

Response to the Work and Pensions Committee call for evidence on Safeguarding Vulnerable Claimants

18 October 2023

About us

The Poverty Alliance is Scotland's anti-poverty network. Together with our members, we influence policy and practice, support communities to challenge poverty, provide evidence through research and build public support for the solutions to tackle poverty. Our members include grassroots community groups, academics, large national NGOs, voluntary organisations, statutory organisations, trade unions, and faith groups.

The Poverty Alliance welcomes the opportunity to respond to this consultation on safeguarding vulnerable claimants. We recognise the critical role that the Department of Work and Pensions must play in the service delivery experience and safeguarding of households that are termed 'as vulnerable'.

Recognizing the underlying drivers and intersections of poverty is critical when considering the concept of vulnerability and the operationalisation of supporting households. Understanding and ensuring adequacy of support and support structures for households across all DWP services is critical in terms of the upholding the dignity, safety and rights of all claimants.

In this response Poverty Alliance call for the increased importance and recognition of 'Vulnerable Claimants' engaging with DWP administered services. We highlight the importance of the conceptualisation and operationalisation of vulnerable claimants, experiences of different claimants, as well as recommendations on the Six Point plan.

1. **DWP does not have a statutory duty to safeguard the well-being of vulnerable claimants. Should this change? - If so, what should this duty look like?**

The DWP has stated in the past that it does not have a statutory duty to safeguard the well-being of vulnerable claimants. We strongly disagree. Like other public bodies – local authorities, the NHS, the police service, etc – the DWP has a duty of care towards those using its services. We outline below why this is the case.

Importance of Vulnerable Claimants

The Department of Work and Pensions has a critical role to play in providing support across its services to ensure that service users are adequately protected and supported. This needs to include all areas of statutory responsibility including the Child Maintenance Service (CMS) and administration of social security benefits.

As one of the largest public services in the UK, the DWP is responsible for social security, pensions, and child maintenance policy, DWP transacts around £212 billion in payments each year with a staff team of over 90,000 employees.¹ The scale and significance of the DWP's work makes clear the importance of its safeguarding responsibilities.

This consultation takes place at a critical time and must recognise the significant evidence on safeguarding and risks within system design and implementation by the DWP across both social security and child maintenance. This includes work by Rethink², The National Audit Office³, Deaths in Welfare Project⁴, Disability Rights UK⁵, Women's Aid⁶ Poverty Alliance⁷ and many others.

Addressing and meeting the needs of 'vulnerable claimants' need to be a central and priority focus of the DWP to ensure that is a system that works for all. It is entirely possible to redesign our systems to ensure that social security and child maintenance is a lifeline for all and supports people fully in its approach.

If an additional need is identified by the consultation or other process for creating a new statutory duty on safeguarding for the DWP, this needs to be fully integrated and aligned with the different national-level structures to ensure effective and coherent provision of support, risk assessment of service users and claimants and to prevent harm.

Within all aspects of the system the concept of 'vulnerability' needs to be considered and reflected and embedded within all areas of work including:

- Access and eligibility criteria and system design of claimants' application routes.
- Ongoing service experience of claimants including adequacy of thresholds of support and removal of conditionality and sanctioning.
- Staff training and support in understanding risks across different household types and populations.

¹ Department of Work and Pensions (nd) 'Life at DWP Digital' <https://careers.dwp.gov.uk/life-at-dwp-digital/>

² Rethink, Tip of the Iceberg <tip-of-the-iceberg.pdf> (rethink.org)

³ National Audit Office (2020) 'Information held by the Department for Work & Pensions on deaths by suicide of benefit claimants' [Information held by the Department for Work & Pensions on deaths by suicide of benefit claimants](https://www.nao.org.uk/wp-content/uploads/2020/06/Information-held-by-the-Department-for-Work-&-Pensions-on-deaths-by-suicide-of-benefit-claimants.pdf) ([nao.org.uk](https://www.nao.org.uk))

⁴ [Deaths by Welfare Project - Healing Justice London](https://healingjustice.org) ([healingjusticeldn.org](https://healingjustice.org))

⁵ Disability Rights (2023) [Research Exposes How the DWP 'Weaponised' Time to Avoid Accountability for Deaths](https://www.disabilityrights.org.uk/research-exposes-how-the-dwp-weaponised-time-to-avoid-accountability-for-deaths) | [Disability Rights UK](https://www.disabilityrights.org.uk)

⁶ Howard, M., Skipp A (2015) 'Unequal, trapped & controlled Women's experience of financial abuse and potential implications for Universal Credit' https://www.womensaid.org.uk/wp-content/uploads/2015/11/Women_s_Aid_TUC_Financial_Abuse_Report_March_2015.pdf

⁷ McHardy, F., Robertson L (2023) 'Child maintenance a system of support'. Fife: Fife Gingerbread

- Escalation and support procedures for claimants in the event of risk being identified.
- Systematic approaches to learning and improving practice on supporting claimants.

