

Good Practice Guide for the Work Focused Interview: Fails to Attend (FTA), Fails to Participate (FTP) and Home Visits.

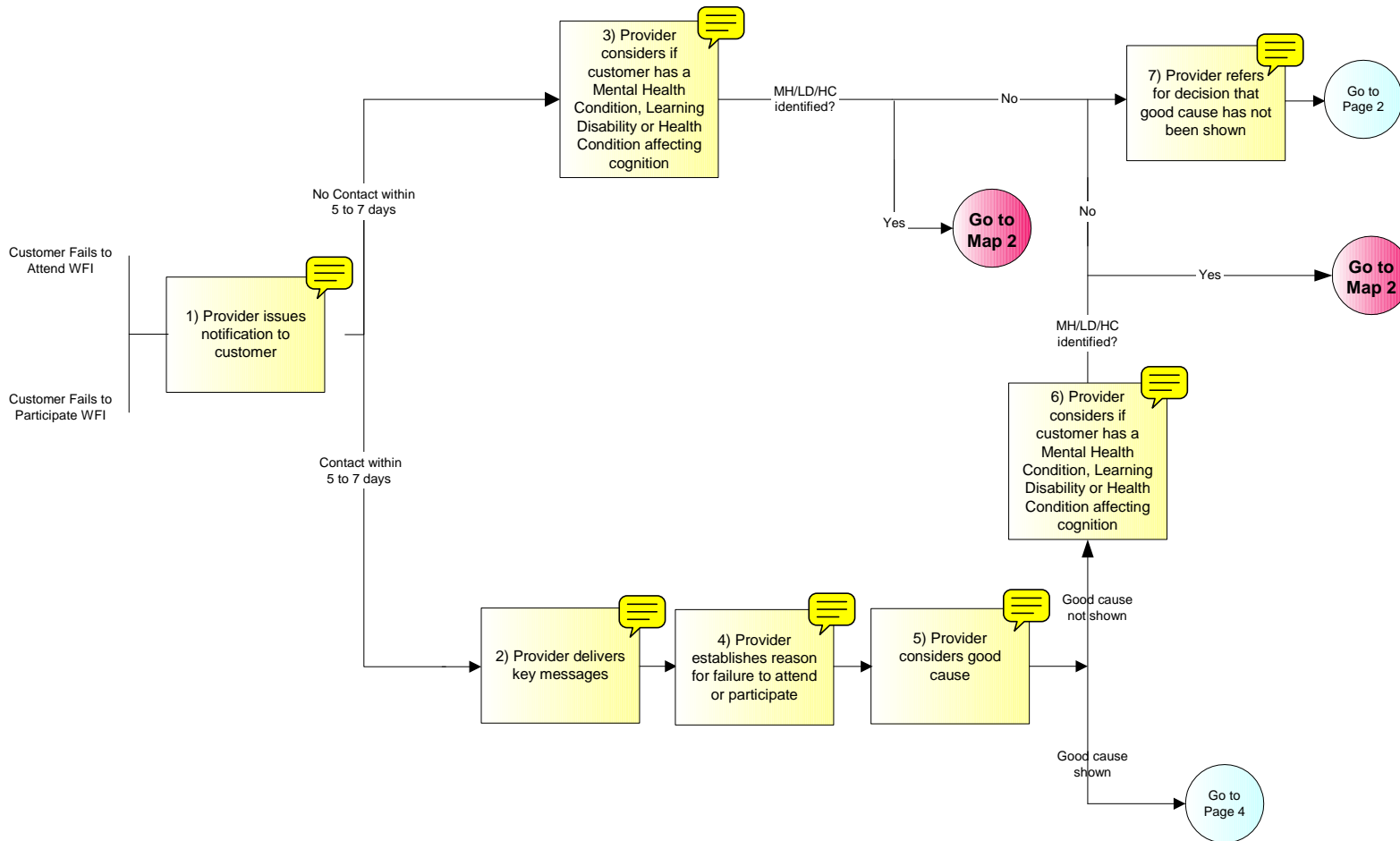
Introduction

1. The following guidance does not replace current Provider led Pathways guidance and should be used in conjunction with Section 5 FTA/FTP (Part 1 and Part 2) and Section 6 Home Visits.
2. The Good Practice guide contains two maps, detailing these processes. The map(s) should be the first point of reference followed by the corresponding text.
3. Each process box on the map/s is supported by guidance and good practice information, contained in a text box accessed via a speech icon (top right of the process box). If the information supporting the process box exceeds the size of the box (e.g. Map1 - box 3), so that you cannot see all process **and** good practice information you will need to left click your mouse on the speech icon. This will bring up a text box that you can scroll down all the available information. All process and good practice information is also available below Map2.
4. This guide has been produced with the co-operation/contributions from Providers, Benefit Delivery Centres (BDC) and Benefit Delivery Experts (Labour Market) (BDE (LM)).
5. This product will be regularly reviewed and will be added to on an ongoing basis.

Provider led Pathways to Work Guidance

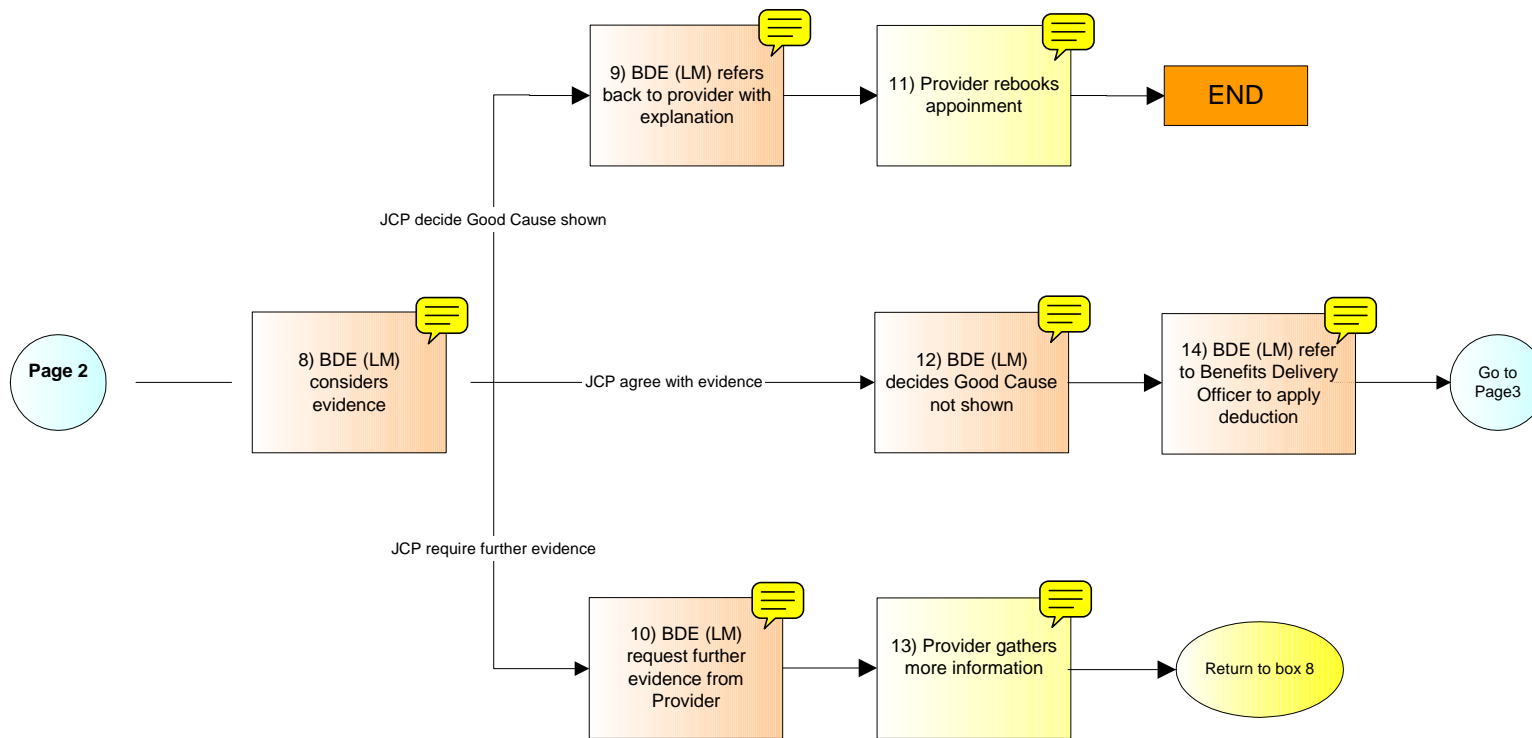
MAP 1
PAGE
1

Map - 1 Provider led Pathways Fail To Attend (all other customers) and Fail To Participate



