To: UC Programme Board
From: Cath Hamp
18th May 2017

Universal Credit – service and provision for vulnerable people and those with complex needs

Summary
A number of issues concerning the accessibility and responsiveness of Universal Credit (UC) in the case of vulnerable individuals and households with complex circumstances have arisen since UC went live.

The Programme is working closely with others across the Department, as well as with external partners in local government, and key stakeholders who understand and represent the interests of vulnerable people, in order to ensure that these issues are addressed and that effective support and tailored services are in place when UC expands to higher volumes.

Reason for coming to the Board
Programme Board are asked to -

- confirm they are content with the plan and work programme to deliver improvements and additions to the UC service for vulnerable people
- confirm that they are content with the assurance and governance arrangements in place to oversee this work

Timing – for discussion at the UC Programme Board meeting on 18 May

Background

1. The rallying cry of “digital by default” and ‘everyone will do everything on line’ was intended as a transformational challenge, but interpreted by some as a literal reality. Given the ultimate caseload of UC, this was never realistic and recent live running experience in UC full service has enabled us to gather evidence, and to test and develop approaches that are successful for those (e.g.) with limited literacy and comprehension, who use English as a second language, who have severe mental health problems, addictions or other issues that impact on their ability to interact successfully and consistently online.

2. Service to vulnerable customers cannot be prioritised solely via volume arguments – ‘there aren’t many of x group or in y circumstances’….it is also about the inherent value in the service that is developed by solving complex problems.
What do we mean by ‘vulnerable’ or ‘vulnerability’?

3. There is no single, standard (or statutory) definition of vulnerability. In developing this work and ensuring that UC provides a tailored and responsive service to those whose circumstances are complex and challenging or who are inherently vulnerable we have used the following prompts and guidelines.

People may be vulnerable as a result of -

- Demographics, or characteristics that are inherent to them as an individual and that they cannot change, for example, having a mental or physical disability from birth, having long periods of mental or physical illness, being from a black or minority ethnic background, being from a very large family.

- Life events, or things that happen to them as a result of their own actions or those of others, for example, past offending, homelessness, problem drug or alcohol use, domestic violence, being a full time carer, a lone parent, a refugee, subject to ‘modern slavery’ or in care as a child.

- Poor skills or limitations that arise from low levels of qualifications, literacy, numeracy and language or comprehension problems.

There are also ‘vulnerabilities’ that arise as a result of the policy or process design of UC. For example, housing and other debt issues, directly linked to assessment and payment periods, and limited or no broadband and digital access where online is the default channel.

From anecdote and concern to actionable evidence

4. It is in the nature of ‘hard cases’ that all stakeholders will have personal anecdotes and often distressing examples at the forefront of their minds. These motivate us to act and need to be further validated and expanded on from other sources. Data and information sources that support the Vulnerable People Action Plan include the following –

- Direct feedback from claimants and their representatives via complaints and correspondence.

- Input from operational colleagues through Implementation Control Centre (ICC) tickets, fast track incidents, partnership manager feedback and jobcentre visits.

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1 However, even these definitions must be subject to caveats since the impact of the same circumstances can vary significantly from one person to another. Research evidence suggests that the existence of multiple indicators dramatically increases the risk of long term worklessness.
Vulnerable people ‘evidence sprint’ identified issues around verification, identification and notification, provision, partnerships and digital exclusion

Vulnerable people ‘design spike’ explored pinch points across customer journey drawing on feedback and insight with involvement of colleagues from operations, the Programme and policy/strategy

Research by Children, Families and Disadvantage group in Strategy - ‘Worklessness in Great Britain: understanding the risk factors to worklessness’ setting out 21 risk factors, associations between risk factors and impact of multiple risk factors on employment rates

The External Relations team in the UC Programme also have access to the Citizen’s Advice database of queries and complaints and receive regular updates

….So, having built the evidence base, what action has been taken and is planned?

Key areas of action and focus

5. In December 2016, the UC Programme Delivery Executive took a decision for greater focus on this subject and explicit inclusion of ‘adequate provision for vulnerable people’ in the scaling criteria for the service. Since then an experienced operational manager has been appointed to work full time on this agenda within the Programme and the Vulnerable People Steering Group (with representation from across the Department) has been established to have oversight of the Action Plan and of successful delivery against the scaling criteria.

