

Complex needs overview

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Introduction

A claimant can be considered to have complex needs if their current circumstances present particular challenges with:

- accessing Universal Credit
- using the Service
- moving towards work and financial independence

When a claimant with complex needs contacts DWP, their customer journey must be equal in quality and outcome to those whose needs are not complex.

While working with the claimant, it may become clear they need additional support. It is important to ask them and record what additional support they need to make sure it's available every time the claimant needs it.

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

Some claimants may be unwilling to tell us they are experiencing difficult life events or personal circumstances. There may be signs, behaviours and language they use that suggest they may have complex needs.

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

What is meant by complex needs

Complex needs reflect personal circumstances and life events that present an individual with extra challenges in accessing Universal Credit, using the Service and moving towards work and financial independence.

A claimant with complex needs may be someone who:

- is experiencing difficult life events or personal circumstances
- has difficulty in dealing with the demands of our processes at the time they need to access and use a service

They may not be able to access the service through on-line or telephone channels and may benefit from extra or face-to-face support.

Some claimants will have obvious physical disabilities which mean they may need extra personal support or that adjustments are required to enable them to access services. Other claimants may have conditions that are less obvious. Complex needs are not always a static state.

It is important to remember that although the circumstances described in the following sections may suggest there are complex needs, the claimant may consider themselves perfectly capable of managing without the need for support.

We must always be mindful not to consider just the claimant's circumstances alone, but how those circumstances affect their ability to access Universal Credit, continue to use the Service and move towards work.

We must avoid making assumptions about what a claimant can or cannot do to help themselves.

What are complex needs in Universal Credit?

Universal Credit claimants may need additional or alternative support if it is likely they will have difficulty:

- accessing Universal Credit
- proving eligibility for Universal Credit
- fulfilling Labour Market requirements
- maintaining their Universal Credit account
- managing their money
- opening a bank account

The claimant may also experience difficulties with:

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

These are examples and not complete lists.

Citizens Advice (England and Wales) and Citizens Advice Scotland are delivering 'Help to Claim' support to claimants who are making a new claim for Universal Credit or moving from a Legacy benefit to Universal Credit because of a change of circumstances. See Help to Claim.

Claimants with complex needs must be able to access Recoverable Hardship Payments if required. This provides financial protection for those whose benefit is reduced by a sanction or a fraud Loss of Benefit penalty.

People from abroad may also have complex needs. See Refugees and asylum seekers.

The following are examples of life events, personal circumstances, health issues or disabilities which could affect a claimant's ability to access and use Universal Credit services. However, some claimants may not need additional support even though they are experiencing one or more of these:

- adoption - children
- age - older person
- age - older person - financial abuse (pensions)
- age – young person aged 16 or 17
- a bereavement, death, recently bereaved
- autism
- are blind or partially sighted
- caring responsibilities
- children - childcare
- child or children in considerable distress
- children who leave care, care leavers
- crime – victim of crime
- victims of modern slavery or human trafficking
- cultural barriers
- language barriers were English is not their first language

- deaf or hearing impaired – Using the Relay UK (previously Next Generation Text)
- debt or indebted
- divorce or termination of a civil partnership
- domestic abuse
- drug and alcohol dependency
- gender recognition or transgender
- homelessness - a person without accommodation, in temporary accommodation, frequent change of address
- Internet use is restricted (for example, due to criminal conviction)
- just left hospital
- leaving the Armed Forces, ex-armed forces personnel and their spouses or partners
- learning disabilities
- MAPPA individuals (Multi Agency Public Protection Arrangements)
- mental health conditions – Reasonable Adjustments information
- memory loss caused by medication
- Offender, ex offender, prisoners or detainees
- physical disabilities
- race - immigration status, refugee, asylum seeker, persons arriving from abroad
- reading and writing difficulties
- redundancy
- retirement
- rural isolation
- suicide and self-harm – declaration, or if there is a risk to themselves or others
- supported by the Supported Families Programme

These are examples and not a complete list.

Young people aged 16 and 17 will not usually be able to get Universal Credit in their own right but there are some exceptions.

Young people are also expected to be in education or training (with the exception of young people in Scotland where there is no requirement to stay in education or training until aged 18). For full details about exceptions to 16-17 year olds claiming Universal Credit, and young people who are not in employment, education or training, see Under 18s.

For disabled claimants, DWP is legally required under the Equality Act 2010 to provide reasonable adjustments - for example, Relay UK (previously Next Generation Text), email, providing information in braille or audio CD format.

It is very important that interaction with the claimant takes place to determine what tailored support or reasonable adjustments they require. This is to ensure equal access to products and services.

Signs, behaviours and language

Claimants may talk about a life event (for example, the death of a relative) or suggest during the course of a conversation that they may have complex personal circumstances (for example, if a claimant has no ID this may indicate they are homeless, have left prison or could have fled domestic abuse).

There may be a combination of factors which means that a claimant needs additional support to access benefits and use Universal Credit services.

When communicating with a claimant, certain circumstances and characteristics could indicate that an individual may require additional support, for example if they are:

- in distress
- not understanding what is being said
- scared or fearful
- always attending appointments with a third party - such as a partner
- 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 behaviour that is concerning and may compromise a future safe interaction (Keep Customer Interactions Safe): [link to KCIS](#)

These are examples and not a complete list.

Difficulties or concerns dealing with written communications, numbers or language

A claimant may display behaviour that indicates they have reading and writing difficulties, or difficulties dealing with numbers or language. This may include being unable (or reluctant) to:

- complete or read paperwork
- navigate telephony or online services
- manage money or budget because they do not have adequate numerical skills or declare that they are in debt
- understand verbal communications well enough to engage with DWP staff

Universal Credit staff may also notice:

- errors on completed online or paper application forms
- that the individual is unable to spell out words when 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. Therefore, it is vital for staff to interact with the individual claimant to determine if they need support and determine what their additional requirements are.

For information and assistance in communicating with claimants whose first or preferred language is not English, refer to the Interpreter and Translation Services.

District Provision Tool

The District Provision Tool (DPT) provides access to the full range of provision and support delivered by Jobcentre Plus, Education and Skills Funding Agency (ESFA), Skills Development Scotland, Careers Wales other providers, local authorities, independent and volunteer charity organisations, health services and addiction treatment. It hosts all the available provision and support within a district and nationally.

The Complex Needs section on the DPT supports colleagues to identify, own and take appropriate action to support claimants with complex needs, including supporting organisations claimants can be signposted to. Each district has their own local version of the DPT and are responsible for keeping it up to date.

To locate the relevant DPT, type the claimant's local Jobcentre into the building directory on the intranet. This will identify which part of the country the claimant lives in so they can be signposted appropriately. See District Provision Tool (DPT)