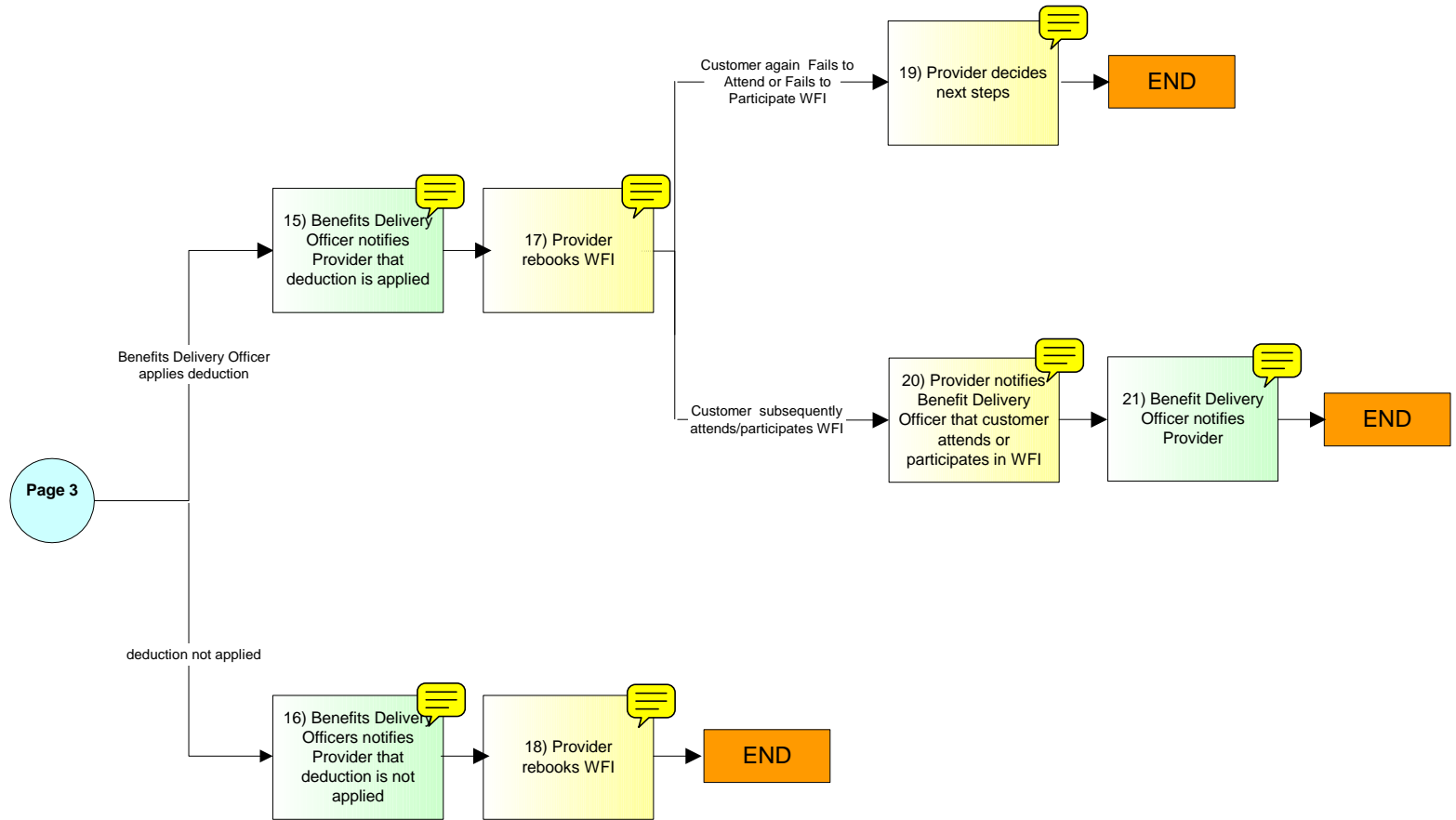
Provider led Pathways to Work Guidance

MAP 1
PAGE
2



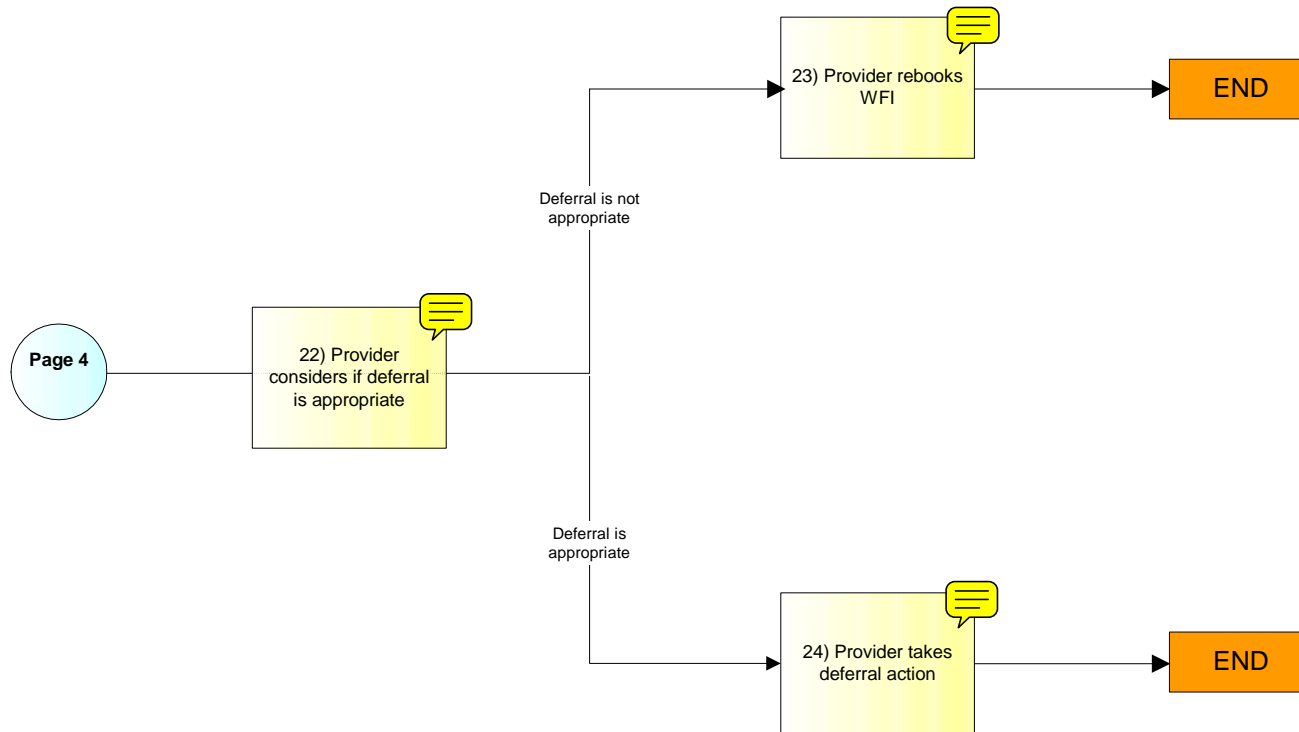
Provider led Pathways to Work Guidance

MAP 1
PAGE
3



Provider led Pathways to Work Guidance

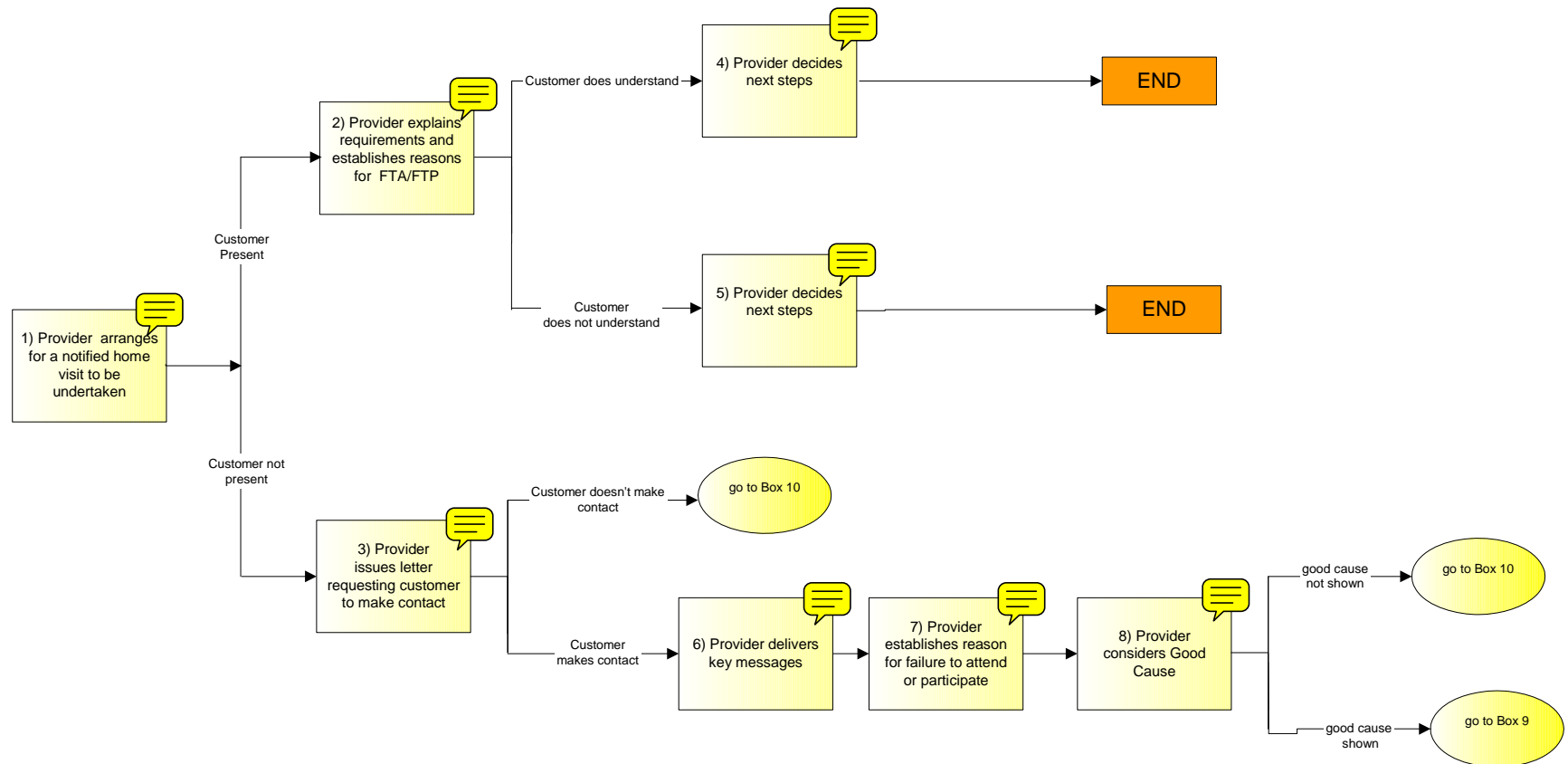
