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Dear Sir/Madam,

4Children welcomes the opportunity to respond to the Social Security Advisory Committee's consultation on the draft "*Income Support (Work Related Activity) and Miscellaneous Amendments Regulations 2013*", which have been put forward by the Department for Work and Pensions (DWP).

4Children is the national charity all about children and families. We have spearheaded a joined-up, integrated approach to children's services and work with a wide range of partners around the country to ensure children and families have access to the services and support they need in their communities. We run Sure Start Children's Centres as well as family and youth services across Britain.

4Children develops, influences and shapes national policy on all aspects of the lives of children, young people and families. Consequently, we take a particular interest in those aspects of welfare policy with implications for parents, children and service providers.

In principle, 4Children is in favour of measures which support parents to return to work, where this is the right choice for them and their families. However, our main concern is that such support should always be provided in a coherent and constructive manner, which recognises the practical needs of parents. In our view, if employment support is to be effective it is crucial that it is fully co-ordinated with other services which parents rely on, such as Children's Centres, childcare and other family support.

When the consultation was initially announced on 11th July 2013, the Committee highlighted five key issues that it was especially keen to seek views on. From our perspective, two of these are especially relevant:

- The potential impact of the proposed mandation of work related activity for those households with a youngest child aged 3 or 4.
- The implications for childcare provision for both lone parents and different types of childcare provider.

We will therefore focus our response on addressing these two areas in particular.

The potential impact of the proposed mandation of work related activity for those households with a youngest child aged 3 or 4

In general, we believe that the proposals put forward in the draft regulations to enable advisers to mandate lone parents with children aged 3 or 4 to undertake work related activities could potentially play a valuable part in supporting those parents' journey to work.

We recognise, as set out in DWP's "*Explanatory Memorandum*", that in many cases lone parents whose youngest child turns 5 are already subject to work related requirements as a condition of eligibility for Jobseeker's Allowance and Employment and Support Allowance, and that the policy intent underpinning the proposed changes is in part to help better prepare lone parents with children aged 3 or 4 for this transition¹. We also note DWP's expectation that in most instances mandation will be applied where the youngest child is aged 4, and that giving advisers the power to apply mandation when the youngest child is 3 is primarily intended to provide flexibility if a parent faces particularly complex barriers to work².

In this context, we feel that the proposed new powers could have a positive impact in helping lone parents to prepare for work, provided they are used constructively by advisers. However, for some lone parents the journey into the labour market will be quite a long one, and we would stress that the key to success is not simply giving advisers the ability to mandate work related activity at an earlier stage, but ensuring that this is used in a way that is appropriate and meaningful for the claimant. To a large extent this reflects the importance of DWP's emphasis on "personalised support into work"³, and we hope that the Department is earnest in its commitment to this.

Indeed, providing truly "personalised" support is also connected to broader issues surrounding service co-ordination, and we believe that Government's ultimate aim should be the delivery of a genuinely "holistic" package of support for lone parents, which recognises the challenges that they face in the round, and not simply their employment prospects in isolation. For us, one key aspect of this is ensuring that any requirement to undertake work related activity is delivered in a manner that is consistent with childcare provision.

¹ The Department for Work and Pensions (2013) *Explanatory Memorandum for the Social Security Advisory Committee: The Draft Income Support (Work Related Activity) and Miscellaneous Amendments Regulations 2013*, paragraph 6.3

² The Department for Work and Pensions (2013) *Explanatory Memorandum for the Social Security Advisory Committee: The Draft Income Support (Work Related Activity) and Miscellaneous Amendments Regulations 2013*, paragraph 6.5

³ The Department for Work and Pensions (2013) *Explanatory Memorandum for the Social Security Advisory Committee: The Draft Income Support (Work Related Activity) and Miscellaneous Amendments Regulations 2013*, paragraph 4.4

The “*Explanatory Memorandum*” notes that under Income Support, lone parents can restrict the hours in which they can carry out a work related activity to when their child is either in school or in the care of a responsible adult. This is clearly very positive, and we welcome the inclusion of such provisions in the relevant section of the draft Statutory Instruments. However, as far as we can see, these do not extend to enabling parents to limit the scheduling of work focused interviews, creating a degree of inconsistency that could potentially dilute the benefits of the provisions for parents and create unnecessary confusion for claimants. We therefore believe that this should be addressed, and urge the Committee to recommend that DWP amend the draft regulations accordingly so that parents are granted the power to limit the scheduling of work focused interviews as well.

