

Spotlight on: Complex needs

Introduction

This Spotlight product has been designed to help identify and support claimants with complex needs. It lists current guidance and tools which staff should use to ensure claimants are given the required support at the earliest opportunity.

The Spotlight will remain in place for a temporary period until the Universal Credit design and supporting products are developed further.

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What is meant by 'complex needs?'

Complex needs reflect personal circumstances and life events that present an individual with extra challenges in accessing Universal Credit, using the service and moving towards work and financial independence.

A claimant with complex needs may be:

- someone who is experiencing difficult life events or personal circumstances
- someone who has difficulty in dealing with the demands of our processes at the time they need to access and use a service

They may be unable to use normal channels to access the service, and may benefit from extra or face-to-face support.

Some claimants will have obvious physical disabilities which mean they may need extra personal support, or that adjustments are required to enable them to access services. Other claimants may have conditions that are less obvious.

Complex needs are not always a static state.

It is important to remember that although the circumstances described in the following sections may suggest there are complex needs, the claimant may consider themselves perfectly capable of managing without the need for support.

We must always be mindful not to consider just the claimant's circumstances alone, but how those circumstances affect their ability to access Universal Credit, continue to use the service and move towards work.

We must avoid making assumptions about what a claimant can do, or cannot do to help themselves.

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Developing complex needs

Below are some of the circumstances which could lead to someone developing complex needs. There is often more than one trigger, and most can impact anybody at any time:

- has just left prison
- is blind or deaf
- has suffered a recent bereavement
- is homeless
- is terminally ill
- has a learning disability
- has a mental health condition
- has just left care
- is a young carer
- is in a hospice
- has an addiction to drugs/alcohol
- can't read or write
- is no longer a carer
- has suffered domestic abuse
- can't speak English
- has had an accident
- has restricted mobility

This is not a complete list.

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Examples of life events that might indicate a claimant may have complex needs

Frequent applications for Advance payments

This could be a sign that claimant is not able to manage their money. It could also indicate an underlying issue, for example - homelessness, addiction, victim of modern slavery. See [Advances](#)

Physical disabilities

The claimant may not always say their health is deteriorating. The following examples are things to look out for:

- does the claimant now use a walking aide?
- are they out of breath upon arrival?
- has their appearance or complexion changed?

Showing signs of addiction

Signs of addiction may be physical as well as non-physical, for example:

- extreme weight loss
- slurred speech
- being anxious
- paranoia
- unexplained need for money
- neglecting their responsibilities

Struggling to set up a bank account

If a claimant is struggling to set up a bank account or provide ID, it could indicate there are other underlying issues, for example homelessness or learning difficulties.

See Spotlight on: Method of payment.

Does the claimant have a history of imprisonment or a criminal record?

Prison leavers are often vulnerable because they have lived outside of the modern world for a period of time and are not used to managing their own affairs.

Has an Unacceptable Customer Behaviour marker

An Unacceptable Customer Behaviour marker is displayed on a claimant's record when they have displayed negative, aggressive or threatening behaviour. However, there could be an underlying reason behind the reaction.

See Unacceptable Customer Behaviour.

Attending appointments with family, friends or support workers

This is usually a clear indicator that somebody is vulnerable and requires further support, for example because of learning difficulties or language barriers. Be aware also of situations where the claimant allows the other person to speak for them or seeks the other person's permission or re-assurance before speaking.

See 'Complex needs - modern slavery' below, Domestic violence and abuse and Appointee guidance.

Previous suicide/self-harm threats

Looking through claimant history, profile and notes should identify if the claimant has made previous suicide or self-harm threats. This may indicate the claimant is vulnerable and requires further support. See Claimant suicide or self harm - 6 point plan framework

Frequent sanctions or failure to attend

This could indicate there is an underlying issue, for example - a change in physical or mental health or addiction. This could also indicate a chaotic lifestyle so may require further support (reminders and help) to understand the consequences.

