

Equality Impact Assessment

The Jobcentre Plus offer

October 2011

Version 2 (replaces version 1 April 2011)

Glossary

ATM – Adviser Team Manager

CTF – Community Task Force

ESA – Employment Support Allowance

ESF – European Support Fund

ESOL – English for Speakers of Other Languages

EZ – Employment Zones

FSF – Flexible Support Fund

FJR – Fortnightly Jobsearch Review

IB – Incapacity Benefit

IS – Income Support

ILO – International Labour Organisation

JSA – Jobseekers Allowance

JRFND – Jobseekers Regime and Flexible New Deal

NEA- New Enterprise Allowance

NEET – Not in Education, Employment or Training

PSLND – Private Sector Led New Deal

RTC – Residential Training College

SDA – Severe Disability Allowance

WCA – Work Capability Assessment

WFI – Work Focused Interview

WRA – Work Related Activity

WRAG – Work Related Activity Group

Equality impact assessment for the Jobcentre Plus offer

Introduction

1. The Department for Work and Pensions has carried out an equality impact assessment on the proposal to introduce the Jobcentre Plus offer, assessing the proposal in line with the current public sector equality duties.
2. This process will help to ensure that:
 - the Department's strategies, policies and services are free from discrimination;
 - the Department complies with current equality legislation;
 - due regard is given to equality in decision making and subsequent processes; and
 - opportunities for promoting equality are identified.

Scope of this assessment

3. The existing public sector equality duties require the Department to show due regard when developing new policies or processes to the impact of the proposals on race, disability and gender (including gender reassignment). This assessment also considers the impact of the proposal on age, sexual orientation and religion and belief (as the general public sector duties in relation to these protected characteristics come into force on 5 April 2011).
4. This assessment looks at the available evidence to determine the extent to which the effect of the proposed change differs between persons sharing a protected characteristic and persons who do not.
5. The introduction of the Jobcentre Plus offer will not significantly alter the additional support given to lone parent and partner claimants, or claimants with caring responsibilities on Income Support. These claimant groups are therefore not treated separately in this equality impact assessment.
6. As skills policy is a devolved matter, this EIA relates to skills policy and implementation in England only. In line with policy intent, alternative arrangements are in place for the provision of careers advice and skills training within each of the devolved administrations. Discussions on the skills fit within the Jobcentre Plus offer need to be settled separately with Scotland and Wales.

Brief outline of the policy or service

7. The Jobcentre Plus offer forms part of a number of Get Britain Working Measures, which include Work Clubs, Work Together, Work Experience, New Enterprise Allowance and Enterprise Clubs. Through the Jobcentre Plus offer, the Department aims to create a framework in which Jobcentre Plus Advisers can focus on delivering results rather than completing activity and processes, and have more discretion to draw down from a wide menu of support. We anticipate that this framework will allow a more effective and personalised system of support to be delivered to our claimants. In the past the support regimes for Employment and Support Allowance (ESA) and Jobseekers Allowance (JSA) claimants have been heavily prescribed from the centre and support options have been subject to complex conditions. The new framework will include:
 - A minimum policy requirement, differentiated between benefits but including face-to-face meetings;
 - Flexible adviser support delivered by advisers according to need rather than benefit type;
 - The absence of centrally-prescribed personal adviser roles based on benefit type;
 - A flexible menu of support options; and
 - A Flexible Support Fund (FSF) to fund additional help where Jobcentre Plus provision, partner provision or support menu are not sufficient or appropriate to meet claimant needs.

8. However, it is important to read this in the context of the wider changes to the welfare system, including the introduction of the Work Programme; the development of a number of Get Britain Working measures; implementation of Work Related Activity requirements; the introduction of the Welfare Reform Bill and Universal Credit. Separate equality impact assessments will be carried out on these changes. An equality impact assessment for Work Experience and the new Employment and Support Allowance work-related activity powers have already been published.^{1, 2} The Department for Business, Innovation and Skills has also published an equality impact assessment for its Skills Strategy.³

What the new regime will look like

Core regime of face-to-face meetings for JSA claimants

¹ <http://www.dwp.gov.uk/docs/eia-work-experience.pdf>

² <http://www.dwp.gov.uk/docs/wca-ia-eia.pdf>

³ <http://www.bis.gov.uk/assets/biscore/further-education-skills/docs/s/10-1284-skills-for-sustainable-growth-investing-equality-impact.pdf>

