Decoding the Algorithm and Data Choices in DWP's Monster Factory
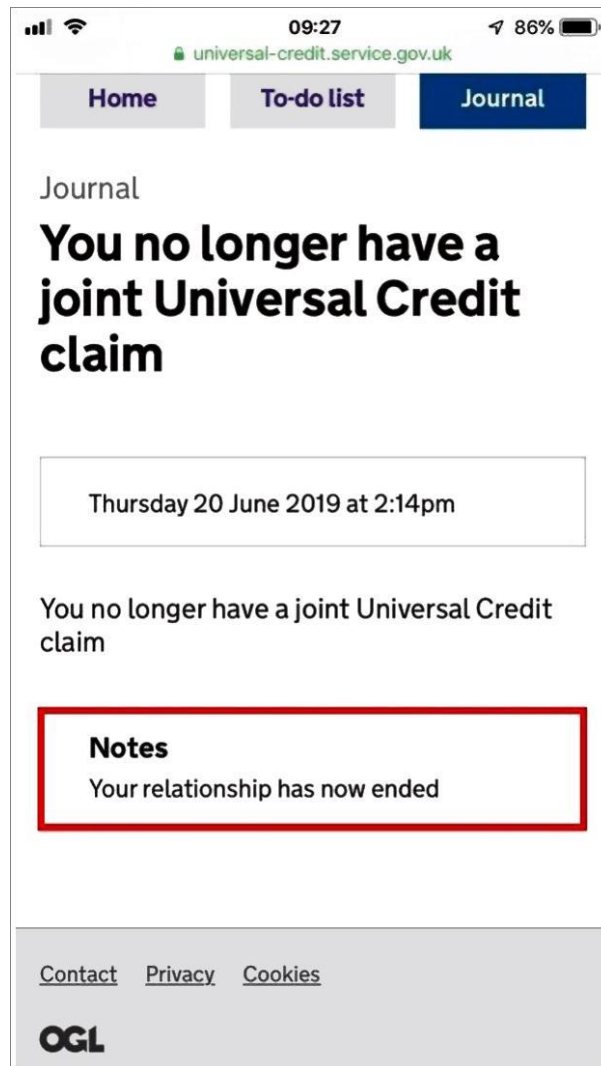
Contents

Preface

i. The systems described in this document were made by human beings; they can be changed by human beings.

ii. The message shown to a grieving widow when her husband dies was chosen by someone in DWP. This is how they chose to convey that message:[1]

iii. Any humanity in the Universal Credit system is entirely optional. And at almost every point, the monster factory chose to make more monsters.

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[1] https://www.mirror.co.uk/news/uk-news/widow-32-gets-dwp-letter-18779905

1. Part 1 - Executive Summary and Conclusions

1.1. Every computer system can be understood; and no matter how complex, once understood, its effects can be explained to people in ways they understand.

1.2. The Universal Credit system is not made of magic. It can be examined, pertinent questions can be asked, and answers required – whether that be from DWP itself, or from those who see and feel the consequences of DWP's decisions.

1.3. For example, every Housing Benefit claimant[2] who goes through the Risk Based Verification process can tell whether they were deemed 'high risk', 'medium risk', or 'low risk' – simply by the documents they are required to provide. Support services can then use that information to assess who is being given which requirements, and assess UC's algorithms against Equality Act criteria. This is not a new approach.[3][4]

1.4. For every decision taken responsibly and accountably, there will be a (paper) trail. Sometimes that trail will be short,[5] sometimes it will be opaque, or obscured – but there will be a trail; and questions beget questions.

Remit and scope

1.5. In this report, we do not propose policy changes *per se* – the abject misery caused by DWP appears to be a deliberate political choice. Wherever it is that the political objectives lie, on a spectrum that runs from human misery to human flourishing, the scope of this report is to establish if and how DWP implemented stated policy goals, and the effects of those decisions.

1.6. There has been some comment on the use of the term 'monster factory' to refer to the Department itself. The term, coined by London-based product manager Vinay Gupta,[6] is generally used as a metaphor for the destructive, grossly unequal way in which society is organised, leading to mass harm and alienation. The evidence suggests that DWP has manifested a microcosm of this in UC and related systems.

1.7. Our approach is largely based on documentary evidence, which includes such things as Data Protection Impact Assessments. While DPIAs do demonstrate issues that have not been considered, they overwhelmingly tend to be done *ex ante* – whereas one needs to look at systems *ex post* in order to uncover biases and discriminatory effects, since many of those effects will not be apparent until **after** you have built the system and it has 'gone live'.

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[2] The use of the word "claimant" tends to underplay people's rights and entitlements. We use it throughout this report for clarity, not because we necessarily agree with DWP's framing.
[3] https://www.jcwi.org.uk/passport-please
[4] https://missingnumbers.org/how-to-collect-your-own-data/
[5] https://www.whatdotheyknow.com/request/creation_of_the_ncc1_form#incoming-1106577
[6] https://anchor.fm/emerge/episodes/Vinay-Gupta---Waking-Up-in-the-Monster-Factory-pt--1-e3ikvk/a-acg0k3

'Ground Truth' and 'Official Truth' can be different, and tested

1.8. Government policy intent is one thing; what it does is in practice is often quite something else. When assessing systems and consequences, it is important to distinguish between the two:

- **'Ground Truth'** is what actually happens in practice for real people, in the real world – i.e. the person in front of you.

