

Consultation Response

No-one Written Off: Transforming welfare to
reward responsibility

October 2008

Response

National Association of Welfare Rights Advisers

The National Association of Welfare Rights Advisers was established in 1992 and represents advisers from local authorities, the voluntary sector, trade unions, solicitors and other organisations who provide legal advice on social security and tax credits.

We strive to challenge, influence and improve welfare rights policy and legislation, as well as identifying and sharing good practise amongst our members.

NAWRA holds a number of conferences throughout the year across the UK, attended by members from all sectors of the industry. An integral part of these events are workshops which help to develop and lead good practice.

Our members have much experience in providing both front line legal advice on benefits and in providing training and information as well as policy support and development. As such NAWRA is able to bring much knowledge and insight to this consultation exercise.

The response to this consultation is informed by discussions and workshops on the green paper held at our conference in Glasgow in September 2008. Our website too has been used to gather the views of the membership.

Introduction

NAWRA notes with some surprise the observation in the foreword that unemployment in the 1980s was so high due to a “soft” benefit regime. It’s our view that to the contrary and that the levels of unemployment were due to recession and economic and employment policies.

NAWRA is concerned at the “work-first” approach method to realising full employment. Recent economic events highlight the serious flaws in many of the proposals contained within the green paper, being predicated on the basis that jobs are available in all regions equally. Unemployment is predicted to rise in the short to medium term with some regions expected to fare worse than others.

Despite this the UK already has a high employment rate (around 74.9%) and child poverty is still high. NAWRA believes that achieving full (80%) employment is simply not enough to tackle child poverty.

NAWRA takes the view that the anti-poverty agenda should address the issue of in work poverty, especially as over half of all poor children live in households where one or more parents are in work¹.

NAWRA has previously publicly welcomed the government’s commitment to tackle discrimination. However we are disappointed in the lack of detail in the green paper about the proposals around employer engagement and their responsibilities to assist those who are ill or disabled to continue in work.

It appears that that many of the proposals in the green paper are based on a punitive rather than an enabling approach. NAWRA is opposed to the use of sanctions in benefits regimes and notes that research has found that their use does not increase levels of positive engagement in the Pathways to Work programme.²

This punitive approach, in NAWRA’s view, conflicts with the stated intention to create an enabling welfare state and risks increasing poverty as incomes will inevitably be reduced.

¹ Cooke G , Lawton K, 2008, *Working Out of Poverty:A study of the low-paid and the ‘working poor’* , London,IPPR

² Mitchell M & Woodfield K, 2008, *Qualitative research exploring the Pathways to Work sanctions regime*, Research Report 475, London, DWP

The barrier to work is assumed to be the claimant's unwillingness to engage in work - NAWRA believes it's more complex than this. The cited research found that sanctions hit the more socially deprived or isolated harder and there were negative impacts on health linked to stresses and anxieties across the sample (not solely for those with existing mental health conditions) with some claimants stating their existing condition had got worse as a result of the process.

Response to the consultation questions

Question 1: How long should ‘work for your benefit’ last at different stages in the claim?

NAWRA has concerns over the long term policy implications of this proposal and is opposed to such an approach. It is our view that claimants who have been unable to find suitable paid work should not be forced to do work for no pay and be obliged to do so as a requirement of receiving benefit.

As an attempt to re-engage long-term claimants with the advantages of work through actual experience and helping them to develop their work-related aspirations, then we do not feel that conditionality of this nature has a place in a humane and just welfare system, and it harks back to the days of the workhouse.

The proposal fails to deal with the complex reasons why the systems of engagement have failed to work for these claimants and punishes them for system failure as emphasis is on the individual. The green paper acknowledges that these people may have multiple barriers to work in its statement at paragraph 2.15 “This group of people would not have been in work for some time and may face considerable barriers before they can move into employment.”

NAWRA has concerns over the effects of such proposals on long-term claimants. If the result of such action is to reduce the number of claimants on JSA then we would have doubts about the ultimate destination of those claimants, many of who may have long-term health problems, albeit not so severe as to give entitlement to ESA. This could result in a new group of those who are excluded from society and increase the likelihood of an entry into criminality. Those with responsibility for children or other dependants would be particularly vulnerable – and of course would be contrary to the intention to reduce child poverty.