9. For all jobseekers there will be an interview at the start of the claim at which the adviser makes clear what is expected in return for receiving benefit and identifies disabled peoples' support needs and requirements for reasonable adjustments. The adviser will also aim to identify any specific barriers to working. The agreed actions are captured in a Jobseeker's Agreement and signed. The same principles will apply in future to those meeting the equivalent qualifying conditions for Universal Credit. This will be carried out in accordance with existing adviser guidance. A review of these processes will be reviewed for compliance via existing procedures through the Quality Assessment Framework.
10. JSA claimants will continue to be seen at least fortnightly for face-to-face Fortnightly Jobsearch Reviews (FJR) for the duration of their claim.
11. There will also be the facility for longer interviews with advisers during a claim. However, rather than having these at set points and for set durations, advisers will have the flexibility to determine when, for how long, and how regularly individual claimants are seen. A claimant who is self-motivated and able to conduct an effective jobsearch might not need much more than FJR during the first weeks of a claim, whereas someone in need of more significant help to find work could have a fuller adviser interview as early as week 1 and be referred on directly to appropriate support from the menu of provision available or draw on the Flexible Support Fund.

Core regime for ESA claimants

12. Claimants moving into the ESA Work Related Activity Group (WRAG) will have their first Work-Focused Interview (WFI) shortly after the outcome of the Work Capability Assessment (WCA) is known. For lone parents in the ESA WRAG (and partners of ESA claimants with children), this will take place once their youngest child reaches the age of one.
13. The adviser will ensure that the claimant's plans to prepare for work are discussed and captured in their Action Plan. The adviser will work with the claimant to identify any specific barriers to working. The same principles will apply in future to those meeting the equivalent qualifying conditions for Universal Credit.
14. ESA claimants will have WFIs delivered flexibly. The timing and duration of each WFI will be at the discretion of the adviser and could take place in person or on the telephone: however the adviser feels is most appropriate for the claimant. Claimants may also be required to undertake Work Related Activity (WRA) at the discretion of the adviser and can be referred to appropriate support from the menu of provision available and from

external organisations. This can be facilitated by the Flexible Support Fund where appropriate. WRAG claimants who are lone parents with a youngest child under 5 will not be required to undertake work-related activity.

15. ESA Support Group, WRAG and credits only claimants who are lone parents with a youngest child under 1 and full time carers will be able to volunteer for support from the Jobcentre Plus offer. If they choose to volunteer for the Jobcentre Plus offer, they will not be subject to the WFI or WRA requirements.
16. Advisers already have skills to effectively support this claimant group from past experience under Pathways to Work. However as part of their normal planning process, managers regularly assess the learning and development needs of their staff to ensure they have the skills to deal with the claimant base in each locality. This is supported via existing performance management processes and is reviewed via the Quality Assessment Framework.

Core regime for Income Support claimants

17. For Income Support (IS) claimants the requirements will be fairly light-touch, with Work Focused Interviews (WFIs) at regular intervals predicated on the age of the claimant's youngest child. For most IS claimants WFIs will take place every six months (except for those with children under the age of 1, who will not have mandatory interviews) In the last year before the claimant moves to JSA or ESA WFIs will become more regular – once every three months.. The increase in frequency is designed to make the transition to work easier, with support increasing as the claimant gets closer to the labour market.
18. Lone Parents, partners and carers on Income Support will be able to receive voluntary personalised support, provided through the Flexible Support Fund. This will consist of intensive support from Jobcentre Plus advisers to enable them to overcome barriers to work and move closer to the labour market, for example by identifying and arranging appropriate training. Jobcentre Plus will continue to deliver this personalised support by building on the success of New Deal for Lone Parents, Partners and Work Focussed Support for Carers.

Jobcentre Plus Support for claimants on Incapacity Benefits

19. Pre-reassessment, claimants on Incapacity Benefits (IB) will be able to access the Jobcentre Plus offer on a voluntary basis. If they choose to volunteer for the Jobcentre Plus offer, they will not be subject to the conditionality or WRA requirements.