MAP 1
PAGE
4



Provider led Pathways to Work Guidance

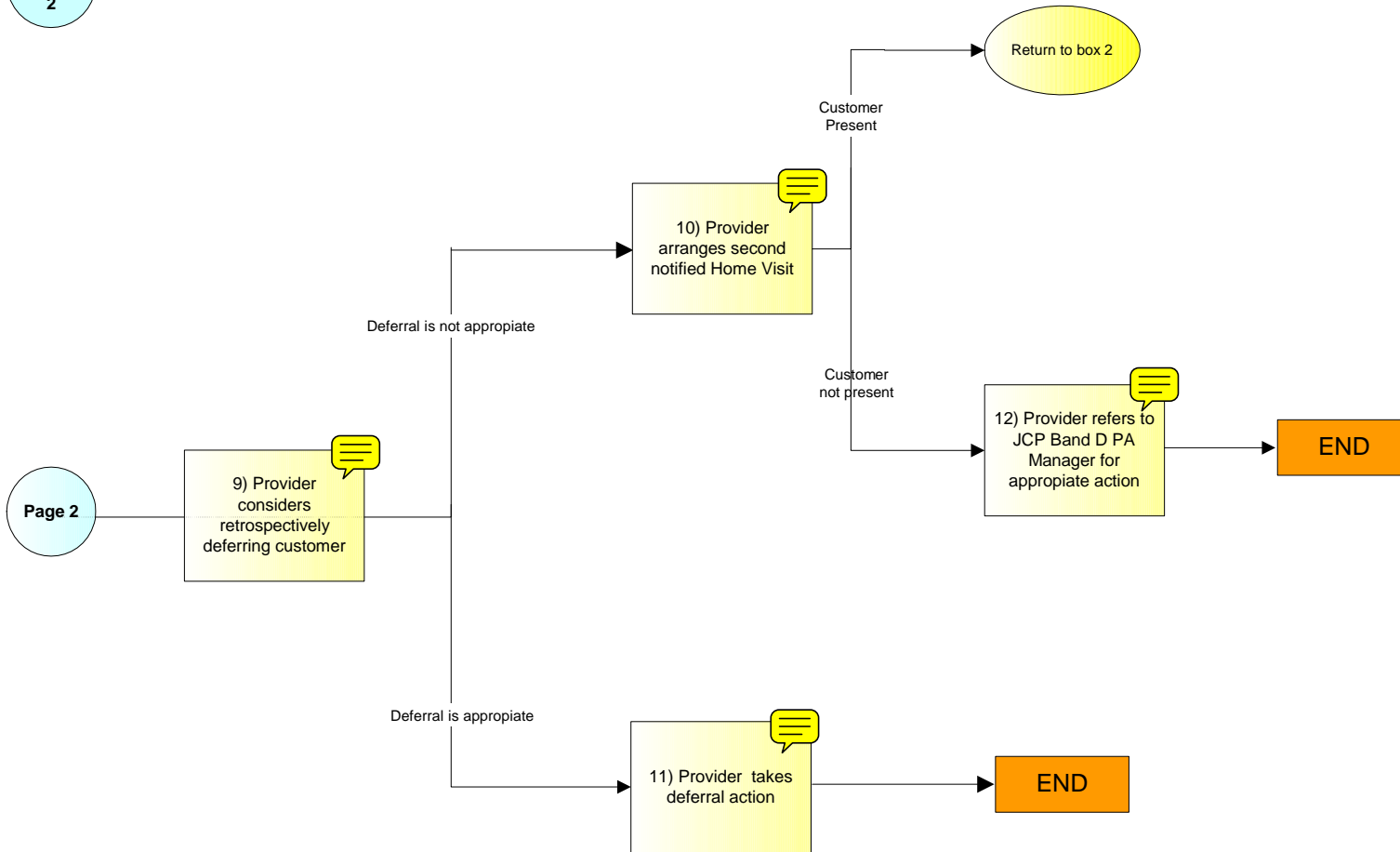
MAP 2
PAGE
1

Map - 2 Provider led Pathways Home Visit (customers with a notified Mental Health Condition/Learning Disability/Health Condition affecting cogniton)



