

**Response to the DWP Green Paper**  
***No one written off: reforming welfare to reward responsibility***

**Adrian Sinfield**

School of Social and Political Studies  
University of Edinburgh  
adrian.sinfield@ed.ac.uk

**Summary**

There is much that deserves to be welcomed in the Green Paper were the proposals not remarkably unbalanced, even more so than those in *In Work Better Off*. The emphasis on responsibilities, increased conditionality, compulsion and ‘work for benefit’ to the relative neglect of the consideration of needs and demand-side factors is extremely likely to be counter-productive. It will neither increase employment nor reduce poverty, but demoralise already deprived and discouraged claimants and, at the same time, alienate already overworked staff. In consequence, job retention is very likely to decline with increased re-cycling in and out of work and the additional problems this causes. In other words, it will not work. In addition, its failure will weaken public support for fresh moves to tackle the problems of poverty and worklessness.

At times the Green Paper reveals a generous, progressive view of moving towards full employment by helping people to overcome the barriers in getting into work and out of poverty. But, overall, this is constantly being overwhelmed by a more punitive, less tolerant view that pushing employment up and getting people off benefits is necessary to ensure that people fulfil their proper responsibilities. There are few points where I, and those I have discussed this with, believe that the claimant is given the benefit of the doubt.

Since the Green Paper was published, unemployment has not only risen but the economy is under threat from the effects of the collapse in the banking and financial sectors. In consequence the proposals for increased pressure on some of the most vulnerable in society is highly likely to have even more harmful and costly effects, and to create even further problems for overloaded staff that will result in a decline in the service. Attempts to tackle problems on an individual basis will be reduced, leading to at best very rough justice for those who are seen as less responsible.

**Five points deserve particular consideration from those evaluating the responses.**

- 1) Evidence, often from DWP studies, indicates that greater conditionality, let alone the difficulties of implementing ‘work for benefit’, can undermine the success of programmes helping people back to work and also fail to reduce poverty – see especially my answers to questions 1-3.
- 2) The Green Paper and its proposals fail to take account of the fact that many people are finding work but not escaping poverty and other problems. The problems on the demand side of poor work, poor working conditions and discrimination receive little mention, and there is even less indication of how they are to be tackled.
- 3) Equally worryingly, there is no consideration of benefit levels and the fact that many people are experiencing difficulty in finding work because of the poverty to

which inadequate benefit levels condemn them. In consequence, it will have much less success in reducing poverty than is needed. Such a system is not ‘passive’ but actively works against those in need.

A generous benefits system can itself be positively active - effective in promoting employment and preventing poverty. This has even been acknowledged by OECD in reviewing its Jobs Study (OECD, 2006).

4) The suggested consultation questions only reinforce the one-sided focus on sanctions and conditionality and a surprising neglect of other issues. The very first one appears to take ‘work for benefit’ for granted and not a matter for consultation. In addition, it is questionable whether the Easy Read questions properly reflect the central concerns in the main, longer, set of questions.

5) It is essential that the evaluation of the responses to this Green Paper is carried out more openly and fairly than the previous one, for *In Work Better Off*, appeared to be. Then there was much less recognition of the criticisms of the emphasis on more and greater conditionality that was generally evident in all the responses I saw or heard about from a wide range of sources. It was not possible to check my impression as responses were not made available, even when respondents had indicated willingness for their views to be made accessible.

### **The failure to observe and practice what works**

The general tenor of the Green Paper is all the more disappointing since the Department for Work and Pensions is now very much better placed than it has been to build on the lessons from its successful programmes and the research that is available within and outside government. With less change but more joined-up policymaking and some real engagement with problems of retention and progression, it could help to achieve its aims of increasing employment and reducing poverty much more effectively and efficiently. In other words, the Department knows what works: why is it not following the direction that its own research and practice would lead it in?

By contrast, the arguments within the Green Paper are worryingly thin and are rarely backed up with any detail, let alone carefully referenced research evidence. The case for the continuing strong tilt towards greater responsibilities for claimants and further conditionalities and sanctions restricting their rights is not backed up by the research that I have read, much of it financed and even carried out by the Department itself. This disregard of the government’s own studies into what works is a dismaying and worrying waste of government funds.