In terms of recognizing the concept of ‘vulnerable’ claimants, defining who is vulnerable requires systems to recognize and reflect wider inequalities within the UK. This should be underpinned by an evidence base on socio-economic inequalities and intersections as well as other core factors that may increase risk such as Adverse Childhood Experiences (ACES), experiencing trauma such as gender-based violence, homelessness, addiction, or other factor that may influence how people experience the social security system including protected characteristics such as disability, gender and so on.

It is important that this conceptualisation also recognises and incorporates changing risks across the life course such as entering and leaving the labour market, taking up caring responsibilities as well as recognising well documented transition points where people may be increasingly vulnerable such as exiting the armed forces⁸ or gaining refugee status.⁹

In addition, it is critical that when working across the UK the DWP consider wider factors such as how access to and experiences of services vary dependent on location within the UK. This includes recognising risks that may be posed for service users living within a rural or remote area because of digital exclusion and transport barriers to accessing services and how this may increase the vulnerability of a household.¹⁰

Alongside this, the system needs to be agile and accommodate rapidly changing circumstances around claimants as required, recognising that households may face increased vulnerability levels due to unforeseen events such as bereavement or ill health or ongoing life circumstances such as precarious employment.

We would suggest that the definition of ‘vulnerable’ needs to recognise the wider evidence base on the population risk factors as well as specific lived experience that may increase a household to be considered vulnerable. This should not only be limited to those who are accessing social security but also consider those who are accessing the Child Maintenance Service which is another DWP administrated service.

Coherence and alignment across all DWP services is essential to ensure that household experience is positive, and risks are identified and support responses consistent and effective. At Poverty Alliance, within our research work on Child Maintenance, we have identified that domestic abuse and safety fears were the most common reason for non-uptake of child maintenance.¹¹ We recommend all ten

⁸ Scullion, L (2021) Research with veterans suggests that a trauma-informed social security system would benefit all claimants who have experienced trauma LSE : London

<https://blogs.lse.ac.uk/politicsandpolicy/trauma-informed-social-security/>

⁹ British Red Cross (nd) Universal Credit inquiry UCR0009 - Evidence on Universal Credit (parliament.uk)

¹⁰ Robertson, L., McHardy, F., Cowen, H., Cloughton, B. and Cowan, S. (2022) “*It’s hard work being poor*”: *Women’s experiences of the cost-of-living crisis in Scotland*. Glasgow: Poverty Alliance.

¹¹ McHardy, F., Robertson L (2023) ‘Child maintenance a system of support’. Fife: Fife Gingerbread

recommendations highlighted in the Independent Review of the Child Maintenance are reviewed for application in wider DWP Services including its social security provision.¹²

The concept of vulnerability is also shaped by the contextual environment claimants and service users are experiencing. The need for support can be influenced by differing factors including external factors like the COVID-19 pandemic and the current Cost of Living crisis, alongside internal factors such as conditionality within the social security systems, stigma and other issues affecting claimants.

In the context of the rising cost of living and the inadequacy of benefit levels there are increased levels of risk to claimants. Multiple evidence strands have highlighted the challenges of the inadequacy of levels of support provided by social security at the UK level. Evidence from the Resolution Foundation highlights the financial insecurity that claimants are facing.¹³ Figures on Consumer Price Inflation indicate that there have been significant rises in the monthly inflation rates resulting in falling living standards which is disproportionately impacting the lowest income households who are more likely to be social security claimants.¹⁴ This context comes following a period of income shocks that many claimants had already experienced during the pandemic.¹⁵

The pressures on levels of income that DWP social security claimants will be experiencing means that they will be facing increased risks of stress and impacts on physical and mental ill health. Evidence highlighted by the Mental Health Foundation has documented that of March 2023, almost half (49%) of Scottish adults reported that their mental health is being negatively impacted by the cost-of-living situation, and 13 per cent said that their mental health is being negatively impacted.¹⁶

Levels of stress and poor mental ill health and the associated risks across claimants increase the need for the DWP to improve income adequacy for social security claimants. We echo the call by the Trussell Trust¹⁷ to provide essentials guarantee within Universal Credit to ensure that the basic rate at least covers life's essentials, such as food and bills.