Provider led Pathways to Work Guidance

MAP 2
PAGE
2



Warming up the customer to the WFI

6. *The period before the initial Work Focused Interview (WFI) and repeat WFI is an important point in which you can influence the behaviour of the customer so that they are less likely to FTA or FTP. This process will have already started with Jobcentre Plus, who will have engaged with the customer, informing them of the benefits of Provider led Pathways. It would make sense to build on this work once the customer has been referred to you.*
7. *The barriers that these customers face mean that any process to break down those barriers is beneficial. Therefore, the more communications that you have with the customer outside of the WFI (especially the initial WFI) the more likely they are to attend the WFI or maintain good dialogue with you. You could consider:*
 - *Group 'warm up' event prior to the initial WFI:*
 - *Break down barriers e.g. my doctor told me I am too ill to attend/work.*
 - *Encouraging debate between provider and customer, as some customers may raise questions that others hesitate to ask.*
 - *Share success stories to encourage customers.*
 - ***Note:** customers are under no obligation to attend any warm up events prior to their initial WFI. It also may not be appropriate for all customers.*
 - *Build up communications for regular customer contact by:*
 - *not sending the appointment letter too far in advance (avoiding customer forgetting appointment).*
 - *telephoning or texting the customer 24 hours prior to their appointment. This could give you the opportunity to allay any fears and confirm the venue and the time etc.*
 - *Softening communications by:*
 - *rewording the emphasis of standard JCP letters (without losing the mandatory elements of the programme).*
 - *handwriting communications so that they appear to be more 'friendly' (depends on the handwriting styles, as this may not be suitable for people with sight problems).*
 - *Instead of/in addition to using the word 'Work', consider terms such as 'Moving back to work', 'Progression to work' or 'planning towards goals including employment'.*

Map 1 – Provider led Pathways Failed To Attend and Failed To Participate

Box 1 Map 1 - Provider Issues Notification To Customers

Activity to undertake

8. The procedure dictates that once the customer either FTA or FTP, the notification letter asking for the reason for FTA/FTP should be sent to customers on the day of FTA/FTP. The letter must have a deadline for expected response of:
 - FTP - five days – the customer will have been handed the notification letter at the WFI; or
 - FTA – Seven days - the customer will be notified by post. Therefore, an extended deadline of a further 2 working days must be given to allow time for the letter to be received.

Good Practice

9. *There is an opportunity to potentially avoid the FTA process if you are able to contact the customer on the day they FTA. Consider contacting the customer by telephone to find out why they FTA. If you determine that they had good cause for FTA, you can then rebook the WFI straight away. This may mean the customer is more likely to attend next time because of the good lines of communication.*
10. *It may be worth contacting customers who FTP again by telephone to ensure they understand requirements and consequences of not participating before deciding they have not participated. Where contact is made you will then be able to consider a retrospective deferral or rebooking the appointment there and then.*

Next Action

11. The action you take depends on whether the customer:
 - Makes contact – refer to box 2 map 1; or
 - Does not make contact – refer to [box 3 map 1](#).

Box 2 Map 1– Provider delivers key messages

Activity to undertake

12. Once contact is established with the customer, it is important to ensure they are aware of their responsibilities i.e. the programme is mandatory, the potential effect it may have on their benefit, length of the WFI regime, and the support that is provided/benefits. You must also ensure that they understand the possible consequences of not attending or participating in their WFI i.e. benefit reductions.

Good Practice

13. *Emphasise the benefits of the programme, especially if you determine the customer appears to associate the programme with being forced into work. You could consider softening the approach - consider terms such as 'Moving back to work', 'Progression to work' or 'planning towards goals including employment'.*

Next Action

14. Once you have delivered the key messages, you must establish a reason for FTA/FTP – refer to [box 4 map 1](#).

Box 3 Map 1- Provider considers if customer has a Mental Health Condition or Learning Disability or Health Condition affecting cognition

Activity to undertake

15. If a customer has not made contact since the FTA/FTP notification was sent to them, you must investigate whether the customer has a stated Mental Health Condition, a Learning Disability or a Health Condition which affects cognition e.g. Stroke.
16. For all customers who have a Mental Health Condition, a Learning Disability or a Health Condition which affects cognition, the Secretary of State has made a commitment that for each WFI the customer FTA/FTP no deduction will be imposed until the customer has had a face-to-face explanation, with an advocate in support, if appropriate. This means if the customer suffers from a Mental Health Condition, Learning Disability or Health Condition which affects cognition, the case must be referred for a home visit in all cases.

Good Practice

17. *Establishing a good working relationship with the customer may bring to the surface issues that help with better participation e.g. *contact leading up to the WFI may provide an opportunity for the customer to re-arrange the WFI to a more convenient time due to their circumstance.**
18. *Do not rely on the PLP1 indicating that there is a health issue. Use all information available to you to determine if the customer has a stated Mental Health Condition, a Learning Disability or a Health Condition which affects cognition. This may include the WFHRA, information received from the customer contact already had so far and information received from Jobcentre Plus e.g. Action Plan.*
19. *Ensure that if a customer is nervous about participating in the WFI regime, that they are aware that they can bring someone along for support – friend/advocate/appointee.*

Next Steps

20. If the information you have available e.g. PLP1 referral form, Work Focused Health Related Assessment or information from the customers advocate, shows they have a Learning Disability or a Health Condition which affects cognition then you must arrange a home visit - refer to [box 1 Map 2](#). For further information about home visits refer to [Section 6 – ‘Conducting Visits in the Customers Home’](#).
21. However, if you cannot determine that a Mental Health Condition or Learning Disability or Health Condition affecting cognition was the cause of the FTA/FTP then you must undertake no good cause action - refer to [box 7 map 1](#).

Box 4 Map 1– Provider establishes reason for failure to attend or participate

Activity to undertake

22. During your dialogue with the customer you need to establish the reasons for the customer not to attend/participate in the interview.
23. You will need to have any information you have gathered already e.g. information regarding a Mental Health Condition or Learning Disability or Health Condition affecting cognition or any individual circumstances.

Good Practice

24. *It is important to establish good lines of communication with the customer. The more information you obtain the easier it will be to determine good cause action. For example, establishing the mood of the customer e.g. tone of voice, body language – may give you an indication of how to handle the conversation to get the best results i.e. being very authoritative to a customer who is anxious, may cause them to not give as full an answer as you would like.*

Next Steps

25. As well as any existing information, you must ask the customer for their reason for their FTA/FTP. This combined information will help you to determine what action to take with the customer good cause reason - refer to [box 5 map 1](#).

Box 5 Map 1– Provider considers good cause

Activity to undertake

26. Once a reason is established with customer, you will need to consider whether or not it was reasonable for the customer not to attend/participate in the interview.
27. In consideration of the good cause reason, use as your guideline the ‘possible reasons for good cause’ detailed in Possible Good Cause

Provider led Pathways to Work Guidance

Decision in [section 5 of provider guidance](#) . This section provides a comprehensive list of scenarios that will help with that consideration.

28. It is also worth considering for those customers who may have given FTA reasons previously, that a review of these reasons may uncover an overused reason that could influence your consideration.

Good Practice

29. *Engaging with Jobcentre Plus. You could discuss quality and understanding with the BDE (LM) and come to suitable determination (possibly avoiding a no good cause referral). For example, personal circumstances when determining good cause can only be done on a case by case basis. As not every scenario can be covered sometimes not making a determination decision straight forward, good links with the BDE (LM) could help.*

Next Steps

30. If you consider that the reason given means that you can accept good cause - refer to [box 22 map 1](#) .
31. If you consider that there is doubt about the good cause reason given - refer to [box 7 map 1](#), before you take action to refer the customer for possible benefit deduction to Jobcentre plus. You need to consider if the customer has a stated Mental Health condition, a Learning Disability or a Health Condition which affects cognition - refer to box 6 map 1.

