



**Helping people achieve their full potential:
Improving Specialist Disability Employment Services**

A consultation submission from ERSA

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About ERSA

ERSA (Employment Related Services Association) is a membership organisation representing 35 providers delivering welfare-to-work programmes. Our membership spans the private and voluntary sector with large, small as well as highly specialised provision. Our membership represents well in excess of 50% of the DWP spend on welfare-to-work programmes. All ERSA members have had the opportunity to input their views into this consultation response.

General Comments

ERSA is pleased to see that the consultation document takes forward the concept that its members have consistently requested, namely providing a customer-focused service that is tailored to individual needs rather than a one-size-fits-all approach, trying to fit a person to the programme criteria. We note that across DWP this more flexible approach is being implemented and we strongly agree that this should also be applied to specialist disability employment services.

Since this consultation document was issued DWP have published their Commissioning Strategy. The Strategy contains a broad set of principles upon which commissioning can be based, setting high and consistent standards for both providers and the Department. DWP must ensure that the Strategy is implemented within any future procurement arising from this consultation to ensure the best outcomes for customers are secured while maintaining value for money for the taxpayer.

Consultation Questions

2. Do you agree that disabled people should only be directed to our specialist disability employment provision where it is unlikely that our other programmes, such as the New Deals, would be effective?

In referring people to specialist disability employment provision we effectively exclude them from the mainstream. Many people currently participating on mainstream programmes have disabilities or health conditions that prevent them from participating effectively in the workplace so placing people into a category of disabled or non-disabled for service provision is not a simple process.

In order to match people to the most appropriate services the customer, where eligible for more than one provision, must be included in any decision taken about which they are referred to. In enabling the customer to make an informed choice about their provision the challenge for the provider is to then offer a service which meets the customers needs effectively and prepares them for employment. This highlights the importance of having broad and flexible provisions to allow the provider to enact a customer-centred programme. It should however be noted that customers with complex support needs are the most expensive to help. If it is simply not possible to support them adequately under the funding available on mainstream provision then the programme participation individuals undertake in practice will largely be driven by the cost of their required support.

3. Are there points of our overall proposal to replace the Job Introduction Scheme, Work Preparation and WORKSTEP with a single programme that you either strongly agree or disagree with?

ERSA strongly agrees that merging these schemes into a single programme is the right way to reform and modernise the provision. With a flexible single provision, providers will be freed up to use their expertise in implementing a support plan which is tailored specifically to the needs of the individual customer.

4. For the Work Entry element of the proposed new programme – how could we best ensure that our providers focus their efforts on all their customers and not just those most likely to get a job?

It is in the nature of specialist programmes that there will be some customers who require more up-front support. In addition to job-outcome payments there would need to be additional payments on completion of milestones for customers requiring pre-employment elements (for instance undertaking voluntary work) set at the start of the customers programme. It is essential the milestones are set on an individual basis according to the customer need rather than as part of a box ticking exercise.

Funding mechanisms can therefore be used to balance financial reward for progression and employment outcomes to overcome concerns about cherry picking. We note that DWP references developing and piloting a distance travelled tool (p.33, Chapter 2, paragraph 47). ERSA members would very much welcome an opportunity to provide input into the tool's development and testing.

5. For the Transitional Supported Employment element of the proposed new programme – is it right that we should introduce a greater focus on helping people progress off the provision and what safeguards and flexibilities would you like to see included?

The emphasis on progression has rightly increased. Nevertheless it is important that customers are progressed only at the right time and with support that is appropriate. The employer should also be involved in the progression process to ensure that all parties are engaged and can contribute to successful progression.

7. What should we do to ensure that consistently high quality standards are delivered?

DWP must engage in robust contract management which addresses poor performance early. Regular quality monitoring based on the Common Inspection Framework will allow quality of provision across the country to be tested. The star rating tool may also provide a mechanism to publish performance data in a standardised format to encourage high standards. The quality of customer experience is also of importance and we welcome DWP's focus on raising customer awareness of feedback (p.54, chapter 4, paragraph 18).

8. What else can we do to improve the way in which DWP's supported employment services for disabled people are delivered?

ERSA believes that longer term contracts are essential to improving services. Not only does this reward success and allow for business planning, it enables the necessary improvements identified in customer feedback and inspections to be implemented. Longer contracts also provide stability for the customer which will be beneficial to their progress to employment.

