



Glasgow Homelessness Network works to end homelessness in Glasgow, and ensure that outcomes for people affected by homelessness meet their needs, interests and aspirations.

DWP Welfare Reform Green Paper In Work, Better Off: Next Steps to Full Employment

October 2007

1 Introduction

1.1 Glasgow Homelessness Network (GHN) is the registered charity and voluntary organisation which aims to end homelessness in Glasgow. Working with networks of people affected by homelessness and the services they need, GHN coordinates a voice for the interests of people affected by homelessness, aiming to inform, influence and improve policy on, provision for, practice in and perception of homelessness. Our members include people affected by homelessness, and a wide range of organisations and individuals with a stake in the issues.

1.2 GHN is pleased to respond to the Welfare Reform Green Paper 'In Work, Better Off: Next Steps to Full Employment'. GHN's response is informed by consultations with a wide range of our networks and stakeholders. It builds on our holistic approach to understanding homelessness, which recognises that tackling it successfully involves considering housing, opportunity and wellbeing issues in an integrated way.

2 Unemployment, Poverty and Homelessness

2.1 GHN welcomes and supports the DWP aspirations to achieve full employment, increase the number of people from vulnerable, disadvantaged or marginalised backgrounds to enter the labour market and tackle child poverty and considers that these goals, if reached, would underpin improved social and economic wellbeing. We also know quite clearly that unemployment can be evidenced to be a structural cause of homelessness. Therefore, success in tackling the level of unemployment will directly improve the level of homelessness.

Our own recent research amongst people with experience of homelessness in Glasgow indicates high levels of both experience of work and aspiration to work in the future. 'Evidence & Aspirations: Employability & Homelessness in Glasgow' (GHN; 2007) was a research study which profiled the employability background, current status and aspirations of over 400 people affected by homelessness in Glasgow. The key findings showed that 68% want to work, and that the occupational sectors that they aspire to are realistic and compatible with expected growth areas in the local labour market.

So, at both structural and individual level, GHN will very much welcome moves which are knowledgeably targeted to increase or incentivise employment opportunities for and employability amongst those affected by homelessness. Our concerns about the proposals in the green paper relate to the extent to which they will achieve that.

2.2 In particular, we have been concerned about the notion that poverty will always be addressed by employment per se, or that child poverty will always be addressed by promoting employment for lone parents. The route out of poverty that work can provide can be blocked by low pay, inflexible tax credits, conditionality and benefit rules and sanctions, and GHN would be concerned to ensure that policies in each of these areas are not allowed to continue to have conflicting outcomes, leading sometimes to working poverty.

2.3 GHN recommends that proposals for the future should explicitly refer to homelessness. The reason for this is that homelessness is always unique, therefore homelessness captures the heterogeneity that must be addressed by a welfare system, however bureaucratic. The single common factor, lack of a home, is not a condition or a pathology, but is, like poverty, a circumstance which marginalises and creates disadvantage. Homelessness should always be temporary, and can often be prevented, but understandings, perceptions and experiences of homelessness remain rigid, stereotyped and often long term, while prevention opportunities are often missed. The role of employment (in-work) support in supporting tenancy sustainment alongside employment sustainment and therefore preventing homelessness is becoming clearer as we learn more about homelessness prevention. Even more importantly, preventing homelessness will avoid the serious risk to employment posed by insecure accommodation.

2.4 Every person who is at risk of or becomes homeless will have a different set of issues, needs and circumstances to tackle, and these needs will change in different time frames. Each will have their own priority issues to address, but genuine, and genuinely suitable and properly supported, opportunity (as exemplified by employment, training, learning and / or volunteering) will always be an important element of their future wellbeing and stability, and either prevention of their homelessness or their sustainable route out of homelessness. The green paper should therefore clarify exactly how its proposals are intended to contribute to preventing, tackling and resolving homelessness. In particular, it should be clear that there is no intention to include people affected by homelessness per se in the 20% of potential participants in the labour market who will remain workless, unless for certain individuals there are substantial considerations other than their homelessness which make this appropriate.

2.5 People experiencing homelessness are subject to discrimination, prejudice and stereotyping. Within their number are many who face this on top of other inequalities. While being aware that the green paper has been subjected to an

inequalities impact assessment, GHN would wish to see much further attention paid to inequalities which impact directly on employment within the content of the proposals.