Box 6 Map 1- Provider considers if customer has a Mental Health Condition or Learning Disability or Health Condition affecting cognition

Activity to undertake

32. If a customer has made contact since the FTA/FTP notification was sent to them, you must investigate whether the customer has a stated Mental Health condition, a Learning Disability or a Health Condition which affects cognition e.g. Stroke. This will enable you to be more informed when delivering the key messages of the programme ([box 2 map 1](#)).
33. For all customers who have a Mental Health Condition, a Learning Disability or a Health Condition which affects cognition, the Secretary of State has made a commitment that for each WFI the customer FTA/FTP no deduction will be imposed until the customer has had a face-to-face explanation, with an advocate in support, if appropriate. This means if the customer suffers from a Mental Health Condition, Learning Disability or Health Condition which affects cognition, the case must be referred for a home visit in all cases.

Good Practice

34. *Establishing a good working relationship with the customer may help to bring to the surface issues that may help with better participation e.g.*

contact leading up to the WFI may provide an opportunity for the customer to re-arrange the WFI to a more convenient time due to their circumstance.

35. *Do not rely on the PLP1 indicating that there is a health issue. Use all information available to you to determine if the customer has a stated Mental Health Condition, a Learning Disability or a Health Condition which affects cognition. This may include the WFHRA, information received from the customer contact already had so far and information received from Jobcentre Plus e.g. Action Plan.*
36. *Ensure that if a customer is nervous about participating in the WFI regime, that they are aware that they can bring someone along for support – friend/advocate/appointee.*

Next Steps

37. If the information you have available e.g. PLP1 referral form, Work Focused Health Related Assessment or information from the customers advocate, shows they have a Mental Health Condition, Learning Disability or a Health Condition which affects cognition then you must arrange a Home Visit - refer to [box 1 Map 2](#). For further information about home visits refer to [Section 6 – ‘Conducting Visits in the Customers Home’](#).
38. However, if you cannot determine that a Mental Health Condition or Learning Disability or Health Condition affecting cognition was the cause of the FTA/FTP you must undertake no good cause action - refer to [box 7 \(Map 1\)](#).

Box 7 Map 1- Provider refers to JCP for decision that good cause has not been shown

Activity to undertake

39. If you determine that no good cause is shown, whether by the information given or a lack of a response from the customer, you need to refer the customer to the BDE (LM) for a decision.
40. The decision will be based on the evidence you have supplied, therefore you need to ensure that at least the minimum evidence is supplied as listed below. Otherwise, you will be asked for more information or accept the good cause reason.

Note: You must attempt to conduct 2 home visits before making a submission for customers with a stated Mental Health Condition, a Learning Disability or a Health Condition which affects cognition.

41. Using the [Notification from Provider \(NFP\) form](#) you should include:
 - the date the customer was notified about the Work Focused Interview with the date, time and place of the interview (including a copy of the appointment notification/letter if issued, or if not, a statement of the contact method used e.g. telephone);

Provider led Pathways to Work Guidance

- details of when the customer was informed they failed to attend/participate including a copy of any good cause notification/letter issued (refer to [box 1 map 1](#));
- supporting information e.g. details of any verbal or written communications between the provider and the customer; and
- details of any Home Visits undertaken for customers with Mental Health Conditions, Learning Disabilities or Health Conditions that effects cognition.

Good Practice

42. *Whatever systems you have in place for the collation of information the following points could be considered to avoid BDE (LM) returning a submission (un-actioned):*

- *Ensure whoever collates provider information (the PIP Adviser, Administration team etc) is aware of the latest FTA/FTP process and the minimum evidence requirements needed i.e. keep records on what information has been passed to the customer.*
- *You could utilise your customer diary/database to record the customer's progress through the WFI regime – to help identify gaps in the evidence needed such as previous referrals and identifying regular FTA/FTP customers by building in additional columns or a separate spreadsheet (if feasible) to log paperwork/additional information as customers progress through the programme.*
- *You may wish to undertake a final evidence check process for all submissions sent. This could be a full check of all submissions or a percentage. This could help identify any training or knowledge gaps if problems with the evidence arise.*
- *If a submission has been returned requiring further information, unless the missing information can be updated and returned immediately, consider regularly updating the BDE (LM) of whatever progress occurs.*
- *Send each referral individually. Don't wait until you have a few to send together, as this will cause unnecessary delays.*
- *Ensure that the BDE (LM) contact address is correct. This may be causing delays in a decision being made by the BDE (LM). If a decision is not forthcoming consider making contact with the BDE (LM) to see if any delay is due to postal issues.*

Next Steps

43. The evidence must be sent as soon as possible after the FTA date to the BDE (LM) contact address for a decision - refer to [box 8 map 1](#).

For more information refer to the [Jobcentre Plus \(Benefit Delivery Centre\) Decision Referral Process in section 5](#).

Box 8 Map 1– JCP Decision Maker considers evidence

Activity to undertake

44. The BDE (LM) will consider the evidence presented and either:
- Disagree and return to the Provider refer to box 9 map 1
 - Make a request for further evidence refer to [box 10 map 1](#)
 - Agree with no good cause evidence refer to [box 12 map 1](#)

Good Practice

45. *Consider regular meetings with decision makers to ensure common understanding of evidence requirements and standards (only if you have experienced problems with previous submissions).*

Box 9 Map 1– JCP Decision Maker refers back to Provider with explanation

Activity to undertake

46. The BDE LM sends back a Notification To Provider (NTP), explaining the reason(s) why the customer did give good cause and as a consequence disagrees with your determination.

Good Practice

47. *Consider regular meetings with decision makers to ensure common understanding of evidence requirements and standards.*

Next Steps

48. You must contact the customer to re-book the WFI as soon as possible – refer to [box 11 map 1](#).

Box 10 Map 1– JCP Decision Maker request further evidence from Provider

Activity to undertake

49. When a request for further evidence is received on the NFP, you must update the evidence with the missing information
50. If you need to further clarify the request, you must contact the Decision Maker as soon as possible as any delays will impact on any no good cause action.

Good Practice

51. *You may want to consider investigating your procedures for collecting evidence to see if they could be strengthened. This could be investigated*

from the PIP adviser side and the Administration team side, concentrating on the understanding of the guidance/policy. If a training need arises, you could involve Jobcentre Plus.

52. *Consider regular meetings with decision makers to ensure common understanding of evidence requirements and standards.*

Next Steps

53. Return the missing information as soon as possible – refer to [box 13 map 1](#).

Box 11 Map 1– Provider rebooks appointment

Activity to undertake

54. You should re-book the WFI as soon as possible after receiving the decision, contacting the customer to arrange a date, time and place of the WFI.

Good Practice

55. *This is an opportunity to open up improved the lines of communication with the customer. Consider using the Good Practice detailed in the [‘Warming up the customer’](#) section.*
56. *You could consider issuing an appointment card. This could show previous and upcoming appointments which the customer could sign every time a new appointment is made. This may inspire commitment in the customer for future WFI participation.*

Next Steps

57. This is the end of this process.

Box 12 Map 1– BDE (LM) decide Good Cause not shown

Activity to undertake

58. The BDE (LM) will make the decision that customer did not show good cause.

Good Practice

59. *Not applicable*

Next Steps

60. The BDE (LM) will refer to the Benefit Delivery Centre for deduction action – refer to [box 14 map 1](#).

Box 13 Map 1– Provider gathers more information

Activity to undertake

61. If the BDE (LM) sends the no good cause submission back to you, they are missing part of the information requested ([Box 7 map 1](#)). You may have to go back to the customer for further information.

