

Written evidence from the Department for Work and Pensions SVC0056

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Introduction

The Department for Work and Pensions welcomes the committee's inquiry into the safeguarding of vulnerable claimants, focussing on the measures in place to support vulnerable people.

Our overarching mission is to improve the day-to-day lives of our citizens and help them to build a secure and prosperous future, while supporting the most vulnerable. This intention connects the many different services, programmes, and support that the department provides across the country.

In a challenging year when families have been feeling the pressure from cost of living increases, DWP has been at the forefront of delivering vital support at an impressive pace and scale, providing Cost of Living Payments to over seven million low-income householders, with millions of additional payments going to pensioners and disabled people.

In this evidence submission, the department sets out the measures in place to support vulnerable claimants, how the department is developing as a learning organisation to improve and transform services for all benefit claimants as well as improving trust and transparency.

Statutory safeguarding duty

We support millions of people every year and our top priority is they get the benefits to which they are entitled to at the right time, and to ensure they receive a supportive and compassionate service.

While the department does not have a statutory or common law duty of care, we engage with claimants and, where appropriate, direct or refer them to appropriate agencies who may owe a duty of care and can provide appropriate support.

Understanding and monitoring the support vulnerable claimants need

The department recognises it has a responsibility to support vulnerable claimants and takes this seriously. We recognise that each claimant's circumstances and needs will differ and can change over time. The framework in place to support vulnerable claimants is therefore flexible, including varied support mechanisms ensuring the health and wellbeing of claimants is central to the delivery of services.

The department's description of vulnerability is, 'an individual who is identified as having complex needs and/or requires additional support to enable them to access DWP benefits and use our services'.

In 2019, we began internal work looking at our obligations and how we might better support vulnerable customers. The purpose of this ongoing internal work is to identify areas where more could be done to build on the support we currently provide.

The department's 30+ Advanced Customer Support Senior Leaders ("ACSSLs") coach and engage colleagues across DWP services to help support our most vulnerable customers. Key to the ACSSL role is the building and maintaining of

relationships with external organisations that support vulnerable citizens, who may also be customers of DWP. ACSSLs are a critical link to external agencies' escalation routes, enabling increased cross-agency case collaboration and more holistic support for customers. ACSSLs are also seeking greater participation for the Department in forums such as local Multi-Agency Safeguarding Hubs.

During 2022-23, ACSSLs have supported over 12,000 vulnerable customer cases, including 4000 customers referred to the department from external sources. We have introduced further roles to provide direct support for the ACSSLs and the work they take forward, with 18 additional colleagues now helping to provide additional local support, strengthening the national ACSSL network.

We have published further information about the impact of the ACSSL role in the [2022-23 Annual Report and Accounts](#).

Six Point Plan framework

The department recognises the importance of supporting vulnerable claimants. All staff working with claimants undertake comprehensive training to equip them with the skills to be able to support claimants who express an intention of suicide or self-harm.

The department has an established Six Point Plan for staff to follow when they identify a claimant who may be at risk of harming themselves. This toolkit ensures the customer is given the appropriate support and this may involve notifying emergency services in the event where they are at immediate risk.

The Six Point Plan is under continuous review to ensure it aligns with current thinking on mental health.

Withdrawing benefits from vulnerable claimants

The department has reviewed the processes in place where existing benefits are suspended or stopped and put in place additional steps to check on wellbeing and support needs.

Guidance, introduced in 2020, ensures that payments are not stopped or suspended while the department considers a claimant's vulnerability. In addition, changes were made to guidance relating to ineffective safeguarding visits, where a vulnerable customer has ceased to engage with the department and where standard processes may impact their entitlement to benefits.

Following two ineffective visits to a customer's address, where concerns remain about their vulnerability the claim will not be automatically closed, and payments will not cease. Instead, the case will be escalated for an additional layer of checks and, where applicable, the case can be further escalated to ACSSLs who will offer support and advice on other options for establishing contact with the claimant. Guidance for cases of claimant non-engagement is now consistent across all service lines.

Measures in place to support vulnerable claimants

We look to maximise opportunities signposting vulnerable claimants towards support. We want to ensure that chances to flag concerns to agencies with statutory safeguarding responsibilities are not missed.

The department frequently collaborates with these agencies. For individual claimants, we can liaise with health and social services to consider next steps, contact GPs for evidence for disability benefits decisions, or offer a voluntary referral to local authority housing teams (in England) for people who may be homeless or threatened with homelessness.

The department's national network of **Visiting Officers** allows DWP to meet needs of customers with complex requirements, who may be unable to access our services. This includes vulnerable customers and those needing additional support.

The network of **Supporting Families Employment Advisers** ("SFEA") work in the community alongside local authority professionals. SFEAs signpost claimants to suitable services, including domestic abuse, substance misuse services, GPs, social prescribers as well as the police and hospitals. SFEAs work closely with families ensuring support is in place and other DWP services are aware of the support in place. This ensures support continues and can be adjusted if required, meeting the needs of the family/claimant.