20. Eligible claimants on IB in England will also be able to volunteer for the Work Programme, as long as European Social Fund (ESF) funding is available (see below).⁴

Flexible Menu of Support options

21. Jobcentre Plus will offer claimants a comprehensive menu of support options. This will include but is not limited to:
- The Get Britain Working measures;
 - Skills provision;
 - Apprenticeships;
 - Adviser jobsearch support;
 - Jobcentre Plus Group Sessions;
 - Next Step Careers advice;
 - Volunteering advice, where possible enhanced by co-location of support by voluntary and civil society organisations; and
 - Most claimants will also be able to access the Work Programme on a voluntary or mandatory basis, as indicated below.
22. At national level the Department will put in place the basic support modules to deliver the Jobcentre Plus offer – for example by working with other Departments and with employers to ensure a basic delivery framework is in place. District Managers will then have discretion over which elements of support are available in their areas and to what extent, based on claimant and local labour market characteristics. This will place a greater emphasis on local partnership working to draw out a co-ordinated and strategic approach to addressing identified need. Advisers will then have broad discretion over what provision to refer or signpost a claimant to, and when, according to their personal needs. Additionally, a Flexible Support Fund will allow Jobcentre Plus to fund activity and services where the adviser or support menu is not sufficient to achieve entry to work.
23. Eligibility for some types of support, such as access to the Work Programme and New Enterprise Allowance will be dependent on benefit types and/or stages in a claimant's claim. This is to provide a further assurance that Jobcentre Plus resource is focused on claimants in need of significant support to move into employment.

Entry to the Work Programme

24. Most JSA claimants will enter the Work Programme if they have not found work after 52 weeks; about 90% of JSA claimants are expected to have left by this point. JSA claimants most in need of support, for example ex-

⁴ The ESF funded access to the Work Programme is only available in England only because DWP's ESF funding can only be used in England.

offenders or young people who are struggling to make the transition between education and work, will be able to volunteer for early entry to the Work Programme to enable them to receive support within a timescale that is most appropriate for them.

25. Claimants who are long-term Not in Employment, Education or Training (NEET) aged 18, or repeat JSA claimants (22 out of 24 months on benefit) and therefore have additional disadvantages in the labour market will have mandatory early entry into the Work Programme once they have been on benefit for three months.
26. The list of claimants below will be able to volunteer for early entry, with the agreement of their Jobcentre Plus adviser. Once they have chosen to start on the programme, they will be required to continue to participate. The list includes:
 - An ex-offender
 - A disabled person
 - A person with mild to moderate mental health issues
 - A care-leaver
 - A carer on JSA
 - An ex-carer
 - A homeless person
 - A former member of HM Armed Forces personnel
 - A partner of current or former HM Armed Forces personnel
 - A person who is stable in recovery who has a history of substance dependency which presents a significant barrier to employment.
27. All claimants on ESA following the Work Capability Assessment (WCA) (except for any claimants appealing the WCA outcome and those with an ongoing contract of employment or self employment) will have the option of accessing the Work Programme.
28. Additionally, new and ex-IB income-related ESA claimants in the Work Related Activity Group will be required to enter the Work Programme if, at their initial or repeat WCA, they are given a prognosis of 3 or 6 months for when they may be ready to return to work (those given a prognosis of 6 months will be referred to the Work Programme after 3 months with Jobcentre Plus). Dame Carol Black's report confirms that work is generally good for physical and mental health and well being;⁵ referral to the Work Programme helps to ensure that those who are approaching readiness for

⁵ Working for a healthier tomorrow – a comprehensive review of work and health. Available at <http://www.dwp.gov.uk/docs/hwwb-working-for-a-healthier-tomorrow.pdf>. Accessed 31/03/2011

work start get the appropriate support at the right time to make the transition to work easier.

29. Primary recipients of IB and IS claimants in England can volunteer to enter the Work Programme at any time via Jobcentre Plus. This will be funded from the European Support Fund (ESF).
30. ESF funds to allow IB and IS claimants in England to enter the Work Programme may be exhausted earlier than 2014 within a specific region. Where this occurs, it may be possible to increase the amount of funding available (subject to an overall limit of an additional 50% of the regional figure). This will be dependent on availability of ESF funds in the region and on relative priority against Department for Work and Pensions other ESF-funded provision. A separate equality impact assessment will be carried out on the use of ESF funding.

Work Choice and Residential Training Provision

31. Work Choice and the provision provided by Residential Training Colleges (RTCs) are voluntary and reserved for disabled people⁶ of working age who are facing complex barriers to employment and have the highest support needs, regardless of any benefits being claimed. Work Choice provides more intensive support to prepare for, find and stay in work (including self-employment) and Residential Training delivers vocational training to unemployed adults. A claimant should only be referred to Work Choice or RTCs if the support offered by the Work Programme and Jobcentre Plus is not suitable for them due to their complex barriers to employment and high support needs.