- **'Official Truth'** is what government databases say, which may not resemble reality.[7]

1.9. When a system gives out different information based on different inputs, that can *always* be detected, and *usually* tested. (If a system *doesn't* give differential outputs, then it is not of much use in assisting decision making.) For algorithms / data-driven / "AI" systems to be usable by a public body, they have to produce something which can be acted upon – and it is those actions that can be constrained by law.

1.10. Systems will naturally reflect the incentives of their creators; this is unavoidable.[8]

1.11. Some systems provide answers directly, some less directly. So, while the spell-checker in MS Word may be a 'black box', it does respond to anything you type – and while you may not have any idea why it doesn't know a particular word, it is always clear what the spell-checker 'thinks' is right. And that process works for anything you choose to type.

1.12. So, while you may not know your housing benefit 'risk score', if different requirements are set for 'high' vs 'medium' vs 'low' risk, then the requirements placed on any particular individual will allow their risk category to be inferred. If particular information is only required from certain people, then their 'risk' category is clearly known.

1.13. In digital systems for public services, these differences are visible to those who know what to look for – and the differences can expose both assumptions[9] and inputs. The risk scores and assumptions within systems may be 'secret', but their effects – and the discrimination due to those effects – are directly measurable by civil society.

1.14. If Government *meaningfully* cared about addressing problems, it would collect the relevant data. All too often, it does not.[10]

1.15. When a support service that serves many claimants who are asked for all different types of documentation sees that claimants with particular protected characteristics

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[7] It therefore follows that if you find yourself 'arguing with official truth', e.g. information taken from HMRC's RTI system, you should first talk to HMRC...

[8] https://onezero.medium.com/the-seductive-diversion-of-solving-bias-in-artificial-intelligence-890df5e5ef53

[9] "The typical government regulatory framework represents '500 pages of untested assumptions'": https://twitter.com/colleen_chien/status/1093260682999488512

[10] https://missingnumbers.org/introducing-the-government-data-graveyard/

are disproportionately asked for certain types of documentation, there is something clearly amiss. And while understanding precisely which characteristics cause which effects can be complex to unpack, having front line staff who talk to real citizens on a regular basis provides a range of questions from which to begin.[11]

1.16. **As the table below shows, knowing which *types* of documents a claimant is required to bring as proof of Residency / Rent (although *not* as proof of Identity or Household Composition) will tell you the risk category to which they have been assigned with certainty:**

Type of Evidence	Sub-category of evidence	Low Risk	Medium Risk	High Risk
Identity and S19	Identity	Originals or Photocopies/ Scanned copies	Originals or Photocopies/Scanned Copies	Originals required
	S19	Originals or Photocopies/ Scanned copies	Originals or Photocopies/Scanned Copies	Originals required
Residency/Rent	Private Tenants		Originals or Photocopies/Scanned Copies	Originals required
	Social Landlords		Originals or Photocopies/Scanned Copies	Originals required
	Public Sector			
	Registered		Originals or Photocopies/Scanned Copies	Originals required
Household Composition	Partner ID/S19/Income/Capital	Originals or Photocopies/ Scanned copies	Originals or Photocopies/Scanned Copies	Originals required

1.17. Piecing this together requires knowledge of both the intended and actual behaviour of the system – and of the underlying data, processes and other systems on which it draws or feeds. Sometimes it is necessary to know the individual fields of data being processed; other times, and most often, it is the assumptions being made *about* the data and/or the inferences being drawn that are most important.

'You're next, grandma'

1.18. This report focuses on Universal Credit, a (hyper) means-tested benefit. When UC is working – as it eventually will – it is unlikely that the approaches UC takes will remain limited to UC. They will be replicated across other means-tested benefits, most likely including and especially those benefits for which the elderly apply.

1.19. Our questions are therefore designed to be more widely applicable to information systems built and designed by (and for) similar monster factories. And our general approach is to try to point from the specifics of UC to the more universally applicable.

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[11] Exhibit A: https://missingnumbers.org/how-to-collect-your-own-data/

Conclusions

1.20.   Applying good design to a bad process does not improve the process, in much the same way as polishing an instrument of torture or oiling its screws doesn't make it any less painful. Being 'agile' or automating aspects of a system are not improvements if such changes predominantly serve the system itself, not the people it is supposed to support.

1.21.   Fixing Universal Credit is not simply a matter of service redesign; it is a matter of *policy* redesign, starting with the most basic assumptions – the foundation of which must be that UC exists to serve people (who may or may not currently be taxpayers) and that the people it serves are not criminals.

1.22.   It was not unreasonable for civil society to expect the Government to deliver the promises it made in advance of the launch of Universal Credit – but in 2020 many of those initial promises remain to be fully delivered, or lie abandoned. The problems we outline in this report *can* be addressed; indeed, the structure of DWP now makes it more likely that they *could* be addressed... if there was the political will to do so.

