APPG Inquiry into Youth Employment



Submission by the

British Association for Supported Employment

November 2020

**About us**

BASE is a national membership charity covering England, Wales and Scotland. We have 200 organisational members, ranging from national, commercial providers to local, social enterprises, and including 60 local authorities as well as schools, colleges and NHS Trusts.

BASE is the national trade association for the supported employment[[1]](#footnote-1) sector and our purpose is to support, promote and develop the principles and provision of high-quality supported employment services, a model that has proved internationally successful for over 50 years.

BASE aims to:
• Assist people with disabilities by encouraging the provision of support into employment.
• Endorse & promote quality standards in the delivery of Supported Employment.
• Nurture & encourage the setting up of new supported employment services.
• Promote the training of supported employment personnel throughout the UK.
• Provide regular, detailed information including an advisory & development service to association members.
• Liaise & negotiate with national and international government & non-government organisations to promote the aims of the Association.

**The Education Pathway to Employment**

The numbers are well rehearsed. While the overall disability employment rate has improved to 53.2%[[2]](#footnote-2) and the disability employment gap narrowed slightly, too few people with a learning disability (17% or 5.9% for people known to social care), autism (16%) or using secondary mental health services (8%) are in paid employment. It has long been this way – a 2004 report[[3]](#footnote-3) published by Government in 2006 made 42 recommendations as to how this could be achieved for people with a learning disability. Not enough has changed since then. Indeed, the situation may have worsened as resources become tighter and labour markets change. Our submission focuses on these three cohorts of young people as they are most at risk of ongoing economic exclusion as a result of the Coronavirus pandemic.

There is growing evidence that the pandemic has had a greater impact on disabled people. Labour market analysis by the Institute for Employment Studies has shown the disproportionate effect.

We know that young people are more likely to be working in insecure jobs and working within sectors that have been hit hardest by the Covid-19 restrictions.

Despite examples of excellent practice, many disabled young people were already being failed by an education system that is unambitious and bureaucratic. Despite support from programmes such as Preparing for Adulthood, too many education providers have low aspirations for their learners and lack the skills to fundamentally improve individual outcomes.

For young people with special educational needs and disabilities (SEND), transition planning is underpinned by an Education Health and Care Plan (EHCP) planning process that has a focus on life outcomes and the support and resources needed to achieve them. It should include detailed vocational profiling[[4]](#footnote-4) from Year 9. EHCPs currently end when the young person leaves education. They should continue to the age of 25 to ensure a successful transition to adult life.

EHCPs have become a gateway to specific employment pathways such as Supported Internships[[5]](#footnote-5) and Inclusive Apprenticeships[[6]](#footnote-6). These programmes have excellent potential but we have inadequate data about the quality and sustainability of outcomes and DfE is working to improve the quality of data and service provision. There is an increasingly confusing overlap in access to Supported Internships, traineeships and Inclusive Apprenticeships and the danger is that young people have to progress through each in turn to achieve sustainable work. Supported Internships were designed as a direct route to paid employment; an alternative to apprenticeships, not an additional route to apprenticeships.

Stronger guidance is needed from the Department for Education about what constitutes a Supported Internship. We recommend a minimum number of 20 hours of workplace learning per week. Providers should have to complete data returns specifying outcomes and sustainability for up to two years. Sustainability will be improved by developing stronger links between education providers and specialist adult Supported Employment services. At the moment, we have no idea whether an employed intern loses their job within a few months. One proposal might be for local authorities to provide and manage the job coaching support to each educational establishment in their area. This might help the exchange of best practice, improve the sustainability of outcomes and provide the time-unlimited support that employers value.