NAWRA notes a recent DWP research report³ looking at “workfare” programmes in the United States, Canada and Australia which shows there’s little evidence that workfare increases the likelihood of finding work. The research presents findings from a literature

³ Crisp R & Fletcher DR, 2008, *A comparative review of workfare programmes in the United States, Canada, and Australia*, Research Report 533, London DWP

review of international evidence and focused on three countries that offered 'interesting and relevant examples of workfare type programmes'.

The research highlights that -

- there is little evidence that workfare increases the likelihood of finding work - it can even reduce employment chances by limiting the time available for job search and by failing to provide the skills and experience valued by employers;
- subsidised job schemes that pay a wage can be more effective in raising employment levels than work for benefit programmes
- workfare has a deterrent effect which stops people claiming or encourages them to leave welfare before the workfare phase - this makes it harder to measure the tangible outcomes of welfare; and
- workfare is least effective for individuals with multiple barriers to work (and NAWRA notes that these are the people the green paper acknowledges will be most affected by this proposal) – welfare recipients with multiple barriers often find it difficult to meet obligations to take part in unpaid work and this can lead to sanctions and, in the most extreme cases, the complete withdrawal of benefits that leaves some individuals with no work and no income.

Question 2: How could capacity and capability to provide full-time work experience in the community sector be provided and incentivised to produce the best employment outcomes for participants?

NAWRA believes that there will need to be significant incentives for the community sector to be involved in providing work placements, and that there is a risk that the sector will be reticent to provide support to such a scheme.

However in the late 1980s and early 1990s the Community Programme provided short-term part-time employment opportunities within the voluntary and public sector for people who had been unemployed for at least 6 months. Providers received a subsidy to employ

participants and the work was designed around developing new skills for work and re-introducing claimants to the workplace.

Question 3: Is full-time ‘work for your benefit’ as an alternative to a sanction of loss of benefit for repeated non-compliance with work search requirements an effective option for some jobseekers? How should it be targeted?

NAWRA's view is that making “sanctions” interchangeable with “work for your benefit” will reduce the credibility of work experience with both claimants and the community sector. If work for benefit is not to be regarded as a punishment for being out of work then we can see no advantage to this proposal.

Question 4: What penalties do you think would be most effective to deter more people from committing benefit fraud?

NAWRA notes the National Audit Office's conclusion in its 2008 report looking at fraud prevention⁴ that it would be difficult to reduce the level of benefit fraud further than current levels.

The same report also observed that the Department had found the existing sanctions regime for fraud to be “fit for purpose”, but that there needed to be greater awareness of the negative outcomes of fraudulent behaviour.

Our comment would be that the Department should continue to publicise the existing penalties rather than consider new ones.

NAWRA is concerned about the danger of deterring claims where the folk devil of the “benefit fraudster” is created. Our members encounter many citizens who are put off making claims due to worry about making a “fraudulent” claim. We note that some local authorities continue to use anti-fraud messages inappropriately on materials designed to encourage take up. The use of Voice Analysis Software further creates barriers to claiming, in particularly for more vulnerable claimants.

⁴ National Audit Office, 2008, *Department for Work and Pensions: Progress in Tackling Fraud*, London, Stationary Office

It is NAWRA's view that a balance must be found between tackling fraud and deterring benefit claims. We note that £0.8 billion (0.6%) of social security expenditure is fraudulently claimed compared to an estimated £13 billion remaining unclaimed⁵.

Question 5: Do you think it would be appropriate to reduce or withdraw entitlement to benefit after a first offence? How long should the sanction period be?

Whilst the use of benefit sanction may be seen to create a deterrent, it is our experience that where someone has been suspected of committing benefit fraud, the activity giving rise to such suspicion has ceased either some time before the investigation had started or during the course of the investigation. The claimant will often legitimately remain on benefit, with this as the only or main source of income.

As with all sanctions there is a risk that dependants are also affected. A sanction that is long lasting can cause particular harm in these situations.

Question 6: Do you agree with the proposed approach for identifying problem drug use? How should it be implemented? Do you think that everyone claiming a working-age benefit should be required to make a declaration of whether or not they use certain specified drugs?

NAWRA is of the opinion that many drug users would like to embark on a journey which sees them move away from reliance on drug use and into the wider community.

However we would suggest that for such a transition to be effective it is vital that those drug users who take part are those who are motivated to engage fully as opposed to participating due to "conditionality".