Good Practice

62. *By regularly monitoring these occurrences and noting which pieces of evidence were missing, you could look at trends which could either lead to training/upskilling of PIP advisers and/or the administration team knowledge.*
63. *If the information relates to incorrect customer information, for example, customer details are incorrect; consider contacting your Third Party Provision Manager (TPPM). They may be able to access customer records and update you.*
64. *Consider regular meetings with decision makers to ensure common understanding of evidence requirements and standards.*

Next Steps

65. You must update the submission with the missing information and re-submit - refer to [box 8 map 1](#).

Box 14 Map 1– BDE (LM) refer to Benefits Delivery Officer (BDO) to apply deduction

Activity to undertake

66. Once the BDO receives the notification they will take the necessary steps to action a benefit deduction. The action will depend on whether a customer is holding a benefit deduction prior to or post the Employment and Support Allowance (ESA) deduction regulations that were introduced on 27/10/08.
67. For more information refer to the Jobcentre Plus (Benefit Delivery Centre) Impose a Deduction in Benefit (Decision Making and Appeals) for those customer holding a deduction [prior to 15/12/08](#) and [post ESA](#).

Good Practice

68. *Not applicable*

Next Steps

69. The BDO will notify the provider that the deduction is:
 - Applied – refer to box 15 map 1; or
 - Not applied – refer to [box 16 map 1](#).

Box 15 Map 1– Benefits Delivery Officer notifies Provider that deduction is applied

Activity to undertake

70. When a deduction is applied by the BDC, you will receive a Notification to Provider (NTP) form informing you of the deduction, please record against the records you keep for the customer.
71. The customer has the right of appeal against the decision if they make contact with you and they want to exercise this right you should advise them to contact the Benefit Delivery Centre immediately as strict time limits operate for appeals.

Good practice

72. *Not applicable*

Next Steps

73. You must then take the action to rebook the WFI – refer to [box 17 map 1](#).

Box 16 Map 1– Benefits Delivery Officer notifies Provider that a deduction is not applied

Activity to undertake

74. You will receive an NTP informing you that the customer does not have any further Benefit that can be deducted. This occurs because there is no further benefit from which a deduction can be made. It will be different depending on when a customer joined PI Pathways i.e. a customer who joined prior to the introduction of Employment and Support Allowance (ESA) on the 27/10/08 and is holding a deduction from before 15/12/08, will be different from those customer holding a deduction after the 15/12/08.
75. Pre ESA customer – once a customer benefit has reached a point that they would be reduced to below 10 pence per week.
76. Post ESA customer – once a customer has FTA/FTP two consecutive times the WFI without good cause, no further deduction can be applied.

Good Practice

77. *For more regular FTA/FTP customers, you could consider making them more aware that their FTA/FTP history is being documented. You could also include some wording regarding the effect FTA/FTP has on the provider and the fellow customers (i.e. wasting resources, lack of appointment times etc). You must decide the best way to inform the customer of this e.g. letter, face to face.*
78. *In addition to the notification letter, you could consider issuing an appointment card. This could show regular FTA/FTP previous and upcoming appointments which the customer could sign every time a new*

appointment is made. This may inspire commitment in the customer for future WFI participation.

Next Steps

79. In these cases, you must still take action to rebook the WFI on receipt of this notification – refer to [box 18 map 1](#).

Box 17 Map 1 - provider rebooks WFI

Activity to undertake

80. When you receive notification that a deduction has been applied, you must take action to rebook the WFI. However, you must also be aware of the benefit status of the customer. The reason for this is the WFI rebooking policy for those customers who joined PI Pathways prior to the introduction of Employment and Support Allowance (ESA) on the 27/10/08 and is holding a deduction from before 15/12/08, will be different from those customers who claimed after the 15/12/08.

Pre ESA

81. These customers must be sent an appointment letter one month after the date the deduction was imposed. Further information can be found in [Section 5 part 1, Para 49](#).

Post ESA

82. These customers must be sent an appointment letter the moment you receive notification of the deduction. If the customer does not undertake the WFI within 4 weeks, a further benefit deduction will be taken automatically. Further information can be found in [Section 5 part 2, Para 49](#).

Good Practice

83. *Where possible try to contact the customer to agree a mutually acceptable time/date/place for the WFI, as this may lead to greater participation.*
84. *For more regular FTA/FTP customers, you could consider making them more aware that their FTA/FTP history is being documented. You could also include some wording regarding the effect FTA/FTP has on the provider and the fellow customers (i.e. wasting resources, lack of appointment times etc). You must decide the best way to inform the customer of this e.g. letter, face to face.*
85. *In addition to the notification letter, you could consider issuing an appointment card. This could show regular FTA/FTP previous and upcoming appointments which the customer could sign every time a new appointment is made. This may inspire commitment in the customer for future WFI participation.*

Next Steps

86. The action you take next will depend on the participation of the customer:
- If the customer again FTA/FTP refer to [box 19 map 1](#); or
 - If the customer attends/participates in the WFI refer to [box 20 map 1](#).

Box 18 Map 1– Provider rebooks WFI

Activity to undertake

87. When you receive notification that a deduction has not been applied, you must take action to rebook the WFI. However, you must also be aware of the benefit status of the customer. The reason for this is the WFI rebooking policy for those customers who joined PI Pathways prior to the introduction of Employment and Support Allowance (ESA) on the 27/10/08 and is holding a deduction from before 15/12/08, will be different from those customers who claimed after the 15/12/08.

Pre ESA

88. These customers must be sent an appointment letter one month after the date the deduction was imposed. Further information can be found in [Section 5 part 1, Para 49](#).

Post ESA

89. These customers must be sent an appointment letter the moment you receive notification of the deduction. If the customer does not undertake the WFI within 4 weeks, a further benefit deduction will be taken automatically. Further information can be found in [Section 5 part 2, Para 49](#).

Good Practice

90. *Where possible try to contact the customer to agree a mutually acceptable time/date/place for the WFI, as this may lead to greater participation.*
91. *For more regular FTA/FTP customers, you could consider making them more aware that their FTA/FTP history is being documented. You could also include some wording regarding the effect FTA/FTP has on the provider and the fellow customers (i.e. wasting resources, lack of appointment times etc). You must decide the best way to inform the customer of this e.g. letter, face to face.*
92. *In addition to the notification letter, you could consider issuing an appointment card. This could show regular FTA/FTP previous and upcoming appointments which the customer could sign every time a new appointment is made. This may inspire commitment in the customer for future WFI participation.*

Next Steps

93. This is the end of this process.

Box 19 Map 1 - Provider decides Next Steps

Activity to undertake

94. If the customer FTA/FTP the rebooked interview, irrespective of when they joined PI Pathways, you must notify the BDC using a Notification to Provider (NFP) form. Further deductions of their benefit will be applied.

For further information on deduction of benefits, depending on when the customer joined PI Pathways and if they are holding a benefit deduction, can be found in the 'deduction in benefits' in [Section 5 Part 1](#) or [Part 2](#).

95. The action you take will depend on when the customer joined PI Pathways as to how you proceed with booking further WFI:

- Pre ESA customers – You must continue to attempt to rebook the WFI (as detailed in [box 17 map 1](#)) as the customer will have further benefit deduction applied. Therefore, you must continue to inform the BDC of further FTA/FTP of this rebooked interview using a Notification to Provider (NFP) form.
- Post ESA customer – once a customer has FTA/FTP the WFI on two consecutive occasions without good cause, no further deduction can be applied.

It is your decision as to whether you continue to engage with the customer. Either way, inform the BDC of the circumstances using a Notification to Provider (NFP) form.

96. Once the BDC receive the NFP, they will look into the most appropriate action e.g. the reason why the customer FTA is that they are no longer in receipt of benefit and therefore not Pathways eligible or they decide fraud action is appropriate.

97. However, unless advised by the BDC, the customer cannot be exited from pathways.

Note: if a customer reaches 60 years of age, any deductions in benefit will no longer apply.