3 Welfare Reform, Sanctions and Conditionality

3.1 More generally, GHN is less convinced about a direction of welfare reform which rewards progress but which may continue to be seen as unjustly punitive towards either the emergence of needs for additional support or in relation to greater conditionality.

3.2 Rewards for progress make sense. However, the availability of support services which are focussed, sticky and flexible, through the varied circumstances in which people who are, or are at risk of, homelessness find themselves, is neither sufficient nor universal. Nor are the flexible pathways to the regular work pattern which is currently the norm for people without significant support needs or chaotic living circumstances well enough understood, available or even described in the Green Paper. Only when these things are in place can a punitive approach avoid being unjust.

3.3 The benefits system is highly complex and inflexible, and this already presents a considerable barrier to employment for many people whose circumstances may sometimes be chaotic and unpredictable, and whose needs may be episodic. Some simplification of and flexibility within the system, together with some specific changes which are mentioned below, would assist the system to meet support greater employment among people affected by homelessness.

3.4 The proposals for the future need to commit at least to minimising current benefit barriers to work. GHN has repeatedly raised the negative impact of the housing benefit taper, the earnings disregard, the 16 hour rule and other benefit barriers to employment. In addition the tax credit eligibility rules increase the risk of homelessness on taking up a job or when a job is retained for more than a

year. This is unhelpful, and it will be important to avoid creating further benefit or tax credit traps which will increase barriers to work for those who are already vulnerable and at risk of homelessness.

4 Supply, Retention and Quality of Jobs

4.1 It is beyond GHN's remit to assess the likely future supply of jobs. However, it does appear to us that the supply of jobs which are genuinely suitable for people with sometimes chaotic life circumstances and with sometimes urgent and multiple complex needs, is less than required. While not all people affected by homelessness will need this type of job, some will. Despite considerable efforts we have not been able to identify large numbers of employers willing to participate in providing such jobs, nor have we been able to identify and access the necessary level of official support from DWP or Job Centre Plus for the provision of jobs which are genuinely suitable in these circumstances. It is our hope that the outcome of this consultation will improve that.

4.2 In addition, GHN is clear that some jobs which are created in response to 'programmes' or 'initiatives' are not sustainable in the longer term, either because the job holder cannot sustain the job, or because the job itself has insufficient value. In the discussion of the supply of jobs, a measurable definition of what constitutes a genuine, and genuinely sustainable, job opportunity should be included. This definition should include a target time for sustainability of at least a year (preferably more), specify the availability as needed of in - work support, training and development, and also spearhead a detailed examination of measures to support retention of and progression within employment.

5 Role of Job Centre Plus

5.1 In the view of GHN's networks, the proposals must explicitly set out in detail the role, duties and obligations of Job Centre Plus in relation to homelessness and employability. In the experience of GHN's networks, local partnership working has brought improved understanding of and commitment to tackling equality of access to employment for people affected by homelessness. However, improved understanding alone cannot make progress. An appropriate range of well informed, well targeted flexible local employability support services, which are equally well coordinated to ensure that people across the range of need can be supported in pursuit of employability, is required. Job Centre Plus should actively support this, and the proposals need to be much clearer and more specific about how this will be achieved.

5.2 Many, but by no means all, people affected by homelessness will be at some distance from the labour market. In Glasgow, many people experiencing homelessness during the current large scale hostel closure programme have been affected by institutionalisation and a deepening of their needs as a result of long stays in what should have been temporary accommodation. Many of them have considerable experience of being employed, but may be unable to rebuild the skills required to re-enter the labour market without high levels of skilled and knowledgeable support, delivered with appropriately varying degrees of intensity from providers experienced in dealing with issues of homelessness.

5.3 Building commitment from employers to the provision of opportunities is a welcome direction highlighted in the proposals, however it is not at all clear exactly how this will be achieved. The role of Job Centre Plus to engage with employers needs to be both strengthened and broadened to specify the range of actions to be taken and the groups of employers to be targeted. Public sector employers, small, medium and large private sector businesses and voluntary sector and social enterprise organisations will all have a part to play, yet the proposals are insufficiently detailed to allow this to be seen.

6 New Deal

6.1 GHN welcomes any reform of the New Deal which will increase its flexibility and the level of support to be offered. The green paper is not specific about the new resources which would need to be allocated to make this commitment effective, and without that information it is not possible to assess the overall impact. It is specific, however, about the timescales for movement along the path to employment through the various stages, and in the experience of our networks this is likely to prove disadvantageous to any client group, such as people facing homelessness, whose support needs vary over time or whose circumstances may change quickly.

