

How DWP involves disabled people when developing or evaluating programmes that affect them: DWP response

1. I thank the Social Security Advisory Committee for its report into how the Department for Work and Pensions (DWP) engages with disabled people and I am pleased to see recognition of the considerable progress we have made. We are committed to putting disabled people at the heart of government policy making, including by increasing participation in the development and delivery of services, products and policies. We want to improve the Department's engagement with disabled people, charities and organisations, and to build strong and trusting relationships. Our wide-ranging engagement, including through forums like the Regional Stakeholder Networks, and our Health & Disability Green Paper consultation, demonstrates how important it is to us to put the voice of disabled people at the centre of what we do.
2. One of the Department's key values is to listen to its customers. The Department regularly seeks insight from disabled people, their representatives and organisations in a number of ways, ranging from large-scale surveys, events and forums, in-depth interviews with individuals to learn from their personal experiences, to the central part user feedback plays in our service design process.
3. We have a number of established stakeholder forums that meet regularly to discuss policy and operational issues and help us improve our services for disabled people. This includes the Operational Stakeholder Engagement Forum (OSEF), containing 17 organisations who represent customers with health and disability issues, the Assessment Policy Forum, the PIP Policy Forum, and Access to Work forums in England, Scotland and Wales. Our health assessment delivery partners also have customer representative groups.
4. To deliver the Disability Confident scheme effectively, we actively engage with the DC Professional Advisers Group (PAG), comprising

disabled people, disability organisations and employers, to review and shape policy. The Department has also developed a proactive DC Business Leaders Group (BLG) to support the strategic direction and promotion of the DC scheme, comprising board-level business leaders from organisations across the UK, including disabled people and key disability organisations.

- 5.** The Regional Stakeholder Network is made up of 225 disabled people, their organisations, parents and carers that are grouped in networks in each of the nine regions in England and led by regional chairs. They allow disabled people to share their views about the policies and services that affect them and offer a channel for organisations across England to contribute their views on government priorities and policies that affect disabled people. Between November 2020 and January 2021 we met with each of the nine regions to hear their views on how our services could be improved, and we have engaged with the networks again during the consultation period, to discuss the Green Paper proposals.
- 6.** In addition to working with these standing stakeholder forums, we regularly engage with disabled people to gain insight on developing policy areas.
- 7.** The Health and Disability Green Paper explores how the welfare system can better meet the needs of disabled people and people with health conditions now and in the future, to build a system that enables people to live independently and move into work where possible. The consultation has enabled disabled people and their representatives to have their voices heard on the approaches we should consider to improve the benefits system. The Green Paper is available in a variety of accessible formats and people were able to respond via our online consultation platform, by post, or by email.
- 8.** The content of the Green Paper was shaped by listening to disabled people about their experience of our services. Between October 2019 and March 2020 the Department held seven large workshops with disabled people, their representatives and charity workers, in

locations across the country. During the pandemic we held 13 virtual events organised with charities and organisations in which we heard directly from disabled people about their real lived experience of the Department's services. In February 2021 we wrote to all Members of Parliament to invite them to host virtual events with disabled people, charities and organisations in their constituency. We held 20 such events prior to the publication of the Green Paper.

- 9.** During the consultation period we continued this engagement with a series of 11 face-to-face events in which we heard from disabled people, people with health conditions and their representatives, from each region of England, Wales, and Scotland. To give people the option of how they wanted to engage with us, we held virtual events alongside these. We also ran a series of virtual events organised with charities, to hear the views of their users. In total we ran over 40 events during the consultation period, gathering a rich set of insights from people with lived experience of the benefits system.
- 10.** As part of our evaluation into fast-tracked support through the benefits system for people who are nearing the end of their lives (Special Rules for Terminal Illness) we engaged with a wide range of stakeholders from across the UK. There were direct contributions from people nearing the end of their lives, their families and friends, the organisations supporting them and the healthcare professionals involved in their care about their first-hand experiences of accessing support. We have used the findings from the evaluation to inform proposals to change the Special Rules. This includes the recent announcement made on 8th July 2021 that the Department intends to replace the current 6-month rule with a 12-month, end of life approach that mirrors the approach used across the NHS.
- 11.** Our approach to designing services puts the users at its heart. This is exemplified by our iterative development of the Universal Credit service based on feedback from users. In April 2020 we launched our Departmental Transformation Area (DTA) to support the development of the new integrated Health Assessment Service. This creates an environment where we can work with users to test and learn from

new policy and service improvements, before it is rolled out at a greater scale.