6. Following the ‘design spike’ workshop, 5 areas requiring design and build activity were prioritised and the vast majority of this work is scheduled to be completed within phase 3 of the UC Full Service backlog2 (by end of June).

7. These are set out below with a brief explanation of their significance.

- **Early identification** and accurate and appropriate **recording in the service** of vulnerability or complex needs in order to ensure that early intervention can be made to provide additional support or handle the claim ‘offline’

- Improving service to **customers without bank accounts** in three areas: i) making their claim; ii) being paid; and iii) securing a bank account
  - 1.71 million adults do not have bank accounts and the groups that are most affected include ex-offenders, homeless, victims of domestic abuse, migrants and refugees. The estimated average annual cost per individual for not having a bank account - the ‘poverty premium’ is £1,300

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2 The exception here is finalising an Agent Led Process for corporate appointees which will be slightly later
Difficulties making claims and making payments where there is no bank account are some of the biggest issues raised by operations

- Ensuring that vulnerable claimants can make and maintain claims regardless of circumstance in a number of ways –
  - Devising effective triage so that whoever makes first contact with the claimant or their representative can identify the right channel of support, refer with confidence and record in the service (as above)
  - Improving the telephony channel in order to ensure that customers who will never go online successfully can maintain their claims effectively

- In the case of ‘appointees’ - where an individual needs to have someone to act on their behalf as a result of severe physical or mental limitation – there will be a new agent led processes for both personal and corporate appointees and revised guidance on working with such representatives

- Improving Universal Support Delivered Locally (USdl) and wider partnership working in support of vulnerable people. Universal Support is in place to help claimants with the transition to UC and to make and maintain their claim and understand and manage their UC award, it is funded by the Programme and delivered by local authorities or their chosen contractors

Assurance

8. Specific success measures are being developed for each of these 5 areas in order to enable the Vulnerable People Steering Group to assess the Programme’s state of readiness against the scaling criteria and report to the Programme Delivery Executive. The Steering Group will also receive ‘show and tell’ presentations of any new functionality intended to support these areas of focus. A further Evidence Sprint on provision for vulnerable people will also take place in August/September and report back on how the work described here has ‘landed’ in operations and what impact it has had in jobcentres and communities.

Partnership working with local authorities

9. Many of the issues that have been reported are for DWP to solve as they relate to interactions with our services. But UC cannot deliver effective support for vulnerable people unless it works effectively with local authorities (LAs) and others providing services in each community. There is a particularly key role in respect of orientating people before they claim UC and helping them to understand how and why it differs from legacy benefits. The UC Programme is providing videos, online guides and other products in support of this work.

10. In addition, as a result of the Universal Support, Incentive Driven Payment, proof of concept in Croydon and London Bridge, the Programme gathered evidence to support the drafting of key principles for effective local partnership working and these have now been discussed with others working in different kinds of communities. This evidence has helped inform the "Improving Lives: helping
Workless families” policy paper published on 4 April. In that paper (at p.54) the Department said –

“Our vision is for joined-up services in Universal Credit, based on these core principles:

- Identification of people with complex needs/barriers, at the right time, and clarity on what the barriers are at point of need;
- Properly trained staff to identify and tailor employment support and conditionality, and refer to other appropriate services;
- Strong partnership working in local communities between Jobcentre Plus, local authorities, wider public services and the voluntary sector, so that all parties are aware of what local provision and support is available and can work together to address the claimants’ barriers (both on an individual and strategic level);
- Information sharing between partners so that they can share relevant information with each other and can more efficiently address the claimants’ barriers (including automated sharing of data).”