6.2 We do, however, have concerns about the implications of enforced work experience. In Glasgow we have supported a wide range of taster sessions and opportunities to try out the use of various skills, and these opportunities have been widely regarded as a success, so we would support the introduction of work experience on a taster basis. However, anything much longer than a taster session might be understood to enforce a requirement for unpaid work, with implications for jobs, pay and competition, as well as for public understanding of welfare reform, and would be highly undesirable. In addition, there should be some quality assurance mechanism to ensure the quality of work experience, alongside appropriate training and skills development for employers operating the scheme.

6.3 Our concerns about punitive conditionality, mentioned previously, also relate to the proposals for New Deal. Better tailored, flexible, intensive-when-required support is presumably now being offered on the basis of better understanding of the need to be both flexible and intensively supportive when required. Surely that understanding in itself would suggest the inappropriateness of a conditionality approach? GHN would propose that it does.

6.4 As in all social issues, assessment is critical. Early and regularly updated assessment of support needs will allow the individualised tailoring of the support which is intended in the proposals. Ongoing assessment and tailoring of support will be essential to ensure successful outcomes.

7 Learning from the Scottish Experience

7.1 The voluntary sector working in homelessness in Glasgow delivered significant outcomes to the homelessness client group through services funded by the New Futures Fund Initiative. The primary advantage was the understanding of and expert response to the homelessness issues during delivery of employability services. GHN strongly recommends that service specifications for employment / employability support services explicitly recognise the requirements for expertise and experience in specific areas.

7.2 In addition, we would wish to ensure that contracting provisions and tender documents take account of the need to attract tenders from small specialist voluntary organisations who provide expert niche services. Without care in this area, GHN believes that blanket provision from generalist agencies is likely to provide overall lower quality of service, less sustainable outcomes and greater exclusion of more difficult to engage groups. These disadvantages we believe would more than offset any benefits of broadly applied benchmarks for outcomes and costs.

7.3 Our networks believe that it would be beneficial across the UK for the future proposals to incorporate both the Workforce Plus Employability Framework for Scotland targets and the learning from the evaluation of the services funded through the New Futures Fund Initiative. Indeed some of our consultees have suggested that progress on employability for vulnerable client groups in Scotland is greater, and that one solution would be for the responsibility for welfare reform and employment to be devolved. While it would clearly be inappropriate for GHN

to take that position, we would be keen to ensure that the extensive learning from Scottish experience is taken account of in UK wide developments and a coordinated approach which integrates the learning while recognising the implications of devolved responsibilities for significant matters such as skills training and childcare.

7.3 The Workforce Plus Employability Framework embeds a 'pathway' approach to employment for people distanced from the labour market. GHN would propose that further consideration of the role of positive activity and learning as steps toward work would be compatible with the employment outcome focus of the Green Paper.

8 Conclusions

8.1 GHN supports the DWP's aspirations towards full employment, more employment for marginalised groups and an end to child poverty, but we are not sufficiently convinced that the proposals outlined will achieve these aspirations.

8.2 We believe that the explicit inclusion of homelessness in both the duties of Job Centre Plus and the principles of welfare reform would be advantageous because of the heterogeneity of homelessness and the inequalities which underpin it.

8.3 GHN considers removal of the benefit traps which act as barriers to employment to be an essential part of any welfare reform proposals which aim for full employment, and we are very disappointed that this green paper does not address them. In addition, we believe that escalating punitive conditionality tied to the availability of personalised intensive support on fixed timescales will both confuse and act as a disincentive to genuine progression.

8.4 Engagement, persuasion and support of employers to offer genuine and sustainable job opportunities is, we think, a rather more involved process than is envisaged by the green paper, and Job Centre Plus should have a clearly specified structure and role, and targets to develop and coordinate this across all sectors.

8.5 GHN's networks take the view that the very positive benefits of the flexibility and intensive support to be offered within the revised New Deal proposed will be negated by the rigid timescales and punitive conditionality proposed within the operational structures planned.

8.6 Much of the learning from the Scottish experience has been incorporated into Workforce Plus, and we believe this should be integrated into, and coordinated with, the UK wide approach, alongside wider application of the Pathways to Work model. Recognition of the role of the voluntary sector, particularly the expert niche organisations, will be vital to success.

**If you would like to discuss this response further, please contact
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