

Department for Work and Pensions (DWP)
Central Freedom of Information Team

freedom-of-information-request@dwp.gsi.gov.uk

Our reference: VTR 1663

Date: 11 May 2015

Dear Dan Manville

Thank you for your Freedom of Information request received on 21 April 2015.

You asked: *I would like copies of all guidance provided to Jobcentre Plus and individual Jobcentres about their Adult Safeguarding role as arises from the Care Act 2014 and the necessary modification of their obligations under the Data Protection Act.*

The Department for Work and Pensions (DWP) has an overarching policy relating to vulnerability, which aims to provide targeted support to those individuals, including vulnerable adults, who have complex needs and those who require additional support to enable them to access DWP benefits and services.

This policy is set out in the guidance DWP provides to staff, an extract of which is at Appendix 1 below, as a representative example of the information available to staff to support such individuals. The policy is also reflected in the design of the processes used to deliver the range of benefits administered by DWP.

If you have any queries about this letter please contact me quoting the reference number above.

Yours sincerely,

DWP Central Fol Team

Your right to complain under the Freedom of Information Act

If you are not happy with this response you may request an internal review by e-mailing freedom-of-information-request@dwp.gsi.gov.uk or by writing to: DWP, Central Fol Team, Caxton House, Tothill Street, SW1H 9NA. Any review request should be submitted within two months of the date of this letter.

If you are not content with the outcome of the internal review you may apply directly to the Information Commissioner's Office for a decision. Generally the Commissioner cannot make a

decision unless you have exhausted our own complaints procedure. The Information Commissioner can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow Cheshire SK9 5AF
www.ico.org.uk/Global/contact_us or telephone 0303 123 1113 or 01625 545745

Working with Vulnerable Claimants Guidance – from DWP Intranet Site

Vulnerable Customers - Extra support for those who need it

1. This guidance is to help you deal with individuals with complex needs, or individuals who require additional support, to enable them to access DWP benefits and use our services
2. For DWP purposes the 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”
3. “Individual” refers to claimants, customers, clients, service users, anyone who accesses benefits and uses our services.
4. “Complex needs” are difficult personal circumstances and/or life events that affect the ability of the individual to access DWP benefits and use our services

Social Justice (SJ) and the DWP Approach to vulnerability

5. Social Justice is about giving individuals and families, facing multiple disadvantages, the support and tools they need to turn their lives around through tackling the root causes of poverty and disadvantage to deliver real and sustained change. It is very important that these individuals are identified so that tailored support can be provided to help them to access and use our services, meet their individual responsibilities and receive an appropriate service outcome. DWP has developed the DWP approach to vulnerability to support the Social Justice principles and there is a range of policies and procedures in place to help these individuals with difficult personal circumstances and/or life events (multiple disadvantages) access benefits and use our services.

DWP approach to Vulnerability

6. The aim of this approach is to ensure:
 - we are consistent in offering individual responses when needed;
 - the response is always joined up and meaningful for the individual; and
 - we deliver appropriate service outcomes.
7. The aim of this approach is to ensure that the targeted additional support to individuals enables them to:
 - access benefits and use our services; and
 - meet their individual responsibilities.

8. This approach consolidates existing DWP practices and will not result in any changes to existing policy or procedures.

9. The DWP approach to individuals with complex needs and those who require additional support includes:

- one description of vulnerability
- consistent use of language and terminology throughout DWP
- focus on life events and/or personal circumstances rather than customer group
- identification of these individuals and recording the support required to enable them to access benefits and use our services
- a clear DWP support offer is in place, to address the impact of those life events and personal circumstances (including health issues and disability) that affect the ability of the individual to access DWP benefits and use our services
- clarity of timeliness and suitability of DWP support offer:
 - not all individuals with life events/personal circumstances/health issues/disability will require support
 - individuals may have one or multiple reasons why they may require support.
 - support offered should be tailored to individual needs
 - support may be put in place once, for a short, medium or long period of time
 - individuals may move in and out of situations where they do/do not require support
- signposting – using stakeholders to help, enable and support individuals
- a coordinated, defined, overarching strategy
- staff Learning & Development products reflect this approach
- integrated and consistent approach in all Customer Journeys to provide additional support to enable individuals to follow standard Customer Journeys.