The department also supports **young care leavers**, helping them transition from the care service to adulthood, providing the correct benefit support. Benefits can be processed in advance ensuring there is no delay to benefit payments or housing costs.

Prison Work Coaches provide support to prisoners on remand and in custody notifying agencies of changes of circumstance reducing the likelihood of overpayments, sustain housing costs avoiding risks of homelessness on release and improve employability. From the day of their release, a support framework allows a smooth transition into benefit payment and Prison Work Coaches collaborate closely with probation teams agreeing appropriate customer centric action plans.

Disability Employment Advisers ("DEAs") have extensive knowledge of the support available enabling customers with health conditions and disabilities to prepare for work and move into and remain in employment. They work with stakeholders and healthcare professionals meeting customer needs.

Contracted providers are required to review their safeguarding processes and approaches ensuring they remain fit for purpose. For example, Personal Independence Payment ("PIP") and Work Capability Assessment ("WCA") providers:

- Deliver mandatory safeguarding training to all Health Professionals ensuring they are fully aware of their safeguarding policies and the situations in which a vulnerable adult or child should be referred to their GP, social services or the police ensuring they receive appropriate support
- Have designated safeguarding leads or teams and/or area safeguarding leads who have all received additional training in safeguarding

- Attend monthly meetings with the department where emerging issues are discussed

Where a contracted provider identifies concerns about the welfare of a claimant they are supported by the long-established '**Unexpected Findings**' process. This ensures a claimant's GP, or Health Professional involved in the claimant's care, is informed of unexpected or potentially serious physical or mental health symptoms or clinical findings that may be revealed as part of an assessment.

The department also regularly engages with stakeholders, including from mental health charities and other organisations, to continue improving customer services. It recently met with the mental health charity Rethink along with a family member representing the families of benefit claimants who have passed away.

The department continues building on its successful introduction of telephone and video health assessments.

In the White Paper the department explained that it is evaluating, through the Health Assessment Channel Trial, how well remote assessments work compared to face-to-face assessments. We want to understand whether different assessment methods drive different award outcomes. We will also be listening to the views and experiences of disabled people, DWP staff and assessment providers via external research. This will ensure an evidence-based approach to reform.

Internal Process Reviews

Internal Process Reviews ("IPRs") form a core part of the department's overall learning approach and help inform improvement activities across DWP product lines ensuring they support the continuous improvement of capability, culture, behaviour and process.

IPRs are not conducted to investigate a customer's death, but provide an internal, high-quality investigation ensuring the department continuously learns from where the customer experience has fallen short of expected standards.

Since the National Audit Office's report in 2020, the department has collected data on cases referred for an IPR, publishing details on the numbers of IPRs providing a breakdown between death and serious harm in response to both Parliamentary Questions and Freedom of Information requests on several occasions.

This year the department has included data in relation to IPRs in its Annual Report and Accounts. Additionally, the department is also considering its options and the potential for publishing IPR data more frequently in the future.

Where cases are referred for an IPR, these will be conducted where:

- There is a suggestion or allegation that the department's actions or omissions may have negatively contributed to the customer's circumstances, and a customer has suffered serious harm, has died (including by suicide) or where the department has reason to believe there has been an attempted suicide:

or

- The department is asked to participate in a Safeguarding Adults Review or is named as an Interested Person at an Inquest, regardless of whether there is an allegation against the department.

Independent body to investigate claimant deaths

There already exists a wide, independent, and transparent system for investigating such cases:

- Causes of death are determined by a doctor or a coroner. If a coroner, on investigating a death, identifies a risk of other deaths occurring, they will issue a Prevention of Future Deaths report highlighting this to the individual or organisation who they believe has power to take action
- The Independent Case Examiner investigates serious complaints relating to DWP. They report to the complainant and publish case studies of findings in the ICE annual report
- The Parliamentary and Health Service Ombudsman also looks at serious cases and publishes reports on its website

Since the National Audit Office's report in 2020, the department established the Coroner Focal Point, providing an open communication channel between Coroners and the department and allowing Coroners' enquiries to be centrally captured and monitored.

Serious Case Panel

The Serious Case Panel meets quarterly considering themes and issues that have arisen across DWP service lines, in order to agree changes and improvements. It does not investigate individual cases but considers themes arising from a range of sources, including Internal Process Reviews, frontline feedback and Independent Case Examiner reports.

The Panel is made up of the department's most senior leaders, including the Permanent Secretary and all Director-Generals. It is chaired by a Non-Executive Director (David Bennett) and also includes the Independent Case Examiner (Joanna Wallace).

The Panel considers opportunities for organisational learning from the themes and issues presented to them. Recommendations for improvement are agreed and Director-General accountability is assigned. The Service Excellence Director-General is responsible for updating Ministers on the Panel's outcomes.

