



IN WORK, BETTER OFF: NEXT STEPS TO FULL EMPLOYMENT.

**Crisis' Response to the DWP consultation on
the Welfare Reform Green Paper**

October 2007

Crisis' Response to the Department of Work and Pensions' Consultation on the Welfare Reform Green Paper

In work, better off: next steps to full employment.

Introduction

Crisis welcomes this Green Paper and the Government's commitment to achieving the 80% employment target. We welcome many of the commitments made in the document, particularly the indication of increased support to the most disadvantaged.

Crisis welcomes the Government's intention to move towards a flexible New Deal to help more people into work. However this New Deal must be genuinely 'flexible', geared around a new focus of supporting people into sustainable employment, not just any employment.

Most homeless people have multiple labour market disadvantages. Almost all have extremely low employability. On average, there is a 60 percentage point gap in the employment rate of homeless people (15 per cent) against that of the overall population (75 per cent). Six in ten homeless people have low or no qualifications, putting over 80% of job vacancies beyond reach.¹

Low skills and high levels of worklessness persist amongst the single homeless population despite an unprecedented period of economic growth, investment in Welfare to Work and targeted interventions for low skilled adults. Without significant intervention this situation is unlikely to change.

However the majority of homeless people do want to enter employment and move on from their current situation. Recent research shows that 97% of homeless people want to work and three quarters want to be in work at the current time.²

Crisis believes that to achieve the headline figure of an 80% employment rate, the Government must invest in supporting all those affected by worklessness, and avoid strategies that only focus on targeting those who will most readily return to the workplace.

Crisis believes that disadvantaged people, such as those who are homeless, need holistic support services that focus on dealing with all their needs, re-engagement and integration with society and the prospect of a sustainable and aspirational future.

In our response to this Green Paper, we answer consultation questions 3, 6, 7, 10, 11, 12, 13, 14 & 15, 16 and make the following key points:

- Crisis believes that more recognition is needed of the difficulties faced by homeless people particularly, and disadvantaged people generally, and the importance of their individual needs when enabling them to find suitable work
- Crisis believes that additional flexibilities should be made for those wishing to build skills and confidence by gaining Level 2 and 3 qualifications. This should include the complete removal of the so-called "16-hour rule".
- Crisis believes that any assurance around "better off in work" must take into account Housing Benefit.

¹ Opinion Leader Research (2006) Homeless People and Learning and Skills – participation, barriers and progression. Crisis: London

² Off the Streets and into Work (2005) No Home, No Job

- Crisis believes that any attempt to help people improve their earnings and lift themselves out of poverty must focus on a holistic solution that includes tackling the poverty trap, a fundamental reform of housing benefit and a renewed focus on providing learning and skills training that meet the needs of vulnerable people.
- Crisis believes the Government should pursue a more joined-up strategy in helping disadvantaged people, including continuing funding for the schemes that have shown success in helping homeless people to improve their employability including the Working Futures pilot, Hostels Capital Improvement Programme and Learning Power Award in the next Spending Review period.
- Crisis believes that more support services need to be provided within safe and secure community settings in order to help ethnic minority women overcome specific barriers that they face.
- Crisis believes that any efforts to bring the most vulnerable in society into the workplace must recognise that the route is not a linear one with easily identifiable outcomes. What is needed is an approach based on options, personal advice, training and support to help people to move into suitable and sustainable employment. Compulsion can work against this.
- Crisis believes that increasing the support available to disadvantaged people is crucial to helping them to find and sustain work. However, increasing the conditionality attached to this only serves to make the process harder for those most in need.
- Crisis believes that the “Flexible New Deal” must be truly flexible. Increased support for disadvantaged people must be accompanied by the early identification of individual needs and barriers. Disadvantaged people must be allowed to progress into employment at their own pace. Conditionality should not include removal of benefits in any circumstances. Specifically, Crisis believes that disadvantaged people should be able to be fast tracked straight through to Stage 4 “Flexible New Deal” of the new process, rather than the “Gateway” stage.
- Crisis believes that volunteering or other community based experience can be effective in enabling people to move-on from disadvantage and back into work. However this activity must be meaningful and purposeful, otherwise it runs the risk of disenchanting and damaging those have previously had negative experiences of the labour market even further.