Reading and extending this report

1.23.   This ongoing report is something of a 'hypertext'; even in its current form it is not intended to be read from start to finish. We suggest the best way to read it may be to start with an Annex that is of most interest to you, using this 'Core Report' for reference or orientation where needed.

1.24.   This is also just the latest snapshot of a living document, one year in (of three). Ultimately, we hope ownership of the document will be shared by many, and that each aspect of Universal Credit's systems – including and especially any legally mandated exceptions – should be covered by an Annex or sub-section focussing on that area.

1.25.   For example, claimants who have been the victims of domestic violence have particular, legally-guaranteed exceptions. An analysis should be performed for each of these vulnerable groups, including the effects of intersectionality. Grouped topically, these would each form an Annex in which common characteristics and broader themes can be considered.

2. Part 2 - The fundamental DWP UC core

2.1.   The 'core' of the Universal Credit service is entirely DWP-owned. DWP builds it, DWP runs it, DWP makes the policy decisions, DWP implements them, and DWP *can* see the consequences. The core service is not outsourced.

2.2.   In this Part, we focus on the way in which policy decisions have been implemented, highlighting where and how different decisions could have been made. In later Parts we consider issues where there are administrative or legal boundaries between entities – e.g. between HMRC and DWP – but for the avoidance of doubt, this Part deals with matters that are entirely the responsibility of DWP.

2.3.   Universal Credit is not just one singular system. It is more like an ecosystem of interlinked and interrelated systems, each of which provide different people with different views and 'functionality', depending on who they are and what they are trying to do. To begin with, therefore, we shall look at things from the perspective of the claimant.

A Digital Account

2.4.   The first interaction someone has with Universal Credit itself is to "register"[12], or what DWP terms "apply".[13] That process creates a record for them on the system – what is later termed the Universal Credit Account.

2.5.   This account will, by its very nature, only contain information that has: (1) been created by DWP; (2) been asked for directly by DWP; or (3) been gathered from elsewhere, and checked as many times as DWP deems necessary. So, in a very real way, Universal Credit does not deal with people in the complexity and richness of their own lives but rather abstracts them into data, structured in ways that fit the system's narrow concept or model of who they are, and how they should act.

2.6.   Information about the design and underlying operation of the UC account is scarce. DWP has repeatedly refused to publish or provide details under the Freedom of Information Act, so the following is drawn from descriptions and guidance published on GOV.UK, and information provided by claimants and those supporting them, as well as a number of high-level "overview" videos posted in June 2017 on the 'Universal Credit in Action' YouTube channel.[14]

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[12] https://www.independent.co.uk/news/uk/home-news/universal-credit-coronavirus-jobs-dwp-therese- coffey-a9424491.html
[13] https://www.gov.uk/apply-universal-credit
[14] https://www.youtube.com/channel/UC7Km4IXfVJB1n8SQUmkJD0Q

2.7. In UC, as with many other Government systems, citizens are not in charge of their own accounts. Those are under the control of DWP, and DWP does exactly what it wishes to do with them. Even without telling you. Clearly DWP may not (and often does not!) trust the information citizens provide; it checks and double-checks as much as it can, treating every claimant as suspect by default. It adds notations you cannot see, and passes information to others you do not know.

The Homepage

2.8. Once you have created an account, when you log in to UC, the **homepage** is used to encourage claimants to report changes in circumstances, as well as providing links to access their Journal and To Do list (see below), and a constant reminder of their "Claimant Commitments".

2.9. The home page provides a 'signposting' function, but while it looks quite simple on the surface it conceals a great deal – not least the list of more than 50 changes of circumstances that claimants are required to report. Indeed, DWP does not publish a comprehensive or definitive list of these changes of circumstance anywhere, leaving claimants to guess what changes may or may not be relevant, and thereby prompt a re-evaluation of their entitlements.

2.10. The system requires that each of these changes of circumstances be reported via a (digital) form. DWP must therefore know exactly how many forms there are, and the changes to which they relate. The choice *not* to publish the full list of forms and/or changes is clearly a policy decision, not a technical limitation – and it has the effect of requiring claimants to hold a model of a system they almost certainly do not understand in their heads, exposing them to arbitrary changes to their income for failing to comply with unclear, unstated or unknown conditions.

