

Flexible New Deal Consultation by Social Security Advisory Committee

<http://www.ssac.org.uk/press/press11.asp>

Before the Committee considers and reports on these proposals, it would like to hear from organisations including existing and potential providers and individuals who have views, in particular on the following aspects of the proposed changes:

- mandatory 'Back to Work Sessions';
- the duration of sanctions;
- the contracting arrangements;
- customer choice within the FND programme;
- the role of the private sector organisations in the sanctions regime; and
- the application of sanctions to the voluntary extension of the FND

Those wishing to make representations to the Committee may obtain copies of the Department's [explanatory memorandum and draft regulations from here](#) or from the Committee Secretariat (contact Natalie Harwood on 0207 412 1508).

Representations should be sent to the Committee at New Court, 48 Carey Street, London, WC2A 2LS, or [by email](#) , or via the [consultation response facility](#), to arrive no later than **Friday 7 November 2008**.

Response from Education Otherwise November 7th 2008

Education Otherwise is the major home education support charity in the UK.

<http://www.education-otherwise.org/index.htm>

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Summary of Education Otherwise position

The draft regulations do not address the issue of childcare nor do the explanatory notes or gloss provided by the Department. Appropriate affordable childcare is a critical problem for lone parents with additional caring responsibilities such as the dedicated lone parents who educate their children at home. We find this astonishing. We are appalled that the draft regulations will not be subject to even the most cursory parliamentary debate. We find the Impact Assessment not fit for purpose. We are extremely concerned that home educating lone parents will be subject to sanctions when they are unable to comply with the terms of FND. We find nothing to suggest that the Prime Contractors and their subcontractors will have any awareness of home education and this must be rectified immediately. We are aware that guidance being sent to JobCentres says home education must be treated “sensitively” but this still allows terrifying discretionary powers to Lone Parent Advisors and JobCentre Decision Makers. The position with privatised employment service contractors operating on commission for FND will obviously be hugely worse.

We would like to cite the following from the debate in the House on Welfare and Work November 6th 2008 :

“ The threat of losing up to 40 per cent. of benefits, which are not generous in the first place, is going to make life very difficult. It will make vulnerable people’s lives more difficult. My hon. Friend the Member for Llanelli explained very effectively the pressures that lone parents face in trying to take their responsibilities seriously. Some lone parents have a disabled child or a disability themselves. In fact, the statistics show that very few lone parents whose children are over 11 are not in work, and those who are not usually have a disabled child or a disability themselves.

The DWP is well aware of the problems faced by lone parents. In its 2005 five-year strategy, it discusses the failed work test in New Zealand, introduced without a good child care infrastructure. It said that

“we think it would be wrong simply to move lone parents from Income Support onto the Jobseeker’s Allowance regime: an unrestricted requirement to search for work is inappropriate, given the complex and difficult circumstances many lone parents face...such an approach would be expensive, unfair and ineffectual.”

That is why I ask the Government to look again at the recommendations of the Social Security Advisory Commission, which says that, although it has supported the programmes for lone parents in the past, it feels that the proposed changes will make life more difficult for lone parents. It says that, at the very minimum, those changes should not be introduced until a comprehensive system of wrap-around child care is available. This is not just about the availability of child care; it is about the quality and reliability of that care. Although the Government have said that they will be flexible and that no lone parent will be sanctioned if it is clear that child care is not available, no detail has been provided about exactly what will be regarded as suitable and reliable child care. I would like the Government to address that point.

On the flexible implementation of these regulations, I also wish to highlight the situation faced by lone parents who educate their children at home. The Government policy is that such people have made a lifestyle choice. That may be the case in some instances, but I have had drawn to my attention an example where it has not been a lifestyle choice but a necessity. One of my constituents has written to me about his sister, who has a child with diabetes and Asperger’s. She decided to take her child out of school when his blood-sugar level was discovered to be dangerously low because he needs four injections every day and he had not been receiving them in a timely manner while he was at school. He also had to deal with the added disability of Asperger’s. She is very worried that she will have difficulty in continuing to support her child when the new regulations come into force.

Will the Government make it clear that they will make a distinction in respect of those parents who are educating children at home out of necessity and thus exempt them from the need to sign on for work? The Government’s argument is that when someone is being educated at home, the school week and the school year can be disregarded. That is true to some extent, but one would hope that those children might have at least some relationship with other children in the locality and might not be treated completely differently. In addition, it will be more difficult for those lone parents to get wrap-around child care, because that is often associated with the school that the child attends. I hope that the Government will pay more attention to the needs of such parents.”

