



The Disability and Health Employment Strategy: the discussion so far

Response by the British Association for Supported Employment

February 2014

The British Association for Supported Employment (BASE) welcomes the publication of *The Disability & Health Employment Strategy: the discussion so far* by the Department for Work and Pensions.

The document describes the discussions so far and attempts to set out a direction of travel in terms of the support available to jobseekers with disabilities and long-term health conditions. We welcome the tone of the document and, in particular, the recognition of

- the role of Supported Employment, including IPS, as an evidence-based intervention
- the need to ensure that specialist provision is utilised effectively
- the vital role of local commissioning

As with all strategies, the devil will be in the detail. BASE is keen to work with DWP, and other Departments, to achieve a system that meets the needs of all customers and employers.

We have some comments to make on the strategy's recommendations and these are grouped around the headings used in the strategy summary. We wish to point out the need for further thinking around the issues of quality and workforce development so we have added a section on this. The better, and more consistently, we do what we do then the better the outcomes and the lower the costs will be.

Further information

For further information on our response, please contact Huw Davies on 01204 880733 or at huw.davies@base-uk.org

Working with employers

We welcome the emphasis on working closely with employers. The Disability Confident initiative is an example of what can be achieved to inform and involve employers as we seek to influence business attitudes and change recruitment practice.

It is clear to us that a one-stop portal is essential if employers are to readily access supporting information and resources. It is important that any information on this portal is easy to read and navigate. It should provide case studies, toolkits and examples of the steps that can be taken to promote good recruitment and retention practices and the business benefits that then accrue.

We are less convinced about the account management and vacancy handling aspects of the portal. It is important that employers are able to access the most appropriate support to meet the needs of a diverse group of employees. National providers already have the infrastructure to engage with large employers and so it is not clear whose “account” this proposal refers to. We feel that vacancy handling is not an appropriate use of the portal. It will also be important that the portal does not simply focus on provision that is funded through DWP funded programmes.

We welcome proposals to reform the “Two Ticks” symbol. It has become meaningless and desperately needs reform and the resources to ensure that any assessment process is meaningful and current.

We welcome the proposals to make Access to Work more flexible and easier to apply for. The programme is the envy of Europe and more needs to be done to ensure that SMEs are fully aware of it because that’s probably where the bulk of the jobs are.

We recommend that attention is paid to the following issues:

- Using a well-publicised information portal to ensure that all employers are clear on the business benefits of employing disabled workers
- A review of employer incentives and their availability across all employment support, including that support which is funded locally
- A review of the use of national agreements between employers and providers
- Ensuring that all DWP marketing activity publicises Work Choice and local provision
- Establishing the regional management of DEAs so that knowledge and expertise can be more readily disseminated.
- Wider promotion of Access to Work and an exploration of how it can be used to fund absence cover for staff who have fluctuating conditions
- Advice to GPs in how sickness absence and return to work should be managed
- A greater focus on informing and supporting SMEs
- The integration of mental health support with support for other disability groups as fragmented services appear incoherent to employers

Enabling young people to fulfil their employment aspirations

Employment rates for the most disabled young people are stubbornly low and it is clear that concerted action is needed if we are to achieve improved outcomes.

There is a danger that the strategy, and its resulting delivery plan, may not dovetail with the SEN reforms currently going through the legislative stages. The SEN reforms seek to improve life outcomes, including employment, and it is crucial that DWP highlights the aim of sustainable paid employment otherwise further training will be viewed as an appropriate destination for young learners, rather than simply being a step on the pathway to a real job.

The use of role models and online careers advice is not sufficient to counter the fact that careers advice has largely disappeared from the lives of many, if not most, young learners, and this is a particular challenge for those with disabilities.

While many young people will go on to higher education, we must recognise that this may not be the most appropriate or most effective option for a good number of young people. Many will require a more practical vocational route into employment. This could be through apprenticeships, internships or supported employment. The percentage of apprentices with disabilities continues to fall unacceptably and more needs to be done to inform employers and training providers about how they could better support disabled young people.