The spirit of the Harker report (2006) is missing throughout the Green Paper. The problems created by poverty in work and poor work, and the risk of increasing their extent, are given scant consideration. By contrast, the imbalance in the text between rights and responsibilities for claimants is so great that at times it might well be considered discriminatory – especially, but not only, in relation to drug-users. This is compounded by the failure to recognise the problems created by the low level of benefits when their inadequacy adds to the barriers getting into work as well as perpetuating poverty, despite the government’s commitment to its child poverty target.

The great majority of those who are out of work and can work are desperate to find a job. They are eager to raise their own and their family's living standards and to provide any children with the support that they cannot currently give them. Most are quite well aware of their responsibilities. Indeed, their inability to fulfil these is often an additional demoralising factor that can pull many down and lessen their ability to compete successfully at interviews, cope with the demands of the first weeks in work, etc. More effort in helping these people into work and staying in it could be much more effective and efficient in reducing poverty and promoting lasting employment than the present proposals. In addition, helping people to succeed encourages others to seek the same help – and this multiplier effect of this positive support is not given attention in the proposals set out here.

### **The importance of alternative strategies**

To bring about the reduction in poverty and the increase in employment that the government seeks, much greater success would be obtained by adopting the following strategies:

- Tackling and preventing poverty in employment requires a strategy that delivers decent jobs, not any jobs, since poverty in work is one of the greatest challenges preventing a faster reduction in poverty. Adequate staffing and support must be made available by the DWP to ensure that the Harker (2006) measures for 'work first plus' have the success that they could have. There should be vigorous promotion of the benefits of decent work with decent pay, removing 'family-unfriendly' working conditions and helping those moving into work to stay and progress in their jobs. By contrast, there is very little specific provision in the Green Paper to tackle this major problem that is all the more important for helping the more vulnerable in our society to get and retain work that lifts them out of poverty.
- Employers should be encouraged to ensure that their HRM and other policies are strengthened and take account of the needs of the groups discussed in the Green Paper. The government should follow up the proposals from CIPD in relation to those suffering from mental illness and other difficulties (Philpott, 2006).
- Trade unions must also be involved in tackling the problems in work.
- More must, and easily could, be done to improve the labour market by the government itself providing models of best practice in employment that help workers to stay and progress in decent jobs, enabling them to bring their children up out of poverty. This should be developed at central, regional and local government levels and in agencies of all types, building on the experience of 'Closing the Opportunity Gap' target C in Scotland, to help people into decent jobs and progress in them. The next step should be to ensure that those companies whom government departments themselves employ meet the same standards in treatment of their staff.
- Benefits and credits must be made sufficient to keep individuals and families out of poverty – see my response to question 20. For example, basic benefits for adults of working age must be increased; child benefit for second and subsequent children should be raised to the same, higher rate available to the first child.
- Eradicating poverty is both about adequate incomes and also about how people on low incomes are treated. The benefits and tax credits services need to be improved.

In view of these comments and the limitations of the questions, I am only including answers to some of them below.

**Question 1** – this is a remarkable, and very depressing, opening to the consultation questions. It presumes acceptance of the proposed ‘work for your benefit’, while providing little detailed argument and virtually no evidence. It runs totally counter to the rhetoric of *No one written off* and its talk of encouragement and support for trapped out of work.

I consider the proposal basically flawed. Experience in other countries not only does not support ‘work for benefit’ but has led to many other problems. It will not work and, even more seriously, it will do more harm than good.

**Question 2** – More effort needs to be given to the strategy of what should be called ‘Decent work first plus’ with more attention to both the quality of the job and better support to enable people to stay in work and progress. Admittedly this is acknowledged a number of times, but it is not backed up by clear indication that the staff, time and resources will be made available, except in the welcome expansion of Access to Work.

**Question 3** – This might have come before question 1. It is not acceptable because it will do more harm than good.

**Questions 1 – 3** - In answer to all three questions, and much else in this Green Paper, it needs to be recognised that so much focus on greater conditionality and penalties such as ‘work for benefit’ can undermine the government’s overall strategy to increase employment and reduce poverty, all the more so when unemployment is rising.

As Jane Millar concluded in a comparative review of what works internationally carried out for the DWP a few years ago:

‘The research evidence suggests that some small degree of compulsion (such as these work-focused interviews) can be helpful, but that beyond that point compulsion can easily become counter productive’ (Millar, 2003, p. 4).

