

How *Psychosocial Risk* Materialises

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



A MORPHIRA PAPER FOR CUSTOMER OPERATIONS DIRECTORS AND EXECUTIVE TEAMS

READING TIME · 9 MIN

DEFINITION

Psychosocial *load*.

Psychosocial load is the psychological demand created by the conditions of a role. It is shaped by the work a person is asked to perform, the circumstances in which it is performed and the resources available to support it. Complaint handling in travel is among the clearest examples.

The risk of harm increases when demands are intense, sustained, unpredictable, emotionally charged or poorly supported. Effective role design, capable management, adequate recovery and appropriate resources can reduce that risk. Individual characteristics also influence how the demands of a role are experienced and sustained over time.

Psychosocial load is not only confined to moments of acute pressure such as a disruption event. Repeated exposure to individually manageable cases can accumulate. Over time, that accumulation may affect wellbeing, confidence, decision quality, motivation 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

When psychosocial load is not identified, measured and managed, the impact is absorbed by the handler, and then by the customer.

01 THE OPERATING CONTEXT**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, rather than litigating through the courts, 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.

For a travel business, 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, package variations 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, social interaction, recovery capacity and psychological safety. Whilst many pressures are sector-specific, the commonality of psychosocial load is work in which human, operational or emotional demands accumulate over time, and travel concentrates that accumulation into disruption peaks that arrive without notice.

When a handler becomes unavailable in these environments, 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 therefore expose the same team to further pressure at exactly the point where accuracy and fair treatment matter most.^[1]

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, NEW CONSUMER
PROTECTION REGIME COMES
INTO FORCE, 7 APRIL 2025

02 WHAT OPERATIONAL DATA CAN SHOW**Complaint and absence data describe visible events. Neither explains the conditions that preceded them.**

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

**22.1
million**

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

HEALTH AND SAFETY
EXECUTIVE, WORKING DAYS
LOST IN GREAT BRITAIN

When demand is redistributed, remaining handlers face higher volumes, less control over their working day and reduced recovery between difficult contacts. Team leaders spend more time maintaining coverage and less time on quality, coaching and case review. If the underlying conditions are left unchanged, the operational response reproduces the pressures that created the original event, and does so in the part of the business the regulator now examines directly.

Conventional data is valuable. It can show rate, frequency, duration, stated reason, team, site, tenure and cost. It can identify concentration and change over time. These

measures describe where absence and service failure have materialised; they do not establish why either developed.

Patterns can nevertheless be informative. Persistent absence, rising escalation or deteriorating decision quality concentrated in a particular queue, shift pattern or tenure group indicates that the organisation should examine the conditions under which people are being asked to perform. Absence becomes one part of a wider diagnostic picture rather than a complete diagnosis in itself. ^[2]

03 HOW PSYCHOSOCIAL RISK DEVELOPS**Psychosocial risk develops through the interaction of role demands, individual characteristics and the work environment**

The pathway rarely begins with a single factor. Emotional exposure may be manageable when volume is controlled and recovery is protected. A demanding shift pattern may remain sustainable when the handler has confidence, autonomy and effective support. The same conditions become more difficult when several pressures coincide, a disruption event, a policy change, a backlog and a new regulatory deadline in the same fortnight.

Role demands create the load. Work design influences its intensity and duration. Managerial and social conditions affect the support and control available to the handler. Individual characteristics shape how the person is likely to process and respond to the demands involved.

Over time, this interaction alters the sustainability of the role for the person performing it. Confidence may weaken after a policy or systems change and emotional effort may increase while recovery contracts. A team-leader relationship may deteriorate, or a previously manageable rota may become harder to sustain. Early changes appear in confidence, engagement, consistency and support needs before they are expressed through absence, disengagement or resignation.

Standard workforce records capture only part of this development. A rota records that a handler was absent; it does not show whether the preceding pattern had eroded recovery. An absence category records the reason given; it may not reveal the accumulation of emotional strain, loss of control or declining role confidence that preceded it.

The organisational task is to recognise when a pattern of conditions drives the relative likelihood that a handler or team can continue to perform sustainably, and lawfully. ^[3]

31%

Of UK service workers have considered leaving their role after abuse. Of those who experienced hostility, **20%** took sick leave as a result, an average of nine days.

INSTITUTE OF CUSTOMER
SERVICE, SERVICE
WITH RESPECT

“The relevant question is how the pattern is developing, for whom and under which conditions.”