We are also concerned that the proposals could create a "therapeutic conflict" i.e between the principles of drug treatment in proving the most effective method and a concern for a benefit claimant to be seen to be "participating" in a programme, for fear of attracting a benefit sanction.

⁵ National Statistics (2008), Income Related Benefits Estimates of Take up 2006-2007, London, Stationary Office

NAWRA seeks to clarify if those providing the treatment will be expected to provide details confirming “participation”. Under the Welfare Reform Act 2007, “participation” is defined in relation to the Work Focussed Health Related Assessment and Work Focussed Interviews and we believe that an expectation that a drug user be seen to participate in a closely defined manner is not helpful given that a treatment process may be a long process with a number of “false starts.”

We see a danger that the proposals in this section could be too simplistic. The factors involved in drug use are many and varied, and may not be able to be resolved through a “1 size fits all” approach. Indeed a medical approach to a claimant’s drug use may fail as the underlying causes may not have been resolved.

For those claiming ESA it is likely that drug use would be indicated early in the claim through the Work Capability Assessment. For those claiming JSA for more than a few weeks we would expect the existing process of work-focused interviews to identify “problem” drug users.

For these reasons NAWRA would not welcome the proposals to provide information on drug use from other state databases.

The proposal for a declaration as to drug use could see some unwilling to make a such an admission. Those who are not yet motivated to engage with treatment may deny using such drugs, creating difficulties with the claim and a potential move into criminality.

NAWRA is concerned that a failure to make a declaration could lead to an overpayment of benefit. Attempting to recover such an overpayment would in our view make the stated policy objectives harder to achieve. It will further isolate those with drug problems who have not made a declaration, making it more difficult for them to seek help when they are ready (for fear of an overpayment), and will potentially lead to those “overpaid” seeking income from illegality.

Question 7: What elements should an integrated system of drug treatment and employment support include? Do you agree that a rehabilitation plan would help recovering drug users to manage their condition and move towards employment?

An integrated system would be broadly supported and we agree that such a rehabilitation plan would assist drug users move toward employment.

There are likely to be a number of agencies involved with treatment and support and it is vital that any further involvement is well co-ordinated. The example given in the green paper is encouraging but we would stress that such a broad approach does need to include support to resolve factors which may underlie problem drug use, such as housing and financial exclusion. This approach needs to be very well co-ordinated across the various stages of treatment including:

- engagement and retention
- stabilisation and community care
- community re-engagement

To be successful such an approach also needs to ensure that all factors of social exclusion are tackled.

We do not see the value of the suggested “Treatment Allowance” and would like further information about this and an opportunity to be consulted further.

A treatment allowance at less than current weekly benefit rates could further stigmatise drug users, create financial difficulties further increasing social exclusion, and further complicate the social security system.

If the proposal is for the re-introduction of an inclusive amount to cover the costs of treatment, then this would need to include appropriate elements for housing and other ongoing commitments. To do otherwise would make such an option unattractive to those who are motivated to start a programme of treatment and support.

Question 8: When is the right time to require ESA claimants to take a skills health check?

NAWRA welcomes the proposal for claimants to be able to undergo skills health checks and then go on to update those with the relevant support.

For sick and disabled people this will enable them to develop their own aspirations for returning and retaining work. As such it should be a positive and empowering part of the journey back to and retaining work.

However, the skills test should take into consideration the requirements of employers from a demand perspective to ensure that any training is appropriate to move individuals closer or into sustainable employment.

We do not believe that undertaking a skills check should be set in a pre-defined time. This should be agreed mutually between the claimant and the personal adviser as part of the Action Plan developed in the Work Focussed Interview.

For some claimants, particularly with a mental health condition or a learning disability, concern over having their skills assessed could prove to increase anxiety or reduce confidence in their own abilities, leading to a reduction in motivation.

We note the findings of Sainsbury et al⁶ that there is often a period of time when they are not ready mentally to enter into discussions about a return to work and only when people feel 'better' do they make (often rapid) progress towards work.

More of the Department's own research⁷ also found that claimants need to understand the relevance of recommended measures to their own situation to engage more effectively.

For this reason we do not believe that conditionality should be attached to such a skills check.

⁶ Sainsbury R et al, (2008) *Mental health and employment*, Research Report No 513, London, Department for Work Pensions

⁷ Mitchell M & Woodfield K, (2008) *Qualitative research exploring the Pathways to Work sanctions regime*, Research Report No 475, London, Department for Work and Pensions

Question 9: Should ESA customers be required to attend training in order to gain the identified skills they need to enter work?