Transitional Arrangements

32. JSA Claimants currently within the Jobseekers Regime and Flexible New Deal (JRFND) and New Deal journeys will receive an intervention to move them into the new Jobcentre Plus offer from 4th April 2011 onwards. This includes:
 - JSA claimants who will not reach the point of referral to existing provision before referrals end on 1 June 2011;
 - JSA claimants who have completed FND, New Deal, Employment Zones (EZ), Private Sector Led New Deal (PSL ND) or Community Task Force (CTF) provision from 5 October 2010 to 3 April 2011; and
 - JSA claimants who will be returning from FND, New Deal, EZ, PSL ND or CTF provision from 4 April 2011 onwards.

⁶ Disability is as defined in the 2010 Equality Act

33. Referrals to all mainstream employment programmes (New Deal for Young People, New Deal 25+, Employment Zones and Private Sector Led New Deals and Flexible New Deal) are being extended until 1 June 2011 so that referrals continue up to the point that the new Work Programme starts. Existing contracts will continue to run alongside new contracts for up to 3 months ensuring claimants already on these programmes get at least 3 months provision, and contracts are viable for providers.
34. For ESA the Jobcentre Plus offer is open to people making new ESA claims, those who are currently on ESA and those being re-assessed to ESA from IB.

Consultation and involvement

35. The Department has piloted greater district flexibility over the past few years, notably through:
 - Delegated Flexibility Pilots in four districts: Glasgow; Gloucestershire, Wiltshire and Swindon; Greater Manchester Central; and South West Wales; as well as
 - 0 – 13 Week Trial in the districts of North East Yorkshire and the Humber; and the Black Country, where the first 13 weeks of a JSA claimant journey were assessed with a view to maximising efficiency and effectiveness in delivery of support.
36. Initial feedback from the Delegated Flexibility Pilots has shown that districts introduced a wide range of flexibilities with a number of common patterns emerging around segmenting claimants and varying the claimant journey. A key theme has been a focus on the needs of individual claimants, with frontline staff being clear that the pilots have had a positive impact on their levels of autonomy and ability to work in-depth with claimants. Specific information regarding increased levels of autonomy amongst staff was collected via a questionnaire survey of Adviser Team Managers (ATM) in both flexibility and non flexibility districts. ATMs in flexibility districts perceived that they had significantly higher levels of autonomy than ATMs in non flexibility districts.
37. Extensive consultation has taken place as part of the preparatory work for the changes to support and conditionality for ESA claimants and the Work Programme. This will be documented in the equality impact assessment for the Work Programme and the new ESA work-related activity powers
38. The Department has used this feedback to inform proposals on back-to-work support and conditionality for ESA claimants, and the design of the Work Programme. The consultation around the introduction of the Work Related Activity requirements has pointed to the importance of tailoring support and conditionality to the needs of the claimant. This has informed the flexible, personalised approach we are putting in place. The detailed

design of the offer has also been influenced by external customer insight conducted by the Department.

Equality Impacts of the Jobcentre Plus Offer

39. The Jobcentre Plus offer has been designed to allow advisers greater flexibility to treat the person in front of them as an individual, with individual needs and requirements. As such, it is designed to improve the way that people are treated and be more successful than a 'one size fits all' approach. One of its explicit aims is to give advisers the ability to spend very little time with someone who does not need much help and a lot more with someone who has significant needs. The measures have therefore been designed to have a positive impact on people and aim to promote equality of opportunity.
40. When tailoring our service to claimants and implementing the flexibilities of the approach we need to be mindful of individual's needs and any barriers to accessing our services. At Annex 1 of this assessment is an outline of some of the issues we need to be aware of and adjust our approach to accommodate. This list is not meant to be exhaustive but will provide an illustration on how we need to ensure we pay due regard to equality when using our flexible working processes.
41. There is however a general risk that advisers could use their flexibility inappropriately, for example to concentrate on "quick wins" by offering more support to claimants they think need a small push into work rather than claimants with multiple or significant barriers to employment. We will mitigate this risk in a number of ways:
 - providing Jobcentre Plus advisers with guidance and learning tools to help them deliver the most appropriate support to all claimants in the new, flexible environment. These have been designed to give advisers the confidence and skills to support claimants who previously may only have seen advisers specialised in certain areas e.g. specific benefit types or particular stages of a claim. The Jobcentre Plus offer will allow greater flexibility to focus on an individual claimant's challenges to employment rather than solely on their prevailing characteristic.
 - monitoring off-flow rates through the Performance Management framework. Where possible the off flow rate will be broken down by the protected characteristics.
 - initially, ring fencing part of the FSF for lone parents, partners, carers and ESA/IB claimants so that they continue to get access to support appropriate to their needs. Ring fencing will be removed after a period if performance monitoring shows no deterioration in outcomes. The

usage of the fund will be monitored through existing financial reporting processes to ensure parity.

