

# Complex needs

## Summary

Identifying if a claimant has complex needs or requirements for additional support and how to record these on the Work Services Platform

## Content

### Overview

When a claimant with complex needs contacts the DWP, their customer journey must be comparable in quality and outcome to those who are non-complex.

While working with a claimant, it may become clear that they need additional support. It is important to ask them and record what additional requirements they need to make sure these are available to the claimant every time they need them.

This will provide a claimant with access to products and services equal to other claimants and enable them to follow the standard claimant journey, if appropriate.

Home visits are available for claimants with complex needs, when all other attempts to contact them have failed. Home visits are requested in exceptional circumstances and should be considered:

- when a claimant has been identified as being vulnerable or having complex needs due to health issues or unable to access normal channels of communication as an individual or through a friend, family member or third party stakeholder partner
- to safeguard claimants against sanctions where it is deemed they have a health condition which restricts them from leaving their home, this will help determine whether the claimant has fully understood their commitments and good reason can be gathered if appropriate

See Visits - Home visits overview.

Some claimants may be unwilling to reveal that they are experiencing difficult life events or personal circumstances, but there may be signs, behaviours and the language they use that suggests they may have complex needs.

Support may be put in place on a one-off basis, for a short, medium or long period of time, or for recurring periods, depending upon the claimant's needs.

## What are complex needs in Universal Credit?

Universal Credit claimants are classified as having complex needs if their circumstances increase the likelihood that they will have difficulty:

- accessing Universal Credit
- proving eligibility to Universal Credit
- maintaining conditionality
- maintaining their Universal Credit account
- maintaining their finances

A consequence of this is that the claimant may experience difficulties with:

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

The following are examples of life events, personal circumstances, health conditions or disabilities that could impact the claimant's ability to access DWP benefits and/or use the appropriate services.

Some individuals may not require additional support even though they are experiencing some or all of the following examples:

- 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 - childcare
- 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
- Multi Agency Public Protection Arrangements (MAPPA) individuals
- offender/ex-offender/prisoner/detainee
- race - immigration status/refugee/asylum seeker/people arriving from abroad
- redundancy
- retirement
- rural isolation

- suicide and/or Self Harm Declaration
- supported by the Troubled Families programme

This is not a complete list.

## Claimant is aged 16 or 17

If claimant is 16/17 years old, they are automatically considered to have complex needs. The age of the claimant can be viewed in the 'Claimant' screen within the Work Services Platform (WSP).

## Claimant reports they are having difficulty paying their monthly rent or Council Tax

If a claimant declares they are financially struggling to pay their rent, they may be able to get further support and financial help from their local authority who have the provision to consider a Discretionary Housing Payment. The agent signposts the claimant to their local authority and if appropriate sends them an SMS text using the template - UC LA Financial Assistance.

If the claimant would like help and support with their Council Tax payments, the agent must signpost them to their local authority and if appropriate sends an SMS text using the template – UC Council Tax Reduction Support.

See Housing – SMS text messaging templates.

## Disabled claimants

For disabled claimants, DWP is legally required under the Equality Act 2010 to provide reasonable adjustments.

It is vital that interaction with the claimant is carried out to determine what tailored support or reasonable adjustments they require to have equal access to products and services.

## Signs, behaviours and language

Claimants may talk about a life event (for example, “my mum has just died”) or give out information in a conversation that suggests they may have complex personal circumstances, for example, they may have no ID which could indicate they are homeless, have left prison or may have fled domestic violence.

There may be a combination of factors which mean claimants need additional support to be able to access benefits and use Universal Credit services.

