**Recommendations of AtW service improvements**

These recommendations have been developed from the experiences of and with feedback from AtW customers and other stakeholders directly affected by the scheme – including Deaf and disabled people, employers, and support workers. These complement the recommendations made by UKCoD[[1]](#footnote-1) and Business Disability Forum (BDF)[[2]](#footnote-2), and those sent to the Select Committee in evidence.

They contain specific detail about suggested changes, because the customer experience is specific, and AtW customers have been clear with me about what improvements would look like in practice. Many are relatively quick and easy to implement, with limited additional resources required. Some improvements have been previously identified, but not yet implemented.

Highlights of critical and immediate importance to Deaf and disabled people at the moment include:

* On an interim basis establish an emergency contact number and email address with guaranteed response & knowledgeable staff who can deal with genuine employment threatening emergencies.
* Establish clearer guidance, publically available, along with a specialist team and/or in depth training re customers who are self employed or employed by their own ltd company. This should include a specialist understanding of the situation for Deaf and disabled actors.
* Conduct a proactive immediate review for self-employed (etc.) customers who have had AtW support removed, to minimise risk of their business folding.
* Conduct a proactive immediate and genuine review for people affected by the imposition of the 30-hour guidance.
* Implement face-to-face assessments for complex / high value assessments, especially where there is disagreement.
* Decision letters for awards, reviews, and reconsiderations, should include the rationale for award, and guidance relied upon in the decision, especially where there is disagreement.
* Consider re-establishing one main named adviser asap.
* Improve access for Deaf BSL users asap, both for phone contact – using remote interpreting, and in writing – supporting communication in BSL.

**The top quick and relatively easy improvements to make**

Whilst all of these recommendations are important, these are in rough priority order according to the potential impact of the changes.

1. Following changes to processes and structures, and with staff changes, AtW decisions and reviews are not all effective. For an interim period, to address this, introduce an emergency contact for Deaf and disabled people whose support has stopped, and they cannot carry out their job, or where they or their clients are put at potential risk due to AtW changes in support. This should be staffed by people who properly understand the ‘guidance’ as guidance, work access needs, and who are able to either resolve issues directly or provide guidance for AtW advisers to help them resolve the issue.
2. Self-employed / own limited company – review the eligibility criteria for start-up businesses, make them clear in writing, offer all of those people whose AtW support has been stopped due to failing to meet these criteria the opportunity to make the necessary changes and resume support, backdated to when the support stopped. Consider establishing a specialist team and/or in depth training re customers who are self employed or employed by their own ltd company.
3. Make the rationale for the award and the reconsideration decisions clear in writing – i.e. showing what support was requested by the Deaf or disabled person, the support actually offered, the rationale for making this offer – including reference to specific guidance if the awards differs from that requested, and next steps (e.g. clear signposting to reconsideration and complaints processes).
4. Set up an ATW website that is accessible and contains information ATW customers need, such as guidance/policies, organisational aims and objectives, organogram, scheme eligibility criteria, how to complain, how to seek a reconsideration, option to call through a BSL live video stream, customer satisfaction survey statistics, proposed changes to the scheme, opportunities for consultation, job opportunities within AtW, separate section for employers and public advisers, and so on. The website should be updated on a regular basis.
5. Review (particularly interpreting) support to ensure that it meets local market rates. Market rates decided on the basis of average freelance rates, rather than cheapest provider, or anonymous market intelligence.
6. Plan and deliver a cultural shift within AtW where staff should have as their primary objective the desire to enable Deaf and disabled people to access, keep and progress at work and in the job market. This message should be made public.
7. AtW staff should assume the Deaf and disabled person is expert in their own needs, and that the scheme should provide an amount of support that is sufficient to enable them to perform in their job roles. It would remain the AtW adviser’s decision to approve the budget and ensure sufficient checks and balances to reduce the risk of fraud, but not to the exclusion of the customer’s stated needs. However, this is not the same as saying that Deaf and disabled people should know all of the services and support available to them. See 20 below.
8. Provide an accessible service, e.g. in BSL, large print, easy-read, face-to-face contact and specialist needs assessments available where needed. With all written information in plain English.
9. Have named / dedicated advisers for individuals and organisations – with contact details (email / phone / BSL web link access).
10. Work should begin immediately with Graeae, Deafinitely Theatre and Candoco, to ensure changes are made that mean AtW supports Deaf and disabled actors to work in the UK and abroad, as was previously the case.
11. Until work is done with employers and on formulae for employer’s contributions, and unless employers have explicitly agreed to fund the difference, awards should not be for less than the employee needs to access work. (See point 23)
12. Offer immediate and easy to access support to customers at interview and probation stage to avoid the risk of employers perceiving new or potential disabled employees as costly and burdensome. This would be in line with current CSI guidance.
13. Where work access is required through interpreting, provide registered and qualified interpreters, not Communication Support Workers (CSWs). CSWs should only be provided where the Deaf person expresses a preference for using CSWs, and it is an appropriate element to meet their access needs.
14. Work with interpreters (and other support services), employers and Deaf and disabled people to ensure that support workers are paid on time. Stop the practice of failing to pay for work done in good faith where the stopping or reduction of an award has been backdated.

