

Equality Analysis for Operational Change

Please see attached notes to help you complete this template (you can expand the boxes to add full supporting information you have).

Even if your change does not have any impact on people with protected characteristics, you must still record that you have fully considered this and save this record.

1. Brief Outline of Change

The current process

DWP complaints correspondence is processed through a non-legislative 2 tier system which enables complainants to escalate their complaint to a centralised team (tier 2) if they are not satisfied with the response from the first tier. If the complainant is still not satisfied they can escalate to the Independent Case Examiner (ICE) and then the Parliamentary and Health Service Ombudsman (PHSO):

- Tier 1 is managed by Group Directors in Work & Health, Child Maintenance Group, Retirement Services and Counter Fraud, Compliance and Debt; Tier 2 is a centralised team in Service Excellence Customer Experience Directorate. In addition to tier 2 complaints their work is made up of operational correspondence from MPs, partners, stakeholders and customers and includes management of the gov.uk contact gateway; legal liaison and special payments.
- The next level of escalation is ICE.

It has become clear that different approaches to complaints are being taken across the business at tier 1 as they maximise service delivery. Closing complaints completely for any period runs the risk of alienating vulnerable customers who are left without benefit payments as a result of service failure. There is also a reputational issue as we leave customers and MPs with no avenue other than going directly to the Ombudsman.

Correspondence and complaints are escalating as people have been struggling to use normal routes to contact DWP. This has now exacerbated due to the pressures of COVID-19 resulting in the need to review current processes.

The case for change

We propose to move from the current (non-legislative) two tiered complaints process to a single tiered approach, triaging **priority operational** complaints. This will be a centralised function with responsibility for all complaints sitting within Service Excellence. The escalation route through ICE and PHSO will remain in place. However, due to resource redeployment and COVID-19 impact, ICE is prioritising only urgent fast tracked cases and any that can be quickly resolved.

This will give economies of scale; consistency and quality improvements; and ensure safeguarding of our most vulnerable customers. In turn this will also support redeployment of current tier 1 complaints resource to priority front line work.

Economies of scale: Instead of a disparate tier 1 service, resourced and operated by individual directors for their areas, we will take a national approach to complaints. This means representatives from Operations do not need to be based in any particular location and we can reduce the resource from tier one required to be involved in the new model.

Consistency and quality improvements: The initial review of the existing complaints service, highlighted that there was no one clear owner of the end-to-end complaints journey. These changes put ownership of complaints into the Customer Experience Directorate and will have clear lines of accountability. Having all complaints in one place, operating a once-and-done approach, provides the opportunity to learn what is working well and applying changes to the national offer, in full.

Safeguarding most vulnerable customers: Without these changes, throughout COVID-19, tier one teams are taking their own approach to dealing with a reduced workforce. This is including stock-piling complaints – in some areas, not even providing a gatekeeper service to monitor vulnerable customers. Moving to the new approach, means that throughout COVID-19, as the business prioritises getting payments to people, vulnerable customers are not left without a route to complain about service issues that may have affected their payments.

We had intended to implement the new process from mid April, but following discussions across the business this will now be mid May following rapid process design.

2.Evidence & Analysis (for both customers and colleagues)

January staff deployment figures (AMB system) shows tier 1 employed 557 FTEs and tier 2 157 FTEs. In a normal year the teams handle an average 98,500 letters and emails.

As services continue to make necessary changes to their business to support priorities during COVID-19 in addition to the increased volumes of claims, we are experiencing increased contact across all areas.

In terms of our Equality Duty, we have considered how this proposed change would impact on customers or colleagues with the nine Protected Characteristics. We do not hold complaints MI recorded by type of Protected Characteristic to baseline against. However, the complaints process is available to any customer regardless of whether they would be categorised as having one or more Characteristic so we do not anticipate the change to a single tiered approach would impact on a particular group over those not identified as having that Characteristic. It is proposed that this would be a positive change to all customers including those identified as having a Protected Characteristic.

With regard to our colleagues, we will continue to use the same IT which is already accessible to those using accessibility software.

Our responsibility under the Public Sector Equality Duty includes consideration of the three Aims. The intention of this change will support these:

Eliminate Discrimination – the change will not encourage or result in any conduct prohibited under the Equality Act 2010.

Advance Equality of Opportunity – there is an equal access to the complaints process by those who share a Protected Characteristic and those who don't.

Foster Good Relations – the expected improvements to the service to customers making complaints will be no different between those customers who shared a Protected Characteristic and those who don't.

With regard to our colleagues, changes will not result in changes counter to the three aims.

In terms of other equality considerations, the United Nations Convention on the Rights of Persons with Disabilities establishes internationally recognised benchmarks for disabled people's rights in all areas of life. Taking into account our responsibilities under Article 21 of this Convention, we would be supporting customers in their right of freedom of expression and opinion, ie to raise complaints. This includes the right to receive information in accessible formats and technologies which is already written into DWP processes.

Looking Forward

As the business enters 'recovery' from COVID-19, we will assess the impact the changes have made and return to CPMO to either:

- Roll out this change for good
- Agree a strategy for returning to the previous complaints function

Further consideration of equality will be carried out at that time.

3.Decision Making

No change DWP – there is no evidence that this proposed change will have a disproportionate negative impact on equality.

4.Plans for Monitoring & Evaluation the Equality Decision

The new process will follow the existing process, in terms of monitoring – we will monitor volume of complaints, closure timescales, type of complaint and the line of business that complaint was made in. Due to the current resource constraints due to COVID-19, a new set of MI to start with this change is not viable. However, as the new process is rolled out, we will include consideration from an equality perspective on project calls.

Going forwards, we plan to hold a quarterly review point, specifically to consider the new complaints process and the impact on equality. And we are appointing an equality champion within the team to bring equality to the table as decisions are made about the future. Recording issues will be part of that role.

We will be returning to CPMO in the future as we decide the approach to complaints after COVID-19 recovery. At this point, depending on the decisions about how the complaints process will continue, we will investigate how we log complaints with equality impacts to provide evidence for a fuller review in the next Equality Analysis.

5.Impacting Review (outcome of plans in section 4)

This will be completed when the evaluation of the project is ready – before we come to CPMO for the roll-out of any future changes post COVID-19.

6.Sign-Off

Completed by: [REDACTED]

Date: 6 May 2020

SRO Sign-off: [REDACTED]

Date: 6 May 2020