Good Practice

98. *It is worth persevering with post ESA customers, as they may be more job ready than you think.*

99. *If the customer regularly FTA/FTP it would be worth opening up the lines of communication with them. Consider using the Good Practice detailed in the 'Warming up the customer' section.*

100. *It is also worth considering any new information you or Jobcentre Plus has concerning the customer as this may indicate that the customer may have a Mental Health Condition, a Learning Disability or a Health Condition that affects their cognition. Therefore, a home visit may be more appropriate (for more information on [Home Visits see section 6](#)).*

101. *The BDC will endeavour to inform you of any change in circumstances of the customer as soon as they are able e.g. no longer in receipt of benefit, change of address etc. However, by establishing a good working relationship with your Third Party Provision Manager (TPPM), you may be able to find out sooner about a customers change of circumstance by asking the TPPM in those cases where the customer has gone off the radar.*

Next Steps

102. This is the end of this process.

Box 20 Map 1 - Provider notifies BDO that the customer attends or participates in the rebooked WFI

Activity to undertake

103. You must inform the BDO that the customer has attended the rebooked WFI using a Notification to Provider (NFP) form. It is important that you notify the BDO straight away so that future deductions are not applied and any existing deductions are lifted.

Good Practice

104. *This is an opportunity to open up improved lines of communication with the customer i.e. now that they are in front of you – strike while the iron is hot! Consider using the Good Practice detailed in the [‘Warming up the customer’](#) section.*

Next Steps

105. The BDO will inform you the about the customers deduction – refer to [box 21 map 1](#).

Box 21 Map 1 - Benefit Delivery Officer notifies Provider

Activity to undertake

106. The BDC will use the Notification To Provider (NTP) form to inform you that the deduction has been lifted from the customers benefit.

Good Practice

107. *Not applicable*

Next Steps

108. This is the end of this process.

Box 22 Map 1 - Provider considers if deferral is appropriate

Activity to undertake

109. You need to determine whether or not it was reasonable for the customer not to attend/participate in the interview, taking into account individual circumstances. This shall be done by using the guideline of

possible reasons for good cause (detailed in [Possible Good Cause Decision in section 5](#)).

Good Practice

110. *It is worth noting that some reasons for retrospectively deferring a customer are obvious but it is also worth considering those reasons which do not fall into a deferral category. Therefore it may be worth considering a deferral for a short period for those less obvious reasons e.g. moving house As long as there is a genuine commitment to re-arrange the WFI appointment.*

111. *This is an opportunity to open up improved the lines of communication with them i.e. now that they are in front of you – strike while the iron is hot! Consider using the Good Practice detailed in the [‘Warming up the customer’](#) section.*

Next Steps

112. If you accept good cause, you may consider:

- Deferring the customer depending on the reason given (as per [box 24 map 1](#)), for example, the customer is undergoing intensive medical treatment. Refer to [deferral guidance in section 4](#) for more in-depth advice.
- Rearrange the Work Focused Interview as soon as possible (as per box 23 map 1). The customer must be informed of the rearranged date, time and place of the appointment.

Box 23 Map 1 - Provider rebooks WFI

Activity to take

113. Rearrange the Work Focused Interview as soon as possible. The customer must be informed of the rearranged appointment using the Good Cause letter.

Good Practice

114. *Emphasise the benefits of the programme, especially if you determine the customer appears to associate the programme with being forced into work. You could consider softening the approach – by using terms such as ‘Moving back to work’, ‘Progression to work’ or ‘planning towards goals including employment’.*

Next Steps

115. This is the end of this process.

Box 24 Map 1 - Provider takes deferral action

Activity to take

116. You must decide on a suitable period of deferral depending on the reason (refer to [section 4 deferral](#) for more information). Agree the period with the customer and arrange a suitable WFI date in the future.

Good Practice

117. *Keeping your customer tracking system up to date with action taken such as deferral periods and the subsequent follow up WFI, will ensure that more efficient working practises will be maintained.*
118. *Having good lines of communication with customers (as described throughout this guide) may work to your advantage with deferred customers. They may keep up to date with their issues and inform you they want to return sooner to Pathways than the agreed deferral period.*
119. *You could consider some low key/friendly customer communications to keep deferred customers informed where appropriate. This may help some customers re-engage successfully with Pathways when their deferral period ends.*

Next Steps

120. This is the end of this process.

Map 2 - Provider led Pathways Home Visit (customers with a notified Mental Health/Learning Disability/Health Condition affecting cognition)

Box 1 Map 2 - Provider arranges for a notified home visit to be undertaken

Activity to be undertaken

121. Once it has been established that the customer has a notified Mental Health/Learning Disability/Health Condition affecting cognition (as per [Map 1 box 3](#) or [map 1 box 6](#)), you must make arrangements to notify the customer of the details of the home visit. The visit must be scheduled as soon as possible after the original no good cause period.
122. If you are aware that the customer has an appointee or advocate, any communications concerning a home visit will need to be made via them. Further information concerning appointees/advocates can be found in [section 3 of the PI Provider guide](#).
123. It is important to consider both the Health and Safety and the Disability Discrimination Acts for yourself and the customer when

arranging the home visit. Further information can be found in [section 18 of the provider guidance](#).

Good Practice

124. *You could consider to attempting to contact the customer or their advocate/appointee as soon as a home visit is identified/arranged.*
125. *It would be worth looking at this on a case by case basis because each customer may react to your contact in a different way e.g. fear/distrust/anxiety:*
126. *It could be useful to use some of the [warming up communications](#) referred to earlier in the guide e.g. using different words other than work, texting customer prior to appointments, breaking down barriers to participation.*

Next Steps

127. The next action you should consider depends on whether the customer:
- is present at the home visit – refer to box 2 map 2; or
 - is not present at the home visit – refer to [box 3 map 2](#).

Box 2 Map 2- Provider explains requirements and establishes reasons for FTA/FTP

Activity to be undertaken

128. At the Home Visit you must, as a minimum, ensure the customer fully understands the requirements and establish why he/she did not attend or participate in the WFI:
- Do they understand that attending and participating in a series of WFIs is part of the conditionality for receiving a Jobcentre Plus benefit: or
 - Do they understand the possible consequences of not attending and participating in a WFI (a potential deduction from their benefit).
129. If it doesn't become obvious during conversation, ask why they failed to attend or participate in the WFI. Record any reasons given as the evidence will be required for any possible referral to JCP to make a decision that a deduction will be appropriate.

More detailed information can be found in the [home visits provider guide, section 6](#).

Good Practice

130. *Take into account any factors of the home visit that could influence a positive outcome/decision. The sorts of factors could include:*
- *The mood of the customer*

Provider led Pathways to Work Guidance

- *The relationship they or you have with appointee/advocate*
- *The setting of the home visit*

All or any one of these could directly affect the outcome/decision, therefore it could be important to be aware of these things during the interview.

Next Steps

131. Once you have explained the requirements you will need to take the action depending on the response of the customer:

- Customer does understand requirements to participate in the mandatory WFI regime – refer to [box 4 map 2](#); or
- Customer does not understand requirements to participate in the mandatory WFI regime – refer to [box 5 map 2](#).

Box 3 Map 2- Provider issues letter requesting customer to make contact

Activity to be undertaken

132. If the customer is not present at the agreed date/time/place, then the visit would be classed as ineffective. You must leave a home visit letter at the customers contact address, asking them to contact you within 5 days from the date of the ineffective visit.

Good Practice

133. *It would be worth considering contacting the customer or advocate/appointee straight after the ineffective visit e.g. Telephone or text the customer. This could give you the opportunity to allay any fears, encouraging them to make contact/participate.*

Next Steps

134. Once you have left the letter, take the action if:

- Customer does not respond – refer to [box 10 map 2](#); or
- Customer does respond – refer to [box 6 map 2](#).

Box 4 Map 2- Provider decides Next Steps

Activity to be undertaken

135. Following your conversation with the customer, there are several possible next steps:

- Consider the reason for FTA/FTP and if a suitable reason is given re-book the WFI.

Provider led Pathways to Work Guidance

- If the customer does not give a suitable reason you will need to make it clear to the customer that the next course of action will be to make a referral to JCP for a decision to make a deduction in benefit.
 - It may become apparent that a deferral would be appropriate. If so, take deferral action.
136. If you are re-arranging the WFI, issue an appointment letter to the customer there and then.
137. If you decide to complete a WFI at this point, take the action as detailed in [section 3, Mandatory Work Focused Interview process](#). You must then take steps to arrange the next WFI.