2.11. This failure to explain or even reveal such critical information to those dependent on the system – information that could materially affect the support they receive, and which may lead to penalties[15] for failing to report a change – is a deliberate choice; a

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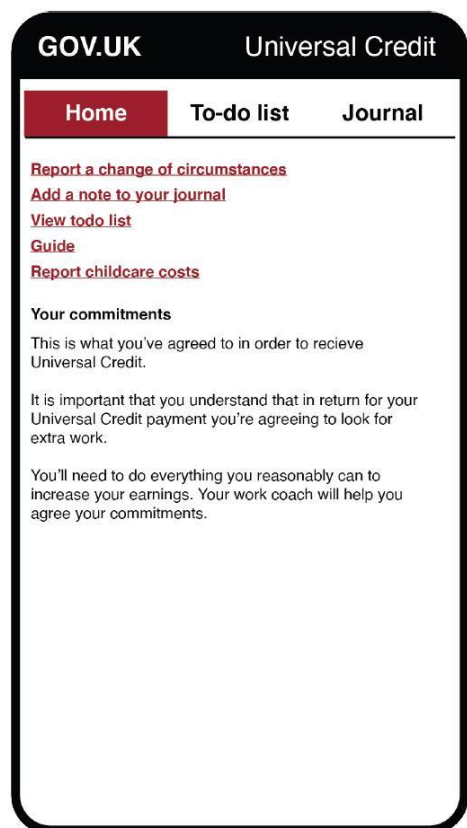
[15] While these might not be formal benefit sanctions (such as those for not complying with work conditionality) if people do not report certain changes in time this could lead to overpayments, or loss of income to which they would have been entitled. Certain 'failures' could lead to penalties, or even being charged with fraud.

choice that disadvantages claimants, and which causes entirely avoidable harm and distress to many.

2.12. **DWP should be required to publish and maintain an up-to-date, definitive list of the changes of circumstances relevant to a UC claim.** Both online, and in the app. Otherwise, in data protection terms alone, this would seem to be a breach of the first principle, i.e. that all data processing must be 'lawful, fair and transparent'. It is plainly insufficient simply to threaten:

> *You need to report changes to your circumstances so you keep getting the right amount each month.*

> *Your claim might be **stopped or reduced if you do not report a change of circumstances straight away**.*

and to then list only a limited selection of the changes that "can include".[16]

The To-do List

2.13. As one would expect, the **To-do list** is the place where claimants can view the tasks and activities they are required to perform in order to maintain their claim at any given point. (The list is also used to collect data from claimants during the initial application process – see 2.16 below)

2.14. The To-do list includes tasks such as booking an interview at a JobCentre, uploading a CV or other documents, filling out questionnaires about the sort of work the person is looking for, and equality monitoring. To-do list items are created by DWP staff, not by claimants themselves – and the creation and issuing of these tasks would appear to be at least partially automated, by the use of 'templates', as seen in the screen shot of the UC agent interface on page 12.

2.15. Once again no definitive list is published of the tasks that claimants can be required to do, and it is unclear to what extent and which types of tasks are (or can be) automatically triggered by information already held on UC systems.

2.16. While to be useful and usable the To-do list must obviously highlight and prioritise certain

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[16] https://www.gov.uk/universal-credit/changes-of-circumstances
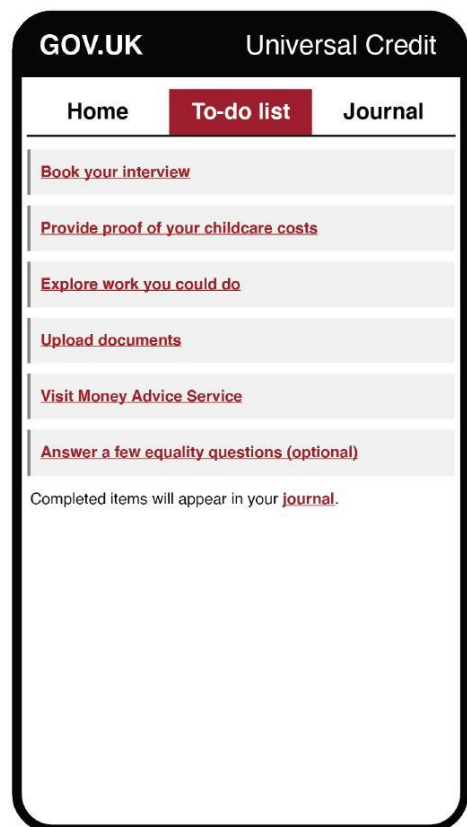
things, that a person's claim can be "stopped or reduced" on the basis of failure to complete items that may or may not appear on their To-do list – and for which the logic of why and how those tasks appear is obscure – suggests the intention is more to drive compliance with arbitrariness of the UC system than to support or guide people through a coherent 'welfare journey'.

2.17.   As mentioned above, when initially submitting a claim, claimants must complete a minimum of ten To-do list items – each of which requires filling in a form or forms, and some of which require providing additional documents, e.g. at the JobCentre interview. Having done this, claimants must make a "final declaration" that the information they have entered is correct and agree to a boilerplate version of the "Claimant Commitment' before submitting their claim. (They must also prove their identity, either online using GOV.UK Verify or in person at a JobCentre; see Annex 2B.)

2.18.   Once completed, items removed from the To-do list are recorded in the claimant's 'Journal'.

The Journal

2.19.   The **Journal** has two main functions: first, to maintain a historical record of claimants' interactions with (and within) the system; second, to act as a communication channel between DWP and claimants.

2.20.   This communication channel is not, however, as 'two-way' as it may seem.

2.21.   While the Journal records when claimants do things on the system, it does not seem to record – and certainly does not report – information such as when a member of DWP staff viewed your account, nor even the time and date on which a particular UC calculation was run or re-run.

