



Department  
for Work &  
Pensions

# DWP Review

# Alternative Format Communications

## **Blind and Partially Sighted People**

In consultation with the Royal National Institute for the Blind (RNIB)

---

March 2015

# Contents

- Foreword ..... 3
- Comments from the Review Lead ..... 4
- Purpose and Scope of the Review ..... 5
- Summary ..... 6
- DWP Commitment ..... 7
- Section 1 Background ..... 8
- Section 2 Recommendations ..... 11
- Section 3 Other Customers and Adjustments ..... 14
- Section 4 Improving Current Systems ..... 15
- Section 5 Ongoing work to improve the customer experience ..... 16
- Annexes ..... 18
- Annex 1: Summary of Stakeholder Perceptions ..... 19
- Annex 2: Summary of Customer/Claimant Perceptions ..... 22
- Annex 3: DWP and its External Delivery Partners ..... 26
- Annex 4: Alternative Formats - Other People ..... 31
- Annex 5: Types of Alternative Formats ..... 33

# Foreword

The Department for Work and Pensions is currently rolling out a wide-ranging programme of Welfare Reform to transform and modernise its services. It is vitally important that information about our services is accessible to all and that we treat people fairly and equally. This includes making reasonable adjustments to meet the needs of all our claimants or customers who have a disability as defined by the Equality Act 2010.

Our customers and their representative groups have told us that we don't always get it right and some of our customers, particularly those who are blind or partially sighted, have experienced difficulties accessing services. In response, we commissioned this review to assess the current processes for providing communications in Alternative Formats, specifically focussing on this group. This review has looked at the provision of Braille, Large Print and Audio and the use of Email when communicating with blind and partially sighted people and it recommends improvements to services in this area. Providing communications to disabled people in a format they need is essential to help them access the support they need when they need it.

I have been monitoring the review closely and I welcome its key recommendation: the creation of a Central Team of accessibility experts to provide Alternative Format Communications where they are needed. This will need to be fully tested to ensure it works properly for our customers and the Department. In the meantime, we will continue to take steps to improve current processes, for example by raising awareness of our people.

I would also like to take the opportunity to thank our stakeholders and partners and specifically the Royal National Institute for the Blind for their assistance and support throughout the review.

Rt Hon Mark Harper MP  
Minister for Disabled People

# Comments from the Review Lead

The Equality Act 2010 creates a legal duty to make reasonable adjustments for disabled people when providing a service to the public or exercising public functions. This requirement is anticipatory and organisations should not wait until a disabled person wants to use a service before considering the type of reasonable adjustment to make. A reasonable adjustment is a change to a physical feature, environment or the way things are done to make sure that a disabled person is not put at a substantial disadvantage compared to a non-disabled person. In addition the public sector equality duty under that Act requires all public authorities to have due regard to the need to advance equality of opportunity for disabled people, including by removing or minimising disadvantages which they face and taking steps to meet their particular needs.

I would like also like to thank the Royal National Institute for the Blind for their support throughout this review. Their engagement and help has been critical in better understanding the challenges faced by those who need adjustments. Also I would like to thank the external charities and DWP partners who supported the review.

I would also like to thank my small review team who worked diligently on this review, investigating and testing the guidance and procedures from request to delivery for over twenty different DWP benefits.

Jon O'Donnell

March 2015

# Purpose and Scope of the Review

- Review, map and test current policies, processes and procedures for implementing Alternative Format requests from DWP customers and claimants across DWP business arms.
- Review staff awareness, across DWP, of the current policies, procedures and processes.
- Consult with external organisations who work with or represent those with visual impairments.
- Consult with visually impaired DWP claimants who currently access our services.
- Make recommendations to improve DWP Alternative Format Communications based on the findings of the review.
- Reduce the risk of errors and in turn reduce associated costs of putting things right including the need for rework and repeating work, also the costs of compensatory payments where customers have experienced a financial loss as a result.

# Summary

## Introduction

The review conducted extensive research into the current provisions of Alternative Format Communications across DWP. Although the review scope was limited to how DWP Alternative Format Communications may impact those who are blind or partially sighted, the review does lightly touch on other people who may need adjustments who would also benefit from the recommendations made in this review.

- 1) This review investigated the current provision of Alternative Format communications across DWP's delivery arms including Benefit Delivery, Work Services and Contact Centres and considered the processes used by some of our partners such as Disability Assessors and Work Programme Providers.
- 2) DWP delivers a complex and varied service, delivering benefit processing, jobseeking support and also support to employers and those in receipt of state retirement pension. The Department services a wide age spectrum, providing benefits and support to almost every age group.