Identification

How to identify those individuals who may need additional support to enable them to access DWP benefits and use our services

10. Individuals now contact us through a variety of channels. Identification of support needs will depend on the channel used.

11. An individual may require additional support to enable them to:

- access benefits and use our services (may be unable to use on-line claim facility, unable to read claim forms for ESA, JSA, PIP, PENSIONS, etc)
- prove eligibility (may not understand or remember what evidence they have to provide, to prove they are eligible to claim)
- maintain conditionality (may not understand the requirement to attend an interview in the jobcentre)
- maintain their claims (may not understand when to provide change of circumstances information)

- maintain their finances (be in severe financial hardship/debt, may not have the ability to understand money/numbers).

12. An individual might experience difficulties with:

- understanding information
- interpreting situations
- making decisions
- giving consent
- communicating information or their views
- requesting specialist or additional help and support.

13. When making a judgment about whether an individual requires additional support, it is essential that you communicate with them and record their additional requirements. If, and what, support is required can only be determined as part of a measured assessment.

14. Some individuals may be unwilling to reveal that they are experiencing difficult life events or personal circumstances.

15. You should use a flexible approach to put additional support/special arrangements in place that are tailored to the specific needs of the individual. This will provide them with equal access to our products and services and enable them to follow the standard Customer Journeys.

16. This support may be put in place once; for a short, medium, long period of time; or recurring dependant upon their needs.

17. Examples of special arrangements or additional support (not an exhaustive list):

- assisted telephony service
- offering a face to face appointment
- implementing benefit easements where appropriate (for example for victims of domestic violence)
- reasonable adjustments must be put in place if required for disabled people and individuals with health issues.

18. All service providers, including DWP, have a legal duty to make 'reasonable adjustments' to ensure their services are accessible to disabled people.

19. LMS markers and hotspots – Working age. It is essential that the markers/hotspots are completed accurately and updated accordingly. Markers and hotspots that are not completed, or hold inaccurate information, can have a significant impact how DWP addresses the needs of an individual. The marker information, if used correctly, will help us to target support where it is most needed, keep all staff informed in hand off/over situations and reduce the need to obtain this information time and time again. Incorrect marker information can result in the individual not receiving the correct payments or

not getting the additional support they require. Some of the life events and personal circumstances require the LMS markers/hotspots to be completed and staff should follow the appropriate guidance to complete them:

- Disabled Person (DP)
- Benefit Cap
- Ethnicity
- Incident or PV
- Domestic Violence and abuse
- Care Leaver
- Work Focused Support for Carers (WFSC)
- Alcohol Misuse
- Drug Misuse
- Refugee
- Ex-Offender
- Person Without Accommodation
- Parent
- Lone Parent WFI
- Child Details and Childcare Barrier to Work
- LA Families Programme (Offices in England only).

Life Events, Personal Circumstances, Health Issues, Disability

20. There are many life events, personal circumstances and health issues/disability that may impact on the individuals' ability to access DWP benefits and use our services. Some individuals may not require additional support even though they are experiencing difficult life events and/or have complex personal circumstances, health issues or disability. These life events, personal circumstances, health conditions and disability may indicate that these people require additional support putting in place, to enable them to access the standard Customer Journeys.

Life Events and Personal Circumstances

- Adoption - children
- Age - older person
- Age - older person - financial abuse (pensions)
- Age - Young Person - 16 & 17 year olds
- Bereavement, Death - recently bereaved
- Caring responsibilities
- Children - child care
- Children who leave care/over 18 care leavers
- Crime – Victim of crime
- Cultural Barriers, Language barriers – English not their first language
- Debt/indebted
- Divorce/termination of Civil Partnerships
- Domestic Violence and abuse
- Drug and alcohol dependency
- Gender recognition/transgender