**The top medium term improvements:**

1. Establish a working group and hold regular meetings with senior staff members. Also set up and run customer feedback sessions (focus groups) and provide feedback from those meetings to both the working group and leadership/executive team meetings for action. The outcomes of the customer feedback should be clear and made public “*you said: we did*”. As a general point, where possible source direct customer experience should be ascertained, rather than rely solely on reported experiences via organisations.
2. Feedback and complaints should be encouraged as ways of improving understanding of the customer’s experience and securing continuous improvement. Making complaints and providing feedback should be accessible to all customers. Anonymised summaries, complaint statistics and themes published quarterly. Senior management actions after considering complaints and feedback should also be published on the website.
3. Improve the training programme for advisers,. Enhanced on-going Deaf and disability awareness training should be provided by a range of Deaf and disabled trainers, avoiding over-reliance on just one perspective or approach. Training providers and the nature of training packages should be published. Online learning should only be used as a supplement after receiving disability and deaf awareness training for advisors with proper training sessions. ‘Word of mouth’ training in-team should stop (as experiences shows that this is too vulnerable to inaccurate information being passed on). Advisers should be trained to understand not just disability/Deafness, but the impact on different job roles of disabilities and Deafness to move away from the one-size-fits-all approach seen lately.
4. Set up an accessibility user group that is consulted on access to the service. For example, this group should be used to advise on the accessibility of the new website, of the call centre, of the complaints process, and of the scheme administration. The feedback this group provides should be used directly and transparently to improve access and details of this published on the website.
5. Review the administration of the scheme (engaging with customers and employers). Reduce the administrative burden on customers and employers, make an e-portal for online admin, set up electronic accounts where customers and employers can access and view the information ATW hold, clarify what information needs to be gathered for a new and an established claim (e.g. no need for a Deaf person to keep explaining that they are Deaf). Improve the, speed of decision making on claims. Choose a response to correspondence timescale and stick to it (this currently says 48 hours but is not adhered to). Make the application system fully accessible so that customers need only minimal support to use this.
6. Have a full menu of communication support and disability access options, with professional quality support materials (in English, Easy Read and BSL) so that customers understand the options available. Offer trial periods of different kinds of support so that customers and ATW can understand if and how different services meet the customer’s needs.
7. Make awards that are annual or tri-annual, allowing for fluctuating need, with averaged daily / weekly / monthly usage, and no 'penalty' for over / under using within the broad parameters. Or give the disabled person responsibility for a personal budget to be spent as they see fit. Stop setting unreasonable restrictions on use that make the support unusable.
8. Ensure Advisers have access to all relevant historic and current support information on the computer system.
9. Set out clearly how the threshold for a ‘reasonable adjustment’ is measured, and where ATW will step in to assist with the cost of adjustment that is judged not to be ‘reasonable’. Ensure that where employers are expected to contribute towards costs, a clear formula to assess employers’ contributions is used and this formula is published on the website. This piece of work should be based on a programme of engagement with employers and customers, and exclusions are made for SMEs and organisations led by and/or employing a high proportion of Deaf and/or disabled people, who would otherwise be disadvantaged e.g. in competitive tendering.
10. Begin a programme of capturing broad and detailed data on the scheme, including the profile of customers, volume and costs of awards made, volume of contacts and complaints made by various customer groups, costs claimed vs. costs paid, etc.
11. For higher value awards, provide customer-centered workplace based assessments that involve the customer and employer, and refer these cases to an expert panel made up of customers and highly experienced ATW staff to quality assure the decision and consider whether other potentially suitable options have been overlooked.
12. Deaf ATW applicants need to be able to apply in BSL, receive letters in BSL and respond in BSL; or AtW provides support for them to do so even before they are a customer (e.g. through BSL live video stream on the website). This is important as they may not have high levels of English literacy.

**Longer-term improvements:**

1. Make the case for an increased budget allocation from the Treasury both to invest in improving the administration of the scheme, and to enable the scheme to support more people.
2. Establish a Deaf/disabled-led Policy Unit and a Deaf/disabled-led Assessment Unit within DWP and ATW. Not subcontracted to Deaf/disabled organisations and charities, but staffed by independent individuals with lived experience and no vested interest.
3. Provide AtW support to volunteers, where part of a pathway to work. (This recommendation assumes the money for this will not be found by reducing access support available for people in work).
4. Contract to provide accessible Advocacy support for Deaf and disabled people who find the AtW assessment process inaccessible and who currently don’t have any relevant support (e.g. people with learning disabilities, mental health issues, Deaf people with limited English, etc.).
5. Consider procuring an improved IT system so that the recording of customer contacts, decisions, reasons for decisions, reconsiderations, feedback, complaints, support paid for, budget remaining, etc., is comprehensive and easy to interrogate when a customer makes contact so that advisers can refer to those records instead of asking the customer to repeat their information. The system should also be able to produce management data on the performance of advisers.

1. <http://deafcouncil.org.uk/news/> Vision for Access to Work 31/10/14 [↑](#footnote-ref-1)
2. http://businessdisabilityforum.org.uk/about-us/news/work-and-pensions-committee-inquiry-into-access-to-work/ [↑](#footnote-ref-2)