

# Withdrawn

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# Department for Work and Pensions

## Work Programme Live Running Memo

**To:** Work Programme Providers

**From:** Change, Policy Planning Division (CEPD)

**Cc:**

Category Managers

Liam Murray

Supplier Manager

Senior Performance Managers

Performance Managers

Compliance Monitoring Officers

**Memo Serial Number:** WP LR194      **Date:** 17 July 2015

**Subject:** Notification of various Compliance Monitoring process changes from August 2015.

**Action:** For Information and Action.

**Timing:** Compliance Monitoring checks from August 2015 onwards.

### Summary

The following message informs all Work Programme providers of forthcoming changes to Safeguarding Vulnerable Groups checks / (During the Programme) Attendance checks / Pre-Visit Provider Checks and Standard Setting expectations for CMO visits which will come into effect from August 2015.

## **Overview**

### **Safeguarding Vulnerable Groups Checks (from August 2015)**

Following the WP Live Running Memo 191, the Compliance Management Team has reviewed the compliance check questions associated with DMA and Safeguarding Vulnerable Groups.

To ensure Providers take the correct action as per WP Chapters 3a, 4, 5, 6 and WP08 (hints & tips), additional compliance checks have been created which will apply if the Provider indicates the claimant is in a Vulnerable Group on the WP08 form.

**From August 15, the 'DMA' section of the ESF2a check form will be as follows:**

#### **DMA**

- 1 Has claimant failed to participate in the programme with the Provider?
- 2 Has claimant failed to participate following issue of a Mandatory Activity Notice (MAN)?
- 3 Was a compliance doubt raised (WP08) for every MAN issued that was not complied with?
- 4 Was Provider Direct consulted before every WP08 was raised / referred?

[Note: Check No. 4 above will be collated for Statistical Purposes Only]

#### **DMA (Vulnerable Groups)**

- 5 For any WP08s raised, was the claimant noted as the claimant being in a Vulnerable Group?
- 6 If YES, has a Safeguarding (face to face) discussion taken place to confirm the claimants understanding of possible sanctions?
- 7 If YES, note the date the Safeguarding Meeting took place.
- 8 If NO, have the reasons been noted of the Providers actions/attempts to try and undertake Safeguarding action?
- 9 For every Vulnerable Group WP08 raised:
  - (9a) Has the correct action been taken by the Provider and,
  - (9b) Was the WP08 fully completed?

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**As well as changes to DMA/Vulnerable Group checks, there will be other changes as follows:**

### **1. 'During the Programme' – Claimant Attendance checks:**

For the PG6 checks, currently being carried out in July 15, there was a slight alteration to one of the ESF2a compliance checks. In July the CMO is checking the "*last three attendances*" for PG6 claimants in order to assess engagement with this customer group. This was a slight amendment on previous checks where the CMOs would only check the claimants 'last attendance'.

The Compliance Management Team has decided that checking claimants' last three attendances will be more beneficial for Providers and Performance Managers to understand specifics within their contract so this check will remain in place from August 15.

### **2. Providers Pre-Populating the ESF2a form prior to CMO visits:**

As discussed at the Provider Forum in July, WPD is requesting that Work Programme Providers carry out their own compliance checks prior to the CMO visit. For compliance checks carried out **from August onwards**, Providers will be sent their Random Selection by the CMO along with the ESF2a forms specific to their contract, from which Providers should carry out their own evidence checks in readiness for the CMO visit.

If the Provider has marked a Minimum Service Offer statement as 'Not Compliant' (due to no evidence being held) the CMO will accept this and move to the next check question saving the Provider/CMO time during the visit.

After surveying all CMOs it was noted that 'evidence preparation' prior to the day of a CMO visit was minimal to non-existent (although it is acknowledged that some Providers have good systems in place and proactively carried out their own checks prior to meeting CMOs).

#### **Pre-Visit Provider Action (August Checks):**

On receipt of your Random Selection and specific ESF2a forms from your CMO, you should ensure that you review your records to understand what evidence is available to support delivery prior to the CMO visit.