About Crisis

Crisis is the national charity for single homeless people and works year round to help vulnerable and marginalised people get through the crisis of homelessness, fulfil their potential and transform their lives.

Crisis' client group is single homeless people - individuals or couples, with no dependent children. Crisis' runs and develops innovative services that help homeless people rebuild their social and practical skills, join the world of work and reintegrate into society. We run services directly or in partnership with organisations across the UK. We also regularly commission and publish research, campaign and organise events to raise awareness about the causes and nature of homelessness, to find innovative and integrated solutions and share good practice.

Crisis' response to this consultation is informed by our research and campaigning work on behalf of single homeless people over nearly 40 years and in particular by our knowledge and experiences operating the following projects:

- **Crisis Skylight** is a learning and activity centre based in east London and Newcastle. It provides an inspirational learning environment where homeless people have the opportunity to build on existing skills or develop new ones, helping them to regain self-esteem and confidence. The centre is open to other members of the public to create an integrated and vibrant community. Members can take part in practical and creative workshops including Art, Woodwork and Tai Chi. The **Learning Zone**, a high specification training suite within Skylight, provides basic skills training in IT, literacy, numeracy and ESOL (English for speakers of other languages)
- **Crisis Skylight Café** is an inspiring, working café and art space in east London and Newcastle. Open to the public, the Café provides a route into work for homeless people. Under the guidance of an experienced Café manager, trainees receive individually structured training leading to recognised qualifications in food hygiene, customer care and health and safety, as well as more specialised skills in food preparation.
- **Crisis Changing Lives** is a UK-wide financial awards scheme which helps homeless people achieve their vocational goals. Applicants are awarded grants of up to £2000 to access training courses, buy tools and equipment for work or help them set up their own business. Crisis also gives essential mentoring support and monitors how the funding has helped change applicants' lives.
- **Crisis SmartMove** is a nationwide programme, delivered in partnership in 25 areas across the UK, which provides homeless people with comprehensive housing advice and access to good quality accommodation in the private rented sector. It helps prospective tenants overcome barriers to accessing private sector housing, by offering landlords a guarantee in place of a traditional deposit. Through **Crisis SmartSkills**, an accredited learning programme, tenants are provided ongoing support and help to develop independent living skills.

Response to Questions

Question 3: Should we do more to ensure that our support for lone parents is accessible and useful for all groups, in particular those with disabled children and those from certain disadvantaged groups and areas?

Crisis believes that more recognition is needed of the difficulties faced by homeless people in particular, and disadvantaged people generally, and the importance of their individual needs when enabling them to find suitable work

Crisis broadly welcomes the Green Paper's suggestions around providing further support for lone parents and other disadvantaged groups in order to encourage the move from benefits and into work. However Crisis would like to see more recognition of the difficulties faced by disadvantaged groups when considering how best to enable people to find suitable work.

Through our work, Crisis regularly interacts with lone parents and others who are experiencing unstable housing circumstances, are in hostels or temporary accommodation with or without children and homeless people who have children who are no longer with them. Without taking individual circumstances into account, Crisis feels that the expectation placed by the White Paper on lone parents to help lift themselves and their children out of poverty is unrealistic.

Question 6: Jobseeker's Allowance recipients can, in certain circumstances, restrict their search for work to a minimum of 16 hours per week. Should additional flexibilities be available if the proposed changes are made?

Crisis believes that additional flexibilities should be made for those wishing to build skills and confidence by gaining Level 2 and 3 qualifications. This should include the complete removal of the so-called "16-hour rule".

Crisis welcomes the Green Paper's suggestions that flexibility will be offered to Jobseeker's Allowance claimants, allowing individuals to tailor work-search activity around their family circumstances. We would call on additional flexibilities to be made to those who wish to pursue further education and skills training including a removal of the so-called "16-hour rule" which limits those who wish to pursue further education on a full-time basis from claiming certain benefits.

