

In work, better off: next steps to full employment

A response by RNID

RNID is the largest charity representing the nine million deaf and hard of hearing people in the UK. As a membership charity, we aim to achieve a radically better quality of life for deaf and hard of hearing people. We do this by campaigning and lobbying vigorously, by raising awareness of deafness and hearing loss, by providing services and through social, medical and technical research.

RNID welcomes the opportunity to comment on the proposals made in the Green Paper, 'In work, better off', and shares many of the Government's aspirations for the increased participation of disabled people in the workplace.

We recognise that disadvantaged people are looking for work in a highly competitive jobs market with an increasing pool of available and affordable labour, and we agree that the current provision of support for those who can and want to work is too often unsatisfactory and unsuitable.

Our own recent research¹ shows that deaf people in the UK have an employment rate of 63 per cent compared to a national average around 75 per cent. Of those who were unemployed, fully seventy per cent had applied for work in the previous twelve months, with almost a quarter of these applying for more than ten jobs during that time. It is obvious, therefore, that the problems facing deaf people in the labour market are not due to a lack of desire to work, and that any reform of the welfare system and associated employment services must take account of the real reasons for the increased worklessness found amongst key groups of disadvantaged people.

We are concerned that the title of the paper accepts as a foregone conclusion the notion that work makes an individual 'better off'. There is no doubt that for many, work does provide opportunity for increased independence (both financial and social), greater opportunity and some ongoing health benefits. However, there will always be people for whom work is not an option because of the complexity of the barriers they face, and the Government must recognise this irrefutable fact by providing these people with a decent standard of living that does not deny them their own independence and opportunity.

¹ Baker, M (2006). *Opportunity Blocked: the employment experiences of deaf and hard of hearing people*. RNID. London.

Chapter Three – Local Employment Partnerships

3.1 – RNID is concerned that the rights and responsibilities laid out in the proposals are not balanced or rooted in a realistic evaluation of the labour market as regards deaf people. Whilst there are a series of conditions placed upon benefits claimants, there is no guarantee that meeting these conditions will improve the chances of gaining and retaining paid work. The balance is one whereby the only spur to the individual is that of the threat of further impoverishment through the enforced removal of breadline benefits. RNID contends that there is no justification for the imposition of a regime of sanctions, and our repeated calls for the production of evidence that sanctions produce positive results for job seekers remain unanswered.

3.2 – The role of employers in the equation has still not been addressed properly. There is no doubt that some employers have proved to be positive towards disabled people in both word and deed, and that they have recognised the benefits of a diverse workforce. However, in our research, the attitude of employers was cited as the main reason why deaf people find it harder to get jobs, and this situation is unlikely to change unless there is pressure from above. To this end, RNID would like to the Government publish a comprehensive and co-ordinated strategy for employer involvement in delivering real results for deaf job seekers.

3.3 – There is already some opposition from employers to the pace of reform. Stephen Alambritis of the Federation of Small Businesses has already forecast that employers will be ‘deluged with interviews that lead nowhere’², evidence that employers themselves have grave doubts about the immediate outcome of welfare reform.

3.4 – RNID believes that the ‘Jobs Pledge’ does not go far enough in encouraging employers to recruit disabled people or people with multiple disadvantage. If any real difference is to be made to the opportunities available to deaf and hard of hearing people, more must be done to encourage SMEs to take positive strides. This would include working with DBERR to develop and publish a strategy for proactive engagement with SMEs, including the promotion of and continued investment in the Access to Work scheme.

3.5 - RNID maintains that the main, if not sole, reason for the low employment rates experienced by many disadvantaged groups lies with the reluctance of employers to recruit them. We are therefore worried that a political reluctance to engage with the idea of increased regulation for employers will serve only to limit opportunity for deaf and hard of hearing people and thwart the Government’s good intentions.

3.6 – In order to be able to engage effectively with employers, the Department of Work and Pensions as well as local public authorities should be capable of acting as exemplar employers in terms of the recruitment, retention and progression of disabled people. Currently, the public sector has a poor record in this area, and RNID would like to see a strategic and measurable commitment to increasing the numbers of deaf people working across both DWP, Ministerial Government Departments and the public sector in general.

² *The Politics Show*, BBC1, Sunday October 21, 2007.

Chapter 4 – The next steps towards full employment

4.1 – RNID is concerned that the broad approach outlined in Chapter 4 will actually serve to increase, rather than reduce, complexity within the benefits system. The Government has repeatedly stated its desire to move towards a more unified system of benefits, specifically for working age people. There needs to be much more appreciation of the interdimensionality of disadvantage, and of the fact that most disadvantaged people have more than one disabling factor affecting their lives. We would like to see detailed proposals of how welfare reform will reach out to support these people.

4.2 – There are many cases where individual claimants may straddle two or more categories. Such a case would be of a lone parent with a deaf child, who would actually be likely to qualify for support for three reasons, each with a separate package of responsibilities. RNID argues that lone parents with deaf or disabled children should be treated as carers with respect to the conditions placed upon them for the continued receipt of benefit. Currently, one in four lone parents has a disabled child, and yet only 16 per cent of these are able to work, and the time spent caring may well increase as the child gets older. This does not mean that we see these parents as incapable of work, indeed, they are free to volunteer for work-focused programmes – but they should be allowed to continue caring for their child and it is the duty of the benefits system to ensure that they remain free to do so without the fear of impoverishment.