## Recommendation 1

DWP tests a 'Proof of Concept' pilot (further details are on page 11) which will test the process, procedures and requirements of a central team to deliver communications in Alternative Formats. This 'Proof of Concept' needs to be tested on a benefit that will give a realistic assessment of the practicalities of a central team and which customers who need adjustments are more likely to claim.

## Recommendation 2

If after conducting feasibility, cost and risk assessments it is not possible to make progress towards having one central team delivering Alternative Formats, then further work will be required to improve the current systems. Further details of these contingency arrangements are set out on page 12. Many elements of this secondary recommendation can also be explored alongside the primary recommendation.

# DWP Commitment

- 1) DWP is committed to exploring Recommendation 1 (page 11), which is supported by the Minister of State for Disabled People, as the preferred way forward.
- 2) DWP will test a 'Proof of Concept' project by setting up a central team for Alternative Formats, with an aspiration to do so by the end of the third quarter of 2015.
- 3) This is an aspiration as we have to secure funding from the budget during a time of constraint before we can confirm a 'Proof of Concept' launch date.
- 4) The benefit that is identified to test the 'Proof of Concept' will be dependent on the outcomes of the Change Feasibility Assessment and other operational factors, but we will select a benefit that provides the most realistic assessment for the proof of concept.
- 5) We will work closely with RNIB and other external partners on the development of and the launch of any trial and share the outcomes of that trial, and we will work together to improve both the customer and/or claimant experience of those people who need reasonable adjustments in the manner in which information is provided.
- 6) We will continue to work to improve our communications and how we make adjustments for our customers to improve accessibility to information.

# Section 1 Background

- 1) DWP is responsible for welfare, pensions and child maintenance policy. As the UK's biggest public service department, it administers the State Pension and a range of working age, disability and ill health benefits to over 22 million claimants and offers employment support to a wide and diverse range of customer groups.
- 2) In the course of its business, the Department issues millions of communications each year. On occasions we get things wrong in providing adjustments, and this can have an impact on the Department's customers and on its own resources through potentially unnecessary re-work to put things right.
- 3) In 2013, DWP identified some commonality in the complaints received relating to Alternative Format communications for the Blind and Partially Sighted.
- 4) An examination of those complaints by the Social Justice Team indicated that there may be issues with the quality, consistency and accessibility of Alternative Formats across some DWP Benefits. During the review Employment Support Allowance, Pensions and Jobseeker's Allowance figured significantly as areas that had received complaints. This also identified the need to improve data recording, and the monitoring of adjustments made, to improve our success in identifying and anticipating the needs our customers for reasonable adjustments in the way we communicate. This requirement has been considered in Recommendation 2 (Contingency Arrangements on page 12) with regard to improvements to the current service.
- 5) The review has found strong evidence identifying opportunities to improve the current service delivery for this customer group. The review found that areas of the Alternative Format process that DWP has in place to identify, address and consistently provide these communications could be improved. The points below highlight the areas that could be improved. In particular the review found:
  - a. DWP do not consistently or routinely, across all benefits, ask about Alternative Format communication requirements.
  - b. There is not a consistent approach to recording Alternative Format requirements on DWP's IT systems.

- c. When Alternative Formats are recorded there is no alert system to automatically highlight to subsequent users that Alternative Format communications have been agreed with the customer.
- d. There is sometimes inconsistent knowledge of, and/or confusion around, the processes to follow to supply letters, forms and leaflets in Alternative Formats because each IT benefit system has small variations in how to put in place the adjustment. This can lead to errors and on some occasions cause delays.
- e. Internal guidance to support staff in delivering a consistent quality service is either not complete or is missing sections of the guidance and as new systems have been launched some guidance is no longer fit for purpose.
- f. Regular review and training in awareness of DWP's statutory duties with regard to making reasonable adjustments offers opportunities to improve staff handling of our customers' problems.
- g. Clerical Handling Handovers between different benefits with regard to customers' Alternative Format adjustments could be improved.
- h. There is a need to improve the retention of staff trained to deliver the adjustments across DWP or improved succession planning for when staff move on.