- Homeless (person without accommodation, in temporary accommodation, frequent change of address)
- Just Left hospital
- Leaving the Armed Forces, Ex-armed forces personnel and their spouses/partners
- Lone Parent
- MAPPA individuals (Multi Agency Public Protection Arrangements)
- Offender/ex Offender/ Prisoners/Detainees
- Race - Immigration status/refugee/asylum seeker/people arriving from abroad
- Redundancy
- Retirement
- Rural Isolation
- Suicide and/or Self Harm Declaration
- Supported by Troubled Families programme

21. Individuals may tell you about a life event (for example, “my mum has just died”) or give out information in the conversation that indicates they may have complex personal circumstances (for example: they have no ID which may indicate they are currently homeless). There may be a combination of factors which mean they require additional support to enable them to access benefits and use our services.

22. Note: Claimant Commitment guidance must be followed if appropriate regarding acceptable restrictions.

23. Note: Some individuals might **not** require additional support even though they are experiencing a life event, health issue or disability; have complex needs or difficult personal circumstances. Try to avoid making assumptions; the individual themselves is the expert on what support is required. If you are unsure as to whether they want/need any additional support, you should consider asking “do you require any support to help you to use our services”.

Signs, behaviours and language

24. These may indicate that an individual requires additional support. When you are communicating with the individual you need to assess whether they are:

- in distress
- not understanding you
- giving brief or one word responses
- upset
- frustrated
- giving inappropriate responses which do not answer the question asked
- continuously avoiding eye contact
- having difficulty processing or remembering what you have said
- holding a parallel conversation with someone else who may be their advocate or appointee which shows face to face contact might be preferable

- unacceptable customer behaviour.

Problems dealing with written communications, numbers or language

25. When you are communicating with the individual, they may display behaviours that indicate they have reading and/or writing difficulties or difficulties dealing with numbers or language.

The individual may:

- be reluctant to complete/read paperwork
- be unable to navigate telephony or on line services
- be unable to manage money or budget as they do not have sufficient number skills (state they are in debt)
- fail to understand verbal communications sufficiently enough to engage with DWP staff.

DWP staff may identify:

- errors on completed on line application forms or paper forms
- that the individual is unable to spell out words if requested via telephony contact
- that English is not their first language.

26. Note: not all individuals who have problems dealing with written communications, numbers or language will need support to access our services.

Health conditions and disability

27. When you are communicating with an individual, they may declare or display behaviours that indicate they have health issues or a disability. We have a legal requirement under the Equality Act 2010 to put reasonable adjustments in place. Health conditions/disabilities may not necessarily indicate “vulnerability” but may mean the individual requires a reasonable adjustment to enable them to access benefits and use our services.

LMS markers and hotspots guidance must be followed when recording reasonable adjustments.

28. Cognitive and Neurological Impairments include:

- mental health conditions
- hidden impairments (for example ADHD, Autism Spectrum Disorders/Conditions, Dyslexia and Dyspraxia)
- memory loss
- learning difficulties
- reading writing difficulties
- literacy/numerical difficulties.

29. Physical and sensory impairment/disability include:

- mobility
- hearing
- visual
- speech.

30. An individual might:

- declare memory loss due to medication
- state they prefer a bit of information at a time
- not interact in long conversations
- fail to remember instructions/information provided by you
- fail to remember personal details
- declare they have sight, hearing or speech impairment(s) (sensory disability)
- declare they are physically disabled/have mobility issues
- be unable to physically access a DWP building
- be unable to physically use electronic or telephony equipment
- declare they have a mental health issue (hidden impairment)
- display inappropriate behaviour that indicates a mental health issue (hidden impairment).

31. DWP Staff may identify that an individual might:

- fail to remember information provided by you
- fail to remember personal details
- not understand simple instructions
- have difficulty accessing the office, room, equipment etc available to them.

32. Note: not all individuals with a physical, sensory or mental health disability will need support to access benefits and use our services.

Health conditions and disabilities - additional information

- DWP D&E Disability Home page
- Operational Guidance. JCP Equality Act - Disability discrimination Guide
- The list of A-Z of medical conditions – glossary of terms is primarily used by decision makers. However, you may use it to obtain information on a health condition or disability, to improve your understanding, as it provides a brief overview of the condition.