2.22.   The primary way for claimants to show DWP how they have met their obligations is by recording or uploading information within their Journal – akin to making every claimant write down what they did, every day. (Every reader of this report who has ever had to suffer a micromanaging boss will understand the demoralisation this engenders.)

2.23.   Currently, the Journal consists exclusively of entries made by the claimant and queries or tasks set directly by DWP staff. There is no obligation on DWP officials to make their
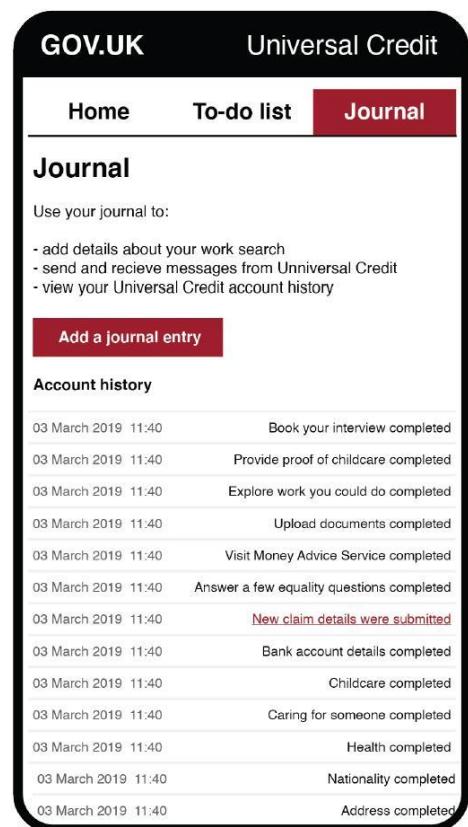
actions visible to claimants, and though some messages sent to the Journal may have some information about who it was in DWP that sent it, messages and demands for information may be listed merely as having come from "an Agent". It is unclear at this point whether automated demands or responses are even marked as such.

The UC 'Agent System'

2.24.　　The UC agent interface from 2017[17] appears quite benign (note the To-do template)....

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2.25.　　...and, as with all systems, it evolves over time. This more recent design won awards:

2.26.   The ability to search for a person across DWP's Customer Information System (CIS) or the Universal Credit system allows DWP officials and staff to find individuals within the system, and to click through to see a summary of their record:

(Noting that any genuine personal data that ever appears on this page is not likely to be available under the Open Government Licence!)

2.27.   The tools that DWP makes for its own staff are more comprehensive and significantly better than the tools it makes for claimants. And while we do not explore them further here, the privacy and security impacts of search interfaces such as these to all of DWP's population databases – including the direct risks to certain subgroups, such as those who have experienced domestic violence, those in witness protection, or high profile persons – merit further consideration.

DWP's Audit Log

2.28.　Norms of corporate accountability require that large computer systems have some facility for auditing decisions: who logged in, who did what, and when. And UC is no exception.

2.29.　DWP maintains an audit log within UC that contains a record of every action and decision by DWP staff in relation to each client record. While an increasing number of entries may be fully automated and thus outside the control of DWP staff members, *every* note in the log should follow the civil service norm of recording decisions and the reasons why they were made. At this point in our analysis, it is unclear to what extent these civil service norms are being complied with.

2.30.　Information about decisions made that are recorded in the audit log should also be visible to the claimant. The need for this is particularly acute when a claimant needs to challenge a decision which, given DWP's poor performance at appeal, may explain why the Department is so reluctant to expose this information.

Input from the claimant

2.31.　Interactions between, e.g. JobCentre staff and claimants, or PIP evaluators and claimants, is outside the scope of this report. These are being covered extensively by others; we are focusing on data and systems.

2.32.　A system which trusts the human judgment of the people it employs will allow individual staff to make decisions that deliver the policy objective. A woman in a Job Centre with two children calling her "Mummy" does not also need to provide proof she has children.

2.33.　All parts of the monster factory assume, however, that its own staff are no more trusted or trustworthy than a claimant or criminal – so every statement is checked, assuming that information is false until it has been checked against the 'official truth' in some other database.

2.34.　Every statement made in the UC registration process is the trigger for a 'digital investigation' across different Government databases, different Government Departments, and sometimes even checks with commercial bodies such as credit reference agencies and banks. Most of those checks are automated, with no humanity involved at all – and any minor mistake by <u>any</u> of the systems becomes a cascade of consequences for the citizen.

2.35.　In this next section, we take the information that a claimant is asked for in their initial application and follow through where that may lead…

Categories of DWP data, and DWP's data stores

2.36.   Simply put, the questions that get asked are what data gets checked. For an initial claim, this will include any and all of the following that are relevant to the individual making the claim:

2.37.   Registration[18] and Personal Details

- Address / Postcode?
- Full name?
- Date of birth?
- Verified mobile number (plus contact preference)?
- Verified e-mail address (plus contact preference)?
- Username / password (plus security questions)?