42. The increased discretion for District Managers in deciding the composition of the flexible menu of support and the framework for local use of the Flexible Support Fund has been designed to enhance alignment of Jobcentre Plus support with local needs. However, it carries with it a risk of allegations of inequitable treatment through the provision offered within a district. To mitigate this risk, local impact assessments are not automatically required. However, District Managers need to ensure due regard to equality requirements is given when implementing the flexibilities within the offer. The Department will monitor uptake of the flexible menu of support provision. The guidance for Flexible Support Fund is being reviewed as the usage of the fund is developed. Jobcentre Plus Equality Business Partners are available to provide support to districts implementing flexibilities

Methodology

43. To explore the equality impacts of the Jobcentre Plus offer on JSA claimants the characteristics of claimants by duration on JSA have been considered – for example, the percentage of female claimants claiming JSA at day one, 6 months and 12 months in a claim. Claimants reaching longer durations are used as a proxy for claimants that are likely to need more intensive support under the Jobcentre Plus offer to gain employment.
44. For ESA the Jobcentre Plus offer is open to people making new ESA claims, those who are currently on ESA and those being re-assessed for ESA from IB. Whether they are mandated or they volunteer everyone on ESA can engage with the Jobcentre Plus offer..
45. Data is shown separately for claimants receiving JSA and ESA/IB/Severe Disability Allowance (SDA), as the data is derived from different sources. The present ESA and IB/SDA caseload is 2.6 million and the figures present a breakdown of this.

Gender

46. The tables below show that men are more likely to claim both JSA and ESA; more men also claim IB/SDA and so more of them are likely to move onto ESA after reassessment . Therefore, in line with the higher numbers claiming these benefits, more men are likely to be referred to the Jobcentre Plus offer than women.

Table: JSA durations by gender⁷

	Male	Female
New JSA claimants	71%	29%
6 month plus JSA claimants	76%	24%
12 month plus JSA claimants	79%	21%

Table: working-age incapacity benefits claimants by gender⁸

Benefit	Male	Female
IB/SDA	58%	42%
ESA	57%	43%
Total	58%	42%

47. Claimants will be referred to the Jobcentre Plus offer irrespective of gender; we expect the offer to benefit all claimants in finding employment. The Department will issue guidance to advisers on referrals, ensuring that all referrals are made on the basis of suitability for the provision.
48. Women are more likely to have caring and childcare responsibilities than men. To mitigate any potential impact, Jobcentre Plus will provide a range of support to carers and those with childcare responsibilities to help them look for and sustain work. Jobcentre Plus also has an important role in signposting parents to more specialist services, where necessary. They make parents aware of local provision of services of which they might not previously been aware. This can be particularly useful for parents with disabled children.

Disability

49. The Department will take steps to ensure that our provision is accessible to disabled claimants. For example, by continuing to deploy disability employment advisers and work psychologists; equipping advisers with the training and supervision they need to work flexibly with claimants with hidden and complex needs; and producing materials in accessible formats. Where appropriate, advisers will proactively consider whether reasonable adjustments might benefit claimants with disabilities. Referrals to Work Choice will continue to take place for claimants facing complex barriers to employment, with the highest support needs. Limited funding has been secured for reasonable adjustments to promote access to Get Britain Working measures for disabled claimants. Disability Employment Advisers and Access to Work advisers are equipped to provide advice to advisers on reasonable adjustments.

⁷ Source: National Benefits Database. Cohort of new JSA claims in 2008/09.

⁸ Source: Department for Work and Pensions Longitudinal Study May 2010. Figures may not sum due to rounding.

JSA

Table: JSA durations by disability⁹

	Yes	No
New JSA claimants	18%	82%
6 month plus JSA claimants	23%	77%
12 month plus JSA claimants	27%	73%

50. The table above shows that a higher proportion of longer-term JSA claimants are disabled compared with new JSA claimants - 18% of new claimants in 2008/09 were disabled compared with 23% of claimants reaching 6 months on JSA and 27% of claimants reaching 12 months.
51. The proportion of JSA claimants stating they have a disability could also increase as IB/SDA claimants are reassessed – more claimants are expected to move from these benefits to JSA following the Work Capability Assessment.
52. The Jobcentre Plus offer will be made available to all JSA claimants regardless of disability. Personal advisers will have the flexibility to tailor their approach to individual claimant circumstances, including the ability to intervene earlier and spend more time with claimants who have significant barriers to work in order to help them to move into sustainable employment. In addition, JSA disabled claimants will be able to access the Work Programme from the third month of their claim if they agree with their adviser that this is the best course of action for them.
53. In addition, it may be appropriate for a personal adviser to refer a disabled claimant to a Disability Employment Adviser for possible referral to Work Choice or Residential Training.