The Panel is currently overseeing the development, impacting and implementation of changes in alignment with the department's wider strategic aims including:

- Mental Health Awareness training being rolled out to colleagues across the department, which includes support for colleagues when they are interacting with a customer who is at risk of suicide or self-harm. As of August 2023, over 51,000 service delivery colleagues have undergone this training.

- Resourcing a multi-disciplinary project improving all aspects of our service offer in relation to appointees, based on discovery work previously commissioned by the Panel in December 2021.
- Working with digital colleagues to explore how the department can better support vulnerable customers who choose to correspond with DWP in writing, either when making an application or providing supporting evidence.
- In relation to the use of sanctions and with a specific focus on the measures in place to protect vulnerable customers, the Panel agreed the need to continue to review and strengthen these measures to ensure desired outcomes from the use of sanctions whilst mitigating the risk for vulnerable customers.
- Commissioning improvement activity in relation to our service when a vulnerable customer requires us to call them back to resolve an issue and on reducing errors when a vulnerable customer changes address.

Directing activity through the Future Method of Payment project to reduce the number of customers with Payment Exception Service as their payment method through financial inclusion conversations aimed at migrating customers to bank accounts. They also commissioned the development of consistent and effective processes across all benefits for establishing contact with customers when expired vouchers are returned to the department. Minutes of meetings are published on GOV.UK after each session, where the Terms of Reference are also available. The department also publishes an update on the Panel in the DWP Annual Report.

‘Help to Claim’ service

‘Help to Claim’ support is delivered independently by Citizens Advice, in partnership with Citizens Advice Scotland, with support being provided through telephony and digital channels.

Those individuals who are unable to access support via these channels will be signposted to their local Jobcentre by Citizens Advice for face-to-face help in making or managing their UC claim.

Work Coaches already support individuals who approach the Jobcentre directly rather than choosing to access independent support. Work Coaches undergo a comprehensive training programme, including training for working with different vulnerable groups and those with complex needs.

‘Help to Claim’ can be accessed from the new claim and reclaim declaration stage until receipt of their first full payment of Universal Credit and includes:

- a. Setting up an email address
- b. Working through claimant to-dos
- c. Accessing the Universal Credit claim by phone service
- d. Accessing DWP home visiting support
- e. Help to verify identity
- f. Help with providing additional evidence

- g. Help to access adaptations such as direct payments to landlords and conditionality easements
- h. Applying for advances and help to access other financial support
- i. Help to prepare for first monthly payment
- j. Long term support and signposting out to other organisations via the District Provision Tool

We continue to review the support required in order to help vulnerable claimants make a successful claim to UC. Since 2019, Citizens Advice and Citizens Advice Scotland have helped over 850,000 people with their claim through the 'Help to Claim' service.

Ensuring benefits are accessible

The department is committed to providing services which promote equality of opportunity.

We are legally obliged to make reasonable adjustments for disabled customers in circumstances where a failure to do so would place them at a substantial disadvantage compared with people who are not disabled. Where disabled customers need assistance to access our services and information, we will make reasonable adjustments to meet their individual needs.

The department has in place a wide range of reasonable adjustments for disabled customers, including production of communications in a range of different (or alternative) formats such as braille, electronic, large print and audio. In addition, we can offer:

- Email as a reasonable adjustment
- Face-to-face British Sign Language ("BSL") interpretation
- A visiting service for vulnerable customers who are unable to use our other contact routes
- Video Relay Service which enables customers to communicate in real time with DWP via a BSL interpreter using a video connection on an electronic device. There's no need to be in the same location or for the customer to make an appointment
- A flexible approach to mandatory face-to-face interviews within a jobcentre

Furthermore, the British Sign Language Act 2022 was brought forward to help promote and facilitate the use of British Sign Language by providing legal recognition of British Sign Language in England, Wales and Scotland whilst preserving the architecture of the Equality Act 2010. This legislation is an invaluable tool for the deaf community, helping every deaf person engage with public services to ensure their needs are met.

Vulnerable claimants and assessments

The department continues to take steps to improve assessments and has set out reforms in the White Paper which follow the department's consultation on Shaping Future Support: The Health and Disability Green Paper, which was published in July 2021.

As part of that, we have engaged widely on the proposed changes, including with disabled people, disabled people's organisations, employers and others. This has provided insight from stakeholders who have been through the current process and understand how and why it needs to change to ensure they have a better overall experience when applying for, and receiving, health and disability benefits.

The department also committed in the White Paper to supporting more disabled people and people with health conditions to start, stay and succeed in work, which is central to the reform proposals.

We intend to legislate to remove the Work Capability Assessment ("WCA") so that in future there is only one health and disability assessment. Removing the WCA will reduce the number of assessments people need to take to access their benefits and enable us to provide more personalised levels of support in a new system.

The department continually works with providers to make improvements to the PIP and WCA claimant experience. The Health Transformation Programme ("HTP") is modernising Health and Disability benefit services. It will create a more efficient service and an improved claimant experience, reducing journey times and improving trust in our services and decisions.

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