Lynne Jones (Birmingham, Selly Oak) (Lab)

<http://tinyurl.com/6qpgyp>

<http://tinyurl.com/6h2efd>

<http://tinyurl.com/6p8b3e>

Affirmative or Negative Resolution Procedure ?

It is not clear to us whether this Statutory Instrument will be subject to affirmative or negative resolution procedure. It seems to be suggested in the SI and Explanatory Note that the regulations simply amend previous regulations rather than amending primary legislation. We would welcome clarification on this issue as a matter of urgency.

What about the children ?

Once again the Department appears not to have considered the problem of affordable appropriate suitable childcare for lone parents on the JSA regime. Home educating lone parents will be particularly hard hit since they have additional caring responsibilities. Education Otherwise has indicated to the Department that any home educating lone parents on JSA should be "treated as available for work" in the same way as lone parents whose children are excluded ie the usual requirements to attend fortnightly interviews can be waived (excluding quarterly Work Focused Interviews) We now require an urgent assurance from the Department that similar discretion will also apply to home educating lone parents on the second year of a JSA claim under the Flexible New Deal. FND does not seem to take account of the fact that home educated children will be present during all meetings and interviews and also during the four week work experience unless appropriate affordable childcare can be found. Our views on childcare have been submitted to the Committee in response to the previous consultation on Lone Parents and we reproduce our findings here :

Why Jobseeker's Allowance Won't Work For Home Educating Lone Parents

The reason why Education Otherwise insists that home educating lone parents should remain on Income Support is that the JSA regime will be completely unworkable for this group as a whole. We can predict this with complete certainty in advance. Why wait until the pilot and assessment stage ? Why over-complicate the issue by looking at each case individually over a long period of time, bringing in many tiers of decision-making ? This problem will not go away.

Jobseeker's Allowance Is An "Active Benefit"

The Department characterises JSA as an "active benefit". The claimant goes to the JobCentre twice a month, recounts the efforts being made to find a job, undertakes to continue to try and find a job and promises to take a job if one becomes available. Benefits are conditional on compliance and benefit sanctions are imposed for non-compliance.

Fortnightly Job Review

We have received the following feedback from home educating lone parents about Fortnightly Job Review or FJR, colloquially known as "signing on":

"What about signing on ? Pushing a disabled child in a wheelchair or buggy is hard work. Lone parents shouldn't be asked to push a buggy or wheelchair for any distance either, and that can result in physical damage to the parent."

"One off childcare for signing on will be really hard to find. There aren't any casual babysitters. Obviously it's not an option to leave them at home because there is no other responsible adult. Will the JobCentre pay childcare expenses or will I have to bring my children to sign on?"

"Will the JobCentre pay my children's bus fares when I sign on?"

"Will I be able to sign on by telephone or post ? I can't drag my children along and I can't leave them at home on their own for half the day. I have to change buses twice. Is there anybody who can answer my questions about this ? My lone parent advisor at the JobCentre knows nothing about it. "

"I am really worried about how I will be able to bring the kids when I sign on. The JobCentre is bound to tell me that if I put the kids in school I won't have this problem. Putting the kids back in school is not an option. "

"I'm on Income Support. Already I don't get any sympathy or understanding when I take the children to the Work Focused Interviews. The new rules will make it even worse. I am absolutely dreading it. "

Sanctions Are Not Effective For This Group

The Department tells us that sanctions are effective as a deterrent, that claimants accept the justice of the sanctions and that claimants modify their behaviour following sanctions. We are in touch with home educating lone parents on a daily basis and they have justifiable fears that their subsistence level family income would be severely jeopardised under JSA.

If home educating lone parents were put onto the JSA regime they would encounter JCP frontline staff and Decision Makers who would declare them to be acting unreasonably. At this point the personal element of the adult claimant's benefit would be cut, which would precipitate a long series of further referrals and appeals within the JSA system. We believe it is absolutely impossible to provide sufficient flexibility in the JSA regime for this group. This group of claimants will meet obstacles at every turn because the JSA regime was not drawn up for lone parents and of course the JSA regime was never drawn up and could never be drawn up for lone parents who have long term additional caring responsibilities for their children. The circle simply cannot be squared.