History of debt or money management issues

Severe debt isn't just a financial problem - it causes relationships to breakdown, people to lose homes and families to breakdown.

Homelessness

If a claimant is homeless, or at risk of homelessness, this is a clear indicator that they require additional support. See Homelessness or at risk of homelessness and Spotlight on: homelessness 'Duty to refer' to a local authority (England only).

Domestic violence and abuse

A claimant may display signs, behaviours and language to suggest they are experiencing domestic violence or abuse for which additional support is required. See Domestic violence and abuse and Spotlight on: safeguarding and reflecting.

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Complex needs - modern slavery

Modern slavery encompasses:

- human trafficking
 - slavery servitude
 - forced or compulsory labour
- Someone is in slavery if they are:
- forced to work through mental or physical threat
 - owned or controlled by an 'employer', usually through mental or physical abuse or the threat of mental or physical abuse
 - dehumanised, treated as a commodity or bought and sold as 'property'
 - physically constrained or has restrictions placed on his or her freedom of movement

Case study

Organised criminals in the UK trafficked people from Slovakia where they were forced to work and claim state benefits. The victims were kept prisoner in various properties and were forced to hand over all their money and benefits.

The criminals falsely procured National Insurance numbers for their victims. Thirteen potential trafficked victims were eventually rescued. None knew that claims to benefit and Tax Credits had been made in their names. Nine criminals were arrested and 4 were subsequently convicted and imprisoned for a total of more than 9 years.

The traffickers were falsely in receipt of benefits exceeding £98,000 and had stolen at least £50,000 in wages.

How can modern slavery be identified?

Victims often do not recognise or realise that they are victims, which can make it difficult to identify them. Indicators for victims of human trafficking or slavery include:

- employed for no or minimal wages
- residing in communal accommodation
- identity documents held by a landlord or employer

Steps to report modern slavery

If it is suspected a claimant may be a victim of modern slavery, any relevant evidence must be gathered. Concerns must be discussed with a line manager without delay.

All referrals, including full details of any evidence gathered should be sent to Central Criminal Intelligence Service (CCIS): email address (link sends e-mail)

DWP guidance - Modern Slavery

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Complex needs - care leavers

More detail about care leavers can be found in the [Care leavers guidance](#).

Given their particular challenges, which is generally the case for other claimants with complex needs, care leavers must have their individual circumstances taken into account with conditionality requirements tailored to their specific needs. As this will often be the first time that a care leaver has claimed benefit, their knowledge of 'the system' will probably be limited or non-existent.

Whilst not universal, common issues faced by care leavers can include:

- coping with the demands of living on their own at a young age
- maintaining a home and managing their lives independently, often without the support from families
- having to manage finances
- lack of knowledge of the benefits system - what to claim, how to claim it and what they need to do to maintain payment
- lack of support to help them to find and sustain education, training or employment

Case study - how DWP and its external partners can work together to support a claimant with complex needs.

Bobby had been in and out of prison for most of his adult life. He needed to break the cycle and knew that finding work would be the best way to do that.

Bobby was keen to do some voluntary work and an interview was arranged with a local shop manager but unfortunately it was felt that his criminal record would be a problem so the placement could not be offered.

Bobby was then signposted by his work coach to a local job club. They worked with him to restore his confidence and helped him produce a good CV.

Following a local launch of the Hospitality Works Campaign, the local Employment Adviser Team worked with hospitality employers in the area. Bobby secured interviews with a cinema, a fast food outlet and a restaurant. Bobby attended an interview at the restaurant, armed with his new CV and with his employment adviser's (EA) support.

Bobby had learnt how to explain his past to the managers interviewing him, and show that he just needed a chance and offered himself on a Work Trial.

The EA was able to explain to the employer how reliable Bobby was as he always attended his appointments on time, was well prepared for them and really wanted to move forward with his life.

