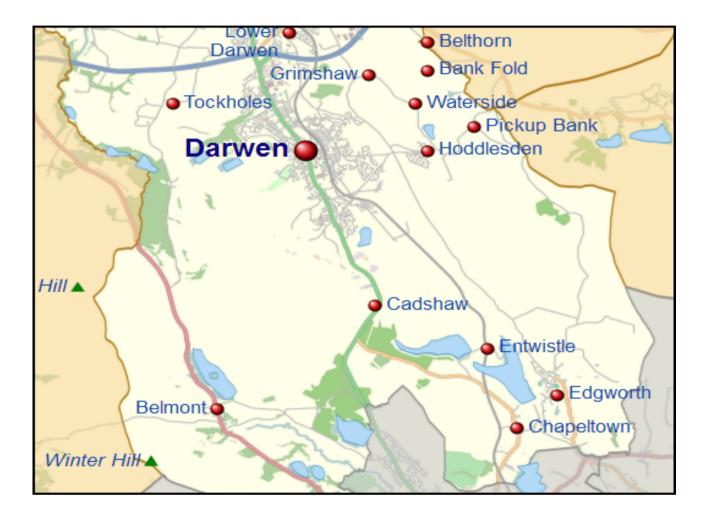
Blackburn and District Trades Union Council



Response to the Department for Work and Pensions

Consultation Document:

Proposal for the future of Darwen Jobcentre

This is the response of Blackburn and District Trades Union Council to the DWP Consultation Document: "Proposal for the future of Darwen Jobcentre".

Blackburn and District Trades Union Council is a local body of the Trades Union Congress comprising delegates from Trade Unions with members working or living in Blackburn, Darwen and the Ribble Valley.

It is our view that the Consultation Document fails to present evidence sufficient to bear the weight of the conclusion it reaches. We are consequently of the opinion that the course of action proposed should not be undertaken. Darwen Jobcentre should remain.

On page 6 of the Consultation Document it is said that "By paying only for the space we need we will save millions of pounds of taxpayers' money".

The Document, however, makes no effort to advise how "the space we need" has been defined or quantified.

In this respect, it fails to meet the standard set by the Government's "Consultation Principles", that a consultation should "give enough information to ensure that those consulted understand the issues and can give informed responses".

Has "need" been defined by claimant count, by the number of staff employed per square meter, by catchment area, by unit costs? A creditable analysis would combine all of these elements - yet none of them are mentioned.

Estimating the catchment area for Darwen is difficult because of it is part of larger administrative and political entities. It is covered by the Borough of Blackburn with Darwen and by the Parliamentary constituency of Rossendale and Darwen - so teasing out its particular circumstances can be difficult, even though its citizens retain a strong sense of identifying more with the town than with either of the larger entities into which they have been absorbed.

It should be noted that anyone who speaks, as the Consultation Document does, of a site in Blackburn as being "a location in the town" (page 7) commits an irreparable "faux pas".

According to information from the Local Government Association website, we think a reasonable description of the population of Darwen and its surrounding rural areas would be (by ward/parish):

Earcroft	4224
Marsh House	6181
Sudell	6788
Sunnyhurst	6328
Whitehall	3931

North Turton	4349
East Rural	1874
	33675

(The Blackburn with Darwen Borough Council website classes "North Turton with Tockholes" and "East Rural" as "rural villages" separate from either Blackburn or Darwen. They do not have seats on the "Darwen Town Council").

With or without North Turton and East Rural, Darwen is clearly larger than some towns that will retain their Jobcentres after the current review. For instance:

Town	Population
Skipton	14,313
Louth	15,000
Wells	16,343
Whitby	14,000

(Population Figures from "Wikipedia").

Our understanding of the 2015 Index of Multiple Deprivation is that Darwen has 4 Lower-layer Super Output Areas in the 10% most deprived (Blackburn with Darwen 015B, 015C, 015D and 016A). The Wards of Earcroft, East Rural, Marsh House, Sudell, Sunnyhurst and Whitehall all appear on the 2014 - 2020 "Assisted Areas" map.

Given these demographics, surely any proposal to close Darwen Jobcentre should be justified by specific arguments as to why it is being described as "not needed"?