Jobseeker's Allowance And Childcare

Childcare is a key issue. Section 4.37 states:

"Jobcentre Plus will not dictate to parents which particular childcare providers they should use, but have an important role to play in both challenging pre conceived ideas about formal childcare and supporting parents to access childcare; parents need to make reasonable efforts to identify appropriate and affordable childcare and provide evidence to Jobcentre Plus on the steps they have taken to source such care; if a parent considers that appropriate and affordable childcare is not available, they will need to explain the reasons to Jobcentre Plus; where a parent considers that he or she cannot take up a job to which they are referred by a Jobcentre Plus Adviser because appropriate childcare is not available, a Jobcentre Plus Decision Maker will consider, on a case by case basis, whether the steps the parent has taken and the reasons they do not want to use available services are reasonable; and the costs of childcare are likely to be well within the tax credit limits, and any claims that childcare is not affordable will be considered on a case by case basis."

The Real Cost Of Childcare For Home Educators Is Much Higher

Hypothetically, if suitable appropriate childcare could be found for each child , a home educating lone parent with 2 children in formal childcare who worked for 16 hours a week, 4 hours a day plus 1 hour each way dropping children off at childcare provision and continuing to work would face a childcare bill of over £300 a week. The foregoing example is a conservative estimate and assumes

that the lone parent has private transport. In other cases the travel times would of course be increased. Would the JobCentre personnel consider this "reasonable"? Would the Decision Maker consider this "reasonable"? Home educating lone parents are already being challenged at Work Focused Interviews and told that they are acting unreasonably and that they should put their children in school so that they are able to go to work.

The Issue Of Childcare

The SSAC consultation document contains the following statement:

"We propose to amend the JSA Regulations in connection with good and just cause so that a Decision Maker must consider whether a parent's child care responsibilities made it unreasonable for him to stay in employment, to take up paid employment, or to carry out a jobseeker's direction. We propose that the Decision Maker must specifically consider the availability and suitability of childcare. In addition, we propose that Decision Makers must consider any necessary child care expenses where they represent an unreasonable amount of that person's earnings." [section 4.37]

Home educating lone parents are greatly concerned about how JobCentre staff will interpret the word "reasonable" in this context. We are further concerned about the phrase "availability and suitability of childcare". We commend the Department for attempting to clarify this issue in draft regulation, amending [Jobseekers' Allowance Regulations 1996 Regulation 13 paragraph 2](#) as follows:

(d) after paragraph (2) insert-

"(2A) For the purposes of paragraph (2)(d), where the person has caring responsibilities in relation to a child, in considering whether those responsibilities would, or did, make it unreasonable for him to undertake a particular employment or carry out the jobseeker's direction, regard shall be had, in particular, to the following matters-

(i) child care would not be, or was not, reasonably available to him or,
(ii) if it would be, or it was, available, it would be, or was, unsuitable due to his particular needs or those of the child." . DRAFT REGULATIONS PAGE 6 IN RELATION TO PARAGRAPH 2 (7) In regulation 13 (additional restrictions on availability for certain groups)-

(a) in paragraph (2), for "(3) or (4)" substitute "(3), (3A) or (4)"

Childcare is a key determinant for benefit eligibility and benefit sanctions . It hinges on this critical question : Was it acceptable for the lone parent to turn down a job offer or leave a job because of problems with finding childcare." The Decision Maker is to determine on a subjective case by case basis whether the lone parent has behaved "reasonably" with regard to childcare, but part of the criteria for "reasonableness" is to do with whether the childcare is "reasonably available". The Department has attempted to define a word by using the same word. We don't feel this is helpful either to the claimants or to the JobCentre staff or to the Advice Workers and advocates who will be inundated with complaints and appeals.

A further possible criteria for assessing "reasonableness" is proposed in regulation. Was the childcare "unsuitable due to his [the parent's] particular needs or those of the child."

If these regulations go through, we predict chaos. Exactly how many avenues is the lone parent required to explore. Under the proposed draft regulations, "if parents consider that options identified are unsuitable they will be required to explain why and show that they have taken reasonable steps to find alternative provision."

Scenario 1

The parent says "I tried the childcare but it wasn't suitable for my particular needs because the

childminder was caring for much younger children. " Was this a reasonable decision?

Scenario 2

The parent says: " I took my child to visit the childcare facility and he had a complete meltdown. I know he would never be able to cope. " Was this a reasonable decision?