Principles of income adequacy also need to be applied consistently within other administrative areas of the DWP. We also call for the removal of charging for

¹² Callaghan, S. (2022) 'Independent review of the Child Maintenance Service (CMS) response to domestic abuse' <https://www.gov.uk/government/publications/independent-review-of-the-child-maintenance-service-cms-response-to-domestic-abuse/independent-review-of-the-child-maintenance-service-cms-response-to-domestic-abuse>

¹³ Torsten, B. (2023) 'What does it take to reduce poverty' Resolution Foundation [What does it take to reduce poverty? • Resolution Foundation](#)

¹⁴ Ibid

¹⁵ McHardy, F., Robertson, L., Cloughton, B. and White, G. (2021) 'Living Through a Pandemic: Experiences of low-income families in Renfrewshire and Inverclyde' Glasgow: Poverty Alliance.

¹⁶ McDaid, S., (2023) Guest blog: Reflections on the Mental Health Impact of the Cost-of-Living Crisis – Year 2

¹⁷ Trussell Trust (2023) 'Essentials Guarantee' <https://www.trusselltrust.org/get-involved/campaigns/guarantee-our-essentials/#:~:text=Our%20petition%20calls%20on%20UK,such%20as%20food%20and%20bills.>

receiving parents using the Collect and Pay system within the Child Maintenance Service which affects the income adequacy of families across the UK.¹⁸

Within and out with the system

Alongside those who are engaging within social security, there are also those who are more 'vulnerable or at risk' to not claiming entitlements. Figures on the total amount of unclaimed income-related benefits is now around £19 billion a year¹⁹ and a complex mix of factors including stigma and fragmentation of administration and support create difficult conditions for households to realise their rights.

Transition points and conditionality

Alongside financial risk, there are also the broader issues of conditionality in the system and the experience of claimants who are affected.

Under UC, the default position is that whilst waiting for a Work Capability Assessment (WCA), claimants with a disability or health condition are placed on an intensive work search regime and subject to sanctions.²⁰ Uncertainty and having to attend appointments or conduct job searches whilst awaiting a WCA affects claimants' mental health with evidence of increased anxiety.²¹ Research also shows that the use of sanctions is ineffective and can exacerbate mental health problems.²² The Changing Realities project states:

*“the UC system should be made more flexible to support the mental health of claimants... Better structures need to be developed for claimants to alert DWP staff if they are experiencing mental health issues and if they would like adjustments made because of this. Additionally, frontline workers need to be trained in trauma-informed communication...”*²³

Under a wellbeing safeguarding duty, the DWP would be required to show due regard when applying conditions to vulnerable claimants. Despite extensive evidence showing that sanctions lead to deterioration in health, the occurrence of sanctions have been rising: a monthly average of 42,186 UC sanctions were imposed in the quarter up to April 2023, which exceeds that for all periods since the start of the present reporting system in 2000.²⁴

Central to supporting vulnerable claimants is the recognition of the responsibility of the DWP when the system design or implementation is directly contributing to the

¹⁸ McHardy, F., Robertson L (2023) 'Child maintenance a system of support'. Fife : Fife Gingerbread

¹⁹ Disability Rights Scotland [Missing out: £19 billion of benefits support goes unclaimed each year | Disability Rights UK](#)

²⁰ Wright, S., Robertson, L. and Stewart, A. B. R. (2022) Universal Credit and the invalidation of mental health problems: claimant and Jobcentre Plus staff experiences. *Journal of Poverty and Social Justice*, (doi: 10.1332/175982721X16437383460256).