Furthermore, the “*Explanatory Memorandum*” also notes that under both old and new-style Employment and Support Allowance and Universal Credit, there are no provisions to allow parents to restrict the hours in which a work related activity can be undertaken, and that advisers will instead be notified in guidance that each individual’s circumstances must be taken into account when deciding what to mandate a claimant to do⁴.

While we recognise that, with regard to Employment and Support Allowance and Universal Credit (which will obviously become increasingly prevalent in the coming years and eventually absorb current Income Support claimants), DWP’s intention is to avoid excessive prescription in order to allow advisers genuine discretion in mandating work related activities, we reiterate that it is utterly vital for parents to be able to balance work related requirements with their childcare responsibilities. We would therefore urge the Committee to recommend strongly that DWP include provisions in the regulations to enable those lone parents receiving Employment and Support Allowance and Universal Credit to restrict the hours in which they can undertake a work related activity, and indeed work focused interviews as well.

One further issue that we believe it is important to highlight from the perspective of delivering a personalised and holistic service is the potential value of service co-location, specifically within Children’s Centres. The All Party Parliamentary Group on Sure Start Children’s Centres, for which 4Children provides the secretariat, has recently published a major report entitled “*Best Practice for a Sure Start: The Way Forward for Children’s Centres*” which examined the benefits of this sort of initiative.

As well as recommending the provision of perinatal services such as health visiting and community midwifery within Children’s Centres, the report also recognised the impact that delivering Jobcentre Plus services in such settings can have on improving parental employment prospects. In particular, it pointed to the evaluation of a set of pilot programmes undertaken by DWP to provide “work-focused services” through Children’s

⁴ The Department for Work and Pensions (2013) *Explanatory Memorandum for the Social Security Advisory Committee: The Draft Income Support (Work Related Activity) and Miscellaneous Amendments Regulations 2013*, paragraph 6.7 – 6.8

Centres. The findings indicated that these pilots delivered important attitudinal outcomes, including “increased levels of confidence, aspirations, better awareness of work-focused opportunities and options and attitudinal change towards Jobcentre Plus and work”, while there was “also indicative evidence from both qualitative and MI that the pilot moved parents closer to the labour market and moved some into paid employment”⁵.

There is already a requirement in section 5(e) of the Childcare Act 2006 for Jobcentre Plus (as well as local authorities and local commissioners of health services) to consider providing early childhood services through Children’s Centres. However, building on this, we believe the Committee should consider whether there is scope to use the draft regulations to promote the provision of work related activity programmes, and indeed work focussed interviews, within Children’s Centre settings. In our view, this would represent a truly joined-up model of service provision, and enable lone parents to ensure that their children are appropriately cared for whilst they fulfil the requirements of their mandate. In addition, this sort of co-location might be helpful for lone parents who find the experience of attending a Jobcentre Plus office particularly intimidating, by facilitating access to employment support in an appropriate alternative setting.

The implications for childcare provision for both lone parents and different types of childcare provider

In many ways this is a challenging question to answer in detail, and depends to a large extent on the numbers of lone parents who will require additional childcare as a result of the introduction of mandation. The “*Explanatory Memorandum*” itself notes that this is difficult to determine, and that it is not easy to estimate the costs and benefits of the policy precisely⁶. With this qualification in mind however, we will offer some general thoughts on the potential implications of the proposals.

To begin with, as the “*Explanatory Memorandum*” recognises, all three and four year olds in England currently have access to 15 hours of free early education for 38 weeks of the year. This is normally provided from the first term after which the child turns three, and is funded by their local authority (as the Committee is no doubt well aware, this entitlement is being extended to 20% of two year olds from September 2013, rising to 40% from September 2014).

In the first instance, it would appear to be clear that the key to minimising complications for both lone parents and childcare providers will be ensuring that take up of this funded free

⁵ The Department for Work and Pensions (2011) *Work-Focused Services in Children’s Centres Pilot: Final Report*, p. 5, cited in All Party Parliamentary Group on Sure Start Children’s Centres (2013) *Best Practice for a Sure Start: The Way Forward for Children’s Centres*, p. 14

⁶ The Department for Work and Pensions (2013) *Explanatory Memorandum for the Social Security Advisory Committee: The Draft Income Support (Work Related Activity) and Miscellaneous Amendments Regulations 2013*, paragraph 10.4

entitlement is as widespread as possible, and that work focussed interviews or mandated work related activities are scheduled within the hours of provision that the parent is using.

