



Department
for Work &
Pensions

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Tothill Street
London
SW1H 9NA

Miss Kirsty Gomersal
Area Coroner for County of Cumbria
Fairfield Station Rd
Cockermouth
CA13 9PT

09 January 2024

Dear Miss Gomersal,

RESPONSE TO REGULATION 28 REPORT TO PREVENT FUTURE DEATHS

I write on behalf of the Department for Work and Pensions (“DWP”) in response to your Prevention of Future Deaths Report made under Regulation 28 of The Coroners (Investigations) Regulations 2013 following the inquest into the death of Mr Kevin Conrad Gale.

On behalf of DWP, I would like to express my deepest condolences to Mr Gale’s family. He was a well-known figure in the area local to Penrith Jobcentre Plus, where my colleagues were saddened to learn of his death.

You raised the following concerns in your report:

“Current DWP procedures may not be practical for those with mental health illness and can exacerbate symptoms. I heard evidence that:

- 1. The number of and length of DWP forms required to be completed can be overwhelming for someone with a mental health illness. This is perpetuated if the applicant cannot get help to complete the paperwork.***
- 2. There are long telephone queues to speak to a DWP advisor.***
- 3. Having to travel long distances for appointments can be detrimental for those with a mental health illness.”***

As you note in your report, DWP was not an Interested Person to these proceedings. For the avoidance of doubt, I confirm that DWP was not aware that an inquest was taking place in relation to Mr Gale’s death and was not asked to provide evidence to

assist within the substantive proceedings or on matters relating to the prevention of future deaths.

I note that you “*did not make a causal link between Mr Gale’s death and his anxiety about his Universal credit application*” within your conclusions. However, I know that a coroner is not limited to such matters when exercising their duty to issue a Prevention of Future Deaths report and I understand that in this case your concerns were raised through witness evidence during the inquest hearing. I further understand that the concerns (in box 5 of the Report) do not necessarily relate specifically to Mr Gale’s individual benefit claim.

1. “The number of and length of DWP forms required to be completed can be overwhelming for someone with a mental health illness. This is perpetuated if the applicant cannot get help to complete the paperwork.”

Collecting personal data from claimants is an essential part of any benefit claim, but DWP strives to make the process as straightforward as possible for its customers. Mr Gale claimed Universal Credit (“UC”), a benefit that DWP has developed primarily as an online service. When someone applies for UC online, the IT system will guide them through the questions required to complete their claim and prompt them only to provide necessary information. This enables a far more streamlined data collection process compared with traditional paper-based forms.

If a claimant needs support to apply for UC, because of a mental health illness or any other reason, help is available by the following means:

- telephone or online video call with a qualified DWP advisor
- face-to-face support from a partner organisation
- in the Jobcentre, or
- through a home visit, where needed, using DWP’s Visiting Service which comprises around 450 Visiting Officers across Great Britain.

Where a claimant is unable to claim online, they can claim by phone through the UC helpline. GOV.UK provides details on how to claim, including information about claiming by phone and signposting to additional support available from the Help to Claim Service, about which I provide more detail below.

Mr Gale told us that he was unable to use the internet and so was unable to apply for UC online. Instead, he claimed over the phone. The UC telephone claim script for gathering information is designed so claimants are asked only questions relevant to their circumstances, much like the online system. This aims to minimise the length and complexity of the information-gathering process. In Mr Gale’s case, this script would have involved questions about his self-employed work, which would have made it more complicated than for someone with no work at all.

The variable level of earnings inherent in self-employment can affect the amount someone is entitled to receive from one month to the next. Because of this DWP asks self-employed claimants to report their earnings monthly. Most claimants can do this quickly and easily online. We ask telephone claimants like Mr Gale to report earnings over the phone, and I note that he did this.

DWP recognises the additional complexity of self-employed claims, therefore, every jobcentre has at least one Work Coach with specialist knowledge of how such claims are calculated. Mr Gale expressed confusion over how his payment amounts had been calculated on several occasions. On each occasion either his Work Coach, Case Manager or a UC Telephony Agent were supportive in explaining how his benefit had been calculated.

Other help is available for all UC claimants to assist them with their claim. Mr Gale would have been made aware of the wider support available which includes:

Help to Claim

Since 2019 the government has provided funding for Citizens Advice (“CA”), in partnership with Citizens Advice Scotland (“CAS”), to deliver Help to Claim support for people who need extra help to apply for UC. CA and CAS provide the support through telephony and digital channels.

Help to Claim can be accessed until a claimant receives their first full payment of UC. Since 2019, CA and CAS have helped more than 850,000 people with their claim through the Help to Claim service. Citizens Advice will signpost people who are unable to access support through telephony and digital channels to their local Jobcentre Plus for face-to-face help in making or managing their UC claim.

Work Coaches already support individuals who approach the jobcentre directly rather than choosing to access independent support such as that provided by CA. UC Work Coaches undergo a comprehensive training programme, including training for working with different vulnerable groups and those with complex needs, to ensure they can support individuals accessing the benefits they are entitled to.