04 WHY ESTABLISHED SYSTEMS SEE RISK LATE**Customer operations have substantial controls. Most were designed to respond to disclosed need or visible failure.**

Quality assurance, call calibration, absence policies, occupational health, employee-assistance programmes, wellbeing resources, team-leader training, engagement surveys and escalation processes all perform legitimate functions. They provide access to support, create procedural consistency and help the organisation respond when a handler needs assistance or a case has gone wrong.

The Stevenson/Farmer review recommends that employers routinely monitor employee mental health and wellbeing by understanding available data, talking to employees and identifying risk factors. ^[4]

[Stevenson and Farmer, Thriving at Work](#)

The timing of their involvement is the central limitation. A handler becomes absent. A QA score drops. A complaint is escalated or referred to an ADR scheme. The response may be sophisticated, but it begins after the organisation has received visible evidence that something has already changed.

Relevant information may exist, but it is fragmented. Role requirements sit in one system; absence, engagement, QA, performance and wellbeing data sit in others. Complaint outcomes sit in a third. Team-leader observations remain local. Without a way to connect these sources over time, each describes one part of the operation while leaving the developing pathway unresolved.

This explains why detailed dashboards do not necessarily reduce absence or improve complaint outcomes. An operation may know rate, frequency, duration, category, team, site and cost without understanding which combination of conditions made the failure more likely, or what earlier action could have changed its course.

Prediction in this context is probabilistic. It uses patterns, pathways and conditions to understand what tends to happen before an outcome occurs. It recognises variation between people and roles, supports earlier judgement and directs attention towards the conditions most likely to require action. It does not determine with certainty who will become absent, unwell or leave.

05 WHY CAUSAL SPECIFICITY MATTERS**Earlier visibility has value only when it leads to a more appropriate decision.**

Similar outcomes emerge through different pathways. A handler may be struggling because induction has not produced sufficient confidence in the new pricing and information rules. Another may be capable of processing cases but poorly matched to the emotional and interpersonal demands of contested refunds. A third may be carrying an unsustainable shift pattern through a disruption peak, or a deteriorating relationship with a team leader.

Those sources of risk require different responses. Low post-training confidence may call for additional practice, feedback or team-leader support. Rota-related strain may require changes to workload, recovery or scheduling. A role-fit issue may require changes to job design, queue allocation or placement. A management issue may require direct intervention.

Adding headcount is the reflex response and frequently the wrong one. It increases the number of people exposed to unchanged conditions, dilutes experience across the queue at the moment regulatory accuracy matters most, and leaves the original pathway intact.

On 6 April 2026 new DMCCA provisions on Alternative Dispute Resolution came into effect and replaced the ADR Regulations 2015. Aviation consumers continue to take unresolved complaints to the approved ADR schemes.^[5]

[UK Civil Aviation Authority, Passenger complaints: latest trends and statistics](#)

The capability gap therefore has four dimensions: 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.

06 THE STRATEGIC QUESTION

**From retrospective administration to
predictive sustainability.**

*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?*

07 A FIRST-OF-A-KIND APPROACH**From psychosocial risk to workforce intelligence.**

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.

The methodology addresses questions that workforce-management and QA systems struggle to answer. Who is likely to thrive handling contested cases? Who may be at risk of struggling? Which conditions make sustainable, compliant performance more or less likely? What support is most relevant? How do role demands, individual characteristics, working conditions and observed outcomes interact over time?

Role and work design

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

Individual assessment

Survey responses, cognitive ability and personality evidence that help establish how an individual 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.

Bringing these dimensions together makes psychosocial risk structured, measurable and actionable. The approach retains the context needed to interpret individual indicators and recognises that neither absence nor a poor customer outcome can usually be explained by a single factor.

07 Continued QUALITY OF HIRE**Extending Quality of Hire to psychosocial fit.**

EU-OSHA identifies poor work design, organisation, management and social context as sources of psychosocial risk, with potential consequences for psychological, physical and social health. ^[6]

[European Agency for Safety and Health at Work, Psychosocial risks and mental health at work](#)

Before hire, Morphira identifies psychosocial risk through a structured combination of survey items, cognitive ability assessments and personality assessment. It builds a rounded view of how an individual is likely to respond to the cognitive, emotional, interpersonal and environmental demands of a complaint-handling role.