Scenario 3

The parent says: " A friend is OK for the children to go to her house while I work but she isn't registered and it's not in my home. Someone has told me this isn't legal so I don't feel OK about it. My friend isn't prepared to come to my house. " What does the Department advise in this situation. Is it reasonable to say no?

Scenario 4

The parent says: "To begin with the kids were fine on their own while I went to work but last week there was a burglary in the house next door and now the children are too worried to be left on their own."

Scenario 5

The parent says: "The local school said they would be fine for my daughter to go in for 2 hours after school every day but she gets bullied because the other children don't understand why she isn't a pupil at the school. They've told her she is breaking the law and that her mum will go to prison. My daughter is now refusing to go "

Scenario 6

The parent says: "A new child has started at the childminder and he fights with my son. The childminder says I should have told her that my son gets angry and lashes out. I've tried to talk to her about Asperger's but she just wants me to take him out. "

The parent would say that the childcare does not meet the particular needs of the parent or the child. The Decision Maker could say that the needs are over-demanding or "unreasonable." Who decides? Will the Decision Makers be externally moderated ? The above scenarios are not plucked from the air; they represent a composite of some of the many questions Education Otherwise is asked on a daily basis.

Under the proposed draft regulations, "If parents consider that options identified are unsuitable they will be required to explain why and show that they have taken reasonable steps to find alternative provision."

This morning home educating parent wrote to us as follows:

"Child minders are often not keen to accept a child who requires more work than other children paying the same rate. A child who needs more supervision changes the way they have their time structured, causes complaints from other parents etc. It can be very hard to find care for these children. Also children with special needs often need supervision at an age when others don't - where is the childcare for a 14 year old that cannot be left alone? No after school provision for this group, and child minders aren't interested/equipped for this either."

We echo the statement published yesterday by the [Work and Pensions Committee](#):

"We are concerned about the Government's plans to exempt only parents who are entitled to claim Carers' Allowance from the requirement for lone parents to work. The proposal does not reflect the reality for families with disabled children, particularly those with the most sick and vulnerable children. Lone parents of disabled children should receive every support to help them to work, but a broader definition is needed for those exempt from the requirement to work. We recommend that the Government engages in further deliberation on this matter with the relevant stakeholders and seriously consider a wider group for exemption. (Paragraph 240)"

Extended Schools Are Not A Viable Option For Home Educators

We know that extended schools form the backbone of the Government's plans for childcare.

"The Government has stated that, by 2010, there will be a childcare place for all children aged 3-14 years old in England whose parents want one. This provision will be available on weekdays between the hours of 8am and 6pm all year round. As part of this objective there is an aim that, by 2010, all schools in England will be offering extended services - which will include childcare where there is a demand. The Government exceeded its target of 2,500 schools providing the extended services core offer by September 2006 and by September 2008 it expects at least half of primary schools and a third of secondary schools to be offering extended services." [Annex 8 p.82]

Wraparound provision in extended schools could provide free or greatly subsidised childcare for up to 50 hours a week. Home educated children could only access these facilities for a maximum of 10 hours per week, between 4pm and 6pm which would not allow sufficient time to work for 16 hours once the parent had to take the children to school and then travel to and from work to the school in the space of 2 hours. It is possible that the home educating lone parent might be available for work for 5 hours a week using extended schools provision. This optimistic estimate assumes access to private transport. It also assumes that schools would take in children from outside the maintained sector. Once again this is a postcode lottery for home educated children.

Is the Department of Work and Pensions aware of the criteria for "community cohesion" in terms of the remit of extended schools ? Are frontline JobCentre staff aware of the criteria for community cohesion ? Are Decision Makers aware of the criteria for community cohesion ? Home educated children are not excluded outright from the criteria, but they take their chances with a host of other potential beneficiaries who tick more boxes for the schools. As a representative in the extended schools scheme in Sheffield told Education Otherwise:

"To put it bluntly, what's in it for us? We don't get any money for helping you. We sympathise but what do you expect us to do."

There Is No Suitable Childcare For Older Children

We are able to report that suitable affordable appropriate childcare cannot be found. In particular, suitable appropriate childcare cannot be found for older home educated children. Suitable appropriate childcare is not available for older home educated with disabilities and learning difficulties. In-home formal childcare is extremely hard to find and in the rare instances it is found, it is prohibitively expensive. We know this in advance. We know it from experience. This is not a "perceived barrier to childcare" or a "preconceived idea" [section 4.37 "good cause and just cause" ; section 4.45 "our approach to appropriate and affordable childcare"] , yet it will be regarded as such by the JobCentre and therefore under the JSA regime, benefits will be cut. This group of people do not fit any of the DWP statistical generalisations about "lone parents of older children". Our parents are able to give us in-depth feedback about childcare because of their experience with respite care.