## Information on DWP Policies and Systems

- 6) However, DWP has given, and continues to give, significant time and resources to Disability Awareness. It has teams dedicated to this and has published internal guidance to raise awareness of the Equality Act 2010 and the Public Sector Equality Duty.
- 7) To ensure that staff are aware that email can be used as a reasonable adjustment we have updated our Emailing policy guidance for staff (October 2014), making it clear that emailing correspondence is acceptable as a reasonable adjustment for disabled customers and the necessary steps staff need to take to achieve this. This information has also been fully communicated to staff who engage with customers via a number of DWP communication channels whether by phone, letters or face to face.
- 8) The primary issues identified within the review come from the difficulty in combining legacy benefits with newer IT systems. These newer systems have significant improvements that do allow in some cases automatic Large Print and also allow the user to record an Alternative Format need. But the links between the old legacy benefits and the new benefits and/or claim processes give rise to avoidable errors and the recommendations in this review are targeted to achieving an improvement in this area.
- 9) The range and variety of benefits and services delivered by DWP are reflected in a range of slightly different processes for responding to and making reasonable adjustments to communications for claimants. The variety of IT systems utilised to record and process benefit claims along with the variety of methods available to make a claim to the benefits mean that there is little standard practice or procedure in place, which complicates the process of adjustment when locally delivered in each site.
- 10) The Alternative Format service offered by DWP can vary from benefit to benefit and from delivery site to delivery site across all Contact Centres, Benefit Centres and Jobcentres and greatly depends on the training and experience of the staff member with whom the customer first makes contact.

# Section 2 Recommendations

## Recommendation 1

### **Proof of Concept – Central Team for Alternative Format communications**

- 1) The entire process of managing Alternative Format communications should be under one DWP business strand and one area of overall management responsibility.
- 2) This would improve the clarity and vision of staff to improve the consistency of the management and interaction with disabled people and enable clearer messages to all parts of the DWP business structure.
- 3) This centralisation of the process should reduce the need for hundreds of key people to be trained in all aspects of the Alternative Format service and will over time improve the consistency of the process. Additionally it should reduce complaints and the need to correct failures to make the adjustments which cost the Department significant time and resources in 'rework'.
- 4) The current approach may be seen as a 'Failure Demand System' in that, when DWP does on occasions get things wrong, not only does it cause upset and distress to some of the most vulnerable customers it serves but it also creates additional demand upon DWP, costing time and money to put things right.
- 5) We considered that as there are up to 140,000 customers with a sight condition claiming DWP Benefits we needed to put into context the current volumes of issues identified. However, the review has identified clear opportunities for improving our current systems and processes and they are highlighted in the recommendations in this review.
- 6) A single central team managing the process could bring significant benefits that include:
  - a. Improved quality and consistency of service and lower costs compared to trying to implement or improve the current system.

- b. Improving the referral process for DWP to enable adjustments to be identified and referred to the central team quickly. This should lead to reductions in complaints and then rework and the associated costs.
  - c. Consistency of delivery during significant change as new systems like Universal Credit and State Pension changes take effect.
  - d. Drawing on all the best practice from across DWP.
- 7) They would also be able to offer consistency of service as the DWP moves through significant change programmes to its online accessibility of services. With Universal Credit and State Pension moving to preferred online channels, the central team will be able to offer a consistency of service and work with the new online provision to move those customers who do have accessibility software onto the online services being offered by Universal Credit and State Pension.

## Recommendation 2

### Contingency Arrangements

- 1) If after conducting detailed feasibility, cost and risk assessments it is not possible to make progress towards having one central team delivering Alternative Formats, then further work will be required to improve the current systems.

This work could include:

- i. Training at least one person for every office in Alternative Formats. This includes planning for absences, and therefore additional staff will need to be trained.
- ii. Continue to review and where necessary rewrite the Alternative Format Guidance. Work towards putting all guidance in one location on the internal intranet.
- iii. Review and improve the handover processes between Contact Centres, Benefit Centres and Jobcentres.
- iv. As and when feasible, introduce centralised data recording for all Alternative Format requests and the adjustments made, to better understand our customer needs and use this information to improve changes to the service for the future.
- v. Continue to Improve Alternative Format Communications awareness training for all staff.

- 2) Of course, many elements of this secondary recommendation are not mutually exclusive with the proposal for a centralised team. We will therefore continue to actively explore what additional improvements can be made alongside the primary recommendation to the service we offer customers who need adjustments.