11. We are also making other improvements in how we work with local authorities in support of this agenda, and more generally, in 2017/18 -

- We have moved from cumbersome “District Partnership” Agreements for UC funding of Universal Support to a streamlined Grant based approach in 17/18
- The new Grant Agreement documents state explicitly the outputs and outcomes expected and also, for the first time, make it clear that LAs and partners can opt to start the Universal Support journey for UC claimants who “land” with them without requiring a jobcentre referral
- With support from LA representatives we are now mapping the four points where a need for additional help and support may be identified and where early referrals/orientation could take place. These are front of house in jobcentres, through service centres, at the local authority and through voluntary sector organisations in the community. We hope that this will be particularly valuable outside urban centres where large distances may make an LA or community group easier to access than the jobcentre
- In April we issued new guidance to our Partnership teams to support them in engaging effectively with LAs to put Universal Support and other services in place to help meet the needs of vulnerable claimants in their area

A complex problem with multiple strands of activity

12. As detailed in the Action Plan, other areas of focus and current work (which do not require build activity in the service) are –

- Wider communication and stakeholder activity specific to the needs of vulnerable people and which acknowledges that third party organisations will often be the first port of call or the ‘trusted intermediary’ with government services
- A process to ensure support for vulnerable people without a work coach
- Ensuring access to services when claimants are asked for proof of benefit
- The effectiveness of the home visiting process and of providing assisted digital support in the jobcentre
• Care Leavers and Prison Leavers – ensuring consistent delivery of the advance claim and other defined processes
• Applying ‘easements’ made in respect of certain welfare reform or conditionality requirements accurately
• Improving the handling of cases where the person is terminally ill
• Simplifying and clarifying identity requirements for those with little or no documentation

A plan for handling vulnerable people and complex cases in every office

13. Service Design and Management team from the Operational Excellence Directorate are also leading on the production of a national tool to support colleagues to identify, own and take appropriate action for vulnerable claimants in every jobcentre. This was launched on 2 May and includes clear and explicit guidance on escalation of difficult and unusual cases, advice on identifying and referring to local services and guidelines on the production of an office/location specific action plan for every site.

14. The team are also exploring the feasibility of an automated scan to pick up suicide/self harm threats from journal entries, reviewing current guidance around suicide/self harm and analysing incident reports (where threats or violence have taken place) from UC full service sites in order to identify trigger points and lessons that can be shared.

Links to other work strands

15. This work is closely linked to, cognisant of and supported by that on payment timeliness in the first Assessment Period, decision making, the Health and Work conversation, customer segmentation and improvements to the housing journey – in particular the evolution and extension of the ‘Trusted Partner’ work with landlords, where they are able to flag to the Department tenants in need of extra support or variations in payment.

Milestones to delivery

16. The latest version of the Vulnerable People Action Plan has been circulated with this paper and contains timelines for delivery of the work discussed here.

Conclusion

17. This programme of work is well supported across the Department and has defined outcomes and goals, despite the huge complexity of the subject matter.

Cath Hamp
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UC Programme
**GO-TO-GREEN PRIORITIES**

**Governance**

- **Improving Online Verification and Claimants without Work Coaches**
  - Personal and Corporate appointments
  - Vulnerable Claimants referrals

**Wider Supporting Delivery**

- **Making and Maintaining Partnerships**
  - For those who can't go online
  - Care Leavers

**Improve Online Verification and simplify ID requirement**

(Jonathan Harris/Anna Hirschfeld)

**March**

- **VC comms**
  - Orientation designed with external groups
  - Partners (including LAs) and PMs published

**February**

- **ALP**
  - Fictional Work Coaches
  - Personal Budgeting Support feature

**January**

- **VCFS**
  - Personal and Corporate appointments
  - Vulnerable Claimants referrals

**ARIES ONGOING AND/OR UNDER CONSIDERATION**

- **Partnership Managers supporting YCs (Neil Hodgson)**
- **VCFS**
- **Proof of Benefits (Jonathan Harris)**
- **Vulnerable Claimants referrals (Anna Hirschfeld)**
- **Claimants without Work Coaches (Debbie Mcmahon)**
- **Prison Leavers, Care Leavers and MAPPA (Jonathan Harris/Anna Hirschfeld)**
- **Support easements when setting claimant commitment**
- **Terminus illness**

**Further Considerations**

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**Vulnerable Claimants**

**Assuring the service, and managing performance & quality.**