²¹ Ibid

²² Wright et al. (2020) Mental health, welfare conditionality and employment support: Policy recommendations and key findings. Available at: [Mental health, welfare conditionality & employment support: Policy recommendations & key findings \(povertyalliance.org\)](#)

²³ Power, M., Pybus, K., Jordan, U., Tominey, E., Kaufman, J., McHardy, F., Robertson, L. and Patrick, R. (2023) Where's the Credit? Single Parents, Universal Credit and Mental Health. Available at: <https://www.povertyalliance.org/wp-content/uploads/2023/08/Wheres-the-Credit-Briefing.pdf>

²⁴ Webster, D. (2023) Briefing Benefits Sanctions Statistics August 2023. Available at: [David Webster \(University of Glasgow\) briefings on benefit sanctions | CPAG](#)

distress or hardship of claimants and service users. This can include the impacts of conditionality or structural issues such as the five-week wait, the two-child limit or the rape clause.²⁵ We support calls to abolish these within the DWP echoing the calls of others on the financial hardship, distress and trauma these policies are causing. As a public delivery service, the DWP should redesign its services to work for all and support social security and child maintenance services as routes to secure an adequate income.

One approach that the Department of Work and Pensions should seek to embed to support vulnerable claimants is a trauma-informed approach across its care. Evidence from Scullion and Cuchin (2022) highlights the growing number of service delivery organizations adopting trauma-informed support and the benefits of doing so.²⁶

An approach to trauma-informed services has been deployed within the devolved administrative social security system, Social Security Scotland. This approach

“Is based on knowledge and understanding of how trauma (anything that is deeply distressing or disturbing) affects people’s lives, how they use a service and what they need from that service. The main aim of this approach is to raise awareness among all staff about the wide impact of trauma and to prevent traumatising clients again in service settings.”²⁷

DWP should look to learn from the embedding of this approach in Scotland.

Finally, we would recommend that a statutory duty to protect the wellbeing of vulnerable claimants could draw on existing legislation at both Scottish and UK levels. The Social Security Administration and Tribunal Membership (Scotland) Act 2020 places guidance for the protection of vulnerable claimants on a statutory footing.²⁸ The Care Act 2014 also provides statutory guidance on how wellbeing should be defined and promoted, as well as clarifying 10 types of experience that would lead to clients being classed as vulnerable.²⁹ Both pieces of legislation provide clear approaches as to how a duty to protect the wellbeing of vulnerable claimants can be placed on a statutory basis. We do not believe there is any reason why the DWP should not be subject to similar requirement in its interactions with clients. Indeed, as outlined above, given the position that many users of DWP services are in, we believe it should be a priority for the DWP to have a statutory duty to protect the wellbeing of all its clients.

²⁵ Bradshaw, J (2017) No 3: Why the two-child policy is the worst social security policy ever <https://social-policy.org.uk/50-for-50/two-child-policy/>

Engender (Child Tax Credit and Child Element of Universal Credit [Engender-Parliamentary-Briefing-on-Child-Tax-Credit-and-Child-Element-of-Universal-Credit.pdf](#)

²⁶ Scullion, L., & Curchin, K. (2022). Examining Veterans’ Interactions with the UK Social Security System through a Trauma-Informed Lens. *Journal of Social Policy*, 51(1), 96-113. doi:10.1017/S0047279420000719

²⁷ Social Security Scotland ‘Equality outcomes 2021–2022’ Online url available at [Equalities Outcomes 2021 -2022 \(socialsecurity.gov.scot\)](#)

²⁸ See Social Security Administration and Tribunal Membership (Scotland) Act 2020: <https://www.legislation.gov.uk/asp/2020/18/enacted>

²⁹ See Care Act 2014 Statutory Guidance <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

2. Is DWP adequately transparent about its safeguarding measures for vulnerable claimants, including how the IPR process works and what is done to implement lessons learned?
 - a. Is DWP adequately transparent about its safeguarding failures to ensure it is held accountable?

We do not believe that the DWP is sufficiently transparent regarding its safeguarding measures for vulnerable claimants.

In 2022, Rethink Mental Illness stated:

*“In practice, the lack of transparency around IPRs means that we do not know how the DWP identifies cases that might warrant an IPR or how they decide whether the incident meets their definition of serious harm”.*³⁰

Research has found evidence that cases of serious harm do not get reported to the DWP because of a lack of awareness about the process and a lack of trust in the department. There is also no adequate process for professionals (e.g., clinicians or social workers) to report suspected incidents or serious harm investigation.³¹ A lack of published guidance or official analysis has also been criticised.

It is important to recognise the distress, harm and loss of lives that failures to safeguard can result in. Like other public bodies and institutions the DWP needs to ensure that it actively works to prevent harm occurring and adopts a coherent and effective approach to doing so.