ESA

54. ESA is specifically for people who are deemed to have limited capability for work by reason of a physical or mental health condition. In the past, support for these claimants has been delivered according to a set pattern of engagement. By providing greater flexibility to tailor support to the individual's circumstances, the reforms should help disabled people and those with health conditions to access help in the way that best meets their needs. As such, the measures have been designed to have a positive impact on disabled people and people with health conditions and aim to promote equality of opportunity.

⁹ Source: National Benefits Database. Cohort of new JSA claims in 2008/09. The statistics in the table are calculated by linking individual level data from the National Benefits database and the LMS Client Evaluation database, and is based on 3.3 million new JSA claims of which 590,000 have declared a disability during a Jobcentre Plus interview.

55. The vast majority of ESA claimants can access the Work Programme on a voluntary or mandatory basis. This is why the amount of adviser time notionally allocated for ESA claimants is lower than the adviser time notionally allocated for JSA claimants. ESA claimants choosing to access the Work Programme will receive support through Work Programme providers.
56. Certain elements of the flexible menu of support are not available to otherwise eligible ESA claimants, including Work Experience and New Enterprise Allowance.
57. In the case of Work Experience, the Department is looking at options to make this measure accessible and available to ESA claimants. In addition, ESA claimants can already gain experience of work through the Permitted Work rules.
58. New Enterprise Allowance (NEA) is only available to JSA claimants. Limiting the eligibility for NEA to JSA claimants will impact disabled people claiming IB or ESA who are interested in self-employment. To mitigate this impact, Jobcentre Plus advisors will signpost claimants to a range of support available for those considering self employment. Where appropriate, Work Choice will offer practical support to help disabled people with complex barriers and the highest support needs prepare for and move into self-employment. This may include claimants of IB or ESA, provided they are eligible and suitable for the programme.
59. As stated above, separate equality impact assessments have been carried out on each of the Get Britain Working measures and should be consulted for further information.
60. As part of the Jobcentre Plus offer and the Work Programme, ESA claimants may be required to undertake work-related activity. A separate impact assessment has been published for the Work Related Activity Regulations. This covers the regulations both with respect to Jobcentre Plus and the Work Programme.
61. Our mainstream provision will be complemented by specialist disability employment programmes including Work Choice and residential training, which will continue to provide support for those disabled people who face the most complex barriers to getting and keeping a job. These programmes are an integral part of the overall Jobcentre Plus offer for benefit claimants.

Age

JSA

62. To be eligible for JSA claimants you must be available for, capable and actively seeking work; aged 18 or over but below State Pension age and be working less than 16 hours per week on average. JSA is not normally paid to 16 or 17 year olds, except in special cases. The table below shows the distribution of JSA claimants by age:

Table: claim length by age¹⁰

	18-24	25-49	50+
New JSA claimants	37%	49%	13%
6 month plus JSA claimants	32%	53%	14%

63. The Jobcentre Plus offer will be made available to JSA claimants irrespective of age. Advisers will have the flexibility to make decisions locally and provide additional support for claimants that require it most. The offer should benefit claimants of all ages by providing additional support to claimants with the most significant barriers in each age group.
64. As shown in the table, there are proportionately fewer young (18-24) people on JSA at six months than there are at the start of a claim. The Jobcentre Plus offer provides some additional support for young JSA claimants; this has been developed in response to a number of factors:
- Young people are disproportionately represented amongst the unemployed. At any one time 18-24 year olds make up around 30% of JSA claims, and 30% of working age International Labour Organisation unemployment statistics, compared to just 14% of the economically active working age population.
 - A lack of work experience and skills are a particular barrier for young people in entering employment. A 2009 survey of employers found that the main barriers to recruiting young people (aged 16 to 24) were lack of experience (72 per cent) and the availability of more suitable candidates (65 per cent).¹¹
 - Younger people with long durations of unemployment have a high risk of being impacted by scarring, where a spell of unemployment and a large and persistent impact on future earnings once they do re-enter employment.