Currently the "16 hour rule" has a damaging impact on those seeking to improve their skills and employability by studying for level 2 and 3 qualifications after the age of 19. Type 1 of the "16 hour rule" forbids those claiming Housing Benefit who have passed their 19th birthday from studying for more than 16 hrs of guided learning per week, even if they are not claiming any other benefits. This applies to all levels of learning, from a basic ESOL (English as a Second Language) course to degree level study.

This ruling has a particularly negative effect on formerly homeless people and those living in hostel or other temporary accommodation. Many people in disadvantaged or vulnerable circumstances don't have level 2 or 3 qualifications and any attempt to re-enter full time education is therefore thwarted by this rule. Indeed at a time when Government is actively seeking to increase the skills level of the population, the fact that this barrier is still in place can not be justified.

Type 2 of the "16 hour rule" also gives us cause for concern. Type 2 requires that in most circumstances people claiming JSA, including those on New Deal programmes, are not entitled to study for more than 16 hrs/week once they have passed their 19th birthday. In addition, Job Centre Plus may require claimants to abandon courses of study in order to participate in mandatory short courses that are part of the New Deal, or to take up employment.

Again, Crisis believes that this puts vulnerable people, including those who are homeless or in temporary accommodation, at considerable disadvantage. Individuals who wish to gain meaningful qualifications that would assist their success in the job market and build their confidence and integration with the community are put off doing this on a full-time basis and on occasion forced to attend shorter courses that are not in line with the individual's aspirations and provide little long term benefit.

By removing both aspects of the "16 hour rule" for those wishing to attend full time education in order to achieve level 2 and 3 qualifications, Government would be allowing individuals to dedicate more attention to study in a shorter time period, increase their confidence and build meaningful skills that would enable a smoother and faster entry into the job market.

Question 7: What form might a 'better off in work' assurance for lone parents take?

Crisis believes that any assurance around "better off in work" must take into account Housing Benefit.

Crisis welcomes the opportunity to discuss "better off in work" assurance and would like to see this discussion extended to cover all people in disadvantageous circumstances, and in particular single homeless people.

One of the key aspects preventing homeless people, both families and individuals, from entering into sustainable work is the so-called "poverty trap", particularly as a result of the complexity and inflexibility of the benefits system. Recent research has shown how homeless people living in high rent temporary or hostel accommodation find the rate at which Housing Benefit is withdrawn leaves them at a considerable financial disadvantage.³

Indeed, in his review on the future of Social Housing, John Hills admits that "a couple with two children paying a typical private rent of £120 per week would gain only £23 if their earnings rose from £100 to £400 per week (as a result of reduced benefits and tax credits and higher tax and national insurance). However, if they paid a typical social rent of £60, the gain would be twice as much, £55 per week. For those in temporary accommodation, with very high rents paid through Housing Benefit, these disincentive effects extend to even higher earnings levels."

Until there is a fundamental reform of housing benefit, which genuinely empowers people into work, this problem will continue to put homeless people at a disadvantage. Crisis believes that this reform should start with increasing the earnings disregard, reforming the tapers and extending the run-on scheme so that it applies to all returning to work without restriction.

In this light, Crisis also calls for a change in the current "better of in work" calculations to be changed to include Housing Benefit and warns that any strategic changes to the benefit system must include consideration of Housing Benefit if they are to make a difference for disadvantaged and vulnerable people, including those who are homeless.

³ OSW (2006) *Key policy recommendations for enabling employment success*

Question 10: What more could we do to help working families – especially those from the most disadvantaged backgrounds – improve their earnings and lift themselves out of poverty?

Crisis believes that any attempt to help people improve their earnings and lift themselves out of poverty must focus on a holistic solution that includes tackling the poverty trap, a fundamental reform of housing benefit and a renewed focus on providing learning and skills training that meet the needs of vulnerable people.

Crisis believes the Government should pursue a more joined-up strategy in helping disadvantaged people, including continuing funding for the schemes that have shown success in helping homeless people to improve their employability including the Working Futures pilot, Hostels Capital Improvement Programme and Learning Power Award in the next Spending Review period.

Crisis welcomes and applauds the Green Paper's desire to open up the debate on what more can be done to help working families improve their earnings and lift themselves out of poverty. However we feel that this Green Paper misses the opportunity to focus on other disadvantaged groups who suffer from worklessness such as single people, and in particular single homeless people.