This extends Quality of Hire beyond whether a candidate can process a case correctly. It considers whether that person is likely to remain well, engaged and effective under the specific conditions of the role. Performance, compliance and wellbeing are treated as connected outcomes because sustained performance depends on all three.

Assessment evidence is 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. Psychosocial fit is therefore a relationship between the person and the work, not a judgement about the individual in isolation.

After hire, Morphira shows whether the role, management relationship, case load, team environment, support structures and organisational conditions 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.

The value lies in knowing what kind of risk is present and what kind of intervention is most likely to reduce it. Morphira enables operations leaders to direct manager support, learning, wellbeing, job design and resourcing activity towards the factors most likely to change the outcome.

08 THE SHIFT**Morphira as the workforce intelligence layer.**

This is pre-emptive absence and attrition mitigation. The operation identifies early signals of strain, interprets the likely pathway and intervenes before that pathway is expressed through absence, disengagement, resignation or a customer outcome the business cannot defend. Investment can then be directed towards the people, roles and working conditions where it is most likely to have an effect.

The required capability is more than another dashboard. It is an operating layer that connects workforce data, role demands, assessment evidence and human insight.

Morphira provides the infrastructure through which travel businesses can understand the workforce by the factors that influence whether people are likely to remain well, present and effective. It connects evidence that would otherwise remain separated across assessment, HR, absence, engagement, quality and wellbeing systems.

The resulting operating rhythm is based on patterns and decisions rather than isolated events. Risk can be examined at organisational, role, cohort, team and individual levels, allowing the response to match both the source and the scale of the issue.

£5.30

Average return for every £1 invested in screening and diagnostic mental-health interventions in Deloitte's analysed sample.

[DELOITTE UK, MENTAL HEALTH AND EMPLOYERS: REFRESHING THE CASE FOR INVESTMENT](#)

Executive decisions

Identify where workforce-sustainability risk is concentrated, which queues or working conditions threaten regulatory performance, and where investment is most likely to influence absence, attrition and customer outcomes.

Customer operations decisions

Recognise emerging pressure, confidence or support needs and determine whether the most relevant response concerns case load, recovery, learning, role design or the management environment.

People and resourcing decisions

Connect Quality of Hire, role fit, employee support and capacity planning so that interventions are directed towards the pathway they are intended to change.

09 CONCLUSION**The question is whether avoidable absence is being prevented.**

The purpose of this intelligence is to support earlier, better and more humane workforce decisions. Individual indicators represent patterns and relative likelihood; they are not deterministic labels or substitutes for organisational judgement. Their use requires clear governance over interpretation, access and the decisions for which the evidence is appropriate.^[7]

A travel business may have comprehensive complaint reporting, consistent case management and well-developed support services. Those capabilities demonstrate control over the response to failure. They do not show that the organisation can recognise the conditions under which avoidable absence, and avoidable regulatory exposure, are becoming more likely.

Employers have a legal duty to protect employees from stress at work by assessing the risk and acting on it. HSE's Management Standards focus organisations on the underlying causes of work-related stress and their prevention.^[8]

[Health and Safety Executive, Management Standards for work-related stress](#)

That distinction matters under the DMCCA. The operating model depends on trained people being present, well and able to make fair, accurate decisions under sustained pressure. When risk becomes visible only after an absence event or an upheld complaint, the business has limited opportunity to alter the pathway and may already be absorbing its operational and regulatory cost.

A more capable model connects assessment, role demands, working conditions, management context and observed outcomes. It establishes psychosocial Quality of Hire before employment, develops that evidence after hire and gives leaders a clearer basis for deciding where and how to intervene.

Morphira provides that workforce-intelligence layer. By making psychosocial risk visible, structured and actionable, it enables travel businesses to identify patterns earlier, interpret them in context and direct intervention towards the source of risk, protecting both the handler and the customer outcome.

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ABOUT MORPHIRA

A workforce intelligence layer for complaint-handling capacity.

Morphira helps travel businesses move complaint-handling workforce management from retrospective administration to predictive sustainability by 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, Morphira connects the person, the role and the working environment across the employment lifecycle.

For executive teams and Customer Operations Directors accountable for regulatory performance and workforce resilience, this creates earlier insight, more targeted intervention and a stronger basis for sustainable operating decisions.

CONTACT

To start the conversation: enquiries@morphira.com
morphira.com