This has been reinforced in study after study. ‘Recent research continues to confirm the impression left by older research ... that the compulsory nature of the work-focused interviews has a very limited beneficial effect overall, and is a real problem for some claimants’ (Osborne, 2007, p. 8). There is already an array of conditional measures, most of which have been long in place and are well-tested. Adding to these with further sanctions and penalties that both tie up scarce staff time and fosters a public view that claimants are even more ‘undeserving’ will be counter-productive.

By contrast, the role of the Personal Adviser (PA) can be most effective if staff are given sufficient time and resources. The summary of one of the DWP studies cited by Osborne is worth quoting at length for its conclusions on this role:

‘One of the strongest conclusions to be drawn from evaluation evidence is the perception that PAs are critical to the success or otherwise of interventions. This is not just a technical matter of how well a service is delivered but also a matter of how well the PA is able to engender a desire to seek and accept employment amongst customers and to build on the initial engagement by providing support and encouragement of an appropriate type. The evidence suggests that the greater

the flexibility given to PAs, the better they are able to fulfil their role and to meet the specific needs of the individual customer. Where customers feel coerced into participation in provision that does not meet their needs, motivation and engagement can quickly be undermined.

‘For all the very positive evidence about the role played by PAs, there is also a substantial body of evidence that their behaviour, decisions and morale is often driven by considerations of Jobcentre Plus performance targets, in some cases to the detriment of the individual customer. Targets and performance-related payment structures have an important role in influencing the motivation of PAs and the way that they work, and, in turn, in shaping “what works for whom” (Haslick and Green, 2007, pp. 3-4).

The importance of these points are reinforced by the fact that there are many people who want work and would be willing to take it if it were made available and they were given the help and encouragement that they needed – the key role of the Personal Adviser given sufficient time and resources. In fact, it could be argued that the targets for improving employment could be met without more conditionality – and achieving that would bring more people into the labour market since they in turn would be encouraged as they saw others getting on. This last point has not been given the attention it deserves – by contrast, a stigmatising of beneficiaries can undo the effectiveness of the PA’s work.

The great majority of people on benefits who can work are desperate to find a job. They are eager to raise their family’s living standards and to provide their children with the support that they cannot currently give them. Most are quite well aware of their responsibilities. Indeed, their inability to fulfil these is often an additional demoralising factor that can actually pull many down and lessen their ability to compete successfully at interviews, to cope with the demands of the first weeks in work, etc. More effort helping these people into work and staying in it could be much more effective and efficient in reducing child poverty and promoting lasting employment than the present proposals.

Equally important for the successful achieving of the employment target is the well-established fact that employers prefer to deal with people looking for work whom they do not regard as reluctant applicants, just coming forward to keep their benefits. ‘**Compulsion potentially reduces acceptability**’, in the words of the international review of what works (Millar, 2003, p. 4, emphasis added). This research conclusion deserves much more attention than it has been given.

Increased conditionality can simply discourage both potential applicants and the staff working with them. Another DWP Research report found that

‘The conditionality associated with WSP (Work Search Premium) is viewed as a deterrent for many lone parents and an administrative burden by advisers’ (Hosain and Breen, 2007, executive summary, p. 3).

In fact, this largely repeats the conclusions of the comparative review for the DWP just quoted:

‘Compulsion is also costly in time and resources. Staff spend a lot of time on arranging compulsory interviews, chasing up people who do not attend, and applying sanctions. Participants spend too much time fulfilling compulsory

conditions and less time on job search or preparing for work. The US evidence also shows that sanctions tend to fall most heavily on the most disadvantaged, as it is those with the most severe and multiple barriers that are most likely to fail to comply, not deliberately but because they find it difficult to fulfil obligations’ (Millar, 2003, p. 4).

In light of the pressures on staffing given the Gershon requirements and ‘efficiency savings’, it is surprising that more attention is not given in the Green Paper to the disadvantages of further conditionality, especially as it is backed up in other research commissioned by the DWP itself:

‘Further increasing the frequency of LPWFIs (Lone Parents’ Work Focused Interviews) also presents a possible risk of undermining the effective functioning of the programme as a whole by overcrowding advisers’ time and reducing effective case load practice, which already appears to struggle with lone parents furthest from the labour market’ (Thomas, 2007, executive summary, p. 10).