# Section 3 Other Customers and Adjustments

## Other customers/claimants who may require Alternative Formats

- 1) Other health conditions that may also require communications in Alternative Formats have been brought to the attention of the review. Although not part of the original remit, there is scope for improving the provision of Alternative Formats for all customers who have a health condition, specifically those who are Deaf or Hard of Hearing, have dyslexia, or who are learning disabled.
- 2) As explained in the Primary Recommendation, it is recommended that any centralised team should consider the provision of Alternative Formats for other impairment groups and should be responsible for Alternative Formats for all customers, claimants or other service users who need adjustments to standard communication methods.
- 3) The centralised team could also eventually manage all customers with Alternative Format needs but specifically, depending of course on available finance and the practicality of an extended remit, it could explore the possibility of taking on further responsibility for those with hearing impairments and other disabilities.

# Section 4 Improving Current Systems

## Jobseeker's Allowance, Employment Support Allowance, Pensions and Income Support IT systems

- 1) There may be scope within the legacy systems to reallocate old codes no longer in use to be reused as an identifying marker for Alternative Format requirements. Although this system is not a high visibility option it may provide one way of identifying customers' needs on the legacy systems and with staff training and awareness the risk of errors in providing adjustments will be reduced.
- 2) Additionally the codes will enable DWP to obtain improved information on adjustments from the legacy systems. The legacy IT systems will continue up to and possibly beyond 2018 and so this small change could bring worthwhile benefits for a number of years.
- 3) This option will require full risk impact assessment by DWP's IT Provider including a cost assessment.

# Section 5 Ongoing work to improve the customer experience

- 1) Since the beginning of the review there has been ongoing work to improve the service to all people who need adjustments to communications. DWP takes seriously its duties under the Equality Act 2010 and recognises that provision of information in an accessible format is an essential part of engaging effectively with customers who need reasonable adjustments to be made.
- 2) The review noted that the work to improve the accessibility and training of staff has continued. It is clear the Department is committed to continuously improving customer access to benefits and services and is investigating a variety of possible options regarding Alternative Format provision. In addition, all new DWP staff undertake Equality and Diversity Essentials, a mandatory online learning module.

## Improvements in Training

- 3) DWP also provides a number of diversity and equality training materials for staff and managers. Jobcentre advisers, in particular, have access to a comprehensive training programme which focuses on raising awareness of the individual's personal circumstances, including disabilities, and tailoring alternative communications to meet an individual's specific needs. This is supported by internal guidance for staff on helping disabled customers who require reasonable adjustments. This is regularly reviewed and new guidance on how to support customers accessing DWP services was written and communicated to staff in December 2014. This has also been strengthened by a refreshed internal staff intranet site, which is dedicated to supporting customers who require reasonable adjustments to access DWP benefits and services.

### **Further examples of this are:**

- a. E-mail as a reasonable adjustment has been rolled-out across the Department and we are working to strengthen the data management aspects of this.

- b. New IT solutions are being pursued, which will allow claimants to log on and access communications.
  - c. Alternative Format communications now form part of the internal adviser quality process (Quality Assurance Framework).
- 4) The current work will be continued to improve the customer experience for blind and partially sighted people who need us to use Alternative Formats. And DWP is keen to continue to work with RNIB and other groups to ensure inclusion, bearing in mind that accessibility of information is an essential part of good customer communications.

# Annexes

- 1 **Summary of Stakeholder Perceptions**
- 2 **Summary of Customer/Claimant Perceptions**
- 3 **DWP and its External Delivery Partners**
- 4 **Alternative Formats - Other People**
- 5 **Types of Alternative Formats**

# Annex 1: Summary of Stakeholder Perceptions

## **Foreword:**

The review worked in partnership with DWP External Stakeholders Forum (a group of thirty-five National Disability Organisations) to gain a comprehensive insight into customer experience and perceptions. Members of the forum were asked a series of questions about DWP's current service and also given the opportunity to make contributions and suggestions on improving the future delivery of Alternative Formats.

The review is very grateful to the individuals who shared their views and to the organisations, who contributed their views, supported the evidence gather and collated the responses. Shown below are the questions posed and summaries of the responses received.

## **Please tell us how easy it is to obtain DWP letters and leaflets in an Alternative Format?**

The responses varied, however the general theme was that it was often very difficult, and at times impossible, to obtain the information in the required format. Customers were sometimes informed the adjustment or format was not available. Making a complaint about the service was bureaucratic, with the need to provide information on an accompanying form which stakeholders added was itself difficult or impossible to obtain in an appropriate Alternative Format. Often customers were referred to Complaints Helpline who, in turn, referred the person back to the same location or area of business where the original problems occurred.

## **How consistent is the provision of Alternative Formats once you have requested it?**

The general theme, again, was that success in obtaining Alternative Formats was inconsistent. Often DWP would provide a communication in a requested format, only to revert to standard format for subsequent communications.