Speaking in Parliament on 30/01/2017 Caroline Nokes, the Parliamentary Under-Secretary of State for Welfare Delivery, said that there had been a big increase in the number of "claims" made online, with the implication that this reduced the need for claimants to attend a Jobcentre. What she did not say was that, in the case of both Jobseekers Allowance and Universal Credit, the new claim process also involves mandatory attendance at a Jobcentre - in the case of "Joint Claims" for both members of a couple. It can be the case that a claimant who does not bring along satisfactory evidence will find this appointment re-booked. Most citizens claiming these benefits will subsequently be expected to attend a Jobcentre on a regular basis as one of the conditions attached to their benefit. The minimum attendance required would appear to be twice in any month, but the frequency can be greater depending upon individual circumstances. There are also circumstances under which claimants receiving Employment and Support Allowance and Income Support may be required to attend a Jobcentre.

If the need for attendance was voluntary, then the move of services to Blackburn would be inconvenient, but materially detrimental only insofar as it would discourage Darwen citizens.

Mandatory attendance, however, imposes additional costs on people who, in many cases, will already be poor.

Darwen Jobcentre is within reasonable walking distance of the most deprived areas of Darwen. Blackburn Jobcentre is not. According, for instance, to "Walkit.com" it is 0.7 miles from Ellison Fold Terrace (in 015B) to Darwen Jobcentre - achievable at medium speed in 14 minutes. Blackburn Jobcentre, by contrast, is 4.6 miles distant; a walk of 1hr 34 mins at medium speed.

One can imagine that most people will need to catch a bus. According to the Blackburn Bus Company the cheapest day return from Darwen Circus to Blackburn Bus Station is £4.30p. One has to be 19 or under to get a "child" concession. A recipient of Universal credit aged 20 to 25 will, by our calculation, be forced to spend 3.4% of their monthly income on travelling from Darwen to Blackburn. For a claimant over 25 it will be 2.7%. Bus fares, incidentally, are due to rise on the 19th February "by around 10p for day tickets".

Caroline Nokes has given the commitment that "When people have to attend a jobcentre more than once a fortnight, we will reimburse them". We would like an assurance that this will be done automatically, and that it will not be up to the claimant to raise this. Even so, we imagine that the citizen will need to be able to find the money first.

Whilst most of Darwen is relatively compact there are rural areas around it that tend to use it as a service centre. Places like Hoddlesden and Edgworth already have infrequent public transport, even to Darwen. We would not be surprise to find that citizens in these areas would find a trip to Blackburn even more difficult.

We hope, by the way, that we do not meet on the road the person who thinks they can drive between Darwen Jobcentre and Blackburn Jobcentre in 14 minutes. We would advise anyone to give themselves 30 minutes to do this.

There does not appear to be any readily available information on either the current capacity of Darwen Jobcentre or on the claimant count specifically for Darwen. It seems to us, however, that the planned deployment of public space cannot depend on a presumption of stable levels of activity.

The DWP should base its estate needs on an assessment that takes into account the possibility of fluctuations in future levels of activity. We believe that amongst factors to be taken into account are:

⇒ A presumption that levels of unemployment will remain subject to movements up as well as down. The immediate situation, for instance, is that there is no consensus as to how

leaving the European Union Single Market and Customs Union will affect unemployment levels:

- ⇒ The extent to which growth in insecure types of employment will mean that the extent to which people are forced on and off benefits will be as significant as overall percentage levels of unemployment in terms of Jobcentre activity; and
- ⇒ The extent to which the roll-out of Universal Credit will involve "in-work" claimants and "housing element" claimants having to attend the Jobcentre, rather than relate to the state through HMRC or the Local Authority.

The DWP should also take into account the services that Jobcentres provide on a more "ad hoc" basis". Whilst they are no longer the places they are in public imagination - ie. a labour exchange - they do make available to claimants IT equipment that can be used to satisfy the sort of "job search" activity the Government has made mandatory. Claimants can also take in documents to be scanned when the processing centres have need of them.

The Consultation Document says in the "Introduction" that "The Closures will...provide the Department for Work and Pensions (DWP) with the opportunity to deliver improved customer services....". Not one example of a potential improvement is given, however. And there are certainly no commitments given to actually providing any.

Having a Jobcentre presence in the community is about the overall completeness of the local public service landscape. It is also about maintaining local awareness and integration. The positioning of the Jobcentre within the community is one of the things that enables staff there to maintain local knowledge and sensitivity.

Admittedly, the Jobcentre does not have to occupy the current building to do this. Darwen Jobcentre does have a configuration that makes its public areas appear cramped whilst the proportion of "unused" to "used" space is rather high. Refurbishment, new premises or co-location might all be worth consideration.

What we would not want to see, though, is merely some rump or token service left in the town, such as the Consultation Document envisages. A case has not been made that Darwen citizens should be obliged to go elsewhere for mandatory interviews or to access jobsearch focussed technology.

17th February 2017

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