

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

XXXXXXXXXXXXXXXXXXXXXXXXXXXX@xxx.xxx.gov.uk

Our reference: FOI 4746

Date: 29 December 2016

Dear Mr Jefferson,

Thank you for your Freedom of Information request received on 13 December 2016. You asked,

from the information you have on file please kindly provide the guidance to DWP/jobcentre staff for communicating with a blind claimant.

Please find attached an extract from DWP internal instructions for communicating with blind customers:

Blind or Partially-sighted Customers: Reasonable adjustments

1. Discuss with the customer if they require any support to enable them to access benefits and use our services. Do not assume or put a reasonable adjustment in place without discussion with the customer. Consider, does the individual require extra support to communicate with DWP? Take the appropriate action to implement the required support and record the details on the customer record
 2. If a blind or partially-sighted person asks for someone to greet them on arrival to help reassure them about their interview or appointment, a specific member of staff should be made aware of the appointment time of the disabled claimant/customer and be available to undertake this task. There should be a contingency plan if this officer is unable to greet the customer.
 3. There could be many reasons why a blind or partially-sighted customer/claimant requests email. It may be that they have a reader application on a device of their own or wish us to email information to them so that they can pass it over more quickly to someone who they wish to assist them, etc.
- E-mail: Send Information to Disabled Claimants/Customers
 - Representatives and Intermediaries
 - Audio/CD format: Providing Information in Audio/CD Format
 - Audio recording of interview
 - Braille: Providing Information in braille
 - Large Print: Providing Information in Large Print
 - Paper - Types/colour of paper
 - Changing the time and date of meetings and interviews
 - Changing location of interview
 - Private Interview Rooms

E-mail: Send Information to Disabled Claimants/Customers

1. DWP may need to use e-mail as a way to communicate with a disabled claimant/customer to make sure that they can fully access our services. Staff are allowed to provide email as a reasonable adjustment for a disabled customer who requires it. The customer must give a valid and informed consent to the use of e-mail so you must be sure that each individual customer understands the risks of data being lost, intercepted or manipulated once it has left our secure IT systems and this consent must be recorded so that you can rely on it if challenged.
2. For more information, follow the instructions in the using e-mail as a reasonable adjustment to communicate with disabled customers guide.
3. You **must** follow security guidance- see: Electronic Communications with Citizens Guidance. You **must** also follow the [DWP Records Management Policy](#) and any benefit specific process requirements. If you have any doubts or questions contact the [Knowledge, Information and Records Management](#) team or the [Security Advice and Support Centre](#)

Representatives and Intermediaries

4. All types of disability and all customers with protected characteristics can be supported by providing services through a representative or intermediary. This can be done as a reasonable adjustment for disabled people and as additional assistance where appropriate for any customer.
5. Some of our claimants/customers want or need to use a representative/intermediary to help them access DWP services. If a claimant/customer wishes to use a representative/intermediary to access our services, then follow the [Working with Representatives Guidance](#) and work with them. Note: you still need to be aware of the duty to protect claimants'/customers' personal information, and [disclosing information](#) rules. If you feel a representative or intermediary would help the customer check with them first; don't make assumptions. The only exception to this rule is that you can assume the representative/intermediary has the claimant's/customer's permission where the implicit consent rules apply.
6. **Do:**
 - apply the [Working with Representatives Guidance](#);
 - treat each case on an individual basis;
 - make a written record of what was disclosed, to whom, and when – in all cases; and
 - follow the [guidance for bogus callers](#) if you are suspicious of any enquiry.
7. **Do not:**
 - disclose information if you have any reasonable doubt
 - be pressured into giving information – refer the call to your line manager;
 - assume written consent is for an indefinite period. The authority to represent the claimant/customer is for a particular item of business; and
 - apply blanket policies in disclosing to representatives/intermediaries. In all cases decisions must be made on an individual basis.

Audio/CD format: Providing Information in Audio/CD Format

1. If a claimant/customer requests communications/correspondence in audio format it is very important staff discuss the full range of options with the customer so they are aware of what is available. The customer will generally know what communication format is most suitable for their needs but you should discuss whether we can provide a better service by giving the information in a different way, for example over the telephone.
2. If after discussion with the customer you agree audio is an appropriate reasonable adjustment to put into place you should order audio formats/CDs, by following the instructions in the [Communication support services guidance](#).

Audio Recording of Interview

3. Staff should also be aware that interviews can be recorded where it is requested by a disabled claimant/customer as a “reasonable adjustment” requirement under the Equality Act 2010. If necessary speak to your local Disability Equality Adviser who can facilitate this. See the Recordings made by claimants guidance for more information.