Some providers market Supported Internships as a work experience programme – it isn’t. It’s a route to paid work and this means that learners have to be ready to undertake them. They should be seen as an exit from education following a carefully planned 3-year pathway of careers guidance, work sampling, and more focused work experience. Work experience tasters should begin in Year 9 as part of the transition process and should be used to inform individual learning curriculum. There also needs to be a greater focus on employment pathways for young people who are not selected for Supported Internship programmes, otherwise they risk lifelong exclusion. **It is becoming apparent that if a young disabled person is not employed by the age of 25 then they are unlikely to work ever.**

Many SEND schools regard the national curriculum as a hindrance rather than a help. It is clear that employers have continually asked for strong soft skills not factual knowledge from potential employees. Schools should focus on the practical skills needed by employers – communication, social skills, adaptability, teamworking, independence, confidence, resilience, and ambition.

The 2014 SEND reforms have demanded great cultural change as the emphasis moves from qualifications to outcomes. This will require workforce development and appropriate quality standards. Ofsted has a key role in encouraging this change and will need to think about outcomes as more than just gaining qualifications. There is little point to education if it doesn’t prepare learners to fully participate in adult life. Too many parents are desperately contacting us for support for their 25- or 26-year old son or daughter and they have been let down badly by the system.

**Employment**

Employment is a key change agent in people’s lives. It can bring financial security, relationships at different levels, and can lead to better health. It is key to independent living and self-worth. The UNCRDP Article 27[[7]](#footnote-7) calls for countries to promote access to employment but, for people with learning disabilities, autism or chronic mental health needs, this is too rarely achieved. It is thought that fewer than 2500 people with a learning disability in England are in paid work more than 16 hours per week[[8]](#footnote-8). The figure has barely changed in decades; indeed, employment rates for people with learning disabilities have generally been on a downward trend[[9]](#footnote-9) in recent years. For people accessing secondary mental health services the figures are slowly improving, largely through NHS investment in Individual Placement & Support (IPS)[[10]](#footnote-10) services, a variation on the Supported Employment model. This is very welcome and we encourage the continued expansion of this support.

The picture is very different for people with autism and/or a learning disability. We have seen prolonged disinvestment in local support due to austerity measures. Local authorities have responsibility for collecting outcome data through the ASCOF indicators[[11]](#footnote-11) but little in the way of resources or drivers to effect improvement. Government has, until recently, neglected this cohort totally; an abdication of its responsibilities. DWP has focussed on increasingly mainstream provision using a commissioning system that has encouraged under-delivery, “cherry-picking” and the “parking” of customers with higher support needs[[12]](#footnote-12). It has continually viewed this cohort as the “hardest to help” or “furthest from the labour market” without any evidence to substantiate this. Indeed, Mencap states that 65% of people with a learning disability want to work[[13]](#footnote-13) and motivation is seen as the key success factor in gaining employment.

The Valuing People[[14]](#footnote-14) initiative demonstrated how cross-Government working can organise itself around clear objectives. The roll-out of IPS provision also demonstrates what can happen when Government works this way. Instead, we have seen people with autism and learning disabilities abandoned during the formulation of employment policy. This has become increasingly apparent to DWP officials themselves and we see tentative signs of resourcing suitable provision through the Supported Employment Proof of Concept[[15]](#footnote-15) and a proposed trailblazer[[16]](#footnote-16). A recent report from New Local[[17]](#footnote-17) emphasises the need for commissioning and embedding local support. We strongly support this approach to drawing down national funding for locally commissioned Supported Employment service provision but it is not enough in itself. We also need to monitor and improve the quality of provision to customers, both jobseekers and employers.

Young people with mental health needs have been particularly impacted by Covid-19. A survey by Young Minds[[18]](#footnote-18) found that young people’s mental health has worsened following their experiences of social isolation, disruption to routines, and break in support received. Support for health and wellbeing has to be an integral part of any employment support offered.

It is vital that we introduce quality assurance kitemarks to assure jobseekers, employers and commissioners of the quality of individual services. BASE has, with European partners, developed the Supported Employment Quality Framework (SEQF)[[19]](#footnote-19) and we are now issuing model fidelity kitemarks[[20]](#footnote-20) following independent audit of a service’s self-assessment. As in IPS delivery, the evidence is that higher model fidelity scores lead to better outcomes and at less cost.