DWP can facilitate the sharing of best practice to ensure that what has proven to be successful is implemented more widely.

DWP must consider how the new provision will cater for customers with high support needs who are unable to work for more than 16 hours per week (as is the current requirement for WORKSTEP). ERSA would recommend that the new provision is open to customers able to work 8 hours or more per week and requiring in work support to include them within the specialist provision.

DWP must also focus on job retention as a preventative measure to stop individuals coming out of the labour market in the first place by providing support to them and their employer. ERSA would be interested to see how the new provision will link up with the Black Review.

12. We are considering holding an open competitive tender for contracts. For some of our current WORKSTEP customers this could mean their employment support transferring to another provider. What would we need to consider and what actions do you think we would need to take to help make any such transfers a success?

TUPE regulations may mean that the service change perceived by the customer is not so acute. DWP should ensure that the statements on TUPE made in the Commissioning Strategy are upheld in tendering for specialist disability services. There exists however a complex issue around customers on current provision that are directly employed by the provider. This will need to be carefully addressed and ERSA would be happy to work with DWP further to seek a solution to this.

Any change that does occur that will impact upon the service the customer receives must be handled sensitively so that individuals feel secure in the continuation of their provision. It is important that all changes are fully communicated to the customer and an outlet provided for any queries they may have. A transitional staggered handover period between current support, new

support, customer and employer would be beneficial, as would the full handover of existing records relating to provision (in accordance with Data Protection Act).

13. How do you think we could best ensure that we retain the skills of smaller and specialist providers in the proposed open competitive tender of this programme?

ERSA believes that the role of smaller, specialist providers is vital in achieving success with customers furthest from the labour market. DWP's procurement practice is key to sustaining the role of smaller and specialist providers. In ERSA's own membership survey on the Pathways to Work procurement exercise it was highlighted that often DWP's policy intentions were not borne out in procurement and there was a danger of the expertise of smaller organisations being lost.

DWP could undertake a mapping of provision to identify gaps in specialist provision in each area. This will also highlight good local provision that potential prime contractors would want to include in their delivery model. Tenders will need to allow for the ability to sub-contract and including appropriate local and/or specialist experience must be a condition of pre-qualification. It would then be up to the potential prime contractor how to include that expertise within their bid and explicitly state how they would achieve it.

ERSA notes that the Code of Conduct contained in the Commissioning Strategy will be an important step in protecting the expertise of the smaller and specialist provider, and we fully support its introduction.

14. Are there other specific issues we would need to consider in moving to a competitive tender for this provision?

ERSA feels it is essential that DWP identifies the outcomes it wants from this provision, ensures that these outcomes are at the forefront of procurement exercises and that appropriate funding mechanisms are in place to allow the outcomes to be achieved.

15. We are proposing that only Jobcentre Plus Disability Employment Advisers (DEAs) would be able to refer individuals to the proposed new programme. What are your views on this proposal?

ERSA has concerns about this proposal. Although the DEA provides a valuable role in identifying appropriate provision, they are also a gateway to services. Members have highlighted that DEAs in some areas work only on a part-time and term-time only basis and that often there is no holiday or sick leave cover. In some areas there is up to 8 weeks waiting time for a DEA appointment, and due to their pressures of work they are often unable to answer telephone calls.

At the very least there needs to be flexibility for other staff to cover the role and make referrals, otherwise there will be an extremely adverse impact on timescales for referrals and the DEA workload will become unmanageable. Ideally, self-referrals under the new provision will continue as the benefits are significant. The customer will be seen at short timescales and the DEA workload will not increase. One member reports that currently only 35% of their referrals come through DEAs. It seems counter to the aims of the new provision to narrow access rather than widen it. Of course, self-referrals must be made within an agreed process and audited effectively.

16. Do you believe that DEAs should have a higher profile role for people to feedback on the support they receive from our externally delivered provision?

Voluntary customer feedback is essential to monitor the quality of the customer experience and to identify areas in need of change or improvement.

DWP should develop an online and paper based feedback system where customers can report their views on the service they receive. The DEA could make the customer aware of these other feedback routes if they were not willing to do this in person. Feedback given through the provider should also be considered as important as that through the DEA if the customer prefers to give their feedback this way. Many providers already proactively seek the views of their customers in order to make service improvements and to ensure the customer voice is heard.