Braille: Providing Information in braille

1. If a claimant/customer requests communications/correspondence in braille, it is very important staff discuss the full range of options with the customer so they are aware of what is available. The customer will generally know what communication format is most suitable for their needs but you should discuss whether we can provide a better service by giving the information in a different way for example by telephone (except in cases where the law requires a written notification) or email (except in cases where the law requires something to be done over the telephone or sent by post), when regulations require this.
2. If after discussion with the customer you agree braille is an appropriate reasonable adjustment to put into place you should order braille, by following the instructions in the [Communication support services guidance](#).
3. Local arrangements may be in place to get documents in braille. Please read the rest of the braille section below before proceeding with the braille request.
4. It is important that we provide braille consistently for customers. Therefore the customer's benefit record needs to be updated and noted with their alternative format requirements to inform staff. Any manually/ locally produced letters must be provided in braille following the instructions in the [Communication support services guidance](#).
5. In order to provide system generated letters in braille you first need to intercept the system letters and should agree with the customer and obtain consent that all notifications will be sent to the local office by using a care of address/ correspondence address. This stops the standard letter being issued to the customer in error. This does not have to be a Jobcentre, it will depend on the benefits the customer receives. It may be more appropriate for a Benefit Centre, a Pension Centre, the DLA

Alternative format team or a local Alternative Format SPOC to be used for the care of address / correspondence address. All notifications/ letters for all the customer's applicable benefits will come to that care of address, and so will need to be actioned and braille provided.

6. We need the customer to agree to a care of address/ correspondence address being applied to their records as this could potentially lead to correspondence from Other Government Departments being diverted to the DWP office. This is because information on the changed address will be broadcast to CIS and from there broadcast to other DWP and OGD systems. We need to make sure the customer is fully informed, explaining the workaround and any potential impacts.
7. **Please have a verbal conversation** with the customer clearly explaining this using the consent wording below * (this can be done by telephone and then update that this has happened on their benefit record)

***Consent wording for use of care of address/ correspondence address:**

DWP are happy to correspond with you by braille as a reasonable adjustment under the Equality Act. However this requires us to intercept the standard system generated letters regarding your benefit being posted to you.

Therefore we need to inform you that that all your standard letters will be sent to the local office by using a care of address. DWP officials will then arrange for the letter to be sent to you by braille as your alternative format.

DWP computer systems broadcast relevant information to other Government Departments in some circumstances. The way we use your information and who we share it with is notified in full in our Personal Information Charter on GOV.UK, if you would like a copy of this we can also send this to you in braille or you may prefer to access this through a computer. Therefore there is a risk that using a care of address could potentially lead to correspondence from Other Government Departments being diverted to the DWP office.

Can we use a care of address for your correspondence to send your letters in braille?

8. To use a care of address to intercept system generated letters for a customer, update a named contact on the correspondence address and please note it as Private and Confidential. Also update the notepad and contact history explaining that *"All post to this customer must be supplied in braille and the correspondence address has been set, please do not remove it. Do not delete this note, please contact (named contact and number) if you have any questions"*
9. Please remember that anything in the notification/letter which is time-bound or with a deadline needs to take account of the potential delay for providing some types of alternative formats. Therefore please explain to the customer there may be a slight time delay with this process. Extend any relevant response times/ deadline dates accordingly.
10. **Please note:** It is very important for staff to be careful when sending out the braille letters to customers to ensure they stay intact. The braille letters must be protected from any damage as they may become unreadable to the customer. **Please do not** fold braille letters in half,

they must be sent out to the customer in a protective envelope. Please use local arrangements to ensure this happens.

Large Print: Providing Information in Large Print

1. If a claimant/customer requests communications/correspondence in Large print, it is very important staff discuss the full range of options with the customer so they are aware of what is available and also determine which size font the customer requires. The customer will generally know what communication format is most suitable for their needs but you should discuss whether we can provide a better service by giving the information in a different way for example by email or using an intermediary (including family/friend)

2. Large print means a minimum of 16 point in Arial or Univers font. If after discussion with the customer you agree large print is an appropriate reasonable adjustment to put into place you can order large print, by following the instructions in the [Communication support services guidance](#).

Local arrangements may also be in place to provide documents in large print depending on the font size required. Check with your line manager.

Please note: enlarging documents on a photocopier to make the print bigger is not an appropriate method to provide large print to a disabled customer.

3. If you require a leaflet or other formal publication in large print refer to the [Communication support services guidance](#) for advice on how to get these documents in large print for claimants/customers.

Paper - Types/colour

1. If you get a request from a disabled person for communications to be printed on 'white' paper (as opposed to the recycled paper DWP use as standard) you should provide this. You should hold a local stock of white paper. Check that you do with your Line Manager, stationery or business support team as appropriate

Changing the time and date of meetings and interviews

2. Consider whether the customer and the delivery of our services can be supported by
 - changing the date and time of a meeting or interview.
 - Increasing the length (time spent) in the interview
3. If claimants/customers are unable to access, or travel to, DWP or partner premises we will provide alternative interview arrangements: for example, by telephone, at home or at another accessible location.

Changing location of interview

4. To make reasonable adjustments for customers with mobility needs the office environment and other accessibility issues must be considered.
For example:
 - If the interview is to take place upstairs, is there a lift available?
 - Can you arrange to interview on the ground floor?

- Can you arrange the interview at another suitable office?
- Is there suitably trained staff available to carry out an emergency evacuation if required?

Private Interview Rooms

1. We will arrange a private interview room or quiet area for those claimants/customers attending a face-to-face meeting who have a specific need, require additional support or who have requested this as a reasonable adjustment. We will provide accessible interview facilities in DWP buildings and/or on our partner premises.
2. Refer to internal processes for arranging interviews.

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@dwpgsi.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