

## Private session with DWP officials: Summary note

1. As part of the inquiry into Safeguarding vulnerable claimants the Committee met with DWP officials in a private session on 28 February 2024 to discuss some of the work that the Department is doing around safeguarding. There were two panels of witnesses; the first panel were questioned about the work being done to introduce a trauma-informed approach to DWP services; and the second panel were questioned about the DWP complaints journey and its systems of internal review.
2. The session was held in private to encourage officials to talk to the Committee openly about work not yet in the public domain. The Committee has produced the following summary note which sets out the points of discussion during the session.

### Witnesses

I: Director for Transformation and Delivery: Universal Credit; Deputy Director for Leading on Future Design; and the Trauma-Informed Approach Integration Lead

II: Customer Experience Director; Head of Advanced Customer Support Transformation; Deputy Director for Customer Accessibility Standards and Assurance; and the Independent Case Examiner.

### Summary note

#### Panel I:

*When did work on a trauma-informed approach begin in the Department? What prompted it in the first place? How does this approach differ from what has happened in the past, and when will the change take place?*

3. Focused work on the trauma-informed approach began about 9 to 12 months ago. As part of DWP's business strategy, it conducts horizon scanning for best practice to look at what is being done in other UK Government Departments and internationally. Through this work, the idea of a trauma-informed approach was identified, having already gained some momentum globally. The Scottish and Welsh Governments are doing work on the trauma-informed approach and have developed a good toolkit. Looking strategically at what bigger organisations were doing, the trauma-informed approach stood out as a key theme.
4. As well as being identified through strategic, top-down work, this approach was also encountered through work in Jobcentres, where staff learned about the trauma-informed approach through joining in with localised training with partner organisations.
5. The approach will build on best practice that exists within the Department, providing clearer structure, expectations, and opportunities to innovate further. The approach highlights how the pervasive impacts of trauma may affect someone across their lifespan, with focus on the neurological, sociological and physiological impacts of trauma.

*How will adopting the trauma-informed approach change a claimant's experience of Jobcentre Plus in the future?*

6. There are six core pillars to the trauma-informed approach:
  - Safety—this refers to a person's physical, emotional and psychological safety;

- Trustworthiness—this includes transparency with claimants (about what the Department does and why it does it) and management of expectations (around the scope and remit of DWP’s services and responsibilities);
  - Choice—this relates to the importance of offering choice to claimants whenever possible;
  - Empowerment—this promotes the sharing of power to adjust the power imbalance between the Department and its customers, both on a one-to-one and on a systemic level. This pillar recognises that often when a person has encountered trauma or adversity, their power has been removed or limited in some way;
  - Collaboration—this includes both internal collaboration across the Department, and external collaboration with external stakeholders; and
  - Cultural considerations— this involves actively moving past stereotypes and biases that might exist about different cultures, and a recognition that trauma disproportionately affects certain groups, such as ethnic minorities, the LGBTQ+ community and disabled people.
7. The definition of the six core pillars DWP is using is the first UK working definition of Trauma Informed Approaches by the Office for Health Improvement and Disparities (OHID) and has been translated into a programme that works in a social security context. The trauma-informed approach is about understanding that anyone could have experienced trauma in their past, and not assuming based on how someone looks or presents themselves. Fifty per cent of the adult UK population have experienced trauma before the age of 18 and this approach recognises how prevalent trauma is. Additionally, this approach is not about asking people to recount their trauma, but rather creating an environment in which people feel to share their stories and receive an appropriate response should they do so.
  8. As a longer-term vision, the Department hopes that this approach will make Jobcentres less impersonal and more welcoming, in line with psychologically informed environments. Through the upskilling of staff and greater transparency around departmental policies and procedures, the aim is that customers will feel more informed and so more comfortable in the Jobcentre environment.
  9. The Department is currently testing out its approach to delivering these aims operational sites referred to as ‘pulse points’. Four of these sites are DWP Innovation hubs who are trialling new ways to engage customers; this has included the introduction of videos for customers before they first enter a Jobcentre to help reduce anxiety about what attending an appointment will be like. DWP staff have trialled greeting customers upon arrival, asking how they can help. Booths and baffle boards have been introduced to provide greater privacy during appointments.

*What is DWP’s organisational development strategy, including staff training, for transforming how it interacts with claimants?*

10. DWP’s organisational strategy works using a four-pillar model focussed on Customers, Colleagues, Contexts and Culture. The programme follows a roadmap inspired by the Scottish roadmap for organisations and spans from training and environmental design through to policies and procedures. In terms of training, DWP has agreed a tiered suite of products, the first of which (an introduction to trauma informed approaches) is currently available to all staff as an e-learning module.