The SEN reforms offer a singular opportunity to integrate the health, care, education and employment supports available to people through the “local offer”. We have some concerns that DWP and DfE are not collaborating as effectively as they could on this agenda. We have worked hard to get employment flagged up within the Code of Practice. We believe the Education, Health & Care plans should have been renamed as the Education, Health, Care and Employment plans in order to ensure a real emphasis on employment destinations.

We recommend that particular attention is paid to the following issues:

- Engagement with parents on employment pathways and employability requirements from nursery age
- Support and encouragement for people to do Saturday and holiday jobs
- Routine work experience within Year 10/11 that is outside of educational establishments and informs curriculum design and delivery
- Resources to support good quality, multi-disciplinary, person-centred planning including careers advice and financial planning
- Inclusion of employment pathways is considered within all individual plans
- Resources to support the employment aspects of the “local offer”
- The establishment of best practice guidelines for providers of supported internships.

Providing personalised support to enable individuals to get into, stay in and progress in work

BASE welcomes the ambition to provide personalised support. There's a lot of confusion around the idea of personalisation in relation to employment; to some it means the use of personal budgets, to others it means offering tailored, individual support. BASE is not aware of any significant successes in using personal budgets. Our anecdotal evidence consistently indicates that most people simply don't want them. They want effective local support to get a sustainable job.

This will involve the early identification of needs; through EHC plans for young people and through an improved Gateway for older jobseekers. We welcome the emphasis on an improved Gateway. It is clear that individuals are being signposted to inappropriate provision and then risk being "parked". We should ensure that early initial assessment focuses on aspirations, strengths and support needs as well as identifying benefit entitlement.

The current provision has not been effective in supporting jobseekers with a complex or substantial economic disadvantage. The Work Programme has not been effective in supporting people with complex needs, particularly those who were previously on Incapacity Benefit. This is partly because of a lack of expertise, partly because of the associated intervention costs and partly because of the limited range of specialists involved on the ground.

Work Choice has been more effective at supporting disabled people but its small size and capped nature requires it to be a mainstream disability programme. There is continuing evidence to suggest that many people with substantial disabilities are not always able to access the programme and are not always being supported adequately where they can. The SRO route simply isn't working in many areas. There are also some concerns about job sustainability – the worry is that target-driven programmes are simply designed to deliver funded outcomes rather than jobs that are sustained beyond 6-7 months.

BASE believes that a disability programme like Work Choice must continue but, on its own and in its current format, it is not going to meet the needs of people with moderate learning disabilities, long-term mental health needs or those with autism conditions.

Some people are going to need more intensive and personalised support than the existing programmes can provide. In our submission to the strategy we argued for the use of national funds to reward outcomes from locally commissioned support. This is where the vast majority of specialist employment supports are located. Local specialist support is disappearing at an alarming rate as local resources become tighter. In the current financial climate it may well disappear totally without national support.

It should be much easier to transfer from one programme to another if it is clear that the person would benefit from the transfer. Everybody is different and it can be challenging to accurately categorise individual needs. It isn't in anyone's interest to see people "parked" on what has turned out to be inappropriate provision.

We welcome the consideration of ideas and initiatives that could be delivered from the ground up and the commitment to improve specialist employment support. There are some

worries that previous learning is not being retained. There have been numerous reports that detail how Supported Employment and IPS are the most effective forms of support. These have come through Valuing People, mental health strategies, and various evaluations such as the recent DH report on the Jobs First initiative. We'd counsel against reinventing the wheel though there may be an argument for testing scalability.

It is important to recognise that, at the moment, the resources are simply not on the ground to deliver large-scale supported employment services. Supported Employment is designed to support people with moderate or high support needs. Whilst some of the principles have been embedded within Work Choice despite the evident constraints, it is clear that model fidelity is a vital factor in improving employment outcomes and delivering cost effectiveness for those people with higher support needs.

There are a number of existing examples of high quality locally funded provision that has substantially improved employment rates for people with more severe disabilities. There will be significant benefit to understanding what has helped these ventures to make such a difference and disseminating this learning.

We welcome the discussion on improving the specialist offer but we are not clear what is being proposed in the reference to a "national network of specialist providers". We would welcome clarification and discussion on this point.

We are particularly heartened by the references to the Supported Employment model and the need to ensure "fuller integration of commissioning and delivery of local services". BASE would be pleased to discuss how we could support this process.