Statement from home educating parents with children on the autistic spectrum:

"Respite care is virtually impossible to find and is very expensive. There are very few registered respite carers trained for caring for a disabled child in the home of the child, and often this is the only type of childcare suitable for disabled children. "

"Respite childcare is there so that the parent can get a break from caring for the child and it would be inappropriate for the parent to have to use that time to work. This would result in a parent becoming stressed and burnt out."

"Respite care for disabled children must not be classed as suitable childcare for allowing a parent to go back to work."

<http://www.freedomforchildrentogrow.org/ssac.htm>

Have Prime Contractors already been signed up ?

It is not clear to us whether the Prime Contractors for Flexible New Deal have already been signed up or whether it is still at short-list stage. We think there are vested interests operating here and that the expansion of privatised employment services is a job-creation scheme in itself.

Impact Assessment insults lone parents

We think it is absurd to say that only 10% of JSA claimants will still be on JSA after a year. There are two reasons for this. One is that the JSA regime is about to be flooded with 100,000 lone parents of children over 12. The second is the credit crunch.

To say that the Impact Assessment is a "living document" is an extreme understatement which completely fails to take into account the devastating effect of the Government disallowing Income Support for lone parents. The Jobseeker's Allowance regime was never intended for lone parents and can never be made acceptable for lone parents. The proposals demonstrate an appalling lack of awareness of the difficulties faced by lone parents who at the time of writing are about to be removed from eligibility to Income Support.

Annex 5 Equality Impact Assessment

The Impact Assessment is a living document and is being updated as more information becomes available and policy develops.

"The main assumption in the costings model is the number of jobseekers flowing through six and 12 months and therefore receiving additional support during the Supported Jobsearch and Flexible New Deal stages. This is a particular risk because the off-flows for jobseekers from 2004/05 have been used for costings, but the level of unemployment might be different in 2009/10 and 2010/11."

"In the Flexible New Deal Invitation to Tender we have set performance expectations to reflect the step change in performance that we expect FND to achieve. The expectations are set at 55% of starts get a short job outcome (13 weeks employment) and 50% get a sustained job outcome (26 out of 30 weeks)."

Costings are based on 2004 and do not take account of 100,000 lone parents newly claiming JSA

The statistics for claimants moving off JSA ("off-flow") used for DWP costings is based on 2004-5

figures which did not of course include any lone parents except those voluntarily on JSA and participating in voluntary New Deal for Lone Parents. On so many levels this is not comparing like with like and we find the Impact Assessment and Value for Money test wholly inadequate.

Query over terms and conditions of Prime Contractors' agreement

Any projected costings for FND are going to be ludicrously off kilter. Either the Prime Contractors end up invoicing way over DWP budget if the service fee is per capita or the PC's service fee contract is capped by DWP in which case the PC cuts back on active outreach (because it isn't cost effective) and simply warehouses the vast majority of clients for a year before returning them back into the JobCentres.

We believe the Prime Contractors will only actively assist those who will move into employment and earn the PC the 30% service fee for sustained employment. If the jobs aren't there, and the affordable appropriate childcare isn't there, then the PC can't earn the 30% of their annual service fee by placing clients into these non-existent jobs. At this point the Department will be in a bit of a hole, because there are so few competitors or substitutes for the PC tender because of the Department's previous cost-cutting decisions. The Department will therefore have to go along with pretty much whatever the PC needs in order for the PC to be able to continue running the vital employment services. Perhaps it is envisaged that the subcontractors would also be re-hired by a different PC under less favourable market terms.

Lay off experienced employees and rehire from JSA ranks at lower rate with no employment rights

The only way this scheme can work is for existing employees to be laid off and replaced by short term job contracts. The employer loses the experienced worker but also cuts down considerably on the wage bill. Of course, we have seen this in previous recessions.

The hope that costs can be driven down by rationalisation and limiting the number of Prime Contractors simply transfers the mess and cost cutting down to the next level of subcontractors to the PCs. However, we also read that “ An impact assessment has not been produced for this instrument as no impact on the private or voluntary sectors is foreseen. “ (Explanatory Note to the SI)

Surely JobCentre Lone Parent Advisors could meet in cafes as well ?