Aside from the username and password, all of these details are held in DWP's Customer Information System (CIS), for those who have been issued a National Insurance Number.[19]

2.38.   Nationality

- Are you a British citizen?[20]
- Have you been outside the UK for more than 4 weeks in the last 4 years?

These are subject to checks with the Home Office.[21]

2.39.   Housing

- Do you own a property / have a mortgage?
- Do you rent from a private landlord?
    - Are you living at the same address / related?
    - How many bedrooms?
    - Is it a Joint Tenancy?
- Do you rent from the council or a housing association?
    - How many bedrooms?
    - Is it a Joint Tenancy?
- Are you in shared ownership / temporary accommodation / other?

These are all subject to checks with local authorities, registered social landlords, private landlords, the Land Registry, and – in the case of 'Living Together' checks –

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[18] We use the term 'register', whereas DWP tends to use 'apply' – the latter implying that some applications will be unacceptable; the former suggesting you will receive what you are owed.

[19] CIS data fields are listed and described here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729893/customer-information-system-the-data-held-about-you.pdf

[20] At no point can a claimant alert DWP to the fact that they or their partner have no recourse to public funds – despite the fact that this can have a significant impact on the calculation of benefits, and how a claim is treated.

[21] See, e.g. Umbrella MoU between DWP and Home Office: https://www.whatdotheyknow.com/request/589574/response/1416586/attach/8/Annex%20F%20MOU%20HO%20AND%20DWP.pdf

may be checked with credit reference agencies.[22]

2.40. Who lives with you

- Children (name, gender, DoB, circumstances)?
- Other people (name, gender, DoB, circumstances)?

You will be required to provide documentary evidence, e.g. a child's birth certificate, and may also be subject to 'Living Together' checks with credit reference agencies. The monster factory has a special 'rape clause' and form you must fill in if you are applying for support for a child conceived without your consent.[23]

2.41. Childcare

- Which children? How much? When?
- Provider (name, address, registration number, circumstances)

You will have to provide *both* an invoice or contract that includes the provider's registration number and full contact details *and* a receipt or bank statement showing the amount you paid, and when you paid it.

2.42. Work and Earnings

- Are you currently working? Have you stopped work in the last 3 months?
- Employment status – hours working / earnings?
- Are you *going* to start work in the next month?
- Are you getting sick pay, maternity / paternity pay, etc?

These are all subject to checks with HMRC.[24]

2.43. Other Income

2.44. Savings and Investments

You will have to provide evidence of your savings and capital, and may be required to provide 3 months of statements. DWP cannot directly access your bank account, except to make payments to it – but it may, e.g. receive notification from HMRC of large sums you receive if you have to pay tax on them.

2.45. Education or Training

- What type of education or training?
- How many hours do you attend?

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[22] See Privacy Impact Assessment for Living Together Data & Analytics: https://www.whatdotheyknow.com/request/589574/response/1416586/attach/3/Annex%20A%20Privacy%20Impact%20assessment.pdf

[23] Form NCC1: https://www.gov.uk/government/publications/support-for-a-child-conceived-without-your-consent

[24] See MoU between DWP and HMRC: https://www.whatdotheyknow.com/request/589574/response/1416586/attach/7/Annex%20E%20MOU%20DWP%20HMRC%20ref%20P0001.pdf

- How long is the course?

You will have to provide evidence from your education or training establishment. This may be checked with them, and also with information held on Student Loans, etc.[25]

2.46. Health

- Do you have a health condition or disability which prevents, or limits, your ability to work?

If you answer 'yes' to this question, you will likely be required to attend a Work Capability Assessment (WCA) that will be performed by the Health Assessment Advisory Service, i.e. Maximus.

2.47. Caring responsibilities

- Name, DoB, relationship of person for whom you are caring?

DWP will check if the person being cared for receives certain rates of disability benefits – Disability Living Allowance (DLA), Personal Independence Payment (PIP) or Attendance Allowance (AA) – on its own systems in order to calculate the carer element of UC.

2.48. Bank account

The details of which not only allow DWP to pay you, but facilitate checks on other databases.

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[25] See. e.g. MoU between DWP and Cabinet Office on 'Universal Credit data match with Student Loans Company': https://www.whatdotheyknow.com/request/589574/response/1416586/attach/6/Annex%20D%20MOU%20UC%20and%20SLA.PDF.pdf

3. Part 3 - Interfaces with other systems and external suppliers

3.1.   As noted in the previous section, the information UC claimants are asked for will be checked on systems within and beyond DWP. For example, national systems such as DWP's **Customer Information Service (CIS)**[26] contain a record for every individual who has registered and been issued with a National Insurance number – and, as well as this identifying information, CIS also keeps a "limited" record of the benefits a person has claimed over the last several years. Other systems are controlled by other Government Departments, by local authorities, the NHS, and private companies.

3.2.   Before we examine the other systems that UC touches in more detail, it would help to explain the types of system that we encounter:

Different 'types' of systems

3.3.   Some systems take inputs from public sources, e.g. a form on a web page, and some take inputs only from 'official truths' in official databases. Some systems provide immediate feedback to the user, and some systems provide no feedback at all. This leaves four different possibilities, which we characterise along a continuum as follows:

Systems where you know all inputs and outputs – e.g. paper flowcharts for making decisions.