Good Practice

138. *It may be useful to issue an appointment card detailing the past and up and coming WFIs. This may help to focus the customer on the programme and keep open an important line of communication.*
139. *If good communication has been established during the home visit it will enable you to decide whether or not to undertake a WFI. Therefore, taking into account any factors that you noticed during the home visit could influence what action to take next. The sorts of factors could include:*
- *The mood of the customer;*
 - *The relationship they or you have with appointee/advocate;*
 - *The setting of the home visit.*

Next Steps

- If the customer gives an acceptable straightforward reason – re book the WFI – refer to [Map 1 Box 11](#)
- If the customer does give a good reason consider if a deferral is appropriate – if yes – refer to [Box 9 map 2](#)
- If the customer does not give a good reason – refer for a deduction decision – refer to [Box 10 map 2](#)
- You may also consider, where appropriate, to continue the conversation and actually conduct the WFI.

Box 5 Map 2- Provider decides next step

Activity to be undertaken

140. If you decide the customer has not taken on board the information concerning the requirements to participate in the mandatory WFI regime, then you must consider what is the most appropriate action to take next. The next action includes:
- Retrospective deferral - refer to [box 9 map 2](#); or

- Re-arrange the Home Visit - refer to [box 10 map 2](#).
141. When making a judgement as to whether or not a customer has understood the information that has been presented to them, the following factors could be taken into consideration:
- The response of the customer – is it coherent?
 - The thoughts/responses of the advocate/appointee (when available)
 - The demeanour of the customer – has the customer become more uncomfortable/distressed since the start of the visit.

These factors are just an indication, which might make up part of your judgement as to what action to take next.

Good Practice

142. *Not applicable*

Next Steps

143. This is the end of this process.

Box 6 Map 2– Provider delivers key messages

Activity to undertake

144. At the Home Visit you must, as a minimum, ensure the customer fully understands the requirements and establish why they did not attend or participate in the WFI:
- Do they understand that attending and participating in a series of WFIs is part of the conditionality for receiving a Jobcentre Plus benefit; or
 - Do they understand the possible consequences of not attending and participating in a WFI (a potential reduction from their benefit).
145. If it doesn't become obvious during conversation, ask why they failed to attend or participate in the WFI. Record any reasons given as the evidence will be required for any possible referral to JCP to make a decision that a deduction will be appropriate.
146. More detailed information can be found in the [home visits provider guide, section 6](#).

Good Practice

147. *Emphasise the benefits of the programme, especially if you determine the customer appears to associate the programme with being forced into work. You could consider softening the approach - consider terms such as 'Moving back to work', 'Progression to work' or 'planning towards goals including employment'.*

Next Steps

148. Once you have delivered the key messages, you must establish a reason for FTA/FTP – refer to [box 7 map 2](#).

Box 7 Map 2– Provider establishes reason for failure to attend or participate

Activity to undertake

149. During your dialogue with the customer you need to establish the reasons why the customer FTA/FTP in the interview.
150. You will need to have any information you have gathered already e.g. information regarding a Mental Health Condition or Learning Disability or Health condition affecting cognition or any individual circumstances.
151. As well any existing information, you must ask them for their reason for the FTA/FTP.

Good Practice

152. *It is important to establish good lines of communication with the customer. The more information you obtain the easier it will be to determine good cause action. For example, establishing the mood of the customer e.g. tone of voice, body language – may give you an indication of how to handle the conversation to get the best results i.e. being very authoritative to a customer who is anxious, may cause them to not give as full an answer as you would like.*

Next Steps

153. This combined information will help you to determine what action to take with the customer good cause reason – refer to [box 8 map 2](#).

Box 8 Map 2– Provider considers good cause

Activity to undertake

154. Once a reason is established with customer, you will need to consider whether or not it was reasonable for the customer not to attend/participate in the interview.
155. To make that consideration of the good cause reason. Use as your guideline the 'possible reasons for good cause' detailed in [Possible Good Cause Decision in section 5 of provider guidance](#). This section provides a comprehensive list of scenarios that will help with that consideration.
156. It is also worth considering for those customers who may have given FTA reasons previously, that a review of previous reasons given may uncover an overused reason that could influence your consideration.

Good Practice

157. *Engaging with Jobcentre Plus e.g. you could discuss quality and understanding with the BDE (LM) and come to suitable determination (possibly avoiding a no good cause referral). For example, personal circumstances when determining good cause can only be done on a case by case basis. As not every scenario can be covered sometimes not making a determination decision straight forward, good links with the BDE (LM) could help.*

Next Steps

158. If you consider that the reason given means that you can accept good cause - refer to [box 9 map 2](#).

Box 9 Map 2- Provider considers retrospectively deferring customer

Activity to be undertaken

159. When you are considering a retrospective deferral, you need to determine whether or not it was reasonable for the customer not to attend/participate in the interview (taking into account individual circumstances). By using the guideline of [Possible Good Cause Decision in section 5 of provider guidance](#).

Good Practice

160. *It is worth noting that some reasons for retrospectively deferring a customer are obvious but it is also worth considering those reasons which do not fall into a deferral category. Therefore it may be worth considering a deferral for a short period for those less obvious reasons e.g. moving house As long as there is a genuine commitment to re-arrange the WFI appointment.*

Next Steps

161. Once you have made your deferral decision you will need take the following action:

- Deferral is not appropriate – refer to box 10 map 2; or
- Deferral is appropriate – refer to [box 11 map 2](#).

Refer to [PI Provider deferral guidance in section 4](#) for more in-depth advice.

Box 10 Map 2- Provider arranges second notified home visit

Activity to be undertaken

162. If the customer does not make contact within 5 working days of the ineffective home visit, **one more** attempt must be made by you to see the customer face to face. The Secretary of State has made a commitment

that in these cases no sanction will be imposed until the customer has had a face-to-face explanation, with an advocate in support, if appropriate.

163. You must send another home visit letter to the customers contact address, asking them to contact you within 5 days from the date of the ineffective visit.

Good Practice

164. *It would be worth considering contacting the customer or advocate/appointee straight after the ineffective visit e.g. Telephone or text the customer. This could give you the opportunity to allay any fears, encouraging them to make contact/participate.*

Next Steps

165. Once you have left the letter you will need to take action depending on the response of the customer:

- Customer present – refer to [box 2 map 2](#); or
- Customer not present – refer to [box 12 map 2](#).

Box 11 Map 2- Provider takes deferral action

Activity to be undertaken

166. Having decided that deferral is the most suitable action, you must decide on a suitable period of deferral depending on the reason (refer to [Provider guide section 4 deferral guidance](#) for more information). Agree the period with the customer and arrange a suitable WFI date in the future.

Good Practice

167. *Keep your customer tracking system is up to date with action taken such as deferral periods and the subsequent follow up WFI. This will ensure that more efficient working practises for will be maintained.*
168. *You could consider some low key/friendly customer communications to keep deferred customers informed where appropriate. This may help some customers re-engage successfully with Pathways when their deferral period ends.*

Next Steps

169. This is the end of this process.

Box 12 Map 2- Provider refers to JCP Band D PA Manager for appropriate action

Activity to be undertaken

170. If you have made two attempts to see the customer face to face which have been ineffective, you must Inform Jobcentre Plus on a

Provider led Pathways to Work Guidance

Notification From Provider (NFP) form with any supporting information on the customer.

171. On receipt of the NFP, the **Band D PA Manager** will consider appropriate action:
- Whether the customer does have a Mental Health Condition, Learning Disability or Health Condition which affects cognition;
 - Whether the customer should be referred for fraud action; or
 - A suspension of their benefit.
172. Jobcentre Plus will also be trying to make (or continue to) to make every attempt to establish the customers whereabouts and current state of health.
173. The outcome will be communicated to you via the Notification to Provider (NTP) form. This will dictate what action should be taken next e.g. re-book WFI, terminate participation.

Good Practice

174. *Not applicable.*

Next Steps

175. This is the end of this process.