If parents who are not accessing their entitlement present at Jobcentre Plus, it will be crucial for advisers to signpost them towards this and encourage them to take it up. We are pleased that there is a recognition of the important role that advisers can play in this regard in the “*Explanatory Memorandum*”⁷, and would encourage the Committee to recommend that DWP do all it can to consistently maximise take up of the free entitlement.

At this stage, we also would reiterate the point made in the previous section, that we believe it is crucial for parents to be able to limit the hours during which they undertake work focused interviews or work related activities to those when their child is either in school or in the care of a responsible adult. In our view, this would play a highly important part in balancing the desire to help parents move into work with the need to ensure appropriate care and support for young children, and therefore feel strongly that such provisions should be included in the final regulations.

We would hope that in the majority of cases, if parents take up their free entitlement and are only required to undertake a work focussed interview or work related activity during this period then the implications of the proposed changes for lone parents will be minimal. In addition, we would also expect the impact of the changes to be quite limited from the perspective of childcare providers themselves. Figures from the Department for Education show that take up of the free early education offer is already very high, with 98% of four year olds and 94% of three year olds benefitting from at least some early education in January 2013⁸. Therefore, even if the introduction of mandation were to result in additional take-up of the free entitlement amongst all the three and four year olds who are not currently benefitting, the level of resource required to meet this extra demand would probably be fairly small.

However, if parents are not able to limit the hours in which they are expected to undertake work related activities or work focused interviews, then it is possible that the implications could be more significant. Without the certainty that these sorts of provisions would provide for parents, they could potentially find themselves in a position where a newly mandated work focused interview or work related activity interferes with their existing childcare arrangements, a situation which would create problems for both parents and providers.

⁷ The Department for Work and Pensions (2013) *Explanatory Memorandum for the Social Security Advisory Committee: The Draft Income Support (Work Related Activity) and Miscellaneous Amendments Regulations 2013*, paragraph 6.24

⁸ The Department for Education (2013) *Provision for children under five years of age in England: January 2013*, p. 1

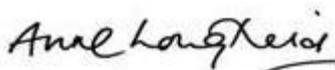
In practical terms, parents usually have to book childcare provision in advance, and commit to set childcare hours over the course of at least a term, meaning it is often difficult to change childcare arrangements. Therefore, if a parent were required to undertake a mandated activity or interview outside of these set hours, it would in many cases force them to seek additional childcare provision beyond that which they had already arranged. In effect, this would create additional demand, potentially at short notice and on an irregular basis, which is something that many childcare providers' business models struggle to cope with.

As a final point, one further issue that we would highlight is a lack of clarity within the proposals around how DWP and Jobcentre Plus would support a claimant in instances where their free entitlement was not sufficient to cover the work related activity or work focused interviews which they were mandated to undertake. For example if parents were required to undertake work related activities lasting more than 15 hours per week, the free entitlement would clearly not be enough in itself. In general, we hope that these sorts of situations would be rare – indeed, we would be concerned in principle if those judged by DWP as being in sufficient need to qualify for Income Support in the first place were regularly required to undertake more than 15 hours of work related activities per week, which in our view would place excessive demands on this group of claimants.

However, we nonetheless believe it is important that DWP's contingency planning in this area is effectively thought through, so that if situations do arise then parents can be clear about the sort of support they will receive. Currently the "*Explanatory Memorandum*" suggests that advisers will be able to use mechanisms such as the Flexible Support Fund to fund eligible childcare costs, but beyond this there is little firm detail about what will happen in instances where the free entitlement is not enough to meet parents' needs. This may be one area in which we believe the Committee should look to push DWP for further information.

Overall therefore, we believe there are several areas in which DWP's proposals require further development and refinement, and hope that the Committee will raise these with the Department when formulating its advice and recommendations on the regulations. If you would like to discuss any of the points raised in this response, please do not hesitate to get in touch.

Yours sincerely,



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