**When information is provided, was it in a format that could be used, for example by post or email.**

Again, the response here was that information is provided in a helpful format inconsistently. Too often the format of letters was not to the required specification, mostly received by post and usually not converted into the required format. Email communications were rare and agreement to email as an Alternative Format was inconsistent, often requiring repeated requests from the claimants.

**Based on experience of accessing information on benefits, how easy is it to obtain the guidance and information people needed in the format required?**

Responses indicated that it was far from easy and in general very difficult to obtain and on occasions almost impossible. However, it was also noted that on occasions some DWP people had “gone the extra mile” in trying to provide the information in the required format

**If you could improve the provision of letters in Alternative Formats from DWP, what you would change about the current service?**

**The most common responses received were:**

- Allow contact by email
- Processes across DWP need to be harmonised
- Improve the speed of communications for Alternative Formats
- Improve the identification of customers who need Alternative Formats on DWP Computer systems
- Do not use grey recycled paper for Alternative Format communications
- Improve awareness of Alternative Formats among DWP customer-facing staff
- Adapt the format of letters to ensure that important information is on the first page.

**If you use DWP customer-facing services, do DWP people provide you with information in Alternative Formats?**

Stakeholders repeatedly reported that Alternative Formats were not offered at face to face interviews, even when the person conducting the interview was aware of the customer's sight impairment. There is limited support offered, with the onus on the visually impaired person bringing a friend or a relative to read the documents to them. Many visually impaired customers found that privacy and their dignity were often compromised as a result.

**We then asked stakeholders to rate the current service, and asked:**

**Overall, on a scale of 1-10 with 10 being excellent and 1 being poor, how would you rate the consistency of information in Alternative Formats from DWP?**

Overall the responses gave low scores, with many scoring only 1 and some suggesting that a negative score would be appropriate if available. In narrative terms, the level of service in this particular area was described in uncomplimentary terms by some of our customers.

There was some positive news for DWP though in that Disability Living Allowance (DLA) consistently received higher ratings within the additional narrative supporting this section.

**Mencap, The National Deaf Children's Society** and **Sense** also commented on the barriers faced by people who are Deaf blind, Deaf, Hard of Hearing or have Learning Disabilities, emphasising the need for information to be available in other formats including Easy Read, very large fonts and British Sign Language. DWP also need to allow extra time for people who may need it.

# Annex 2: Summary of Customer/Claimant Perceptions

## Foreword:

The review commissioned a DWP Occupational Psychologist to conduct a Customer Forum with claimants identified from the Chatham Jobcentre. All those who took part were claiming Employment Support Allowance.

The review is very grateful to the management and staff of Chatham Jobcentre for sensitively identifying and approaching these customers to take part in the forums.

While only a small sample group of 17 customers, the views and anecdotal insight into customer perceptions of the services offered by DWP have proved invaluable in helping to shape the Department’s proposals in this area.

## Age and Sex of Participants

Age Range	Total	Female	Male
21 – 40	3	3	0
41 – 60	14	7	7

## Key facts - Summary data

- 30% identified themselves as blind/visually impaired and all were registered as blind with the local authority;
- 70% identified themselves as visually impaired or partially sighted. Over half of these were not registered blind with the local authority;
- 90% of those who took part stated they cannot use computers;
- 40% had actually requested Alternative Formats;
- 25% off those who asked did obtain communications in the requested Format;
- 60% stated that they were unaware that Alternative Formats could be arranged; and
- 40% stated that they have to rely on their spouse/partner, children or other family members to read letters and leaflets for them.

Concern was raised not only through the customer forums but also from the feedback received from stakeholders and representative groups that customers normally prefer not to share the personal or sensitive content of letters issued by DWP. The increasing drive towards using digital technology and platforms for Government services poses a clear risk for customers whose circumstances mean they have only very limited or no access to digital channels.

