



Supporting Vulnerable Claimants

Complex Needs in Universal Credit



The biggest reasons why it is absolutely essential to ensure a client has their 'complex needs' formally recorded on their Universal Credit record

- 1 Protection from sanctions
- 2 Legal right to reasonable adjustments
- 3 Safeguarding and tailored support

Complex Needs in Universal Credit



1. Understanding, Identifying & Recording Complex Needs
2. What “Complex Needs” Means
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What “Complex Needs” Means



A claimant has complex needs when their circumstances make it significantly harder to:

- access UC
- prove eligibility
- meet conditionality
- keep on top of their UC account
- manage finances

What “Complex Needs” Means



This often results in difficulties with:

- understanding information, forms, commitments
- remembering or processing instructions
- communicating needs
- making informed decisions
- requesting specialist help

Key point for advisers:

- Complex needs can be temporary, long-term, or fluctuating and must be recorded clearly so all DWP staff adjust their approach.

Common Complex Need Categories



- Mental health conditions (including crisis risk)
- Learning difficulties / cognitive issues
- Homelessness or housing instability (sofa surfing, hostels, temporary accommodation)
- Domestic abuse / safeguarding risks (refuge information must NOT be recorded)
- Drug or alcohol dependency and treatment schedules
- Physical health conditions affecting engagement or mobility
- Language barriers / ESOL (requires interpreters or alternative formats)

Common Complex Need Categories



- Digital exclusion (no device, no literacy, no online access)
- Care leavers / young people 16–17 — automatically considered complex needs cases
- Refugee status / immigration-related vulnerabilities

Note

- this is not an exhaustive list; claimants may have multiple linked needs (e.g., homelessness + substance misuse + mental health).

Adviser role:

- Identify which category/categories apply and help the claimant present this clearly to UC so it can be formally recorded.

Why Accurate Recording Matters



- compliance with the Equality Act 2010 through reasonable adjustments
- Work Coaches tailor conditionality, remove unrealistic tasks, and apply easements appropriately
- claimant receives more time, appropriate communication methods, and safe interaction patterns
- avoidance of inappropriate sanction referrals because vulnerabilities must be considered first
- consistency across Work Coaches, Case Managers, and all Jobcentre staff (via the visible profile and pinned notes)

Where and How DWP Records Complex Needs



a) **Additional Support Tab**

- Used to record temporary or long-term complex needs and how they affect engagement with UC.

b) **Claimant Profile Notes**

These summarise needs, barriers, and adjustments. Notes must be factual, relevant, accurate, not excessive and current

c) **Pinned Notes**

Used when the claimant is at immediate risk to welfare, e.g.:

- suicide or self-harm risk
- domestic abuse

Pinned notes appear on the main UC overview page so all staff see them immediately.

How Advisers Help Clients Request Additional Needs Status



Additional Needs Status is not automatic

1. Report their health condition/barrier via the UC journal or phone or take it with you to a Work Coach appointment.
2. Provide supporting evidence, including fit notes, hospital letters or professional reports.
3. Submit the Additional Needs Request (using template). This includes:
 - oexplanation of each complex need
 - owhat adjustments they require
 - onominated professionals and consent
4. Ask UC to open the Additional Needs Tab and confirm it on the journal.
5. Request UC contact professionals before making adverse decisions (“preventative safeguarding”).

Writing high quality notes for UC



When helping a claimant draft wording for their journal/form, ensure notes:

- start with a keyword: “Homeless – ...”, “Mental health – ...”
- outline how the need impacts UC engagement (“cannot attend mornings”, “no device for online tasks”, etc.)
- specify what adjustments are required (phone appointments, longer time limits, interpreter)
- avoid unnecessary sensitive detail (never record refuge addresses)

Case Study 1 – Homeless & Digital Exclusion



Jordan sofa surfs, no smartphone/laptop, inconsistent internet. Misses To-Dos and appointments; receives sanction warnings.

Adviser actions:

- Help Jordan request recording of “Homeless” + “Non-digital claimant”
- Ask for pinned note referencing inability to complete To-Dos on time
- Request phone-only commitments and extended deadlines

Case Study 4 – Mental Health Crisis



Sarah: severe depression; suicidal ideation; doesn't read journal; missed appointments.

Adviser actions:

- Request pinned note for “Risk of suicide/self-harm”
- Ask Work Coach to apply appropriate safeguarding (*Six-Point Plan - this includes appropriate vulnerability checks, reasonable adjustments, adapted communications, and escalation to the vulnerability lead if required before any compliance action is considered*)
- Request reduced commitments + proactive contact to professionals

Case Study 3 – Learning Difficulty



Michael struggles with reading/writing/numbers; can't interpret letters; forgets instructions.

Adviser actions:

- Ask DWP to record “Learning difficulty” + literacy barriers
- Request simplified commitments, easy-read formats, phone follow-up
- Suggest interpreter/advocate support if needed

Case Study 2 – Domestic Abuse



Leanne fled domestic abuse; in refuge; missed appointments; financial control issues.

Adviser actions:

- Ensure “Domestic Abuse” recorded without refuge address
- Request pinned note due to immediate risk
- Seek easements and safe communication methods

Adviser Summary Checklist



Before engaging with UC

- ✓ Identify barriers
- ✓ Collect supporting evidence
- ✓ Agree wording with claimant

When requesting Additional Needs Status

- ✓ Submit detailed explanation of needs
- ✓ Ask for Additional Needs Tab to be opened
- ✓ Request pinned notes for welfare risks
- ✓ Provide nominated contacts with consent

After recording

- ✓ Monitor journal updates
- ✓ Ensure commitments are realistic
- ✓ Challenge inappropriate conditionality or sanctions
- ✓ Review needs regularly (remove or update as needed)

UC Additional needs status request



UC ADDITIONAL NEEDS STATUS REQUEST

1. FORMAL REQUEST FOR SUPPORT FROM DWP

My name..... Date of Birth.....

National Insurance Number.....

Address.....

I have started an award of Universal Credit or I am in the process of submitting a UC claim. I have 'complex and additional support needs' as defined in DWP guidance (please see details below). This document is a formal request for you to ensure (i) all steps and reasonable adjustments are made to my conditionality assessment, and (ii) full support is provided to me by DWP, as required by the Equality Act and various DWP policies and procedures that are relevant, due to my vulnerability.

This is therefore a formal request for you to open an **ADDITIONAL NEEDS TAB** on my Universal Credit account, which is clear and visible to all DWP agents and staff.

It is unlawful for you to refuse to consider this request. If necessary, please refer this request to the Complex Case Coach or Additional Needs Customer Support Team.

2. THE NATURE OF MY COMPLEX NEEDS

My problems/diagnoses

.....

Other relevant personal circumstances.....

.....

3. THE KIND OF HELP OR PROTECTION THAT I NEED FROM DWP

In order to assist, I have listed below some circumstances that are relevant and then listed below more information to explain my difficulties:

- I cannot use a computer well enough to meet UC requirements
- I may need support to understand my Claimant Commitment, or I may need to have my Claimant Commitment adjusted to reflect my needs and circumstances.
- I am particularly vulnerable to sanctions for reasons outside my control
- I am vulnerable to the effects of alcohol/drugs/medication
- I may struggle to notify changes of circumstance due to my vulnerability
- I will need home visits because of my vulnerability
- Other problems I have to deal with.....

More information to explain my difficulties.....

.....

[Link: Example: UC additional needs status request form](#)