We call for more transparency and prevention to be a focus across DWP. This should include integrated structures for whistleblowing from within and outside of the Department and Work and Pensions where areas of poor practice are identified. Alongside this there needs to be a clear measurement framework to provide accountability and rigor and action in this area. A multi-agency approach, which understands DWP interactions with other services is also required in order to create a more collaborative ethos and infrastructure for supporting vulnerable claimants in a consistent, accountable and effective manner.

3. What are the main challenges that vulnerable claimants face when trying to make a new benefit claim?

Vulnerable claimants face a range of challenges when claiming benefits. Extensive research shows that the digital default approach underpinning Universal Credit is not only inaccessible for people who do not have digital access or have low digital skills but is experienced as isolating by claimants.³² A recent report by the Trussell Trust highlights four key issues with the design and delivery of the social security system including: lack of information about entitlements, difficulties claiming benefits,

³⁰ Rethink Mental Illness (2022) “We’re just numbers to them” – The DWP’s failure to investigate death and serious harm”. Available at: [were_just_numbers_to_them.pdf \(rethink.org\)](https://www.rethink.org/were-just-numbers-to-them.pdf)

³¹ Ibid

³² Robertson, L., Wright, S. and Stewart, A. B. R. (2020) How well is Universal Credit supporting people in Glasgow? Available at: [How well is Universal Credit Supporting People in Glasgow? - Full report - The Poverty Alliance](https://www.povertyalliance.org.uk/wp-content/uploads/2020/12/How-well-is-Universal-Credit-Supporting-People-in-Glasgow-Full-report-The-Poverty-Alliance.pdf)

insufficient income from benefits and further reductions to income from sanctions, caps and debt deductions.³³

Extensive research highlights the hurdles people with mental health problems face when claiming benefits.³⁴ In a survey of 455 people with mental health problems who claimed a range of benefits, nearly all reported finding application forms difficult; four in five (82%) had difficulty finding the right information to send; and nine in ten (93%) said their mental health deteriorated in anticipation of a medical assessment.

Research on Universal Credit in Glasgow with Jobcentre staff highlights that work coaches felt that mental health support was an essential but unrecognised part of their role. Time was not allocated to deal with mental health crises that were now more likely to arise, such as claimants disclosing suicidal thoughts. Jobcentre Plus staff in this research wanted increased funding to create more Disability Employment Advisor roles.³⁵

Accessing support to make a benefit claim is challenging, particularly for vulnerable adults who have limited access to resources and support networks. Research commissioned by the DWP shows that availability and awareness of free support and provision for people with disabilities and health conditions varies considerably between local authorities.³⁶

Fear and stigma are also barriers that social security claimants face. Evidence from Inglis et al (2019) raises experiences of structural stigma claimants face across several areas in social security provision including assessment processes, information and support and levels of support.³⁷ In relation to the Child Maintenance Service, the £20 application fee to apply to the service also serves a significant barrier for low-income families receiving support increasing their risk of no maintenance support and financial vulnerability.³⁸

Given the significant level of evidence from voluntary sector, public bodies, parliamentary committee on experiences of the social security system and Child Maintenance Service within the UK, including work centred on lived experience, there is need to be reviewing and drawing upon the lessons from across the evidence base on vulnerabilities and vulnerable claimants across the Department of Work and Pensions.

³³ The Trussell Trust (2023) Hunger in the UK. Available at: [2023-The-Trussell-Trust-Hunger-in-the-UK-report-web-updated-10Aug23.pdf \(trusselltrust.org\)](https://www.trusselltrust.org/wp-content/uploads/2023/08/2023-The-Trussell-Trust-Hunger-in-the-UK-report-web-updated-10Aug23.pdf)

³⁴ Bond, N., Braverman, R. and Evans, K. (2019) The benefits assault course: making the UK benefits system more accessible for people with mental health problems. Available at: [MMH-The-Benefits-Assault-Course-UPDATED.pdf \(moneyandmentalhealth.org\)](https://www.moneyandmentalhealth.org/wp-content/uploads/2019/04/MMH-The-Benefits-Assault-Course-UPDATED.pdf)

³⁵ Wright, S., Robertson, L. and Stewart, A. B. R. (2022) Universal Credit and the invalidation of mental health problems: claimant and Jobcentre Plus staff experiences. *Journal of Poverty and Social Justice*, (doi: 10.1332/175982721X16437383460256).