## Summary of Claimant Views

This is a summary of anecdotal feedback from individual DWP customers about their experiences in gaining access to information:

- One customer reported that DWP had never asked if communications are required in a large print. Would expect DWP to know about such requirements where it is on record that an individual is partially sighted.
- Another said they had contact with DWP but had not been asked if communications are required in Alternative Format nor have they ever requested these. Reported reading is difficult irrespective of font size and all letters are read by their spouse.
- One customer was fully supported by their elderly parents who are both aged 85+ to read, write and when travelling outdoors. Contact from DWP had been by telephone to check how they are getting on. DWP always asked if any other information is needed but had never specifically asked if communications were needed in Alternative Format.
- One individual who had developed acute blindness following a headache said they live on own their own with their children. Has asked for all contact from DWP to be by telephone but keeps getting letters which the children then have to read. Customer is concerned that it is inappropriate to involve their children in financial matters and doesn't wish them to worry. Feels their dignity has been taken away.
- Another customer said they would like communications in large print but has never requested this, as was not aware it was possible. Would have liked to have been informed this was available.
- One customer reported that they do not get the information they need from their Jobcentre adviser due to lack of time allocated for their appointment. A feeling that no one understands how hard it is with limited vision and they do not get any help from anyone.
- Another customer who had had both phone and face to face contact with DWP had never been offered information in Alternative Format nor had they requested this. Phone is a better form of communications for them but would also like audio tapes. All letters are read by spouse but communication in larger print or audio would be helpful.
- Another customer in regular contact with DWP said they didn't mind different forms of communication, although they had a preference for large print. Partner reads for them when has difficulty. Always has to explain to get communications in large print.

## **The general theme:**

- It would be helpful to speak to people in DWP who know of the issues faced by blind or partially sighted people as this would avoid having to explain their condition to everyone they have contact with;
- Most customers prefer to have access to their personal information themselves, rather than having to have this relayed to them by a friend, relative or other third party;
- An individual's circumstances should be clearly recorded for people in DWP so that are aware of any special requirements. This needs to be coupled with greater awareness of the problems faced daily by people with visual impairments.

# Annex 3: DWP and its External Delivery Partners

## **Alternative Formats and Non-standard communications and Third Parties**

### **Summary**

DWP is supported in the delivery of its customer facing business by contracted and non contracted providers of services.

DWP refers claimants to external providers of services, in the course of its business with referrals being made for health assessments, such as is the case for Personal Independence Payment (PIP) and ESA claims, and/or training, work related services or more general employability courses and programmes such as the Work Programme Providers (WPP), Sector Based Work Academies and the 'Support Contract' provision.

The review team visited two WPP and made contact with ATOS Healthcare, the organisation which at the time carried out health assessments for ESA and PIP claims.

Where DWP claimants are referred to external providers of services, it is important, in the first instance, that any Alternative Format needs are identified by DWP and are routinely passed to providers to maintain continuity of communications for the claimant.

The review wanted to see a clear handover of agreed Alternative Format information to the providers to ensure a seamless continuation of use of the appropriate format.

DWP's duties under the Equality Act 2010 cannot be delegated, and so it is for DWP to ensure that its delivery partners and providers have in place robust processes to ensure that Alternative Format requirements are consistently identified and complied with.

WPP is delivered for DWP, across the country, by a number of contracted external delivery partners. Some of whom operate in multiple geographical areas. The review team visited two WPP both of whom deliver in multiple geographical areas.

Both providers had good processes in place to address and take forward any Alternative Format requirements identified and passed to them by DWP.

Equally, both providers had good systems in place to identify requirements that may not have been notified to them by DWP during the referral stage.

Both providers were able to demonstrate systems and processes that ensured Alternative Format needs would be consistently met, once identified. The systems used included IT System Markers to alert their staff that an Alternative Format requirement is in place and had clerical processes in place to mark case papers highlighting requirements.

Neither of the providers were able to provide any current or historical volumetric information on claimants who had Alternative Format needs either from local records or from their respective regional or national tiers.

Both providers reported that if Alternative Format needs were identified which could not be met locally, a solution would be found as and when needed (large print option was to use photocopier). The national resources of the provider would be investigated before considering sourcing conversion by them locally.

As with concerns over using photocopiers in Jobcentres there was a presumption by both providers that enlarging print on a photocopier meets the definition of Large Print.

This widely held perception that enlarging documents on a photocopier satisfies a large print requirement needs to be challenged.

In 2009 DWP introduced an IT solution, to automate and enable IT transitions between JCP and its providers of external provision. This replaced, for some external referrals, a clerical based system involving the completion of clerical referral forms. The system is known as Provider Referral and Payments (PRaP). We believe that the eventual aim is develop PRaP so all programmes are supported and it provides a single end to end solution for referrals to labour market provision, however this is not currently the case.

While vulnerable claimants are identified to the provider by means of a vulnerable claimant marker within PRaP, there is no alert or other reminder to the Jobcentre

Adviser making the referral to include specific details of Alternative Format requirements, if they are known.