Crisis welcomes the comments in the Green Paper around delivering an integrated employment and skills service and the aim to find the right balance between looking for work and the development of skills. We also welcome the role that the Green Paper sets out for the new Adult Careers Service, however we are concerned that it remains unclear what form this service will take, how it will operate and how it will be resourced. Crisis believes that it is vital that the Adult Careers Service genuinely adds value to the progress of disadvantaged adults into employment and does not become yet another institution within an increasingly complicated welfare to work system.

Any support to lift people out of poverty must include tackling the poverty trap and a fundamental reform of housing benefit. We would echo our comments in our answer to question 7 in our response to this question.

Skills and experience is a key barrier to bringing vulnerable people into sustainable employment. The most vulnerable adults in society remain the least likely to take part in learning, despite the Government's Skills Strategy and having the most to gain by improving their skills. Learning for vulnerable adults is hampered by poor mainstream provision and a lack of available learning opportunities in the Voluntary and Community sector. Low participation in learning by vulnerable workless adults occurs in spite of their strong appetite for improved skills and employment. For vulnerable adults, skills are as relevant to secure housing, improved health and social inclusion as they are to sustainable employment. Vulnerable learners will not always progress smoothly and quickly from one level to the next but will at times stall, fall back, step sideways or even leap forward. Without getting individuals engaged, building their confidence and esteem and developing their skills, they will never make a successful and sustainable transition to work.

Crisis has recently completed a campaign entitled "Weapons of Mass Instruction" that sought to promote good practice solutions around learning and skills for homeless people. This campaign focused on the three themes of "Right People", "Right Places" and "Right Approach". "Right People" focuses on improving the skills of disadvantaged adults to be central to the national skills strategy and local Skills and Employment Board strategies. "Right Places" emphasised the need for high quality learning provided in the places disadvantaged adults are more likely to use. "Right Approach" urged the Government to expand the choice and availability of innovative learning provision which engages disadvantaged adults and lays the foundation for learning progression.

Crisis believes that any support model created to help people into work must be a multi-faceted one, capable of assisting with the multiple needs of the most vulnerable in society. Homeless people, like other disadvantaged individuals are often dealing with a number of different issues and negotiating multiple transitions simultaneously. A holistic approach is therefore needed, with applicants receiving flexible, personalized support. A relevant model to adopt would be that contained in the NOMs National Reducing Re-offending Delivery Plan which identifies the need for support to be provided across seven strands: Accommodation; Education, training & employment; Health; Drugs & Alcohol; Finance, Benefit and Debt; Children and families; Attitudes, thinking & behaviour.

Finally we would call for more joined up cross-Government thinking on the issues mentioned above as any holistic approach requires the involvement of several Government departments. There needs to be effective integration between the agenda of the Department of Work and Pensions and those of Communities and Local Government and the Department of Innovation, Universities and Skills. It is also crucial that this happens at the regional and local level between the Learning and Skills Councils and Job Centre Plus. Joined up strategy, approach and delivery is an absolute necessity if we are to deliver sustainable employment for disadvantaged people including those who are homeless or living in temporary accommodation.

There are many existing Government schemes and initiatives that are delivering effectively for homeless people. These include the cross-departmental "Working Futures" pilot which aims to address poverty trap issues, Communities and Local Government's Hostel Capital Improvement Programme and DIUS' Learning Power Award. There is uncertainty around future funding for all of these programmes and Crisis would call on the Government to make provision for their continuation into the next Spending Review.

Crisis recognises that there will be a considerable cost to developing effective schemes and processes that really do assist the most disadvantaged in building their skills, confidence and employability and then enabling them to find work. However the long term advantage would far outweigh the initial investment as current estimates suggest that every homeless person out of work costs £7,758 per year in welfare benefits payments,⁴ £1,341 per year in income tax and national insurance payments foregone (based on minimum wages) and £12,000 per year in lost economic output.⁵

Question 11: What more could we do to help ethnic minority women, particularly of Pakistani and Bangladeshi origin, overcome specific barriers they face?

Crisis believes that more support services need to be provided within safe and secure community settings in order to help ethnic minority women overcome specific barriers that they face.

