

15 March 2013

Local Support Services Framework – a joint response from the Association of Directors of Adults Social Services (ADASS) and the Association of Directors of Children's Services (ADCS)

By email to: localservices.framework@dwp.gsi.gov.uk

Lord Freud,

Thank you for the opportunity to comment on the first draft of the local support services framework. We hope that this will be the first of many opportunities that we have to shape the localised support that vulnerable adults and families may need in accessing Universal Credit from October 2013. We are broadly in favour of the principles of partnership working that are outlined in the document. Like your department, we are also interested in developing new ways of providing services, including digitally, with all the support services that that channel-shift entails.

However, we also feel that the framework makes certain assumptions that we cannot agree with at this stage and takes too narrow a view in a number of key areas. For example, we feel it is wrong to assume without evidence, that the need for advice services will reduce over time as a result of welfare reform. Demand will inevitably peak, on top of what is already a high level of demand, when reforms such as DLA and Social Fund replacement, the under-occupancy penalty and the benefit income cap take full effect later this year and that is without any impact being assumed by the introduction of, and transfers to, Universal Credit. Whether the demand for advice will ever return to or below pre-reform levels is, to say the least, arguable. It is certainly not the basis on which support services should be planned.

The DWP's narrowness of approach to partnership working is perhaps most noticeable in the framework's relative silence on the role of the social care sector in being a key, and perhaps leading, partner when it comes to identifying, supporting and assisting vulnerable individuals and families. This may reflect the fact that many of the discussions about local authority roles have involved our colleagues in housing, Revenues and Benefits and Finance - inevitable perhaps, given the intended transfer of responsibilities for housing support from local councils to the DWP (for Universal Credit) and the reverse transfer of council tax benefit to local authority support schemes. However, this has resulted in social care knowledge and interests being possibly overlooked. It is in the social care sector that the expertise in dealing with vulnerable individuals and families is mostly located. This ranges from the practical support offered by front-line, directly-employed staff to the commissioning role for both health and social care that local councils lead on to the myriad of support organisations that are financially supported by local authorities. Apart from local welfare schemes that social care departments are creating in response to the Social Fund changes, discretionary housing payments will play a significant part in providing financial support to families and individuals affected by the benefit cap, under-occupancy penalty etc. as we know many such cases will turn on the needs of disabled children and adults. It is therefore vital that, at local level, social care interests are represented around the table in partnerships which are largely defining who is vulnerable and how they should be supported.

It is for that reason that we would ask you to look again at the make-up of local partnerships and who should be involved. For example, the letter that accompanied the framework, sent to local Job Centre District Managers, advised them that Revenue and Benefits staff should be their initial contacts within local authorities - which is not necessarily appropriate in most councils, and irrelevant in two-tier authorities where social care interests would therefore not even be considered. This is not a minor point, as it illustrates an attitude towards the partnerships that will colour what we hope is their eventual success. The expertise in Commissioning that local authority staff - in partnership with Health colleagues, already possess, as well as their in-depth local knowledge, is a valuable resource and it seems somewhat perverse to create an alternative local commissioning model led by Job Centre Plus, especially as it would be targeted on many of the same organisations who are already working in partnership with their local council. It would seem to be more efficient to enhance these partnerships rather than create new ones.

There is also a narrowness of approach in looking at Universal Credit in isolation. We anticipate that many people will require additional support through the DLA migration to PIP for example, which takes place over a similar time-frame as Universal Credit and affects up to 2m individuals, many of whom will be known to their local social care sector. They will require as much support - and possibly much more - than many Universal Credit applicants. The other changes noted above - social fund abolition, benefit capping etc. - will only add to the demand and it will be felt across the social care sector.

We therefore ask if a greater emphasis can be placed on the role of the social care sector in supporting individuals and families and consideration being given to the possibility that, at local level, existing commissioning models are used as the basis for the creation of benefit delivery partnerships (and not just restricted to Universal Credit).

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The Association of Directors of Adult Social Services (ADASS) represents directors and senior managers of adult social services departments in English local authorities. Directors (DASSs) have statutory responsibilities for the social care of older people, adults with disabilities and adults with mental health needs. In many authorities ADASS members will also share a number of responsibilities for the provision and/or commissioning of housing, leisure, libraries, culture, and community safety on behalf of their councils. Nearly a third of DASSs are also the statutory director of children's services for their authority.

The Association of Directors of Children's Services (ADCS) is the national leadership organisation in England for directors of children's services appointed under the provisions of the Children Act 2004 and for other children's services professionals in leadership roles. The statutory role of director of children's services (DCS) was created by the Children Act 2004 to establish a single point of leadership and accountability for services for children and young people.