The following could indicate that an individual requires additional support. When communicating with the claimant, the agent assesses whether they are:

- in distress
- not understanding what is being said
- 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 has been said
- holding a parallel conversation with someone else who may be their advocate or appointee which suggests face to face contact might be preferable
- demonstrating unacceptable customer behaviour

## Difficulties or concerns when dealing with written communications, numbers or language

A claimant may display behaviours which indicate they have reading and/or writing difficulties or problems dealing with numbers or language. This could include:

- being reluctant to complete or read paperwork
- being unable to navigate telephony or online services
- being unable to manage money or budget as they do not have sufficient numerical skills (or state they are in debt)
- failing to understand verbal communications well enough to engage with DWP staff

Universal Credit staff may also notice:

- errors on completed online application forms or paper forms
- that the individual is unable to spell out words if requested during telephone calls
- that English is not the claimant's first language

Not all claimants who have difficulties or concerns dealing with written communications, numbers or language will need support to access Universal Credit services. It is therefore vital that staff interact with the individual claimant to determine if they need support and what their additional requirements are.

## System checks for complex needs or requirements for additional support

The agent must:

- record any complex needs or requirements for additional support on WSP
- make checks to confirm if any existing complex needs or requirements for additional support are already registered on WSP

To do this the agent selects 'Personal' on the 'Claimant' screen and views the claimant's personal information, for example:

- Carers marker
- Ex-HM forces
- Homeless
- Claimed Incapacity Benefit within past 6 Months
- Refugee status
- Has special needs
- Offender status

The agent must also select 'Notes/Archived notes' from the Claimant screen to check for any other relevant information. To locate WSP archived notes, see Work Services Platform guide (claimant records - maintaining claimant records).

## Deciding if a claimant has complex needs, requires a reasonable adjustment or additional support

If there are no existing complex needs or additional support required, the agent obtains all relevant information from the claimant. This could either be during a diagnostic interview or by the agent supporting a claimant with complex needs or requirements for additional support in making a claim to Universal Credit.

The following indicators may suggest that a claimant has complex needs or requirements for additional support:

- mental health conditions
- memory loss caused by medication
- learning difficulties
- reading and writing difficulties
- visual/hearing impairment
- drug or alcohol dependency
- domestic violence
- English isn't the claimant's first language
- Internet use is restricted (for example, due to criminal conviction)

This list is not exhaustive.

The agent makes a decision on whether the claimant has any complex needs or requirements for additional support without making any assumptions.

## Recording claimant's complex needs on the Work Services Platform

If the agent identifies that the claimant has complex needs, they must establish if these fall into one of the WSP category/categories and records them, these are:

- offender status
- carers marker
- ex-HM forces

- partner of (ex) HM forces member
- people who have claimed benefit for 22 out of the last 24 months
- not in employment, education or training (NEET) - this only applies to 18 year olds (see Work Services - not in employment, education or training)
- homeless
- claimed an incapacity benefit within the last 6 months
- care leaver
- refugee status
- has special arrangements (if the 'Yes' radio button is populated, this will display active special arrangements)
- health barriers to work (if the 'Yes' radio button is populated, this will display the active health barriers to work)

If the complex need falls into one or more of the categories above, the agent must select all the relevant categories.

If there is a complex need that does not fall into one of the WSP categories, the agent records this in 'Notes' on the claimant record. To do this the agent:

1. Selects 'Notes'.
2. Selects the hyperlink 'Add new note'.
3. Records the complex need(s).
4. Selects anywhere outside of the notes box (to save the note).

When completing the notes on the claimant record, bear in mind that the claimant may fall into more than one category.



The notes made by the agent must be factual and for DWP business use only. They must ensure they meet the requirements of the Data Protection Act and that the information is relevant to the contact, accurate and current. The note must not include any more information than is necessary.

## Deciding the correct category for complex needs, reasonable adjustments or additional support

If it is decided that a claimant has complex needs or requirements for additional support, the agent considers which of the following support categories is appropriate:

- Physical
- Mental Health
- Learning difficulty
- Domestic violence
- Prisoners
- Armed forces and other UK exception groups (for example, working abroad)
- Homeless
- Drug or alcohol dependent
- 16/17 year olds

Where an agent has established that a claimant has a physical, mental health or learning difficulty, a reasonable adjustment should be considered and agreed. The following link provides a comprehensive list of what is available Reasonable Adjustments.