³⁶ NatCen (2022) Uses of Health and Disability Benefits. Available at: <https://committees.parliament.uk/publications/8745/documents/88599/default/>

³⁷ Inglis, G & McHardy, F & Sosu, E & McAteer, J & Biggs, H. (2019). Health inequality implications from a qualitative study of experiences of poverty stigma in Scotland. *Social Science & Medicine*. 232. 10.1016/j.socscimed.2019.04.033.

³⁸ McHardy, F., Robertson L (2023) 'Child maintenance a system of support'. Fife: Fife Gingerbread

- a) How effective is the Universal Credit “Help to Claim” service at supporting vulnerable claimants to register a claim?
- b) What should DWP do to improve support for vulnerable people to make a claim and ensure they do not delay making a claim?

For people experiencing mental health problems, the Money and Mental Health Policy Institute states: *“the government must take a universal design approach – assuming any claimant could be affected by a mental health problem, and creating systems that a person experiencing common symptoms would not struggle to access”*.³⁹

To ensure that vulnerable people get access to benefits that they are entitled to requires additional, targeted one-to-one support to be made available to people with more complex needs. Research led by Professor Sharon Wright on mental health and conditionality recommended personalised support for people with mental health problems, provided by specialist advisors within Jobcentres alongside working with locally-based support organisations.⁴⁰ This requires sufficient funding in specialist, suitably trained Disability Employment Advisors who have set maximum caseloads. Jobcentres also need to be working in partnership with locally based support organisations to enable signposting and direct referrals. Individuals should also have the choice of having Jobcentre appointments in a private space, with appointments offered in ways that meets the need of individuals. In DWP research on health and disability benefits, there was a view that JCP staff should improve their customer service through more respectful and compassionate treatment of those with health conditions and disabilities.⁴¹

We call that people engaging across the DWP as social security claimants or within the Child Maintenance Service should be treated with dignity and respect and compassion as a central tenant of their service delivery. Alongside this we call for the removal of conditionality and removing fear of sanctions as well as adequacy of support across all systems.

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⁴⁰ Wright et al. (2020) Mental health, welfare conditionality and employment support – policy recommendations and key findings. Available at: <https://www.povertyalliance.org/wp-content/uploads/2020/10/Mental-health-welfare-and-employment-recomendations-and-findings.pdf>

⁴¹ NatCen (2022) Uses of Health and Disability Benefits. Available at: [Microsoft Word - NatCen response - 26 January 2022 \(parliament.uk\)](https://www.natcen.ac.uk/parliament/2022/01/26/microsoft-word-natcen-response-26-january-2022-parliament-uk)

⁴² Bond, N., Braverman, R., Evans, .K (2019) ‘The Benefits Assault Course Making the UK benefits system more accessible for people with mental health problems’

<https://www.moneyandmentalhealth.org/wp-content/uploads/2019/03/MMH-The-Benefits-Assault-Course-UPDATED.pdf>

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7. Is DWP's staff guidance for dealing with vulnerable claimants, including the Universal Credit Six Point Plan Framework, adequate?

Central to the six-point framework should be the principles and understanding that underpin it. Within the current guidance there is wording that is unhelpful and dangerous and reinforces unhelpful narratives and stereotypes regarding supporting persons with suicidal ideation.

*Whilst some claimants may declare they intend to kill or harm themselves as a threat or a tactic to persuade; others will mean it.*⁴⁵

The emphasis within the six-point plan on a discussion of claimant disclosure of suicide or self-harm as a threat or persuasion tool fails to acknowledge the distress and risk of harm a claimant is potentially facing when expressing any kind of suicidal thoughts and increases the risks of those following this guidance to dismiss or incorrectly interpret a claimant disclosure.