For many of the same reasons as described in the answer to Question 8 it is suggested conditionality is not linked to attending training to gain additional skills.

It will not be possible to monitor someone's use of those skills so it is far better to encourage engagement on the process of acquiring new skills, as it is more likely that this will result in a positive use of the skills acquired.

NAWRA hopes that the training available would be provided within the mainstream, rather than only within a small area of provision specifically for ESA claimants. Introducing claimants to a wide range of learners could also serve to raise aspirations.

Question 10: In view of the need to help lone parents develop the skills they need to find work, are we right to require lone parents to have a skills health check and training as a condition of receiving benefit?

For the same reasons identified at Questions 8 and 9 we have concerns about the proposal to make entitlement to benefit conditional on undertaking a skills check.

We support the principle of offering additional support to lone parents in the form of a skills check and then assistance in accessing training to increase and develop skills should that be appropriate.

However we would like to see this offered to all lone parents in receipt of benefit and not just those who are required to undertake some form of work-related activity as a condition of receiving benefit.

NAWRA believes that this group may require additional support in relation to childcare, both formal and informal, to undertake skills checks and further training. Research⁸ indicates that lone parents view childcare issues as being a major barrier to entering into work and we would suggest that the same would apply to engaging positively with skills updating.

⁸ Yeo, A., DWP (2007) *Experience of work and job retention among lone parents: An evidence review*, London, Corporate Document Services

Question 11: Should we pilot extra benefit payments for lone parents in return for training, and if so, when the youngest child is what age?

NAWRA believes that this proposal could help add an extra incentive to participate in training, and would welcome some additional exploration into this area. In particular this could identify how much extra incentive additional payments provide.

We note that this could create a scenario of training being undertaken solely to attract additional income and this would seem at odds with the stated objectives of encouraging a start on a journey to sustainable and satisfying work.

However we do not think it is appropriate for the government to set a fixed age for a child to any of these benefits measures as it fails to recognise that children and families are all different. Setting an arbitrary age trigger ignores these differences and the individual's needs and aspirations.

It is also our view that suitable childcare will need to be provided at no cost to participants.

Question 12: Are there any other circumstances where customers cannot get the skills they need to enter employment under present and planned arrangements?

Whilst welcoming the commitment in the green paper that those in the ESA support group will not be subject to any conditionality, NAWRA expresses its hope that those in the support group will be able to access skills updating and support to find work. This group will contain many disabled people who have aspirations about returning to work and to deny opportunities which could assist in achieving this, at whatever level, would do nothing to promote their human and civil rights.

Accessing such opportunities should not affect benefit entitlement in any way - to do otherwise will merely continue the fear felt by many disabled people that to consider any level of skill updating or "work taster" will result in problems with their claim.

We would welcome further exploration of this matter and would be happy to assist in this respect.

Question 13: How might we build on the foundations of the current rules so that they do not discourage unemployed people from volunteering as a deliberate back-to-work strategy, while retaining a clear focus on moving off welfare into paid employment?

Its NAWRA's members experience that those claiming incapacity benefits who consider or actually undertake voluntary work as a back-to-work strategy have concerns about how that will be viewed under the Personal Capability Assessment. Often those concerns will mean that the idea of undertaking such voluntary work is discounted, and a valuable opportunity to try out a different type of work in a safer environment is lost. We do not expect this to change under ESA.

We recognise that expecting voluntary work to be ignored for the PCA or WCA is unrealistic, but the clear differences between voluntary work (often in a very supportive setting and with some form of skills development) and the ability to do sustained paid work need to be highlighted to those carrying out the assessments.

Question 14: Do you agree that the WCA and WFHRA should be re-focused to increase work-related support?

We note that ESA is open to new claimants from 27th October and as such feel that any changes are premature. It's our understanding that the Welfare Reform Act and the ESA regulations already make a claimant's participation in work-related support conditional to receiving benefit.

NAWRA also understands that as people transfer from IB to ESA that they will be subject to the new regime, and that the WCA and WFRHA, as with the PCA, can take place as frequently as every 6 months.

Therefore NAWRA sees no need for any refocusing of either "test".

Question 15: What expectations should there be of people undertaking the personalised support we will now be offering in the Work Related Activity Group? Could this include specific job search?

