**Work and Health Programme statistics consultation response**

Work and Health Programme Provider guidance states that the following actions are ‘high level must-do’s’ [[1]](#footnote-1):

* Identifying participants with complex needs/additional support requirements
* Work with participants to identify and put in place support required
* Recording requirements and agreed support on provider systems
* Reviewing complex needs/additional support requirements throughout the participant journey

Given that these are ‘must-do’ actions RGWRS would recommend that DWP report on:

* The number of WHP participants recorded as having complex needs
* The number of WHP complex needs participants recorded as having adjustments applied to their conditionality
* The number of complex needs participants who are referred for a compliance doubt
* The number of compliance doubt referral for complex needs participants resulting in a sanction being applied (both before and after appeal)

**Vulnerable participants**

The eligibility criteria for the Work and Health Programme means that high proportions of WHP participants are likely to have complex needs[[2]](#footnote-2). DWP estimates of the proportion of vulnerable UC claimants range from 25% to 50% [[3]](#footnote-3).

The Work and Health programme will be using a different definition of vulnerability to that used by the Work Programme, identification of complex needs will be much more reliant on JCP and WHP provider staff being able to spot vulnerability and apply appropriate adjustments. DWP and JCP have been poor at identifying vulnerability in the past [[4]](#footnote-4), this was an issue raised a number of times in DWP Peer Reviews (carried out following serious incident or death).

Given the number of participants likely to be judged to have complex needs and the consequent risks, outcomes for this group should be reported on by DWP as part of their statistics publication plan.

**National Audit Office Report**

The recent National Audit Office report on the rollout of Universal Credit [[5]](#footnote-5) touched on the need for better monitoring of outcomes for claimants with complex needs. The report states that:

“*the department has found it difficult to identify and track those who it deems vulnerable. It has not measured how many Universal Credit claimants are having difficulties because it does not have systematic means of gathering intelligence from delivery partners*.”[[6]](#footnote-6)

The report goes on[[7]](#footnote-7):

“*2.5 Identifying which claimants are vulnerable is important so that the Department can properly target support and set appropriate conditions on welfare (for example, reduced work search requirements). However, the Department’s research in October 2017 shows that some staff found it difficult to support claimants because they:*

* *lacked the time and ability to identify claimants who needed additional support;*
* *lacked the confidence to apply processes flexibly and make appropriate adjustments; and*
* *felt overwhelmed by the volume of claimants reporting health problems.*

*[…]*

*2.6 The Department has recognised the need to make changes to the way it identifies and provides support to vulnerable claimants. This includes making it easier for work coaches to record information about claimants’ needs. […]*

*2.7 The Department lacks the ability to monitor the treatment of vulnerable claimants nationally. It has not yet developed means to record different vulnerabilities in its data systems. Jobcentre managers told us the lack of vulnerability identification markers makes it difficult to understand the types of local provision needed. The Department has told us it is developing a text-mining approach to allow it to identify different vulnerability groups within the pinned information.*”

The call for monitoring of vulnerability and adjustments made by employment support providers is not new, for example the Disability Rights UK submission to the 2016 NAO report on sanctions raises the issue of monitoring of vulnerability among Work Programme Participants [[8]](#footnote-8).

Given that the NAO believes that the identification of vulnerable claimants is important and that frontline staff are struggling to support vulnerable claimants this would seem to suggest that monitoring outcomes for these groups as recommended above is vital.

**Recommendations**

Royal Greenwich Welfare Rights Service would like DWP to regularly report on outcomes for WHP participants recorded as having complex needs. RGWRS would recommend that DWP provide statistics on:

* The number of WHP participants recorded as having complex needs
* The number of WHP complex needs participants recorded as having adjustments applied to their conditionality
* The number of complex needs participants who are referred for a compliance doubt
* The number of compliance doubt referral for complex needs participants resulting in a sanction being applied (both before and after appeal)
1. <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/678180/whp-provider-guidance-chapter-6-working-with-participants-with-complex-needs.pdf> [↑](#footnote-ref-1)
2. <http://researchbriefings.files.parliament.uk/documents/CBP-7845/CBP-7845.pdf> [↑](#footnote-ref-2)
3. Paragraph 32 <https://publications.parliament.uk/pa/cm201719/cmselect/cmworpen/740/74007.htm> [↑](#footnote-ref-3)
4. See documents 1, 6, 14, 15, 26, 27, 32, 36, 38, and 48 in redacted peer reviews  <https://www.gov.uk/government/publications/dwp-foi-releases-for-may-2016> [↑](#footnote-ref-4)
5. <https://www.nao.org.uk/report/rolling-out-universal-credit/> [↑](#footnote-ref-5)
6. Summary paragraph 10 <https://www.nao.org.uk/wp-content/uploads/2018/06/Rolling-out-Universal-Credit.pdf> [↑](#footnote-ref-6)
7. Paragraphs 2.5-2.7 <https://www.nao.org.uk/wp-content/uploads/2018/06/Rolling-out-Universal-Credit.pdf> [↑](#footnote-ref-7)
8. <https://www.disabilityrightsuk.org/sites/default/files/word/DRUKNAObenefitsanctionsstudy24Jun2016.docx> [↑](#footnote-ref-8)