Other help Work Coaches can provide to new UC claimants includes:

- Setting up an email address.
- Working through claimant “to-do’s”.
- Accessing the UC Claim by Phone service.
- Accessing DWP home visiting support.
- Helping to verify identity.
- Helping with providing additional evidence.
- Helping to access adaptations such as direct payments to landlords and conditionality easements.
- Applying for advances and helping to access other financial support.
- Helping to prepare for the first monthly payment.
- Providing long-term support and signposting out to other organisations via the District Provision Tool, a directory of the support delivered by Jobcentre Plus, local authorities and independent, volunteer and charity organisations.

Additional support for customers with complex needs

To assist customers who may have a more acute need for support, every Jobcentre is equipped with a “complex needs toolkit” containing links to local organisations who can help and provide appropriate support as required. In Mr Gale’s case, his local

Jobcentre (Penrith)'s complex needs toolkit includes links to such support organisations (amongst others) as:

- Lancashire County Council Adult Safeguarding Team
- NHS Lancashire and South Cumbria wellbeing and mental health teams
- Cumbria Law Centre (a community organisation offering free legal advice and representation)
- Debt Advice Foundation
- Warm Spaces
- Eden Housing Association

Additionally, DWP has in place a wide range of reasonable adjustments for customers, including:

- The production of communications in a range of different (or alternative) formats such as braille, large print and audio.
- Email as a reasonable adjustment (for example, to replace any hard copy notifications that would normally be sent to the customer).
- A visiting service for vulnerable customers who are unable to use our other contact routes.
- Support for our staff including instructions, guides and awareness raising on reasonable adjustments.
- Face-to-face British Sign Language (“BSL”) interpretation or Video Relay Service which enables customers to communicate in real time via a BSL interpreter using a video connection. There is no need to be in the same location or for the customer to make an appointment.
- A flexible approach to mandatory face-to-face interviews within a jobcentre (and I cover travelling to appointments in more detail below).

Improving form design

Most types of benefits rely on customers providing information via paper forms at various points during their claim. It may assist you to know how DWP makes this process as accessible as possible for customers, and what support is available if needed.

DWP maintains a central team to drive improvements in its printed customer communications, which can include application forms, letters and leaflets – including some forms being available in an “Easy Read” format for people with learning disabilities – and SMS text messages. The team has an on-going programme of work to identify ways in which we can better provide information to customers.

DWP continually seeks to improve the content of these communications so that information is clear and accessible for everyone. This includes work to develop products using a quality assurance and sign-off process involving senior communications professionals. The team also tests content with customers and external stakeholders to ensure it is fit for purpose whilst ensuring DWP collects all the information it needs to efficiently process claims.

2. *“There are long telephone queues to speak to a DWP advisor.”*

Times taken to answer calls across benefit lines can vary and are influenced by a number of factors. DWP aims to forecast demand on its inbound enquiry lines and balance resources so that more people are available to answer calls at times of peak demand than during quieter periods. Such forecasting cannot be an exact science, however, and unplanned events such as technical issues or labour market instabilities can increase demand with a knock-on effect on wait times.

Despite this, UC enquiry lines have rarely had any problems with high call waiting times. While I accept that waiting times can vary from day to day and even within a single day, most calls to UC enquiry lines are answered within minutes. For example, between January and March 2022 calls were answered on average after 1 minute and 29 seconds. And in the week commencing 28 February 2022 – a week during which Mr Gale called UC with his support worker – the average time taken to answer a call was 2 minutes and 26 seconds.

3. *“Having to travel long distances for appointments can be detrimental for those with a mental health illness.”*

DWP is changing the way that UC claimants are asked to communicate with us such as the introduction of online journal messaging. Most claimants communicate with Work Coaches via an online “journal”, in which they can record work search activity and other related information, and therefore only need visit their Jobcentre for a limited range of reasons such as identity verification interviews. If a claimant is unable to access their claim online, they have the option to complete tasks such as reporting their self-employed earnings by phone.

Mr Gale informed the department that he suffered with mental health problems, however, he did not declare any health condition that affected his ability to work and declared that he was self-employed. As a result, he was not asked to attend a Work Capability Assessment, either at an assessment centre or by any other method. Mr Gale attended his local Jobcentre only once, as part of his UC claim identity verification process, which, according to department records, was a journey of less than 200 metres each way.

Conclusion

DWP is committed to ensuring that it gives claimants the right support at the right time and are constantly reviewing the services we provide in an effort to improve for all our customers, especially the many vulnerable people who rely upon us.

Comprehensive guidance is available for colleagues on how to support customers who discuss or imply that they intend to harm themselves. When a threat of self-harm is identified, staff follow a six-point plan that helps them take the appropriate action; this could include alerting the emergency services where appropriate.

DWP has a detailed mental health training package which includes modules on appropriate actions to take to support customers with vulnerabilities including mental health issues. This training is delivered to all customer facing staff, to provide

colleagues with learning that they can then apply in the different scenarios with which they may be faced.

The package is constantly evolving, and work is ongoing to strengthen guidance and training as part of continuous improvement activities, ensuring colleagues have the necessary tools and confidence to respond to these challenging declarations.

Upon reviewing the full circumstances of this case, we are satisfied that appropriate support is already available to allow claimants with complex needs to access benefits. I trust that my response helps assure you of the measures DWP has in place, and on which it is committed to building, to meet your concerns.

Yours sincerely,



Customer Experience Directorate