From our work in our Skylight centres in London and Newcastle, Crisis is very aware of the increasing number of women from ethnic minority backgrounds who are living in temporary or hostel accommodation. As part of our services to homeless people, we run a Learning Zone which offers a range of free courses to those who are homeless, ex-homeless or at risk of becoming homeless. One of the key courses provided is currently English for Speakers of Other Languages (ESOL). Many of the students on this course are ethnic minority women.

We have seen many of these women engage in courses and activities around ESOL and other learning areas as part of a carefully built relationship with Crisis and its staff, which may not have happened otherwise. Very often these clients come to us for support with other needs and then move into learning activities, when they would not otherwise have approached an education institution for.

⁴ OSW (2005) *Transitional spaces project: economic appraisal*

⁵ Home Office (07/2006) Probation Circular

We would therefore call for the Green Paper to consider the expansion of funding of voluntary and community sector provision of ESOL and other learning support. Crisis also calls on the Government to extend the current Hostels Capital Improvement Programme (HCIP) for a further three years. Poor physical conditions and services that don't motivate people to address their needs can reinforce rather than break the cycle of homelessness and worklessness. HCIP should continue and be focused upon creating a nationwide network of high quality learning centres, particularly where provision is limited, where homeless people can take part in activities and get involved in learning.

Question 12: In exchange for more specialist support, are we right to ask more of those who have been unemployed and receiving benefit the longest?

Crisis believes that any efforts to bring the most vulnerable in society into the workplace must recognise that the route is not a linear one with easily identifiable outcomes. What is needed is an approach based on options, personal advice, training and support to help people to move into suitable and sustainable employment. Compulsion can work against this.

Crisis broadly welcomes the thrust of the Green Paper's view on the need to provide flexible personalised support to longer-term more disadvantaged customers. However we would urge caution on statements around responsibility and loss of benefit.

Research carried out for Crisis⁶ has shown that 86 per cent of homeless people are workless. Of that amount, 31 per cent have been workless for over six months and 57 percent have been workless for over three years. Of those in employment, six in ten have been so for less than one year. Six in ten homeless people have no qualifications or qualifications below NVQ Level 2, putting over 80% of job vacancies beyond reach. Eight in ten left school aged 16 or younger. Virtually all want to support themselves by having a job but many have become very discouraged and want to avoid further rejection. Recent research shows that 97% of homeless people want to work and three quarters want to be in work at the current time.

Homeless people identify employment as a key stepping-stone to escaping their homelessness and education and training as the single most important success factor in moving towards long-term employment. There is a strong appetite for education amongst single homeless people, with six in ten wanting to take part. Participation remains low, however, with eight in ten not taking part in any type of education or training in the previous five years. Of those that are in education or training three-quarters believe they would have benefited from doing so earlier in their homeless episode.

Given this information, Crisis believes that the approach suggested by the Green Paper needs to be taken slowly and cautiously. We welcome any efforts that include personalisation of service and flexibility. Our view is that if we are to really tackle the problems of worklessness affecting the most disadvantaged, we need to move away from linear solution and towards a "funnel" style approach, which would provide a wide offer of opportunities and activities that first engage people and then support them to progress towards the goal of employment.

Too often efforts to find employment for homeless people fail as a result of processes that try to simply match people to individual jobs. Individuals are given the opportunity to take up a particular role and then left without appropriate support to enable them to succeed. On many occasions individuals fail to take up the designated job, due to its unsuitability. Even if the job is attempted, when the individual then finds that the job is not for them, difficulties occur or they discover that the

⁶ Opinion Leader Research (2006) *Homeless People and Learning and Skills – participation, barriers and progression*. Crisis: London

job is not secure or unsustainable in terms of higher wages or progression, there is rarely a safety mechanism in place and the individual falls back into the benefit system.