There are some contradictions in the discussion on better use of local providers. DWP's 2008 commissioning strategy effectively locked these providers out of programme funding causing disinvestment leading to a number going out of business. We're not convinced that it will be easy to build market capacity or ensure effective competition. Jobseekers, commissioners and employers will need much better information on service quality and outcomes if they are to have an informed choice of provider.

The strategy discusses the use of local information portals. This sounds very similar to the requirements to publish the "local offer" and we'd recommend that these initiatives dovetail with the developments in SEN reform

We recognise the value of peer-support and would welcome further exploration of how this can be developed and supported based on learning from the ESA pilot programmes.

We suggest that particular attention is paid to the following issues:

- An improved Gateway that identifies individual needs but which for young people does not duplicate the assessment and planning systems contained in the SEN reforms
- Easier movement of the customer between programmes
- A focus on supporting and funding local specialist provision that is tied in to other local services for those with higher support needs
- An emphasis on quality, outcomes and workforce development as part of the commissioning of disability employment provision

Better support for people with mental health issues

We recognise the huge numbers of people affected by mental health issues and the range of actions already underway. Unfortunately, many people are discouraged from engaging because of the risk of punitive sanctions rather than the prospect of personalised support. Sanctions do little to encourage people with mental health needs back into employment. We would like to see the reintroduction of the 104-week linking rules so that people are assured that they have nothing to lose and everything to gain from seeking employment.

We support the ambition for “personalised services and co-ordinated support”. Again, there is ample evidence that Supported Employment/Individual Placement & Support (IPS) is the most effective form of support. Whilst the sector cannot meet the needs of everyone with mental health needs, the principles can be transferred into more mainstream provision.

Most people with mental health needs are supported through the Work Programme. We believe there is a need for workforce development, collaboration with social care support and the inclusion of specialists within provider supply chains if that support is to improve.

There is also a strong case for supporting people before they become entrenched in the system. Improving Access to Psychological Therapies (IAPT) services exist across England but they generally do not follow the national guidelines of 1 employment specialist per 8 advisors. There is strong evidence to suggest that applying Supported Employment principles within IAPT services could have a big impact in reducing the number of people dropping out of work and in encouraging a return to work for others. IAPT has excellent potential as a retention support programme but it can also be very successful in achieving job outcomes for people seeking to re-enter work and would dovetail nicely with other locally funded provision.

We support the proposals of the task and finish group. More needs to be done in collaboration with DH, NICE and the NHS to encourage investment and prioritisation of employment-related issues, which is very patchy across the country. We feel that Jobcentre Plus will require support if it is to use local funding effectively.

We suggest that particular attention is paid to the following issues:

- Embedding Supported Employment/IPS within local IAPT services with 1 employment specialist per 8 general IAPT advisors
- Reviewing how Work Programme supply chains make better use of specialist provision
- Better collaboration with Health and Housing providers
- A focus on CCG/NHS commissioning

Quality and workforce development issues

The strategy document doesn't really address issues around quality and workforce development. BASE feels that it is important that employers, jobseekers and referring organisations have access to clear information about the quality of services so that they can make informed choices.

We would favour a system of independent inspection of all disability employment support provision, whether nationally or locally funded. Ofsted's inspection of Workstep provision did more than anything to raise standards and ensure that providers had quality assurance systems in place.

There is increasing evidence that model fidelity is a key factor in achieving better job outcomes and improved cost effectiveness.

BASE has been consulting with our members on a framework for service standards and the feedback is that, while it is not viewed as a priority as services struggle to survive, it is certainly needed. We have drafted a set of quality standards in collaboration with the Scottish Union of Supported Employment (SUSE) and would be happy to forward this document.

We have worked closely with the Learning and Skills Improvement Service to gain approval for National Occupational Standards for the sector and we are about to commence delivery of a Level 3 Certificate for Supported Employment Practitioners.

We suggest that particular attention is paid to the following issues:

- The use of independent inspection for all employment support provision so as to inform jobseekers and employers and enable service benchmarking
- Professionalising the workforce through relevant qualifications
- Supporting improved and outcome-focused commissioning by local authority and health commissioners