3.4.   These types of systems are very common across medicine. The main question here is whether a particular algorithm has been integrated into a system correctly[27] – which is mostly a matter of testing and vigilance. (N.B. This problem exists for all other types of system too.)

Systems which are entirely opaque – currently the focus of many efforts from civil society.[28]

3.5.   When neither inputs or outputs are public-facing, e.g. prediction models for stop and search, facial recognition by policing, predictive policing, etc. These are cases where existing approaches to opaque power are directly applicable, and this is why most work is done in these areas (and also, arguably, why there is little policy innovation). Using large-scale data for 'fraud detection' is a similar arena, where what goes on is entirely opaque.

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[26] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729893/customer-information-system-the-data-held-about-you.pdf

[27] https://www.digitalhealth.net/2016/06/qrisk2-in-tpp-fixed-but-up-to-270000-patients-affected/

[28] Amongst the best of these being this project from the LSE: https://www.odbproject.org/our-cities/los-angeles/

Systems where you know inputs, but not outputs – rare in the public sector.

3.6.   For public-facing public systems, it is effectively impossible for a public body to make a decision that the applicant never hears about.

3.7.   The most obvious example here would be job or housing application processes where all you can do is send in your information. But even in those cases, *someone* hears back, even if it isn't everyone – and the inputs can (sometimes) be crafted to get some form of output. Research is regularly being done in this area, and natural experiments provide invaluable sources of data.

Systems where you know *some* amount of input, and *some* amount of output.

3.8.   Many other categories bleed into this one, and it is the biggest category – but also underexplored. "AI" systems often get this very, very wrong, with results that vary from mildly amusing to outright harmful. Human systems (mis)perform similarly; JCWI's 'right to rent' challenge[29] being an example of this, using 400 cases.

3.9.   If the people who fall out of a process all share a particular characteristic, specific assessments can be made, such as: for two identical persons, what happens if inputs that *can* be changed are varied only in one respect? Which of those variations result in different outputs? And, equally, which do not?

Mapping the UC 'ecosystem'

3.10.   There are several ways in which one can map out the systems involved. We have chosen two approaches; the first beginning with the UC account at the centre.

3.11.   UC claimants deal with the Department for Work and Pensions in the first instance, and while the interface presented may suggest their details reside solely with DWP, the wide range of other bodies and organisations to which claimants' information is actually passed – or with which it is checked – is illustrated on the following page.

3.12.   Not all of these checks and data transfers are automated, even those between UC and other DWP systems. Most commonly, claimants are required to attend a JobCentre or other interview in order to to have documents or other facts checked in person. And in the pandemic, as 'surges' of up to a million people at a time joined various queues for support,[30] DWP changed almost nothing in the UC 'digital' pathway – initially instead only moving staff between call centres. (The Department's response to COVID-19 is covered in more detail in Annex 4.)