As a result, Bobby started a Work Trial in a catering position. He worked really hard and picked up the job with ease. The Work Trial was supposed to last two weeks but Bobby was offered a full time job after only a few days.

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Supporting complex needs – site level hints and tips

- develop and maintain a site level action plan to manage the activity relevant to the site in supporting claimants with complex needs
- be aware of the list of current guidance and useful links
- regularly review Commitments to ensure they are tailored to suit the claimant's individual needs
- consider if the claimant's circumstances require work search and availability requirements to be switched-off for a period of time - see [Switching-off requirements guidance](#)
- use the claimant history to manage and review content and record the support claimants might need – but not the details of any health condition
- ensure complex needs are identified at every opportunity, for example front of house, assisted digital, interviews, the journal and telephony
- resolve queries on a once and done basis wherever possible
- develop and maintain the right partnerships and provisions to support claimants with complex needs and ensure close links with your linked Partnership Manager (PM)
- ensure the District Provision Tool (DPT) is up-to-date with the appropriate provision
- consider signposting or referral to Help to Claim
- ensure referrals to money guidance or debt advice deliver quality support
- support and encourage claimants to secure bank accounts and manage their money effectively
- ensure Leaving Care Teams notify the site of care leavers when appropriate
- ensure claimants transferring into or out of the office are supported
- understand claimant groups requiring specific focus and support
- arrange case conferencing with colleagues (SIL, DEA, DMA, PM) and ensure there are clear escalation routes

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Recording information on the service

Some claimants may worry about what information is being recorded about them.

Whether the claimant is at a face to face appointment or on the phone, it is important to explain what is being done with the information you are recording about them, including:

- what you will do with the information
- that the information is kept secure

When the claimant is in the Jobcentre, to put them at ease the agent should turn the screen around to show them what they are recording.

While on the phone, the agent should explain any moments of silence on the call, for example while they are typing.

Put yourself in their place. How would you feel about what information is being held about you and what is being done with it? Always read the information back to the claimant to reassure them that you have recorded it correctly.

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Complex Needs Toolkit

Since the complex needs toolkit rolled out to all Universal Credit sites, using feedback and working with operational colleagues an improved version of the toolkit has been developed.

This standard template further supports colleagues to identify, own and take appropriate action to support claimants with complex needs.

Service Centres are no longer required to have their own, tailored toolkit. Instead, they work closely with their linked Jobcentres and, as appropriate, contribute to site toolkits.

Operational Excellence Directorate Universal Credit Service Design and Transformation own the Complex Needs Toolkit and its overall design.

However, each Jobcentre is responsible for their own toolkit.

A nominated jobcentre SPOC is responsible for maintaining the toolkit, for example - adding hyperlinks to provision/DPT, ensuring action points are progressed and the calendar is updated.

There is a dedicated public shared folder to save all complex needs toolkits. This allows colleagues from both jobcentres and service centres to access the plans that are relevant to them.

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Supporting guidance and products

[Assisted Digital overview](#)

[Complex needs overview](#)

[Claimant self harm or suicide - 6 point plan](#)

[Consent and disclosure](#)

[Home visits](#)

[Care leavers](#)

[Housing](#)

[Money guidance and Alternative Payment Arrangements](#)

[Domestic violence and abuse](#)

[Recoverable Hardship Payments](#)

Health

Claimant Commitment

Method of payment

Spotlight on: using the claimant history to record complex needs

Spotlight on: Help to Claim

The DPT provides access to the full range of provision and support delivered by Jobcentre Plus, Education and Skills Funding Agency (ESFA), Skills Development Scotland, Careers Wales other providers, local authorities, independent and volunteer charity organisations, health services and addiction treatment. It hosts all the available provision and support within a district and nationally. To locate the relevant DPT, type the claimant's local Jobcentre into the building directory on the intranet. This will identify which part of the country the claimant lives in so they can be signposted appropriately.