Research for the homelessness organisation Off the Streets and into Work (OSW) has shown that a large proportion of the homeless people who used services provided by Jobcentre Plus did not find them helpful to their needs. In particular, they found that the jobs offered were inappropriate and that their individual needs and circumstances as homeless people were not acknowledged. Around six in ten homeless people who had been on New Deal thought that they had not benefited from it. The main reason for this was that training/courses was/were found to be unsuitable. In addition, the 'rules' applied under New Deal appeared to be unfair to some respondents; some were forced to withdraw from attendance on courses to attend New Deal; and the opportunities for sustained employment at the end of the period were low.⁷

As a result, we are concerned about the terminology used by the Green Paper when referring to "the responsibility on individuals to make the best use of support or face a loss of benefit". Compulsion is not the answer and sanctions should not be used as a threat through the process. It is clear that current systems are failing to work for homeless people and to introduce a further compulsory element would only serve to pressurise the situation and reinforce the individual's current situation. Compulsion also indicates a "fit in the box" mentality rather than an approach that seeks to deal with all of the needs of the most vulnerable. This attitude will heighten the sense of failure and disengagement that homeless people experience when things go wrong.

Crisis suggests that a more effective "funnel" approach be used that starts by reengaging the individual in learning and other activities, building confidence, aspiration and skills. Structured learning would then support the individual in skills development enabling them to target work that they wish to pursue and open up career avenues up to them. These opportunities must be sustainable, offer progression and development and the realistic and viable potential for increase in pay. When the individual takes up employment, clear support mechanisms and checks must be put in place for more than a short introductory or probationary period. Such an approach is more likely to lead to sustainable employment and a successful outcome for both employer and employee

As suggested earlier, we would urge the Government to look at a model of support based on the NOMs National Reducing Re-offending Delivery Plan, which aims to tackle all areas of disadvantage when reintegrating a person back into society.

Question 13: Should there be any exceptions to this approach of increased conditionality and increased support?

Crisis believes that increasing the support available to disadvantaged people is crucial to helping them to find and sustain work. However, increasing the conditionality attached to this only serves to make the process harder for those most in need.

As mentioned in our answers to questions 10 and 12 Crisis calls on the Government to ensure that support for vulnerable people is provided in a holistic manner that really delivers according to individual need. Attaching conditionality to this will only serve to undermine efforts and increase the pressure on the individual and adding to the sense of failure are reinforcing the cycle of disadvantage.

⁷ OSW (2005) *No Home, No Job*

Question 14: Is a structured, progressive regime of support and conditionality at fixed intervals the right approach?

Question 15: Should some people be enabled or required to enter the Gateway stage more quickly than others, taking account of their employment history or needs? Which groups should be 'fast-tracked'?

Crisis believes that the "Flexible New Deal" must be truly flexible. Increased support for disadvantaged people must be accompanied by the early identification of individual needs and barriers. Disadvantaged people must be allowed to progress into employment at their own pace. Conditionality should not include removal of benefits in any circumstances. Specifically Crisis believes that disadvantaged people should be able to be fast tracked straight through to Stage 4 "Flexible New Deal" of the new process, rather than the "Gateway" stage.

In responding to the Green Paper's "Flexible New Deal" for all job seekers, Crisis would point out that previous versions of the New Deal have not worked effectively for homeless people, underlined in our answer to question 12. Therefore we would urge that further consideration be given to the impact that the proposed changes will have on the most disadvantaged groups in society.

Although welcoming the desire to move on to a "flexible" new deal, Crisis's reading of the Annex of the Green Paper causes us a great deal of concern. Throughout the description of the first three stages there are references to work first principles, expectation of individuals and mandatory activities. Crisis believes that this is unhelpful and undermines the Green Paper's provision of further support. Any attempt to enable the most disadvantaged to find sustainable employment must be centred on engagement, opportunity and flexibility rather than compulsion.

Crisis welcomes the assessment of an individual's barriers to employment at the first stage in the process. However we believe that the Government must ensure that front-line staff are made fully aware of the needs of disadvantaged people and that the skills health check as well as any advice and support offered would be on a holistic basis, rather than just tackling the initial employment issue.

We believe that involving the most disadvantaged in any group sessions aimed at reinforcing the "work first" principle would be counterproductive and damaging. We hope that the Government is not considering this as a potential route for individuals in this situation.