## Registering requirements for additional support

The agent registers the claimant's complex needs/requirements for additional support as follows:

### **Accessibility and communication**

The agent:

1. Selects 'Personal' on the WSP Claimant screen.
2. Updates the 'Has special needs' radio button to 'Yes'. Be aware that if special arrangements are already noted, this doesn't always mean

that there will be complex needs/requirements for additional support. For example, the claimant may be a wheelchair user but they can still be a standard Universal Credit claimant.

3. Selects 'Active special needs' (this becomes available when 'Yes' has been selected).
4. Selects 'Add new special need' from the toolbar menu to open the 'Special Needs' screen.
5. Selects 'Look up' from the 'Special Need Type' field, for example wheelchair access.
6. Enters 'Extra Information' as appropriate.
7. Selects 'Save and Close'.
8. Updates CAMLite Contact history 'Notes' with the actions taken.

### **The consequence of not considering additional support or reasonable adjustments could include:**

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- Not complying with the Equality Act 2010
  - Agents not understanding their responsibility under this Act
  - Not understanding or recognising appropriate behaviours, language and terminology
  - Departmental complaints and damaged reputation

### **Domestic violence**

The agent:

1. Selects 'Notes on the WSP Claimant screen.
2. Selects the hyperlink 'Add a new note' at the top of the 'Notes' field.
3. Records all information about the domestic violence. All data must be factual and for DWP

business use only so that the requirements of the Data Protection Act are met. The information must be relevant, accurate and up to date. Don't record more information than is necessary.

4. Selects 'Save'.

## **Prisoners**

The agent:

1. Selects 'Personal' on the WSP Claimant screen.
2. Selects 'Offender Status' and choose the relevant option from the drop-down list:
  - Currently in prison
  - Ex-Offender
  - Released from custody within 13 weeks of claim

Once the option has been selected the 'Offender status' field will be populated.

## **Armed forces and other exception groups**

The agent

1. Selects 'Personal' On the WSP Claimant screen.
2. Selects the 'Ex-HM forces' check box.

## **Homeless claimants**

The agent:

1. Selects 'Personal' On the WSP Claimant screen.
2. Selects the 'Homeless' check box.

## **Claimants who are drug or alcohol dependent**

The agent:

1. Selects 'Notes' on the WSP Claimant screen.
2. Selects the hyperlink 'Add a new note' at the top of the 'Notes' field.
3. Records the relevant information regarding drug or alcohol dependency. All data must be factual and for DWP business use only so that the requirements of the Data Protection Act are met. Information must be relevant, accurate and up to date. Don't record more information than is necessary.
4. Selects 'Save'.

## **Refugees**

The agent:

1. Selects 'Personal' on the WSP Claimant screen.
2. Selects the 'Refugee status' drop-down list.
3. Selects the appropriate value.
4. Selects 'Save'

## **Recording the claimant's special arrangements on the Work Services Platform**

When a claimant is accessing DWP services, it may be necessary to provide special arrangements. On WSP this is known as 'Special needs'.

If a claimant who has special arrangements has been identified, the agent:

1. Selects the 'Yes' radio button against 'Has special needs'.
2. Selects 'Special needs' (this becomes available when the 'Yes' radio button is selected).

3. Selects 'Add new special need' from the ribbon.
4. Selects 'Appropriate special need' type from the 'Look-up' record as follows:
  - Private Room
  - Remote management
  - Room fitted with an audio loop
  - Text phone for hearing
  - Text phone for speech
  - The claimant requires an interpreter to be provided
  - The claimant will bring their own interpreter
  - Trusted intermediaries
  - Wheel chair access
5. Selects 'OK'.

The agent books a specific work-related interview and checks whether there is an outstanding interview for the claimant with their work coach.

If there is no appointment on WSP, the agent books a specific work-related interview with the owning work coach to ensure the claimant is receiving the support required for their complex needs.

The agent decides whether the claimant needs additional time to complete any potential interview. This will be set in the 'Schedule variants', not in the 'Special arrangements' box. See Booking appointments.