¹⁰ Source: National Benefits Database. Cohort of new JSA claims in 2008/09. This doesn't include the small number of 16-17 year-olds that claim JSA on hardship grounds.

¹¹ Labour Market Outlook Summer 2009

65. There is also some direct targeting of younger people within the overall Jobcentre Plus offer. Work Experience – a Get Britain Working measure – will be targeted at 18-24 year olds, while they are also a key claimant group for Service Academies. In addition, claimants aged 18-24 will be able to access the Work Programme earlier – at nine rather than twelve months.
66. In terms of older (50+ jobseekers), with the gradual equalisation and raising of State Pension Age an increasing number of females over 60 will be entitled to JSA and males over 60 will also become subject to conditionality. There is also evidence to suggest that claimants aged over 50 are less likely than average to experience most support options under the JSA interventions regime.¹² Jobcentre Plus will have the flexibility to target support to the needs of their changing claimant base to improve outcomes for older jobseekers.

ESA

67. ESA is a working-age benefit and can be claimed from age 16 to the day before a claimant reaches pension age. The help and support provided for ESA claimants is available regardless of age. The table below shows the age distribution of incapacity benefits claimants:

Table: working-age IB/SDA and ESA claimants by age¹³

Age	16-17	18-24	25-34	35-44	45-49	50-54	55-59	60+
IB/SDA	0%	4%	12%	21%	15%	16%	19%	13%
ESA	1%	14%	17%	24%	13%	13%	12%	5%

68. Just under half of claimants claiming incapacity benefits are over the age of 50 and almost half of ESA claimants are over the age of 45. This is because older people are more likely to have a disability or health condition. However, this does not mean that they do not want or are unable to work. The Government is committed to promoting employment prospects for older people, indeed for people of all ages, with and without health conditions, and tailored support will be available to this group.

Ethnicity

JSA

69. The table below shows that JSA claimants from ethnic minorities are more likely to spend longer durations on JSA. The Repeat Jobseeker's Allowance Spells report also found that ethnic minorities were more likely than average

¹² Jobseekers Regime and Flexible New Deal Evaluation: Stage 2 and Stage 3 Claimant Surveys

¹³ Source Department of Work and Pensions Longitudinal Study May 2010. Figures may not sum due to rounding.

to have spent long periods on JSA and New Deal programmes.¹⁴ Ethnic minorities disproportionately claim JSA, as although ethnic minorities account for 12% of the working-age population in Britain, they represent 16% of the claimant stock.

Table: JSA durations by ethnic background¹⁵

	White	Ethnic Minority
New JSA claimants	87%	13%
6 month plus JSA claimants	85%	15%
12 month plus JSA claimants	84%	16%

70. The Jobcentre Plus offer will be made available to claimants irrespective of ethnicity. Advisers will use their flexibility to target claimants who they feel have the most significant barriers to work; whilst this may include claimants with an ethnic minority background, ethnicity will not be a deciding factor in the support from which any individual will benefit.
71. Claimants from an ethnic minority background should benefit relatively from the Jobcentre Plus offer. The *Qualitative Evidence from Ethnic Minority Customers Report* found that it could be beneficial for advisers to be granted more flexibility in the timing and content of their interactions with claimants, to drive forward a more personalised service.¹⁶
72. Language poses a barrier to employment for some claimants from ethnic minorities. Claimants for whom English is not their first language may need additional support; JSA and ESA WRAG claimants are eligible for fully funded English for Speakers of Other Languages (ESOL) provision.
73. Eligibility for fee remission for skills provision, which includes provision for Jobcentre Plus claimants, has been determined by BIS as part of their wider skills strategy, and an equality impact assessment has been published separately.¹⁷ In addition, partnership working between Jobcentre Plus District Managers and training providers will ensure that the skills offer meets the needs of local claimants.

¹⁴ Carpenter, H. (2006) Repeat Jobseeker's Allowance spells DWP Research Report No 394

¹⁵ Source: National Benefits Database. Cohort of new JSA claims in 2008/09

¹⁶ DWP Research Report 717

¹⁷ Department for Business, Innovation and Skills Equality Impact Assessment (November 2010) Skills For Sustainable Growth And Investing In Skills For Sustainable Growth

ESA

74. The table below shows that there is a lower proportion of ethnic minorities on incapacity benefits (6 per cent) relative to the working age ethnic minority population as a whole (11 per cent). Therefore, more white incapacity benefits claimants may benefit from these reforms because they represent a higher proportion of those claiming IB/SDA and ESA. The introduction of the Jobcentre Plus offer will allow advisers/suppliers to provide personalised support to all claimants with disabilities regardless of ethnicity.