- 12.** I am pleased to see the progress we have made in engaging with disabled people recognised in the Committee's report. I share the Committee's view on the importance of keeping the voices of disabled people at the heart of health and disability policy development and delivery. However, I do not agree with several of the Committee's recommendations because I believe that we can achieve the outcomes of sustained, meaningful engagement with disabled people in ways other than those identified in the report.
- 13.** A full response to the Committee's recommendations is annexed. In this response we have sought to demonstrate the progress made towards effective engagement with disabled people and the work we are doing to drive further improvement in future.

Chloe Smith MP

Minister for Disabled People, Health and Work

Recommendation Responses

- 14. Recommendation 1: DWP should develop a clear protocol for engagement. This protocol should be co-produced with disabled people. It should be applied consistently and comprehensively.**
- 15. We reject this recommendation.** The Department strongly believes in the value of meaningful engagement with disabled people to gain insight on how our services can be improved. The Committee's report recognises our commitment to consultation with disabled people, and in our response we show some of the ways we are demonstrating that commitment. However, we do not believe that a protocol for engagement is the right way to achieve these outcomes.
- 16.** We believe that a protocol for engagement is likely to limit flexibility and increase bureaucracy in how we engage with disabled people. The nature of engagement should reflect the problem being addressed and the appropriate level and format will vary according to the nature of the policy, the stage of the policy process and the needs of the relevant customer group. We share the goals of accessible, meaningful and wide-ranging engagement with disabled people put forward in this recommendation and we believe that we can achieve this without a formal protocol.
- 17. Recommendation 2: DWP should routinely publish information about its engagement.**
- 18. We reject this recommendation.** We believe that our existing reporting provides sufficient information on our engagement with disabled people and stakeholders.
- 19.** In accordance with Central Government Corporate Transparency Commitments, the Department publishes a record of ministerial meetings on a quarterly basis, including details of which groups attended and the purpose of the meetings. We do not believe that it would be practical or productive to routinely publish details of official-

led engagement with disabled people and stakeholders. As the Committee's report notes we need to recognise that some stakeholders or users may not want to be identified as having worked with the Department and we do not want to compromise open and honest dialogue.

20. While we do not routinely publish information about official-led engagement we do communicate about our engagement where practical. For example, the content of the Health and Disability Green Paper reflects the conversations we have had with disabled people and their representatives in the months leading up to its publication. It features many of the insights we took from those discussions and contains an Annex explaining the engagement we undertook and the organisations we worked with. It also explains our aim to follow up on the responses to the consultation with a White Paper later this year.
21. During the consultation period we held over 40 events with disabled people and their representatives to hear their views on the proposals in the Green Paper. We have since contacted attendees, or the organisation who facilitated the event, to explain what we heard from them during the event and how their feedback will be used.
22. **Recommendation 3: DWP should recruit a large panel of disabled people with experience of social security that it can consult with regularly.**
23. **We reject this recommendation.** We acknowledge the value of consulting with a wider variety of voices and the Department will continue to consult with disabled people and those with long-term health conditions via its well- established social research functions and stakeholder engagement forums. However, we do not believe that recruiting a standing panel is the most effective way to effectively consult disabled people and we believe we should continue to adopt a wide range of research activities that reach a large diverse audience.