Referrals made to providers using the PRaP System allow for free text boxes to be completed at the point of referral that then pass information to the provider. The passing on of Alternative Format information is entirely and solely dependant upon the DWP Work Coach making the referral, identifying the requirements and consciously making the decision to notify the provider. There is an inherent risk in this process, because if the information is not passed to the provider, any communications issued, including invitations to attend an interview in person, and information documents about what to expect of the provider, will all be issued in standard formats which may not be fully understood by the claimant with Alternative Format requirements. Provision of information in the correct format is essential to enable people to understand their rights and responsibilities, for example instances where a benefit sanction may be applied.

## **Other Provision of Information not covered by PRaP referral system**

For some purposes, the PRaP referral system cannot be used. Jobcentres have two standard referral forms, which may be used as an Alternative Format.

Both referral forms provide various tick boxes that are completed by the work coach at the point of referral. While these boxes indicate to the provider that the person referred may have a disability or health condition, there are no sections that specifically allow for the work coach to detail an Alternative Format requirement and therefore inform the provider of Alternative Format needs.

It is common for a 'warm handover' to take place when either a PRaP or non PRaP referral is made. A 'warm handover' allows for the provider to speak with the claimant at the point of referral either face to face or on the telephone. It is often at these points that Alternative Format requirements are discussed and agreed between claimant and provider.

Warm handovers are seen as good practice and the review encourages their use whenever possible or practical to deliver.

## **Claimant handover process for Work Capability Assessments.**

**Update Note:** Atos Healthcare is no longer the provider of assessments but at the time of the review investigations, they were the provider.

For ESA, a Work Capability Assessment (WCA) is generally required to process the claim. The WCA is undertaken by external providers on behalf of DWP.

Clear internal guidance exists for DWP staff to follow when making a referral for a WCA. The review found that this guidance was relatively easy to search and find on the DWPs intranet pages although within that guidance some links to process charts were broken.

As part of the WCA process, claimants are initially required to complete a health questionnaire (ESA50).

Whether the ESA50 is issued in non-standard formats is dependant upon whether it is known, and identified by DWP prior to the referral being made for a WCA to be undertaken.

If it is known prior to the referral for a WCA that there is Alternative Format communications need, it is DWP's responsibility to arrange completion of the ESA50 and issue it in an Alternative Format.

If the referral has already been made, the guidance suggests that the referral should be withdrawn and the process conducted clerically, again instructing DWP to arrange for an Alternative Format ESA50 being issued.

We know that many claimants' Alternative Format needs are not recorded correctly, and from claimant feedback received from stakeholders, and the review team's own claimant forum, we know that some requests are denied and may therefore not be recorded at all. If there are Alternative Format needs and these are not known when making the referral for a WCA, the ESA50 is likely to be issued in standard format risking non completion by the claimant. It is likely than non completion within the set timescales would result in benefit sanctions being applied.

The current provider of the WCA, ATOS Healthcare, has clear guidance in place to follow and can provide all correspondence in Alternative Format where they are made aware of this.

The guidance covers all of the benefits for which they are contracted for and clearly lays out the responsibilities of ATOS Healthcare, the timelines and the procedures to follow depending upon the various scenarios of when the notification or request is received by them.

While ATOS Healthcare has very clear guidance and procedures for making the required adjustments, the process is entirely reliant on DWP informing ATOS Healthcare in the first instance. If this step is missed, subsequent communications will be issued in standard formats risking sanction activity where claimants do not comply with appointment invitations or completion of required documents.

# Annex 4: Alternative Formats - Other People

## Foreword:

This review during the course of its evidence gathering was made aware of other issues impacting other customer groups who also had an Alternative Format need.

Although this review is focussed on the issues impacting the Blind or Partially Sighted we could not ignore the other evidence that gives an insight into the problems faced by all customers who need a non-standard communication method.

The problems with guidance to provide Braille, Large Print, Audio or Email are not unique to this customer group.

## **DWP defines customers who are vulnerable and sets out a list of guidance from its Social Justice Intranet pages:**

Cognitive and Neurological Impairments include:

- Mental Health conditions
- Hidden Impairments (for example ADHD, Autism Spectrum Disorders, Dyslexia and Dysphasia)
- Memory Loss
- Learning Difficulties
- Reading and writing difficulties
- Literacy/Numerical difficulties

Physical and Sensory Impairment/Disability includes:

- Mobility
- Hearing
- Visual
- Speech

## **Easy Read**

Easy Read is a format that enables documents to be produced in a format such that someone with a Learning Disability can easily understand the information.