Table: Proportion of incapacity benefits claimants by ethnicity¹⁸

Ethnicity	Incapacity benefits
White	93%
Ethnic minority	7%

Gender Reassignment

75. The Department does not collect data on claimants who have undergone gender reassignment. All Jobcentre Plus claimants will be treated fairly and equally regardless of whether they have had a gender reassignment or not. Greater flexibility will allow advisers to focus on and take account of the employment support needs of individual claimants.

Sexual Orientation

76. The Department does not collect data on the sexual orientation of claimants. All Jobcentre Plus claimants, though, will be treated fairly and equally regardless of sexual orientation. Greater flexibility will allow advisers to focus on and take account of the employment support needs of individual claimants.

Religion and Belief

77. No data is available on the religion or faith of claimants who will be impacted by this proposal. All claimants subject to activity under the Jobcentre Plus Offer will be treated fairly irrespective of their religion or belief and will not be asked to undertake any activity which goes against their belief and allowances will be made to reflect religious holidays and practices. It is not anticipated that the religion or belief of claimants will affect their eligibility or take up as advisors will offer support tailored to individual circumstances.

¹⁸ Source: Based on the Family Resources survey 2006/07, 2007/08, 2008/09

Maternity

78. No data is available on pregnancy / maternity status of claimants who will be impacted by this proposal. It is not anticipated that pregnancy and maternity will affect claimants' eligibility or take-up as advisers will offer support tailored to individual circumstances.

Monitoring and Evaluation

79. The Department will monitor the unemployment durations of different demographic groups to help ensure no unlawful negative impacts on each group.
80. This will be supplemented by the new Performance Management Framework for Jobcentre Plus that is currently in development. It is the means by which to assess Jobcentre Plus' performance on delivering its two headline outcomes:
- Moving claimants off benefit and into work; and
 - Paying benefits accurately and on time while reducing losses through fraud and error.
81. The framework will be underpinned by a range of supporting measures to help put into context performance.
82. The Department are developing an evaluation strategy for the Jobcentre Plus offer. The evaluation will investigate the delivery of the offer, including how the offer is experienced by different claimants groups, and their outcomes. The evaluation is likely to include qualitative and quantitative approaches, alongside internal monitoring.

Next steps

83. This Equality Impact Assessment will be reviewed within the next 12 months.

Contact details

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Annex 1

Operationalising flexibilities – considerations and mitigations to be taken into account at local office level

This table illustrates the kind of consideration required at District level to ensure Due Regard when introducing flexibilities. The list is not exhaustive.

Potential discriminatory area	Considerations	Mitigations
Accessibility	<p>Is there any mobility issues that may affect the client's ability to access the support offered?</p> <p>Are there caring issues that need to be taken into account to allow the client to attend?</p> <p>Do any other health considerations affect a client's ability to access support offered?</p> <p>Are there issues regarding attendance times for client due to religious observances?</p>	<p>Discussion initiated with the client at outset to understand any equality issues to be taken into account.</p> <p>Support arrangements agreed with client to facilitate access to intervention/support.</p> <p>Time is allocated based on agreed individual requirements of client.</p>
Communication	<p>Are there barriers to communication that need to be considered in managing process e.g.</p> <ul style="list-style-type: none"> • Translation requirements. • Learning disabilities. • Mental health considerations. • Other health considerations 	<p>Discussion with client focuses initially on individual need, mapping out extra support or reasonable adjustment requirement.</p> <p>Ensure appropriate method of contact is in place to provide most appropriate level of service.</p> <p>External support options are considered based on client need</p> <p>Time is allocated based on agreed individual</p>

		requirements of client.
Capability	Are there knowledge and capability gaps that will prevent advisers applying processes appropriately?	<p>Discussion initiated with the client at outset to understand any equality issues taken into account.</p> <p>Support arrangements agreed with client to facilitate interview process.</p> <p>Discussion with client focuses initially on individual need, mapping out extra support or reasonable adjustment requirement.</p> <p>Ensure appropriate method of contact is in place to provide most appropriate level of service.</p> <p>External support options are considered based on client need.</p> <p>Advisers are regularly assessed via the Quality Assessment Framework and Performance Management Framework and personal development targeted as required.</p>
Process	When determining the level of support a customer requires, have processes been assessed to ensure they meet legislative requirements?	Due regard is given to all methods of managing interventions with clients to ensure fairness and parity.