*How will DWP get this approach to work, and be implemented as intended, in an environment where staff are already under pressure and have big caseloads? How does this approach work for claimants who interact with DWP's contractors?*

11. Work Coaches will be front and centre of this as they are on the frontline working with claimants. Upskilling of Work Coaches with more detailed training will be a necessary process. DWP are looking at ways to reduce the workload of Work Coaches in certain areas to allow them more time to spend with the customers who need a more tailored service.
12. The Department is currently conducting an evaluation with 110 jobcentres in the test (and 110 as the control) looking at outcomes for UC claimants if some face-to-face appointments are replaced by either phone or digital communications. The aim is that this would free up more frontline resources to deal with people who need more support. This is due to report later in 2024.
13. Another aspect of this approach is service modernisation and development; ensuring that internal systems and customer records are linked up across different benefits, clear and accessible so that claimants do not need to repeat themselves.
14. DWP will aim to work closely with the contractors who deliver health assessments on behalf of DWP to carry this approach across. DWP wants to apply this learning to external partners that deliver services on its behalf.

*How will this work feed into the policy change and development process?*

15. Part of the longer-term vision will be to raise questions about whether the likelihood of re-traumatisation has been considered, or whether a change would disproportionately impact somebody who is likely to have experienced trauma, when policies are being developed. This is not yet live, but in the future will be part of the standardised framework.
16. This trauma informed approach will impact the way in which new support programmes and benefits are designed. DWP's governance processes have been revised so every major change programme in DWP is now part of this core piece of work.

**Panel II:**

*How does the DWP complaints process work?*

17. Learning from the pandemic, in 2021 DWP changed its complaints model, moving from a two-tier approach to a single tier approach before a case could progress to ICE. A complaint can be raised in a number of ways: through an interaction with a work coach, through an agent or through an email.
18. The first step is issue resolution which tries to resolve the problem before it becomes an official complaint. If the customer is still dissatisfied, either staff will then transfer the case, via a template, to the complaints gateway team or correspondence directly from the customer will raise the complaint.
19. As part of the new model, there is a centralised gateway team with dedicated staff triaging those cases. Prior to the pandemic, complaints were dealt with in date order, regardless of the nature of the complaint. Now, the triage process identifies cases which are urgent or involve someone who is vulnerable and lifts those cases out of the queue and sends them to a

dedicated lead within the complaints handling team. There are approximately 30 or 40 people who work in the gateway team.

*What training do Jobcentre staff receive on the complaints process and on internal process reviews?*

20. DWP have introduced complaints standards, aligned with the PHSO standards, and a quality assurance framework. Complaints training is part of the general service delivery training, and DWP are also about to embark on a roadshow campaign aimed at service delivery with a focus on the issue of resolution.
21. In November 2023, PHSO accredited DWP's bespoke learning pathway for complaints handlers which the Department is starting to test and hopes to roll out in 2024. This will be in addition to the general customer service issue resolution training.
22. All staff are trained on how to use an Internal Process Review as part of the broader training on mental health and the six-point plan.

*Is there a reason why the Department does not publish numbers of complaints by service area?*

23. There is no apparent reason not to publish numbers of complaints by service area. DWP will take this point away and see if those numbers can be published.<sup>1</sup>

*What are the key themes in the complaints that reach the Independent Case Examiner?*

24. The role of the Independent Case Examiner is to see if the Department has done what it says it is going to do. Between 800 and 1,000 cases reach the ICE a year and in half of those, the answer is, "No, they did not." The detail of that is what leads to things going wrong for customers who might have vulnerabilities.
25. A lot of this is human error or errors in acting on a system and this can happen at different stages of a customer's interaction with DWP. It can be something as simple as not calling a customer back when they have said they will, not setting a flag for a review so the review does not happen, or putting a response on an online journal when the customer does not have online access. A case that is upheld by the ICE has usually had an accumulation of these such errors, which can have a very frustrating or negative impact for the customer.
26. The ICE provides information to the Department about where these complaints arise and the benefit strand they relate to. Data on uphold rates in different benefit areas is published in the ICE's annual report.
27. For every case on which the ICE reaches a conclusion, the report is shared with the department. She also meets with the directors of the Department, and if any themes or trends have been identified in their areas, these are highlighted.
28. There is also a process to highlight with the Department if something occurs that is not the result of an error but is still a cause for concern and could be impacting others. Themes from the complaints received by the ICE and the feedback given to the Department are published

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<sup>1</sup> DWP has now started publishing this data as Viscount Younger of Leckie explained in oral evidence on 26 March 2024 ([Q274](#)).

in the ICE's annual report. Information about specific cases and the individuals concerned must be kept confidential.

*What does DWP do to learn from these complaints?*

29. DWP analyses all the complaints that come in, regardless of whether these are taken up or not, to draw out themes and learning points. The Department is now investing more in qualitative text analysis to assist this process.
30. For every case, the complaints resolution manager provides personal feedback to the individual and their team leader. That often results in secondary action such as new training, upskilling or additional quality checks. DWP then step back and look at the wider theme of a complaint and the early resolution feedback from the ICE.