24. For example, a survey of approximately 2,000 claimants in summer 2020 following the introduction of telephone assessments as a consequence of Covid- 19 provided rapid, rich insight. The Department also runs the **Claimant Service and Experience Survey**, which gathers annual feedback from around 6,000 claimants on disability benefits on their experiences of claiming and receiving welfare and associated support. The Health and Disability Green Paper involves large-scale consultation with a diverse range of stakeholders including disabled people, aiming to elicit a broad range of views on the Department's latest policy proposals. The establishment of the Regional Stakeholder Network enables us to engage with a nationwide group of disabled people and representatives with real lived experience of our services.
25. Creating and maintaining a representative panel across all disability benefits is unlikely to offer value for money as it would require continuous oversight and recruitment. Given the wide range of policies the Department is responsible for, which will be of interest to different groups in society, we think having the flexibility to tailor our engagement will lead to more meaningful insight than using a standing panel. Any findings from such a panel would only be indicative and could not be used for robust evaluation to assess the impact or effect of any single policy intervention. The Department has previous experience of setting up a panel (**Fulfilling Potential Forum** in 2014) but this was found to be resource intensive and unsatisfactory for many of the disabled people involved.
26. Due to the extremely diverse characteristics of disabled claimants (across multiple benefits), bespoke, targeted sample populations for each research project are likely more effective than even a broadly representative panel of 2,000 disabled people.
27. **Recommendation 4: DWP should make increasing use of publicly available, accessible, networking tools, including video-conferencing, to make meetings and other forms of contact more accessible to disabled people.**

28. **We accept this recommendation** and are committed to increasing our use of accessible technologies. These technologies have many advantages for the Department and our stakeholders, including improving the accessibility of our events and reducing costs.
29. Since the beginning of the Covid-19 pandemic we have used video-conferencing in a series of virtual events with disabled people in the build up to publication of the Health and Disability Green Paper, and throughout the consultation period. We recognise that these technologies are often more accessible than face-to-face forms of engagement.
30. The Department is testing Video Remote Interpreting (VRI) within Universal Credit and Access to Work. VRI is a service that will allow a video call between a customer and a member of staff. This service will help people for whom English is not their first language as well as those who are Deaf and Hard of Hearing.
31. We are working with stakeholders to ensure that the service provided will be safe for our staff and customers. Once approval has been received we will look at testing the service as a proof of concept. VRI will complement the new video calling service as well as existing channels of communications.
32. The Department is looking at future contracted services available to our citizens. As part of contract renewal we have asked that any new supplier allows for an invitation to bring in a third party to support the citizen during their interview. This will enhance the existing Video Relay Service in providing an enhanced offer of assistance.
33. **Recommendation 5: DWP should routinely build its principles of engagement into its contracting processes.**
34. **We reject this recommendation.** There are constraints on our ability to involve external stakeholders in the evaluation of bids; for example, how we select those stakeholders, and any advantage gained by bidding organisations could give rise to a legal challenge.

There are also practical constraints on ensuring the required commitment to the process and the level of training required to participate.

35. However, we will continue to engage disabled people in the design of our contracted services. This is much wider than the contracting process itself. Early engagement to shape policies, and ongoing engagement throughout the life of a contract, play a key part in shaping the design of our contracted services. For many of our health and employment services we do this already through established stakeholder events and claimant surveys.
36. **Recommendation 6: DWP should rapidly assess areas in which it needs to improve the accessibility of their services and make it a priority to implement solutions.**
37. **We accept this recommendation** and we are committed to meeting the accessibility needs of all our customers. We have already implemented a number of changes to improve the services we provide. For example:
 - Within the last year, we have implemented the Video Relay Service across all of our benefit lines. Video Relay enables British Sign Language interpretation for telephone calls via an application.
 - We have begun work to make all of the forms we publish on GOV.UK fully accessible, whilst making it easier for customers to find the information they need on the GOV.UK site about alternative formats.
 - We are improving how we collect and record alternative formats and reasonable adjustments on our IT systems so that people will not need to request a change to their communications more than once.
 - We are amending our IT system generated letters so that they clearly highlight to customers how they can request communications from us in an alternative format, and we are

now focussing on updating our clerical forms.