We note the following on page 44

“Employment Zones have both operational and financial flexibility. In practice this means that advisers can, for example, meet jobseekers in alternative locations, such as cafés or outreach centres. “

We have also read reports comparing privatised employment services very favourably with in-house JobCentre experience. It seems to come down to small but significant elements such as follow-up “are you OK” type phone calls and meeting in cafes rather than in unfriendly JobCentres.

Surely JCP Lone Parent Advisors could meet claimants in cafes as well ? This is not a flippant suggestion. How do the public sector unions feel about this?

The end of the Department of Work and Pensions ?

<http://tinyurl.com/4sxlhm>

Public and Commercial Services Union

PCS general secretary Mark Serwotka said: “It is shocking that the DWP is now seen as a potential multi-billion pound industry to be exploited by private organisations pursuing a profit out of the welfare state. As well as questions remaining about the private and third sectors' capacity to deliver welfare services, there is a fundamental issue of whether profits for the few should be the driving force of the welfare state, rather than the needs of those who rely on these services.”

DWP Literature Review

A review of all DWP research in this area must be undertaken before any further action can be contemplated.

http://www.dwp.gov.uk/asd/asd5/summ_index_2007_2008.asp

Welfare Reform Briefing Paper from Education Otherwise November 2008

Finally, we would like to submit for consideration the Briefing Paper on welfare reform written by Education Otherwise an extract of which is reproduced below

<http://www.freedomforchildrentogrow.org/welfarereform.htm>

What Everyone Says about These Measures: Work and Pensions Committee; Lone Parent Stakeholder Groups; Social Security Advisory Committee; Merits Committee; 6th Delegated Legislation Committee

In the summer of 2007 the Department of Work and Pensions ran a consultation on the Government Green Paper In Work, Better Off. The Government's own consultation report expressed reservations about the policy. In March 2008 the Government's Work and Pensions Committee published [a highly critical report](#) with submissions throughout from the Child Poverty Action Group and One Parent Families/Gingerbread stating that benefit sanctions should only be applied with extreme caution, and that the Jobseeker's Allowance regime was inflexible and in urgent need of a complete overhaul.

Social Security Advisory Committee highly critical

In May 2008 the Government presented draft regulations to the Social Security Advisory Committee for consultation with stakeholders and other interested parties. The SSAC report was highly critical of many aspects of the draft regulations and strongly recommended that the measures did not go ahead. Read the report [here](#).

Merits Committee said measures were contentious

The regulations were nevertheless laid before parliament on October 6th and were promptly referred to the House of Lords Merits Committee which has the job of considering statutory instruments which may be contentious or likely to give rise to issues of public policy.

The Merits Committee in its turn drew attention to a number of intractable problems with the draft regulations. You can read the Merits Committee report [here](#).

6th Delegated Legislation Committee criticisms and questions for Minister

The last stage in the successful progress of these regulations has been the debate at the 6th Delegated Legislation Committee on October 30th where the new Minister Kitty Ussher explained

why the Government was still going ahead with the regulations. You can read the transcript of the Committee meeting [here](#) (need to click to advance web pages).

Scrapping Income Support and privatising the employment services

The proposed welfare reform regulations are part of a package of measures with the ultimate aim of abolishing Income Support and contracting out employment services to private companies. See the Department of Work and Pensions website for private tender information [here](#) and the [DWP Green Paper No One Written Off](#) for more information on scrapping Income Support and the current [Social Security Advisory Committee consultation on the Flexible New Deal](#) for information about privatised employment services in the second year of the JSA claim.

During the recession how will 90,000 lone parents find employment in first year of Jobseeker's Allowance?

The latest measures were introduced before the economic recession and recent credit crunch. Originally Government said that the jobs were there and people just needed to be pushed into taking them. Now Government has the same policy in a radically different economic climate, so the new Minister says that the worst of economic times is by an extraordinary coincidence the very best time to put 100,000 lone parents onto a jobseeking programme so that "lone parents do not become further detached from the labour market". You can read more from the Minister at the 6th Delegated Legislation Committee debate [here](#).

Earlier in October 2008 the Department of Work and Pensions told the Social Security Advisory Committee that 60% of claimants move off Jobseeker's Allowance within 13 weeks; 80% of claimants find work or move off benefit by 26 weeks and 90% find work or move off benefit by the end of the first year. You can read our notes [from the DWP here](#).