It is disappointing that the findings of many research studies, and not just these, have clearly not informed the Green Paper proposals, given their implications for the success of its stated aims. In consequence there is a very real danger that the proposals will have a counter-productive effect, costing more without increasing employment or reducing child poverty. This will have the multiple, lasting and costly effects of further demoralising claimants as well as staff and weakening public support for fresh moves to tackle these problems.

The constant over-emphasis of sanctions leads me to ask how many more times this lesson about compulsion has to be learnt before it is accepted. Given that failure to recognize it is likely to be, as in the United States and other countries, at the cost of the most vulnerable who become further damaged and distanced from employment, it is even more important that this realisation is incorporated into policy-making, for both moral and economic reasons.

**Question 4** – Respondents can only properly offer an answer to this question if we are given some detail in the Green Paper about the extent of fraud and the efficiency of, or problems with, current measures. We are not. We are told that fraud has reduced and is at its lowest level (2.23), but there appears to be no attempt to explain why new procedures are necessary. It is astonishing that you should ask our advice without telling us anything about the current situation.

**Question 5** – Following my response to question 4, I would point out that we need to know more about the first offence. What evidence is there on the effectiveness of the current duration of sanctions? It seems at the least unhelpful to be proposing further sanctions without more evidence and without having first completed, assessed and discussed the review of ‘conditionality systems’ elsewhere proposed in 2.14. It would then make good sense to come forward with proposals for consultation.

If the question relates to violence (2.13), it is not clear why the normal processes of the law are not brought into action as with other acts of violence elsewhere.

**Questions 6 and 7** – I do not agree with imposing additional requirements as proposed. It will undermine any good work that is being achieved by those working

with people with drug problems. There would also appear to be questions about the legality of a requirement to declare drug use. By contrast, a genuine rehabilitation plan can be successful, especially if the appropriate resources and staffing are made available.

**Question 8** – Introducing a requirement is not helpful for increasing employment. More attention needs to be given to enabling all those who would like to take a skills health check to obtain these, and then helping them to follow up on the results. This does not appear to be achieved at present, so there seems to be no point in making it a requirement.

**Question 9** – No, and for the same reasons. More attention needs to be given to enabling all those who would like to attend training to gain the identified skills they need, and then devoting staff time and resources to help them get work. A requirement would be bound to mean a routinisation of what can be very successful if carried out with more personal care and attention.

**Question 10** - No, and for similar reasons. A skills health check, and then progression to training with the provision of adequate child care, should be made an entitlement for all lone parents. Priority should be given to ensuring adequate staff time and resources to all those requesting this.

**Question 11** - The first objective should be to ensure that benefits and any tax credits lift families above the poverty line. Then experiments with additional payments might be useful. At present inadequate benefit levels, this type of pilot discriminates against those who for various reasons are unable to get or take work – especially, parents with disabled children, or adults who need care.

**Question 16** - It is very good to hear that the budget for Access to Work is being increased, but there is a strong case for it to be further extended, and comparable arrangements made for others out of work. It is surprising that so little has been published on the experience with using this, and there has been so little publicity of its availability.

**Question 20** - It is very surprising that this is the only question relating to the chapter, 'Ending Child Poverty'. (Maybe the missing question 19 also related.)

The neglect of any questions relating to benefit adequacy indicates that the government's commitment to reducing child poverty is to continue to discriminate against those children whose parents are workless. This creates serious problems for the long-term.

Far too little attention is given in the Green Paper to the evidence from survey after survey that being in poverty is itself a cause of wider problems. This creates 'a vicious cycle of disadvantage, whereby people can be progressively marginalised from the employment structure. But **the central factor underlying this process is poverty**. Unemployment heightens the risk of people falling into poverty, and poverty in turn makes it more difficult for people to return to work' (Gallie, Paugam and Jacobs, 2002, p. 18, emphasis added).

This important conclusion from a major survey across European countries derives

from detailed analysis of the European Community Household Panel Survey: that enables analysis to go beyond the snapshot picture to the examination of patterns over a number of years.

