

How Psychosocial Risk Materialises

Why the travel industry's response to the DMCCA depends on the sustainability of the people
who handle complaints

EXECUTIVE SUMMARY



A MORPHIRA PAPER FOR CUSTOMER OPERATIONS DIRECTORS AND EXECUTIVE TEAMS

READING TIME · 3 MIN

01 THE EXPOSURE**The regulatory bar has moved. The capacity to meet it has not.**

The Digital Markets, Competition and Consumers Act 2024 changed the consequences of getting customer treatment wrong. Since April 2025 the Competition and Markets Authority has been able to decide for itself whether consumer protection law has been infringed, and to impose redress and fines directly. Travel is squarely in scope: pricing transparency, hidden fees, misleading information and unfair contract terms are named enforcement priorities.

Compliance is not delivered by policy documents. It is delivered in tens of thousands of individual interactions by contact-centre and case-handling teams working through cancellations, delays, refunds, denied boarding and complex multi-party itineraries. Each of those interactions is where the regulatory position is either honoured or breached.

Those roles carry high psychosocial load. They place sustained demands on emotional regulation, cognitive processing, perceived control and recovery capacity, and travel concentrates that accumulation into disruption peaks that arrive without notice.

When a handler becomes unavailable, demand seldom falls in proportion to capacity. Cases are redistributed, queues lengthen, response deadlines tighten and remaining colleagues absorb work that still has to be completed to the same standard. Repeated episodes expose the same team to further pressure at exactly the point where accuracy and fair treatment matter most.

10%

Of global turnover, the maximum fine the CMA can now impose directly where a business infringes consumer protection law under the DMCCA.

COMPETITION AND MARKETS
AUTHORITY, 7 APRIL 2025

DEFINITION**Psychosocial load.**

The psychological demand created by the conditions of a role: the work a person is asked to perform, the circumstances in which it is performed and the resources available to support it. Risk of harm rises when demands are intense, sustained, unpredictable, emotionally charged or poorly supported. Repeated exposure to individually manageable cases accumulates, affecting wellbeing, confidence, decision quality and a person's ability to remain engaged and present at work.

TYPICAL CONTRIBUTORS IN COMPLAINT OPERATIONS

- Emotional demand of each contact
- Disruption peaks and recovery time
- Procedural and regulatory pressure
- Manager relationship and support
- Exposure to distress or hostility
- Perceived control over outcomes
- Confidence after policy change
- Belonging and identity at work

02 WHY MORE DATA HAS NOT CLOSED THE GAP

Dashboards describe what has already happened. They do not explain why it developed.

Customer operations are already rich in measurement. Volumes, handle time, first-contact resolution, escalation rate, backlog age, ADR referral and uphold outcomes are tracked, and absence is tracked alongside them. Each metric describes something that has already happened, in a system where trained capacity is the binding constraint.

Psychosocial risk develops through the interaction of role demands, individual characteristics and the working environment. Emotional exposure is manageable when volume is controlled and recovery protected.

The same conditions become difficult when several pressures coincide: a disruption event, a policy change, a backlog and a new regulatory deadline in the same fortnight. Early change appears in confidence, engagement, consistency and support needs long before it is expressed through absence, disengagement or resignation.

The evidence is fragmented. Assessment data sits in one system, engagement data in another, absence and complaint outcomes in a third, and team-leader observation stays local. Without a way to connect these sources over time, each describes one part of the operation while the developing pathway goes unresolved. This is why detailed dashboards do not necessarily reduce absence or improve complaint outcomes.

Similar outcomes also emerge through different pathways, and each requires a different response. Weak post-training confidence in new pricing and information rules calls for practice, feedback and team-leader support. Rota-related strain calls for changes to workload, recovery or scheduling. A role-fit issue calls for changes to job design or queue allocation. A management issue calls for direct intervention.

22.1m

Working days lost in Great Britain to work-related stress, depression or anxiety in 2024/25.

HEALTH AND SAFETY EXECUTIVE,
WORKING DAYS LOST

Adding headcount is the reflex response and frequently the wrong one. It exposes more people to unchanged conditions and leaves the original pathway intact.

THE CAPABILITY GAP

Four dimensions have to be present together: visibility of the developing conditions, sufficient time to act, interpretation of the likely pathway, and enough specificity to select a proportionate response. Earlier data without interpretation simply gives the organisation more information. Workforce intelligence must improve the decision.

03 THE MORPHIRA APPROACH

From retrospective administration to predictive sustainability.

Protecting complaint-handling capacity requires an evidence model that connects the person, the role and the working environment over time. Morphira's approach builds on first-of-a-kind tooling originally developed for high-pressure frontline environments, where psychosocial load, role suitability, wellbeing risk and performance sustainability had to be understood together.

Role and work design

The cognitive, emotional, interpersonal and environmental demands of complaint work: case volume, pace, control, shift pattern, recovery and the consequences of error.

Individual assessment

Survey responses, cognitive ability and personality evidence establishing how a person is likely to experience and respond to the demands of a specific role.

Employment environment

Team-leader relationship, team conditions, support structures, confidence, belonging and the wider organisational context in which performance is sustained.

Observed outcomes

Patterns in wellbeing, quality, engagement, absence and attrition that allow the evidence model to develop over time.

Before hire, Morphira establishes psychosocial fit through a structured combination of survey items, cognitive ability assessment and personality assessment, always interpreted against the demands of the role. A characteristic has no fixed meaning outside that context: the same profile may support sustainable performance on a routine booking queue and create additional risk on contested redress cases. This extends Quality of Hire beyond whether a candidate can process a case correctly to whether that person is likely to remain well, engaged and effective under the specific conditions of the role.

After hire, the same model shows whether the role, management relationship, case load, team environment and support structures are helping the individual to sustain performance or increasing psychosocial load. Connecting the pre-hire profile with post-hire conditions and observed outcomes creates a continuous view of workforce sustainability.

Pre-emptive absence and attrition mitigation.

The operation identifies early signals of strain, interprets the likely pathway and intervenes before it is expressed through absence, resignation or a customer outcome the business cannot defend. Investment is directed towards the people, roles and conditions where it is most likely to have an effect.

THE STRATEGIC QUESTION

How does a travel business connect the handler, the role and the working environment early enough to protect both the person and the standard of customer treatment the law now requires?

ABOUT MORPHIRA

Morphira is a workforce intelligence layer for complaint-handling capacity, making psychosocial risk visible, structured and actionable before absence, attrition or service failure occurs. Through psychosocial Quality of Hire, post-hire workforce intelligence and targeted decision support, it connects the person, the role and the working environment across the employment lifecycle.

CONTACT

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This is an executive summary. The full paper, with complete argument and sources, is available at morphira.com.