Lifting children out of poverty?

The Government also says that these measures will lift children out of poverty yet lone parents who cannot comply with the Jobseeker's Allowance regime will have their family income slashed by £24 a week. The leaders of the main political parties have all said that they support Government objectives to raise children out of poverty but many individual MPs are now questioning the wisdom of these particular regulations as a way to achieve this goal.

The nuts and bolts of claiming Jobseeker's Allowance

Income Support is paid weekly and JSA 2-weekly. At the start of the JSA claim, lone parents will be expected to take out a repayable loan until they receive their first JSA payment. This is attracting considerable criticism from child poverty and lone parent stakeholders.

Normally, JSA claimants are expected to sign on 2-weekly and have an Action Plan for seeking employment of at least 16 hours. This is called the "fortnightly job review" or FJR. Education Otherwise is making the case to the Department of Work and Pensions that home educating lone parents should be able to sign on by post in a comparable way with parents of excluded children and parents in the school holidays who can't get short term childcare. EO already made this point in [our submission to the Social Security Advisory Committee in June](#).

The longer lone parents are on JSA, the more the employment services will step up attempts to get claimants to consider different jobs outside their preferred or specialist field and to investigate other childcare options etc. The first year will be in-house at the JobCentre but the second year will be with privatised employment services. More details available [here](#).

Appropriate Affordable Childcare

Lone parents will only be required to take employment if "appropriate affordable" childcare is available. A huge amount of discretion will be in the hands of Lone Parent Advisors in JobCentres who have not received the relevant training. Education Otherwise had a last minute opportunity to review the guidance which the Department of Work and Pensions will be sending out to all JobCentres. The issue of appropriate affordable childcare is at the heart of the Government's proposals and was one of the major areas of concern highlighted by the Work and Pensions Committee, the Social Security Advisory Committee, the Merits Committee, the Members of Parliament comprising the 6th Delegated Legislation Committee and by all lone parent stakeholder groups and individual lone parents who have responded to Government consultations on these proposals. For the Education Otherwise view on appropriate affordable childcare please read [our submission to SSAC from June 2008](#).

What about home educating lone parents?

Education Otherwise has lobbied the Department of Work and Pensions, the Social Security Advisory Committee and Members of Parliament and Ministers continuously on this issue. We remain adamantly opposed to the introduction of these measures. As we stated in [our submission to the Social Security Advisory Committee in June](#), we believe the proposals to be totally unworkable.

"Whether one accepts the principles behind the change or not, the proposed new regulations are contradictory and confused and require a great deal more planning and consultation. Under the present hastily drawn-up proposals, the entire system will shortly grind to a halt, vulnerable families will be plunged into poverty and the JobCentres will be flooded with expensive and time-consuming appeals. It is not too late to demand that the Government think again. Why wait till it all goes pear-shaped as it certainly will? Why not work to get it right in the first place?"

In addition, we are currently talking to the Department of Work and Pensions and to other stakeholder groups about how we can possibly limit the damage of these measures on home educating lone parents and their families. The DWP has agreed that this is a policy issue and that home educating lone parents should be treated sensitively. More about this can be found in [our notes](#).

Education Otherwise had last a minute opportunity to review the JobCentre training material to see how home educating lone parents could be "treated as available for work" in order to meet the criteria for JSA and not lose benefits.

EO will also be attending a Lone Parent Stakeholder meeting with the Department of Work and Pensions on November 13th. More details [here](#).

[Social Security \(Lone Parents and Miscellaneous Amendments\) Regulations 2008 Briefing Paper from One Parent Families](#)

[Information on statutory instruments procedure and more here](#)

[Work and Pensions Committee Report 2008](#)

[Department Work and Pensions web page on privatised employment service contracts](#)

[Department Work and Pensions consultation on scrapping Income Support](#)

[Education Otherwise submission to the Social Security Advisory Committees](#)

[Social Security Advisory Committee Report 2008](#)

[Merits Committee Report October 2008](#)

[Transcript 6th Delegated Legislation Committee October 2008](#)

[Education Otherwise Briefing Paper on Flexible New Deal Consultation \(SSAC 2008\)](#)

Contact Details

For further information or feedback please contact Education Otherwise [Government Policy Group](#) or Education Otherwise [Disability Group](#).