NAWRA's view is that the ESA regulations appear to include job-search activity as part of the Work Focused Interview (WFI)⁹ and that failure to participate in the WFI could result in a benefit sanction.

NAWRA firmly believes that the WFI process is likely to be most successful where it is based on mutual understanding and a sense of partnership between the adviser and the claimant. We fear that enabling a direction to be issued (linked to the risk of a sanction) relating to a specific job opportunity could put that positive relationship in jeopardy.

We note the research into Pathways to Work and sanctions previously cited and its finding that sanctions appear to adversely affect those with families, with certain health conditions or longer-term benefits claimants. It is these groups who we suggest will be hardest to support back into work and therefore it's vital that this work-related support is built around a positive relationship with the personal adviser with the main elements being trust and person-centred. Fears that the changes are target-driven can move advisors from providing personalised support to providing outcome-driven support which can be detrimental on the claimant.

Question 16: How can we make Access to Work more responsive to the needs of claimants with fluctuating conditions – including mental health conditions?

It is NAWRA's view that Access To Work can be difficult for disabled people to access without the assistance of supported employment services or advocates who may need to negotiate between employee and employer. We believe these services can bring additional value to the process of involving Access to Work. We believe therefore that they should be recognised as having an important role to play in providing brokerage for claimants with fluctuating conditions.

⁹ Regulation 55, ESA Regulations 2008

Question 17: What additional flexibilities in the system or forms of support would claimants with multiple and complex problems need to enable them to meet the new work-focused requirements proposed in this Green Paper?

In order to be successful the additional support and proposed new work-focused requirements need to be flexible and responsive to the needs of disabled people. The government carried out much work around issues of social inclusion for disabled people and this needs to continue to be centred around their needs.

We would welcome a review of the current sanctions regime within the benefits system to ensure that those who are most vulnerable are not caught up unfairly within it. NAWRA expresses concern that the commissioning of *More Support, higher expectations: the role of conditionality in improving employment outcomes* appears to have been made on the basis that sanctions do work - whereas the research previously cited suggests differently.

Under ESA and the transition from IB many claimants who have been not expected to engage with work-related activity will now have to. This will include many who have enduring mental health problems or a learning disability. Whilst we note the intention is to make being in receipt of a benefit less attractive, as yet we have to see the real impact on these groups of people – many of whom, in our experience would like to overcome the barriers to work but for whom this may take some time.

Question 18: What are the key features of an action planning approach that would best support employees and employers to take the steps for the employee to make a swifter return to work?

NAWRA has no expertise in this matter and so does not offer a view

Question 19: There is no Question 19.

Question 20: What approach might be suitable to assist partners of benefit claimants who can work into employment?

NAWRA is concerned that the proposals outlined are unclear and appear to add further complexity to the benefits system. The illustration in the document leads us to be concerned that couples may receive lower rates of benefit than they would under current arrangements.

We would suggest that the proposals need to be reconsidered and proposed again at a future date.

Question 21: What are the next steps in enabling disabled people, reliably and easily, to access an individual budget if they want one? Should they include legislation to give people a right to ask for a budget or will the other levers the Government has got prove sufficient? What are the safeguards that should be built in? How can this be done?

NAWRA notes the “Putting People First” initiative which has as one of its objectives the promotion of Individual Budgets (IBs).

NAWRA supports the right of all disabled people to have control over their care and to have an Individual Budget if they so desire.

Currently we see a number of barriers to greater uptake of IBs including confusion around eligibility criteria, existing charging policies and joint funding issues which have the effect of restricting the flexibility of IBs.

For some disabled people there may be concern about the move to being an employer, and this can act as a disincentive to taking up an IB in the first place. Access to reliable information about this role and access to advice is a necessity.

We believe there is a need to develop additional capacity for brokerage within the public sector. We also see a need for an increase in advocacy services to assist with requests and planning for IBs.

NAWRA notes with concern rumours about changes to Disability Living Allowance, and states that it believes that DLA should remain intact and not be subsumed within Individual Budgets.

Question 22: Is a system based on a single overarching benefit the right long-term aspiration? How could a simpler system be structured so as to meet varying needs and responsibilities?

It is our view that the proposals will not necessarily result in a simpler benefit (and may create a new “concentrated complexity”), rather the claiming process may be streamlined and that take-up of such a benefit may be higher.

