform emphasises the necessity of ensuring that vulnerable claimants understand conditionality and the risks of breach. The impact of the new regime is exacerbated by the changes to hardship payments due under Universal Credit (UC): payments will become repayable, meaning that an individual unable to comply could have their difficulties compounded by debt owed to the Department. Furthermore, the requirement of claimants to change behaviour to “address the breach” of their claimant commitment to JCPs satisfaction before they can receive hardship payments will increase the likelihood of destitution further.

JCP’S role in supporting a flexible labour market

25. **JCP’s effectiveness in helping people into work:** Most homeless and substance dependent people want to be in paid employment. However, employment rates remain disappointingly low. Member agencies report a range of client experiences at JCP, much as might be expected from an organisation with a large and diverse customer-facing team with varying expertise and experience.
26. The recent introduction of “Freedom and Flexibility” to JCP gives cause for concern¹⁷. Whilst the rationale for allowing local managers to provide the services and interventions they believe will best help them to achieve local priorities is clear, the lack of a defined minimum offer risks those furthest from work being deprioritised and resources targeted more intensively at those closest to the job market. Whilst this may enable rapid benefit off-flows, it raises questions of fairness in access to services, particularly when taken in conjunction with the unclear minimum service offers found in the Work Programme.
27. Front-line services have told us that their clients often feel stereotyped by JCP staff and not given the support they need. The general perception tends to be that claimants who are identified as homeless or as substance dependent are often seen as unlikely to obtain work. Agencies feel more could often be done to identify past work experience, educational attainments and/or transferable skills and match those with appropriate job opportunities

¹⁵ <http://www.jrf.org.uk/publications/review-of-benefit-sanctions>

¹⁶ <http://www.dwp.gov.uk/docs/jsa-sanction-changes.pdf>

¹⁷ DWP have recently described key principles under Freedom and Flexibility as including, “greater local autonomy” and “increased opportunities for Jobcentre Plus services to be delivered in a more flexible way,” <http://www.dwp.gov.uk/docs/jpeg/freedom-and-flexibilities.pdf>

The impact of benefit reforms for JCP staff

28. **JCP staff roles in implementing Universal Credit:** We are very concerned about the pivotal role front-line JCP staff will be expected to play in the delivery of Universal Credit. The light-touch nature of the regulations in many areas gives those dealing directly with claimants a lot of discretion, power and responsibility. We have numerous concerns, some of which are highlighted below.
29. We understand a key policy aim is to encourage households to become accustomed to budgeting and familiar with patterns and routines of paid employment. But there are numerous risks contained within the direct, monthly single payment of UC to a single-person in the household. These include arrears and eviction, increased substance use and domestic violence.
30. We are particularly worried about claimants with health needs who might currently be eligible for Employment Support Allowance. JCP advisors will be expected to allocate these people to conditionality groups on the basis of their interview with them, in advance of any medical assessment. JCP staff are not medically qualified and it is unclear how they will be able to make informed judgements across a broad range of physical and mental health issues.
31. The introduction of tailored conditionality for individuals entering structured, recovery-orientated drug or alcohol treatment is welcome, both to support recovery for the individual in treatment and also to promote closer working between JCP and treatment providers. Its success too will rely on front-line staff being able to encourage disclosure.
32. The Government's Digital-By-Default approach will create practical problems. A recent report by the Office for National Statistics¹⁸ stated that 7.1m adults in the UK had never used the internet. Treatment providers and homelessness agencies generally work with some of the most disadvantaged and socially excluded individuals in the country who are often not part of the "digital revolution".
33. The Local Support Service Framework is intended to facilitate partnerships between JCP and local authorities, ensuring local integrated support to vulnerable claimants to overcome these types of problems. However, details and safeguards remain vague, as highlighted by the Social Security Advisory Committee.¹⁹
34. Lord Freud recently stated in a letter "*We have estimated that around 3.5m people will need some element of budgeting support.*"²⁰ Hence, JCP staff will be expected to identify

¹⁸ http://www.ons.gov.uk/ons/dcp171778_310435.pdf

¹⁹ <http://ssac.independent.gov.uk/pdf/occasional/implementation-uc-claimants.pdf>

²⁰ <http://homeless.org.uk/sites/default/files/site-downloads/Lord%20Freud%20Letter%20to%20IFF.pdf>

potentially millions of claimants who need support and assess what type and level is appropriate (including alternative payments). Given concerns about identification, disclosure and understanding identified elsewhere in this submission, we have concerns about both how accurately and consistently this will happen.

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