During the day(s) of the CMO visit, the CMO will go through each of the ESF2a check questions and, if you do not have evidence of a Minimum Service Offer statement being delivered, the CMO will accept this, update their own records and move to the next question or claimant.

Providers carrying out pre-visit checks to enable 'informed' discussion about the evidence they hold is the only amendment to the CMO visit process and all other elements of the CMO visit will remain the same.

### **3. 'Standard Setting' for CMO Visits:**

From August 2015, along with the information that will be provided in section 2 (above), the CMO will send their Provider a 'Standard Setting' letter which will request specifics to enable the compliance visit to be carried out.

After surveying CMOs, it was found that many CMOs are e.g. 'working on the end of a desk with their laptop' when carrying out visits or have no access to a power supply for their laptop. There are also instances where CMOs have carried out compliance checks in 'very public areas' or have had to wait for a long period while 'a file is being found'.

In advance of the compliance checks from August 15, the CMO will supply a standard letter listing minimum expectations in order to be able to carry out their Provider visit. The letter will be a request to provide some basic facilities for visit days e.g. a desk suitable for viewing claimant records including a power supply to work from and a request that pre-visit checks are carried out.

**\*\*An example of the CMO Visit Standards letter is in Annex 1.**

### **Summary of changes in practice:**

12 days prior to the pre-arranged compliance visit, the CMO will supply the Provider with the following information:

- The (PRaP) Random Sample of claimants to be checked during the visit,
- A Blank Provider-specific ESF2a/ESF3 spreadsheet (to enable Provider pre-visit checks),
- A 'Standard Setting' letter listing expectations for the visit date.

During the visit, the CMO will work through each compliance check question and will discuss the Providers own 'Pre-visit' checks information. If the Provider states they have complied with the check, the CMO will validate this delivery by viewing this evidence. If the Provider acknowledges non-compliance to a check, the CMO will accept this and move on.

The CMO will also apply the changes to the DMA and Attendance check questions, as above.

Following the visit, the CMO will compile their ESF3 compliance report and the report will be based on the revisions above.

### **Further Information Contact Details**

All enquiries on the subject of this memo should be raised with your Performance Manager in the first instance; they will endeavour to provide you with an answer as soon as possible.

**Regards**

**Compliance Management Team**

## **Annex 1 – ‘Standard Setting’ Letter example**

Dear (Insert Provider SPOC)

### **Re: Timetable of Compliance Monitoring Visits and Provider Expectations**

Below are the dates of the proposed Compliance Monitoring Visits for the next six months, as well as confirmation of the venue and named DWP Compliance Monitoring Officer

(CMO):

- |                 |                         |       |
|-----------------|-------------------------|-------|
| • (insert date) | (insert provider venue) | (CMO) |
| • (insert date) | (insert provider venue) | (CMO) |
| • (insert date) | (insert provider venue) | (CMO) |
| • (insert date) | (insert provider venue) | (CMO) |
| • (insert date) | (insert provider venue) | (CMO) |
| • (insert date) | (insert provider venue) | (CMO) |

To ensure the Compliance Monitoring Visit is as productive as possible, please can you ensure the following are accessible on the day:

- Provider representative/facilitator on site that has a sufficient IT ‘access level’ to ensure all compliance checking areas can be accessed.
- IT facilities (power socket)
- Adequate area/room that ensures the confidentiality of claimant records is maintained by the CMO.

#### **Pre Visit Checks:**

It is imperative that all ‘sample cases’ are assessed prior to the Compliance Monitoring Visit and our expectation is that you will have undertaken a thorough review of all cases through the completion of an ESF2a (blank copy attached). By undertaking this pre-visit exercise will ensure that the check conducted will run smoothly and allow all parties the opportunity to discuss findings and consider any remedial action. Less time will also be spent by our CMO chasing up information and impacting on your resources.

If you have any concerns with any of the requests mentioned above please can you contact me at least 48 hours prior to the visit.

**Insert blank ESF3**

Yours faithfully

**Insert Name**  
**Insert Job Title**