NAWRA believes that changes should be focused around the needs of claimants and with an aspiration of full take up, rather than for administrative expediency.

We are alarmed by the proposal to abolish Income Support with the suggestion that all claimants can migrate onto JSA or ESA. These claims are for many diverse reasons and many require the “safety net” provided outside JSA and ESA - the existing eligibility criteria are already stringent. ESA and JSA may well be an inappropriate destination for many IS claimants.

We feel that the levels of benefit and eligibility for the elements described should be subject to a wide and frank debate. If the government is serious about tackling child poverty (which we give credit for) then it must give proper attention to increasing benefit levels and attacking poverty in that manner.

We note that in the suggested structure existing benefits such as Disability Living Allowance, Carers Allowance and IIDB remain intact, and are of the view that these should remain as separate entities.

Question 23: Would moving carers currently on IS onto JSA be a suitable way of helping them to access the support available to help combine caring with paid work or preparing for paid work?

NAWRA takes issue with the assumption within the green paper that carers are not currently subject to an expectation to undertake work related activity and job search. Many carers do not receive Carer’s Allowance, for various reasons, and rely on JSA, IS or IB as their main income.

NAWRA takes the view that carers are already carrying out work and requiring any direct work-search activity would devalue their crucial (and massively under-funded) role.

Whilst NAWRA would welcome the provision of support to keep skills up to date we are concerned that a move to JSA, with its expectations to carry out work-focused activity could damage the relationship between carer and disabled person. We would also be concerned over the possible impact of the JSA sanctions regime on carers.

Transferring to JSA could see a negative impact on take up of income-related benefits and therefore an increase in poverty for carers and their families.

We would welcome opportunities for all carers to have support and opportunities to consider upgrading skills with a view to obtaining or retaining work if their caring responsibilities permit this and they so desire to do so. This could be achieved using a “light touch” approach by the Disability and Carers’ Directorate working with JobCentre Plus to keep carers informed of support available.

We would be pleased to see the network of Carers Centres and organisations have a role in delivering this.

NAWRA would suggest that increasing the rate of Carer’s Allowance and relaxing the earnings rules would also achieve the aim of removing carers from IS.

Question 24: How might we reform Bereavement Benefit and IIDB to provide better support to help people adjust to their new circumstances while maintaining the work focus of the modern welfare state?

We note that people in receipt of IIDB are not always out of work or dependent on other benefits. Following an injury or contracting a prescribed disease the proposals for helping with the retention of work for disabled people would be very useful and we recommend further development of these.

For those that are also claiming IB or ESA then the usual expectations around work-related activity will presumably apply and they will be able to access the existing and proposed support available.

In respect of Bereavement Benefit we note that this benefit has restricted eligibility and is time limited. As with IIDB, bereaved claimants may not claim other benefits and may retain employment.

For those who qualify for Tax Credits, the introduction of an element parallel to that of BB may help promote a return to work or retention of a job.

Question 25: Are lump sum payments a good way of meeting people's needs? Do they give people more choice and control? Could we make more use of them?

In terms of benefits there can be an inherent unfairness built into qualifying for lump sum payments, in that someone is expected to claim in a certain way and at a certain time. Often at times of crisis, such as an accident or death, this is overlooked and the opportunity to claim passes.

As a replacement for IIDB, it is our experience that an assessment of the degree of disability will often need to be reviewed, as it is carried out early after the injury is sustained. Often someone's condition will improve more quickly or more slowly than assessed and require review. A lump sum payment would therefore be inappropriate.

Question 26: What information would providers need to make the Right to Bid effective? How would the evaluation process need to work to give providers confidence that their ideas would be evaluated fairly and effectively? How do we get the balance right between rewarding those who come up with new ideas and the obligation to tender projects?

NAWRA has no expertise in this matter and so does not offer a view

Question 27: What would the processes around contributing to commissioning and performance management look like in a range of different partnership areas? How might they best be managed to achieve the desired outcomes?

NAWRA has no expertise in this matter and so does not offer a view

Question 28: How could a link be made to the radical proposals for the pilots set out in Chapter 3, which seek to reward providers for outcomes out of the benefit savings they achieve?

NAWRA has no expertise in this matter and so does not offer a view

Question 29: How effective are current monitoring and evaluation arrangements for City Strategies?

NAWRA has no expertise in this matter and so does not offer a view