Responses to any disclosure of suicidal intent should recognise a claimant's risk of harm and the importance of suicide prevention and ensuring vulnerable claimants are supported. O'Connor (2021) highlights historic context around suicide and the problems with discourses and narratives which frame suicide disclosures as attention seeking or manipulative. They emphasise the need to focus on all responses being compassionate and to recognise the pain and distress and need of support when this is shared.⁴⁶

⁴³ Wright et al. (2020) Mental health, welfare conditionality and employment support – policy recommendations and key findings. Available at: <https://www.povertyalliance.org/wp-content/uploads/2020/10/Mental-health-welfare-and-employment-recomendations-and-findings.pdf>

⁴⁴ NatCen (2022) Uses of Health and Disability Benefits. Available at: [Microsoft Word - NatCen response - 26 January 2022 \(parliament.uk\)](#)

⁴⁵ Document Title (parliament.uk)

⁴⁶ O, Connor R (2021) 'When it is Darkest- Why People die by Suicide and What we can do to prevent it'

Discussing vulnerabilities around suicide is complex and we would suggest further DWP consultation with a range of organisations and healthcare professionals and those with lived experience around the most effective approach and interventions within service design to support a framework that upholds suicide prevention and rights.

We also suggest that DWP draw upon the extensive evidence base on known health inequalities and risk factors for adverse mental health. Critical to supporting prevention of suicide is ensuring that staff working across the DWP, and policy and practice embed a nuanced and intersectional approach of mental ill health which ensures the protection of all who engage with the system.

This intersectional understanding needs to recognise wider inequalities such as the risk faced by women who have experienced gender-based violence. Recent research by the Agenda Alliance in the UK on intimate partner violence (IPV)⁴⁷ and suicide found that women who have experienced IPV are more than twice as likely than those who have not experienced IPV to have had suicidal thoughts in the past year.⁴⁸ In Scotland men are almost three times as likely to die by suicide than females but female suicide rate is increasing.⁴⁹ Inequalities may also be related to other social demographic factors such as ethnicity, gender identity and so on. Evidence highlights that lesbian, gay, bisexual or trans are at higher suicide risk than heterosexual or cis gender groups.⁵⁰

Living on a low income continues to be a key risk factor of suicide. Recent statistics within Scotland have highlighted that people living in Scotland's most deprived areas are 2.6 times more likely to die by suicide than those living in the least deprived areas.⁵¹

Evidence from other periods of economic challenges and pressure such as previous recessions provide important learnings during a cost-of-living crisis. The current context poses challenges in terms of downward pressure on incomes. Previous periods of recession have illustrated trends in terms of increased risks of poor mental health and suicidal behaviour.⁵²

There is much evidence on inequalities in mental ill health and of the increased risks of suicide for those on a lower income, which would apply to all universal credit

⁴⁷ IPV as defined by World Health Organisation, behaviour within an intimate relationship which includes acts of physical violence, sexual violence, emotional (psychological) abuse, and controlling behaviours.

⁴⁸ Agenda Alliance (2023) 'Underexamined and Underreported' [Underexamined and Underreported Briefing \(agendaalliance.org\)](https://agendaalliance.org)

⁴⁹ Public Health Scotland (2022) [Suicide statistics for Scotland - Update of trends for the year 2021 - Suicide statistics for Scotland - Publications - Public Health Scotland](https://publichealthscotland.scot.nhs.uk/publications/suicide-statistics-for-scotland-update-of-trends-for-the-year-2021/)

⁵⁰ Di Giacomo, E., Krausz, M., Colmegna, F., Aspesi, F., & Clerici, M. (2019) 'Estimating the risk of attempted suicide among sexual minority youths: A systematic review and meta-analysis' 'When it is Darkest- Why People die by Suicide and What we can do to prevent it'

⁵¹ Dave Morris (2023) 'Suicide is an inequality issue' [Guest blog: Suicide is an inequality issue - The Poverty Alliance](https://povertyalliance.org/guest-blog-suicide-is-an-inequality-issue)

⁵² Frasquilho, D., Matos, M., Salonna, F. *et al.* Mental health outcomes in times of economic recession: a systematic literature review. *BMC Public Health* **16**, 115 (2015). <https://doi.org/10.1186/s12889-016-2720-y>

claimants as well as many other households engaging with wider DWP services such as the Child Maintenance Service.

Preventing suicide needs to be a central focus across the Department of Work and Pensions. We support the Samaritans call for Suicide and self-harm awareness training within social security systems emphasising the importance of compassionate communication and the need to take all signs of distress seriously. DWP staff and contracted partners must feel confident to identify when someone is in distress, have the skills to open a conversation, listen compassionately and be aware of support that is available to refer people to where relevant.⁵³

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⁵³ Samaritans (2023) [Insights from experience: economic disadvantage, suicide and self-harm \(samaritans.org\)](https://www.samaritans.org)