Crisis also has concerns about the indication that stage 2 of the process would include an expectation on jobseekers to extend their jobsearch based on factors other than preferred employment. Time and again, Crisis has seen the negative and damaging aspects of this approach. Forcing people who are vulnerable into jobs they are not prepared for, is a set-up for failure and a continuation of the cycle of disadvantage. Instead we should be aiming to re-engage disadvantaged people through an approach based on learning and skills, building confidence and meeting needs and aspirations that will give them ownership of their career paths and move them into sustainable jobs that they want to do.

Crisis welcomes the more intensive support offered at the Gateway stage, but would echo our comments above about making agreed activities mandatory. We also welcome the inclusion of an additional skills check and the training provided by the Learning and Skills Council. We would hope that these opportunities were again focused on holistic approaches to individuals' skills needs rather than just being targeted at a particular job route.

Crisis welcomes the idea of fast tracking those with particular barriers or disadvantage through the stages, but would call that individuals in these circumstances be fast tracked through to stage 4 of the process rather than stage 3. Whilst acknowledging that stage 3 provides more support than

available at stages 1 and 2, it is still a six month period of time before the truly personalised support becomes available. Crisis feels that these six months could entail a further period of failure for the vulnerable, potentially undermining the process. Instead Crisis believes that after the initial assessment at stage 1, those whose situations meet criteria around disadvantage, such as homeless people or hostel residents, should be fast tracked straight through to stage 4 and the new deal. This would enable a more responsive and holistic solution to be deployed which really meets the needs of the most vulnerable. This view would also apply to the suggestions around those claimants who fail to find work after 12 months.

Crisis is opposed to any threat of removal of benefit attached to the flexible New Deal.

Question 16: Should we require a period of work experience from those who do not succeed in getting work after benefiting from a more intensive level of help from specialist providers? How can we best ensure that this work experience is beneficial?

Crisis believes that volunteering or other community based experience can be effective in enabling people to move-on from disadvantage and back into work. However this activity must be meaningful and purposeful, otherwise it runs the risk of disenchanting and damaging those have previously had negative experiences of the labour market even further.

Crisis welcomes the Green Paper's suggestion that the flexible New Deal includes the opportunity for work experience or work in the community. Crisis, through its Skylight Learning and Activity Centres in London and Newcastle, runs volunteering opportunities for homeless people in our Skylight Café and Skylight Member Volunteer Programmes.

Crisis Skylight Café, which opened in London in 2004 and in July of this year in Newcastle, is one training and employment strand of the Crisis Skylight progression model. The Café aims to be both a thriving business and a training ground for homeless people. Run by a professional manager, the Café provides training in catering and employability skills. In London over 660 members of the public visit our Café each week, giving trainees experience of working in a highly demanding commercial environment.

Our volunteer programme enables formerly homeless people to gain effective work experience by spending three-month periods working as part of Crisis head office projects. These projects successfully enable people to reintegrate into society and move towards work by improving their skills, motivation and self confidence.

Train to Gain: Skills for Jobs is a service, proposed by Crisis, which aims to improve skills and employment outcomes for single homeless people by making employment and training support relevant to labour market demand. The proposal has been developed at the request of the Department for Education and Skills (Now DIUS).

Train to Gain: Skills for Jobs offers a dual facing, demand led, skills and employment brokerage service. Train to Gain: Skills for Jobs works with employers to define packages of training that meet their recruitment needs, and supports homeless people to complete the training. The effect is to make employment and training services relevant to labour market demand. In return for qualified candidates employers offer guaranteed job interviews.

From this experience Crisis has discovered that to be really successful in improving an individual's skills, confidence and readiness to work, work experience and volunteering flexible needs to be meaningful. Placements that are not thought through, supported effectively or have little purpose run a high risk of disenchanting the individual involved and doing damage to the efforts to integrate that person back into the workplace.

We would like to echo this point when responding to the Green Paper's comments around the proposed "Jobs Pledge" and suggested partnerships with employers. Any jobs designed for disadvantaged people, must be sustainable and have opportunity for progression. Employers who provide these opportunities need to take people on in order to do a real job, not just out of a sense of corporate social responsibility and must train and support them appropriately. Crisis would highlight the recent National Grid scheme for ex-offenders as a model of best practice in this area.

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