- We have developed a Public Sector Equality Duty learning module for all staff within DWP to ensure they understand their legal duties and responsibilities in providing an inclusive service and being able to offer reasonable adjustments for customers. To date, this learning has been completed by 45,000 staff.
 - We have enhanced Employment and Support Allowance scripts so that colleagues are prompted to ask customers at the start of the claim about any reasonable adjustments they require DWP to make.
 - We are introducing improved signposting to assist customers in getting the information and support they require. For example, in 2020 we introduced a network of 31 Advanced Customer Support Senior Leaders (ACSSLs). These roles are located throughout England, Scotland and Wales. Where people need extra support to access our benefits or services, ACSSLs support and signpost people to a range of local provision.
 - Since April 2019, we have funded Citizens Advice and Citizens Advice Scotland to successfully deliver support through Help to Claim. This provides independent, tailored and practical support to help people make a claim to UC and receive their first full payment on time.
 - We have been working with organisations for people with learning difficulties to develop a DWP Easy Read standard and publish new Easy Read guides on topics such as Access to Work which are accessible online. Further Easy Read products for Personal Independence Payment (PIP) and Universal Credit (UC) are also available on the GOV.UK website.
- 38.** We are testing Video Remote Interpreting, Speech-To-Text Reporting and the use of Microsoft Teams to meet customers' communication needs.

39. We are also testing a service for PIP, which will enable customers to receive a 'How your Disability Affects You' (PIP2) form electronically. We will provide customers with information and links so they can submit their supporting evidence and the form securely. This will meet a range of accessibility needs.
40. Feedback is crucial in enabling us to improve our services. Since January 2016, we have met regularly with a Taskforce on Accessible Information. In 2020, we established a Reasonable Adjustments Forum. Both forums provide an opportunity for us to work with a large number of stakeholder groups to influence our plans, learn from their feedback and support the development of accessible solutions for customers.
41. **Recommendation 7: DWP should show through leadership actions and messages across the organisation that actively involving all people claiming social security, including disabled people is central to the Department's way of working. This should be built into corporate governance arrangements and a non-executive member of the board should be given oversight and report back.**
42. **We partially accept this recommendation.** We agree with the importance of leadership in embedding a culture that recognises the value of engaging with disabled people in the development of policy and services. We are already taking steps to embed learning from external engagement as part of our leadership culture.
43. Non-Executive Directors (NEDs) provide appropriate support across all areas of the Department's work, including disability. We are integrating existing NEDs into a number of governance boards relating to health and disability (for example the Serious Case Panel). However, oversight is provided by the Minister for Disabled People, Health and Work and the Executive Team and we do not believe that a non-executive member of the board having oversight of disability engagement would add value.

44. There is already extensive work across the Department to emphasise engagement and learning through our policy development and how we design and deliver our services. This includes sharing insight with our leadership. Forums and structures that support this include, in addition to those already mentioned:

- External Engagement Board (EEB) – Policy Group directors have accountability for maintaining strategic relationships with external organisations, including disability organisations, and role modelling open collaborative working.
- Serious Case Panel – considers serious issues arising from cases and other insight that affect the DWP customer experience recommendations to address these issues. Attendees include members of the Executive Team (ET).
- The Department is committed to creating a workforce that embraces diversity and promotes equality of opportunity for all. We aim to raise understanding about disability amongst leaders, empower disabled colleagues and improve our workplace adjustments process. Our approach has been driven by insight informed by colleague lived experiences, industry best practice and behavioural science. Our vision for a disability inclusive workplace is only attainable through continued collaboration with DWP's employee disability network THRIVE. The disability strategy has rigorous governance overseen by a Steering Group comprising senior leaders and Executive Team-level Champions.

45. In response to findings from a review into DWP conducted by the Equality and Human Rights Commission (EHRC), we will also include a behaviour and expectation statement within our senior boards' Terms of Reference. The Public Sector Equality Data Statement will be formally agreed with each board as they next meet. The approach would prompt all Board members to demonstrate awareness of the PSED at all times, to demonstrate an understanding of the need to eliminate unlawful discrimination, advance equality of opportunity between people who share a protected characteristic and people who

do not share it and foster good relations between people who share a protected characteristic and people who do not share it.

- 46.** We will look to build on existing governance structures for decision making to better identify how engagement and insight with customers has shaped a particular proposal or approach, and to share the views of disabled people with senior leaders.

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