There also needs to be a programme of workforce development within the sector. BASE has led on this through the creation of National Occupational Standards[[21]](#footnote-21) for job coaches and the development of a Level 3 Certificate for Supported Employment Practitioners[[22]](#footnote-22) that has now seen over 500 job coaches enrol on it. It is simply not good enough for a college to tell their learning support assistants that they are becoming a job coach the following week without any training to support them in their new role.

Future commissioning by DWP has to have a focus on quality rather than cost if we are to achieve better outcomes. The existing system of commissioning is not fit for purpose as it encourages contract discounting, over-promising and under-delivery. It relies on supply chain delivery without effective stewardship of the market, meaning that smaller, specialist organisations are unable to access funding to deliver what they know works. We see encouraging signs of a new approach to DWP commissioning[[23]](#footnote-23) and welcome it. DWP has to take a lead in encouraging evidence-based practice. Ironically, it has historically not funded Supported Employment provision because of a lack of UK evidence and yet it has never sought to fund this much-needed research until now. We would like to see investment from the Work and Health Unit in creating this UK evidence base and subsequent support for providers in a similar way to that offered to IPS providers through the IPS Grow initiative[[24]](#footnote-24).

Employers echo this call for evidence-based practice and quality assurance. Bodies such as the Chartered Institute for Personnel and Development (CIPD) and Federation of Small Business (FSB) are very supportive. Employers have too often been excluded from discussions about employment support but the changing labour market will mean that they have to become more imaginative in their recruitment and retention procedures. We would like to see a greater emphasis on disability issues within diversity management. Disability has long been the “Cinderella” issue within the equality bodies and while the Disability Confident scheme is finally making itself relevant to small and medium enterprises, where the majority of vacancies are, it is still too much a numbers game with inadequate monitoring and support and disconnected from the wider diversity agenda.

Reasonable adjustments to the recruitment process such as “working interviews[[25]](#footnote-25)” are key to being more flexible in recruitment. Most employers have little experience of disability because of the segregated lives that people lead. They need advice and ongoing support to effect change. Providers are generally not dealing with companies at a strategic level and the recruitment system relies on individual contacts and commitment[[26]](#footnote-26). This has to change and will only do so when education and employment support providers engage with employers on the economic business case[[27]](#footnote-27) for recruiting people with disabilities.

Much of Europe has disability employment quotas to drive higher disability employment rates. In France[[28]](#footnote-28) and Germany, companies are fined if they don’t achieve their quotas and the income is directed to resource specialist provision. This has led to a wide roll-out of Supported Employment provision in France, though it probably has little effect on underlying employer attitudes. BASE does not advocate the use of employment quotas but the experience in France demonstrates the value of a clear cross-Government approach.

We do, however, feel there is a case for positive employer incentives. There seems to be no debate about the value of incentives to encourage involvement in apprenticeships or traineeships. We would like to see parity of employer incentives for the recruitment of people with substantial disabilities, whether it’s through Supported Internships or more general local recruitment support for adult disabled workers.

One of the greatest selling points for employers should be the Access to Work programme. This is widely admired across Europe as a means of funding support and reasonable adjustments. It has the potential to be a world-beating programme but since the introduction of call centres to handle applications, the programme has become steadily more bureaucratic and difficult to navigate. BASE is inundated with complaints from providers and individuals. Employers can apply for support but are not advised how or where to access that support. There are major problems with the applications process, the transmission of documents, communications with DWP advisors and claims procedures. BASE has engaged with DWP for four years to seek improvements but we have been met with a defensive attitude that borders on a denial of any problems. We were recently told by a parent of how an advisor had described her son as “deadwood”. This is unacceptable and the poor performance of this programme risks it becoming toxic with employers and providers.