4.3 – If welfare reform is to work for lone parents, particularly those with disabled children, then employers will have to make the necessary adjustments to accommodate their needs. The fact that a parent has to wait until they have been working for 26 weeks before they have the right to request flexible working is a significant barrier to work. The right to request flexible working must be extended to the start of employment for people with caring responsibilities.

4.4 – The proposals should take greater account of the proven double penalty for people with a sensory disability from ethnic minority communities, and the specialist help that will be required to assist these people into work. The same research³ has also shown that disabled women from ethnic minority groups face a further labour market penalty that needs to be anticipated when awarding contracts to specialist providers and in designing statutory services.

4.5 - RNID is very concerned that the proposed model for welfare reform is that of Job Seekers Allowance (JSA). JSA has a long track record of failing to find people sustained employment opportunities⁴, one of the stated aims both of this paper, and of the recent report by David Freud. The reforms for JSA outlines in the report are concerned almost wholly with increasing unnecessary conditionality upon claimants in return for more support. The report fails to address the nature of the low-paid, low-status and low-security jobs that JSA claimants are regularly forced to take. Again, more work needs to be undertaken with employers to ensure that opportunities are real and lasting and provide opportunities for progression and advancement.

4.6 – To this end, we believe that the Disability Discrimination Act does not go far enough in protecting the rights of disabled people in the workplace. The DDA exists primarily as a

³ Sefton, T., M.Baker and A.Praat (2004). *Ethnic minorities, disability and the labour market*, University of Hull

⁴ Carpenter, H (2006). *Repeat Jobseekers Allowance Spells*. DWP research report No.394. DWP.

restitutive tool, compensating people for discrimination after the event. Whilst it has encouraged some employers to be more receptive to the skills and abilities of disabled people, it remains the responsibility of the wronged party to seek redress through a legal system that, ironically, often remains inaccessible to them. RNID argues that the Disability Equality Duty for the public sector should be extended across all employers, forcing them to anticipate the needs of disabled people as employees. This should at least be the case for all signatories to the 'jobs pledge' and those that work directly with government-sponsored or contracted schemes.

4.7 - RNID is unequivocally opposed to the notion that benefit claimants should be required to undertake a period of full-time work experience after a set time on benefits. Such a system will not only force claimants to perform unpaid work in order to keep claiming benefits, but will do so on the basis of their having been failed by a system that too often is incapable of identifying and meeting their needs. We also believe that compulsory work experience would not have any beneficial effect in enabling those people forced to undertake it in finding paid work, as a period of unpaid economic work may actually serve to stigmatize the individual.

Chapter 5 – Delivery through Partnership

5.1 – At the very core of the delivery of employment services to disadvantaged people lie the notions of personalized services and informed choice. RNID believes that individual claimants ought to have the right to choose the support that they need as well as the provider of that support. We believe that not only is the notion of choice in keeping with the drive towards individualized services for disabled people in social care, but also will work to drive up the standards of services offered, promoting a diverse service economy that is better equipped to meet the needs of its clients. Early evidence of a commitment to choice would be for the Department to publish details of the subcontracted elements of the awarded prime contracts.

5.2 – It is vital that all contracts and subcontracts are transparent and open to scrutiny. The performance of all contractors should be measured objectively, regularly and publicly so as to assess their ability to meet the needs of all service users, rather than concentrate on those already nearest to employment. The current reliance on numerical targets could mean that prime contractors could fulfil their obligations without ever having come into contact with people from some harder-to-help groups, and we believe that segmented targeting is the best way to ensure that opportunity is extended to all. Those contractors that are found to failing in these respects should be subject to severe penalties, including the removal of their contractor status and the repayment of fees received.

5.3 - The measurements utilized should be more sophisticated than a mere ‘return to work’, but should also focus on sustained employment and career progression over the medium to long term. Similarly, contractors should be urged to help those who are furthest from the labour market by a system of measuring soft outcomes and landmark steps towards employment for clients with more complex barriers.

5.4 – RNID is concerned that all but one of the initial contracts for Pathways to Work have been awarded to private contractors. In this, we believe that much of the expertise and knowledge found in the voluntary sector will be marginalized, along with the unique skills set provided by current Job Centre Plus staff. There are fears amongst some third sector organisations that prime contractors have been keen to use their names in submitting bids, but without the ongoing commitment to use their services. We call on the Government to monitor the running of these contracts carefully and transparently to ensure that their original terms are fulfilled and that there is evidence of real and meaningful engagement with those people seen as being furthest from the labour market.

5.5 – We expect that no bid for a contract or subcontract would be considered for award to any organisation that is not fully DDA compliant and we would hope that successful contractors will be in a position to publish their Disability Equality Schemes.

5.6 – We are concerned that the pace of reform may not allow full time for key services to evolve and develop sufficient capacity to meet expected demand. RNID joins with ACEVO in asking that the second wave of Pathways contracts be delayed in order to allow for the full evaluation of the impact of the first round of contracts on both clients and service providers.

5.7 – RNID welcomes the moves that this paper makes towards a more joined-up way of approaching the problem of a lack of opportunity for disadvantaged people. However, real and lasting change cannot be delivered unless the Government works and acts as a single unit. DWP cannot move forward in its ambitious plans without support from the Department of Health at both a strategic and a service delivery level. It would, for example, be totally unreasonable to expect a deaf or hard of hearing person to engage with employment services if they were still waiting for the hearing aid that could transform their life – nor should a person be forced to wait for such interventions before they can take advantage of the opportunities on offer.

Conclusion

RNID continues to welcome the opportunity to engage with developing policy on welfare reform, and would appreciate the opportunity to discuss the proposals and their ramifications for the UK's deaf and hard of hearing people.

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