If you try and find a leaflet or have a letter produced in Easy Read you will have significant difficulty as this review found.

The Easy Read provision from the DWP Intranet points towards the PASS Contract (I-ON). It directs to a page that lists the formats that can be obtained. But this list does not show Easy Read.

When investigated further it directed to another link, which then opened a PDF document from the Public Information Team.

There is a section on Easy Read, and link from that document ended up back at the Pass Contract page.

This highlighted the guidance is not fit for purpose; it is a cyclical route that would eventually end with the member of staff informing the customer that Easy Read is not accessible.

# Annex 5: Types of Alternative Formats

## Screen reader

A screen reader is a specialised type of software that converts electronic text to speech and outputs it to headphones, speakers or refreshable Braille devices, in line with user preference.

Screen readers utilise an accessibility API (a software "hook") to access either a web browser and the web content it renders or a computer's operating system, which in turn communicates with certain computer software.

## Screen magnifiers

A screen magnifier is software that interacts with a computer to present enlarged screen content.

## Speech recognition software

Speech recognition software allows people to operate their computer and enter data using voice rather than a mouse or a keyboard.

## Text-to-speech (TTS) software

Text-to-speech software converts written text such as, text files, web pages, PDFs and emails into audio files that can play on a wide range of devices, such as computers, MP3 players, iPods and CD players.

## Optical character recognition (OCR) software

OCR software takes scanned text and converts the scanned image into an electronic text file, which can be saved and edited.

## Large monitors

Large monitors make on-screen reading easier by providing more space on-screen, for people to manage preferences in their operating systems for how certain elements are displayed.

## Closed circuit television (CCTV)

CCTVs are stationary standalone devices that use cameras to magnify large format printed materials and objects. The materials are inserted into a shelf in the device, which displays the magnified images on-screen.

## Hand held electronic magnifiers

Hand held electronic magnifiers work in a similar way to CCTVs, are standalone devices but unlike CCTVs, they are smaller and are laid flat on objects to magnify smaller items or pieces of text.

## Dictation devices and transcription

Dictation devices allow people to record meetings or take notes that can be transcribed from the recording made. Most devices are standalone and require human translation, although there are some devices that have integrated or bolt-on translators, but the output is not always accurate so human review is still required.

## Scanners

Scanners convert images from printed material to a computer file. The type of scanner used in the context of assistive technology is a flatbed scanner, which scans at a high resolution and can be accessed by a wide range of other assistive technology devices.

## Standalone reading machines

Standalone reading machines integrate a scanner, optical character recognition software (OCR), and speech software and functions without the need for a computer. Users place printed material or an object that they would like to read into the device, which scans it, converts it into text and then reads the text out loud.

## Fusers and swell paper

Fusers are used to produce tactile printed materials, such as diagrams and maps, on especially designed swell paper.

## Braille technology

There are several different types of devices that utilise Braille technology and provide discrete outcomes based on user needs.

### **Refreshable Braille displays**

Refreshable Braille displays are electronic devices that connect to computers and produce tactile Braille output from what is on-screen.

### **Braille note takers**

Braille note takers are mobile devices that use either a Braille or QWERTY keyboard for input and voice and/or refreshable Braille for output. They also use a variety of methods to connect to and transfer information to and from other devices.

### **Braille embossers**

Braille embossers are specialised printers that produce Braille embossed documents. They use Braille translation software to convert electronic documents into Braille before printing.

### **Braille writers**

Braille writers can be either manual or electronic devices that are used for Braille input. Manual Braille writers produce Braille onto paper and electronic Braille writers input Braille directly into a computer.

### **Braille translation software**

Braille translation software is used in conjunction with a Braille embosser. Electronic documents are loaded into the translation software and can be edited, if necessary, before printing.

## Alternative keyboards

A standard keyboard may not be suitable for people who have low vision.

Many people who have low vision use either large print keyboards with high contrast colours or large print adhesive keyboard stickers in high contrast colours than are affixed to a standard keyboard.

## Audio description

Audio description is the provision of an additional narration track for audio visual content displayed on a television, video, computer or cinema screen, for viewers who wish to access it. It describes what is happening on-screen and utilises the natural pauses in the audio in order to be unobtrusive.

## Audio players

There are devices available for visually impaired people using a variety of formats, but the main formats that are being promoted are the DAISY format, which requires a DAISY Player, and the mp3 format, which is the standard format for digital audio for music, podcasts and audio books.

## Digital books

Digital books are available via handheld devices or tablets and use a variety of formats, many of which are specific to the device being used.