*What are the main areas of concern around safeguarding in DWP?*

31. A lot of the issues around vulnerable customers are about customer service fundamentals: not getting a callback, or not identifying or resolving issues. This is the focus for DWP. The Department has taken steps to make sure that its guidance is clearer, and that staff are properly trained and upskilled in key areas. Themes for wider, broader, cross-cutting improvements are communicated internally and feed into the work of the Serious Case Panel.
32. The Department had an inflection point in 2019, and since then significant progress has been made. DWP is aware that it does not always get it right but are trying to achieve a culture where everybody sees vulnerability as their responsibility—to either spot it, respond to it or signpost a customer to other services if it is something that DWP can't help them with.
33. A range of actions have been put in place to achieve this since 2019. DWP deployed the six-point plan where all frontline staff are trained to be responsive to customers who have severe vulnerabilities and to raise an alarm if there are any concerns, and almost 60,000 staff have had mental health training.
34. The Department now has a robust record of all contact from coroners.

*How do cases get submitted for an Internal Process Review?*

35. Cases get referred by frontline staff. Staff might come across a case where somebody has died, and a family member has said that the Department's actions impacted that customer. Staff fill out a referral form, which asks a series of questions about the circumstances of that customer's case.
36. These forms are processed in a very similar way to the complaints. A gateway triage team receive the forms and go through the records to build evidence of the customer's interactions with the Department, which is what the IPR is looking at: whether DWP followed its policies and processes.
37. The case is then passed to a senior leader to decide whether it meets the criteria for an IPR. If accepted, it then goes through the investigation stage. The case is handed to an investigator who conducts a thorough investigation into the case and pulls out any learnings. These learnings are then fed back on an individual basis to the product lines, and any wider, thematic issues that emerge are escalated through other governance routes and the Serious Case Panel.
38. Individual cases are not submitted to or discussed by the Serious Case Panel. The SCP focusses on wider themes, beyond just the issues that arise from IPRs. DWP's customer experience

team try to build up an evidence base across the whole complaints landscape, from ICE reports to interactions with customers. Themes are then fed to the SCP.

39. An IPR is no longer automatically conducted for all claimant suicides; there must also be a suggestion or allegation that the Department's actions or omissions might have negatively contributed to the customer's circumstances. Not all cases where a customer takes their own life involve something that has happened in the Department.
40. DWP completed 40 IPRs in 2020–2021, 57 in 2021–2022 and 47 in 2022–2023.
41. The Department does now make families aware when an IPR is being conducted.

*How does DWP identify systemic issues and how effective is the current approach?*

42. There is a tracking system for every single action and learning point that is pulled out of IPRs, and so it is possible to go into the system and see repeated patterns. Developments such as strengthening the six-point plan, the large payment guidance and stopping payments to customers which addressed wider issues all originated from IPR cases and then went through the Serious Case Panel.
43. There are technologies that DWP can use to build on this. The Department is deploying call-listening technology to detect key words and identify where there are vulnerabilities so that these cases can be pulled out and responded to. The complaints inbox can also be scanned for key words that might suggest vulnerability so that those complaints can be accelerated and resolved.
44. DWP is building capability in the Department to use technology as it develops to enable it to spot vulnerability on a more broad and systemic level, without relying on staff to identify or customers to disclose vulnerabilities.
45. The pilots DWP is running on this technology are showing some success and starting to identify the right kinds of correspondence. This needs to be expanded. The ability to fully roll-out the call listening service is dependent on some change programmes.
46. DWP is still reliant on the strength of its frontline staff spotting vulnerabilities and interacting with those customers, and the Department is continuing to invest in training and developing the trauma-informed approach. However, technology is an additional safety net.

*Is effective learning happening in the Department?*

47. There are mechanisms in place to ensure that learning is happening. There is more that the Department could do, but it is striving to become a learning organisation.
48. DWP works closely with the PHSO but would be happy to work more closely with them so that PHSO can see the infrastructure in place within DWP to ensure that learning is happening, and to understand the breadth of what is being done. This is not as visible as it could be to the PHSO.
49. From the perspective of the ICE, the SCP is discussing the issues that it should be. However, the Department also needs to identify themes, such as the nature of overpayments and the making of underpayments—for example, paying large amounts to a vulnerable customer who might have a drug or alcohol addiction. Those are the kind of things that the SCP should be looking at.

*Is it easy enough for customers to make a complaint?*

50. It is something that the Department is continuing to work on. DWP is driving a culture that moves away from defensiveness, towards learning, and towards admitting mistakes and acknowledging what needs to change.
51. In terms of accessibility, DWP has tried to make the complaints process on gov.uk much simpler. DWP is launching an internal campaign this year to ensure that all frontline staff across all service delivery areas understand the complaints process.

*Could the Department do more to demonstrate the learning it is doing to the public?*

52. Transparency is very important but there are also rules that DWP must operate within, including continuing to protect confidentiality where appropriate. In late 2024, DWP plans to publish an advanced customer support publication with the aim of making this an annual publication.
53. DWP acknowledges that although there is a lot of information on gov.uk, it is not always easy to find. DWP is working on an advanced customer support landing page and hopes to have this up and running soon.
54. DWP also has an Additional Customer Support document (which was published after our meeting) which details what the Department is doing to support vulnerable customers now and set out its ambitions for the future.<sup>2</sup>

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<sup>2</sup> DWP published the [Additional Support for DWP Customers](#) booklet on 19 March 2024.