**Welfare benefits**

We continually hear reports of disabled people choosing to work under the Permitted Work rules so that benefit entitlement is not affected. This has led to Supported Interns not taking up job offers because of family pressure. This should not be happening but it reflects the anxiety caused by what is seen as a punitive welfare benefits system. The early 2010s saw widespread scapegoating of individuals as shirkers and malingerers, reflecting 19th century sensibilities. This has undermined the confidence of employers and the attitudes of wider society and needs addressing urgently. Individuals are trapped between ever-changing benefit silos that are used to categorise perceived ability.

We would like to see a more encouraging welfare system that lets people try out work without risk to their benefit entitlement. The 104-week benefit linking rules, abolished in 2012, allowed people to move back on their original entitlement if employment didn’t work out for them in that period. It allowed people to try working without risk. We’d like to see the introduction of something similar so that people on Employment and Support Allowance are protected and encouraged to try work and maximise their hours. This should be backed up by reliable better-off financial calculations[[29]](#footnote-29) so that young and older people are clear about the financial implications of working. It should be an integral part of transition planning for young people so that families are clear on the employment implications for family income.

**The Impact of Covid-19**

Whilst we welcome the Chancellor’s Plan for Jobs, we have grave concerns about the extent to which they will support young disabled people. Employers have been offered a range of incentives to employ young people, including wage subsidies through Kickstart and incentive payments for taking on an apprentice or Traineeship.

Most young people undertaking Supported Internships had their placements stopped in March 2020 and are having to continue their education into the 2020-21 academic year. Education providers are finding it very challenging to restart placements and to secure new placement opportunities. This is not helped by the fact that there is no comparable incentive for employers to take on a Supported Intern. We fear that these opportunities will be displaced by the measures put in place for Kickstart and for apprenticeships and traineeships. We are asking for parity in the way that Supported Internships are marketed to employers. We’d like to see stronger promotion of them through the Disability Confident campaign.

The Kickstart scheme is administered by Jobcentre Plus and Work Coaches are asked to only put forward young people that they consider to be “ready for work”; a concept that we don’t recognise. We are calling for a framework of support so that young people with SEND can access the programme and be fully supported. Gateway organisations should demonstrate that they are able to identify and meet the support needs of disabled people and we believe that they should have links in place with specialist support organisations. We think that Kickstart should be open to young people in receipt of Employment & Support Allowance or who have an EHCP in place.

We understand that an adjustment is in place for disabled Kickstart participants where the employer receives the full 25hr/wk subsidy even if the young person works fewer hours per week. This adjustment needs flagging up.

**Our ask of Government**

**For the Department for Work and Pensions:**

1. Publish an Equality Impact Assessment of the Kickstart scheme and ensure that the initial evaluation of the scheme considers the experiences of disabled participants.

2. Work with our coalition to produce a framework that sets out the targeted support disabled young people accessing the Kickstart scheme should have from Gateway organisations.

3. Work with DfE to enable employers currently providing supported internships to offer Kickstart placements to their interns.

4. Promote the Disability Confident scheme and supported internships to employers who are providing Kickstart placements.

5. The Kickstart scheme is made open to a wider group than just those claiming Universal Credit (e.g. those with Education, Health and Care plans and on Employment Support Allowance).

6. Doubling the number of Disability Employment Advisors in line with the doubling of work coaches to ensure sufficient capacity to provide effective support.

7. Ensure that disabled young people on Kickstart placements who require support or technology funded through Access to Work have their support packages agreed by the time their placement starts.

8. Ensuring that online job-finding support services are accessible and relevant to disabled job-seekers through consulting with organisations representing disabled young people. Our coalition would be happy to support.

**For the Department for Education:**

1. Provide £2,000 incentive payments to employers that offer supported internships in order to provide parity with apprenticeships.

2. Work with the DWP to enable supported internship employers to offer Kickstart placements to young people completing their supported internships.

3. New careers advisors within the National Careers Service to receive disability awareness training to enable them to provide improved support for disabled people.

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3. <https://www.base-uk.org/knowledge/improving-employment-opportunities-people-learning-disability> [↑](#footnote-ref-3)
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