DWP Support – what additional support/special arrangements are available to enable individuals to access our services/benefits

33. We have a variety of ways of providing support and help to enable individuals to use our services - to find work, claim benefits, claim pensions, obtain child maintenance, and look for jobs. It will depend on which service is being used or which benefit is being claimed, and their personal needs as to

what additional support is provided and for how long we put this support in place.

34. The aim is for individuals to follow the standard Customer Journeys and we need to work with them to identify how we can enable them to do this.

35. Support on offer includes: (not an exhaustive list)

- easements for Domestic Violence Victims
- Voluntary referral for claimants with Drugs or Alcohol dependency
- providing information in large print for customers with visual impairments
- the BigWord interpreting services for those whose first language is not English
- British Sign Language (BSL) interpreting services for those with hearing impairments
- day one support for people recently released from prison
- working with representatives. Representatives/Key Workers can be very helpful both in supporting the individual and by offering advice to DWP staff on recognising support needs and how this impacts on the individuals' ability to access benefits and use our services.
- specialist Single Point of Contact (SPoCs) are available in some parts of DWP to help with customer service.

36. The Vulnerability Hub provides more information on life events and personal circumstances, and further details of the range of support on offer for individuals who require help to enable them to access benefits and services.

Vulnerability Hub

37. The Vulnerability Hub (previously known as the Vulnerable Customer Hub) is a DWP intranet site, designed to bring together existing information and guidance (a one stop shop of information), to help you to support individuals with complex needs, and those who require additional support, to enable them to access DWP benefits and use our services. The Vulnerability Hub includes mini guides on Life events and Personal Circumstances, Health conditions and Disability, or direct links to all relevant DWP guidance and signposting information.

Suicide and Self Harm

38. DWP has policy and guidance available for how to handle individuals who make a declaration of suicide or self harm.

Signposting

39. Staff can find general information, fact sheets, leaflets and signposting details in a number of locations:

- Signposting Leaflets – All customers/individuals
- Links to external websites for help, advice and support

- District Provision Tool – Working Age. The District Provision Tool (DPT) provides access to the full range of provision and support delivered by Jobcentre Plus, Skills Funding Agency (SFA), Skills Development Scotland, Careers Wales, other providers and local authorities. It includes a comprehensive menu of Specialist support information for vulnerable groups linking to national and local sources of help
- Local signposting arrangements are provided at some DWP office locations
- Advisory Services Team Site provides information via sub sites on Armed Forces, lone parents, under 18s and childcare
- The Vulnerability Hub includes mini guides on each of the Life Events and Personal Circumstances, and links to organisations that can offer help and support to individuals.

DWP Strategy / Policy on offering support to enable an individual to access and use DWP services

40. DWP staff are expected to identify and make judgements about those individuals for whom it would be more appropriate to put additional support in place to enable them to access DWP benefits and use our services. DWP staff are expected to identify those situations where support is required, record this and then put it in place. For example, offering a home visit or face to face service if it is more appropriate, because the individual has complex needs or requires support to enable them to use our services.

41. DWP has customer service standards in place to ensure all individuals receive equal access to our products, services and benefits.

Legal Requirements

42. Some of the products and services we offer are underpinned by legal requirements. For example the Equality Act 2010 states that Disabled people need to be identified so that DWP can:

- meet its obligations as a provider of goods and services, by giving access to specialist disability service help if needed, as a result of a person's disability
- meet its obligations as a provider of goods and services by making reasonable adjustments to its services for disabled people
- ensure that we do not discriminate, or allow others to discriminate, against disabled people in vacancy handling
- satisfy Treasury that funds devoted to us for the provision of disability services are used appropriately.

Learning and Development

43. There is a variety of Learning and Development products available for staff: (this is not an exhaustive list)

- Introduction to working With Vulnerable Customers

- Introduction to Working with Customers with a Mental Health Condition (facilitated event)
- Introduction to Mental Health conditions for Telephony Staff (0.5 day facilitated)
- Diversity and Equality Learning – including disability awareness.