Poor benefits and credits are far from ‘passive’ in their effect, as they are described in the Green Paper: they can be ‘active’ barriers to getting into work as well as harmful to families. One of the greatest myths that has grown and flourished in this area is that benefits are ‘passive’ while labour market measures are ‘active’. Unfortunately the Freud Report and subsequent Green Papers have failed to recognise that the positive, poverty-preventing potential of good social security support continues to be made more difficult by routine use of the policy slogans of ‘active’ labour market measures which help people into work and ‘passive’ benefits which encourage dependency. It did not recognise that the very use of these terms, ‘active’ and ‘passive’, helps to set the policy agenda and close off certain policy options in advance of more detailed discussion. What minister or department is going to devote more effort – resources, staffing, time – to ‘passive’ measures instead of ‘active’ ones?

Calling benefits ‘passive’ discounts evidence that a good benefits system helps people avoid poverty, enabling them to cope and plan more easily when earnings are interrupted for whatever reason (Sinfield, 2001). That a generous benefits system can itself be active - effective in promoting employment and preventing poverty - has at last been acknowledged by OECD in reviewing its Jobs Study (OECD, 2006). By contrast, inadequate benefits and tax credits are far from ‘passive’ in their effect, they can be positively harmful and trap families in poverty (Green, 2007).

**Question 22** - Until basic benefit levels are adequate to support an individual or family out of poverty, there is no case at all for such a benefit – and I am not convinced that it would be adequate then for the variety of needs to be met. To call such a multi-purpose benefit ‘Jobseeker’s Allowance’ only compounds the problems of those not able to work.

Presumably question 17, the last one in the Easy Read version, is relevant to this: ‘Will a simpler benefit system make it easier for people to use and understand? Is there anything else we can do to make it easier?’ I do not think that this adequately conveys the idea of a single working-age benefit and is therefore misleading.

As the Work and Pensions Committee has pointed out, much could be done to improve the service without rule changes: the ‘DWP must put the claimant at the heart of the simplification process, and it is clear that there is much potential for improving the customer experience - and internal DWP processes - without changing the rules’ (WPC, 2007, recommendation 29). Given the turmoil that previous new starts have created, more attention needs to be given to delivering a better service rather than trying one more simplification.

**Question 23** - Many people move into work without being on JSA. I can see no point, and am aware of no evidence, that suggests carers would be more likely to seek work under a benefit titled ‘Jobseeker’s Allowance’. If they could be more confident that they would receive more support in work, this might lead to more moving into employment. The transitional problems of moving from benefit into work and, where

necessary, back on to benefit also need more attention, especially when changes may have to be made quickly due to the changing circumstances of the person(s) cared for.

### References

- Freud, David (2007) *Reducing dependency, increasing opportunity: options for the future of welfare to work*, DWP, London.
- Gallie, Duncan, Serge Paugam and Sheila Jacobs (2002) 'Unemployment, Poverty and Social Isolation: Is there a Vicious Circle of Social Exclusion?' *European Societies*, 5 (1), pp. 1-32.
- Green, Mhoraig (2007) *Everyone Matters? Voices of people experiencing poverty in Scotland*, York, Joseph Rowntree Foundation.
- Harker, Lisa (2006) *Delivering on Child Poverty: what would it take?*, London: Department for Work and Pensions.
- Haslick, Chris and Green, Anne E. (2007) *What works for whom? A review of evidence and meta-analysis*, Leeds, DWP, Research Report 407.
- Hosain, Mehreen and Breen, Eleanor (2007) *New Deal Plus for Lone Parents Qualitative Evaluation*, Leeds, DWP, Research Report 426.
- Millar, Jane (2003) 'Employment policies for lone parents', in Jane Millar and Martin Evans, *Lone parents and employment: International comparisons of what works*, London, DWP.
- OECD (2006) *Boosting Jobs and Incomes: Policy Lessons from Reassessing the OECD Jobs Strategy*, Paris, OECD.
- Osborne, Simon (2007) 'Work-focused interviews: recent rules and research', *Welfare Rights Bulletin*, 198, June, p. 8.
- Philpott, John (2006) 'Getting to the Core of Welfare to Work Policy', *Scottish Anti-Poverty Review*, summer, pp. 13-15.
- Sinfield, Adrian (2001) 'Benefits and Research in the Labour Market', *European Journal of Social Security*, vol 3, no 3, pp 209-235.
- Thomas, Andrew (2007) *Lone Parent Work Focused Interviews: Synthesis of findings*, Leeds, DWP Research Report 443.
- Work and Pensions Committee (2007) *Benefits Simplification*, HC 463, London, TSO.