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[29] https://www.jcwi.org.uk/passport-please
[30] "3.1 million individuals, in 2.5 million households, made a claim for the six-in-one benefit between March 1 and June 2": https://www.mirror.co.uk/news/politics/3million-people-now-made-universal-22162084
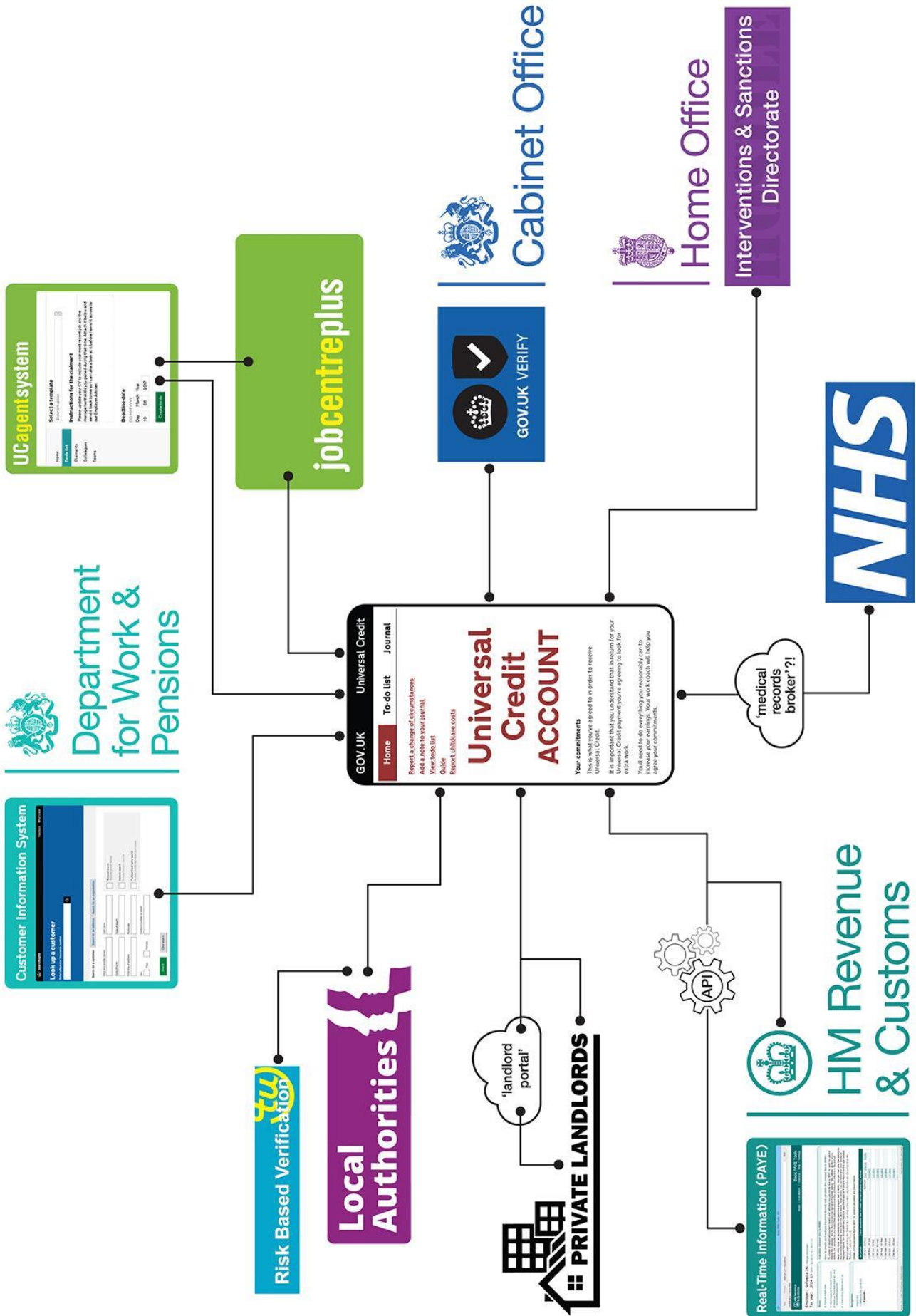
3.13.   As the map on the previous page indicates, some checks are done entirely outside DWP; such as when people are required to verify their identity when first making a claim, for which they can use **GOV.UK Verify** – a fully online process provided by the Government Digital Service, part of the Cabinet Office – or DWP's own identity processes. Though it is the case that DWP may still additionally require some claimants who have successfully completed the Verify process to take their original documents into a JobCentre, without disclosing why. For more detail on this, see Annex 2B.

3.14.   Payments by employers to claimants is one element that has been almost entirely automated, at least in terms of the transfer of data between HMRC and DWP. This is done via an API – a tightly defined interface, requesting specific pieces of information from HMRC – to which DWP then adds from its own systems, making it less clear exactly what data it holds. This is the interaction with HMRC's **Real-Time Information (RTI)** system, which we cover in Annex 1.

3.15.   While automated risk assessment is increasingly incorporated into UC and the wider benefit system, DWP has made a concerted effort since 2011 to 'outsource' **Risk Based Verification (RBV)** to local authorities for Housing Benefit and Council Tax Reduction / Council Tax Support – the explicit intent being for *"more intense verification activity to be focussed on claims more prone to fraud and error"*.[31] This has resulted in councils using commercial RBV offerings – often provided by, or partnering with, credit reference agencies – to apply a raft of new measures to those deemed by secret algorithms to be in the 'highest risk' group. Annex 2 provides an analysis of this process, its discriminatory effects and what might be done.

3.16.   While the Work Capability Assessment (WCA) process is outside the scope of this report, DWP clearly has ambitions – indeed, it has already commissioned a "pre-Beta" service, using Amazon Web Services Health Platform[32] – to automate its existing processes for requesting medical information from the NHS, such as claimants' GP details, hospital records and conditions diagnosed. DWP not only mistrusts claimants but refuses to trust even their medical professionals, seeking instead to acquire its own copy of their data through 'medical records brokers'.

3.17.   We cover the consequences of this chronic mistrust – and not just about health data – in more depth in Annex 3, demonstrating ways in which 'data-driven Government' is riddled with prejudice, inconsistency and contradiction. Underlying all of the checks on every piece of information entered into one's UC account is the official assumption that citizens commit "fraud", while what government itself or companies do is merely "error". The former must be stamped on heavily; the latter is to be treated entirely differently.

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[31] page 3, HB/CTB S11/2011 Housing Benefit and Council Tax Benefit Circular: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633018/s11-2011.pdf
[32] https://www.theregister.com/2019/02/19/dwp_health_data_tool/

3.18.   Focusing in on just one part of the map,[33] as below, gives an indication of the number and different types of (data and) information exchanges that take place between Departments. Annex 1 deals in detail with the way in which DWP interacts with HMRC's RTI system,[34] noting that the information that is exchanged not the only information that *could* be exchanged – and while the concern or perception may be that DWP is getting too much data, we point out that there is in fact data which DWP chooses *not* to ask for, which could make things more straightforward and far less onerous for claimants.
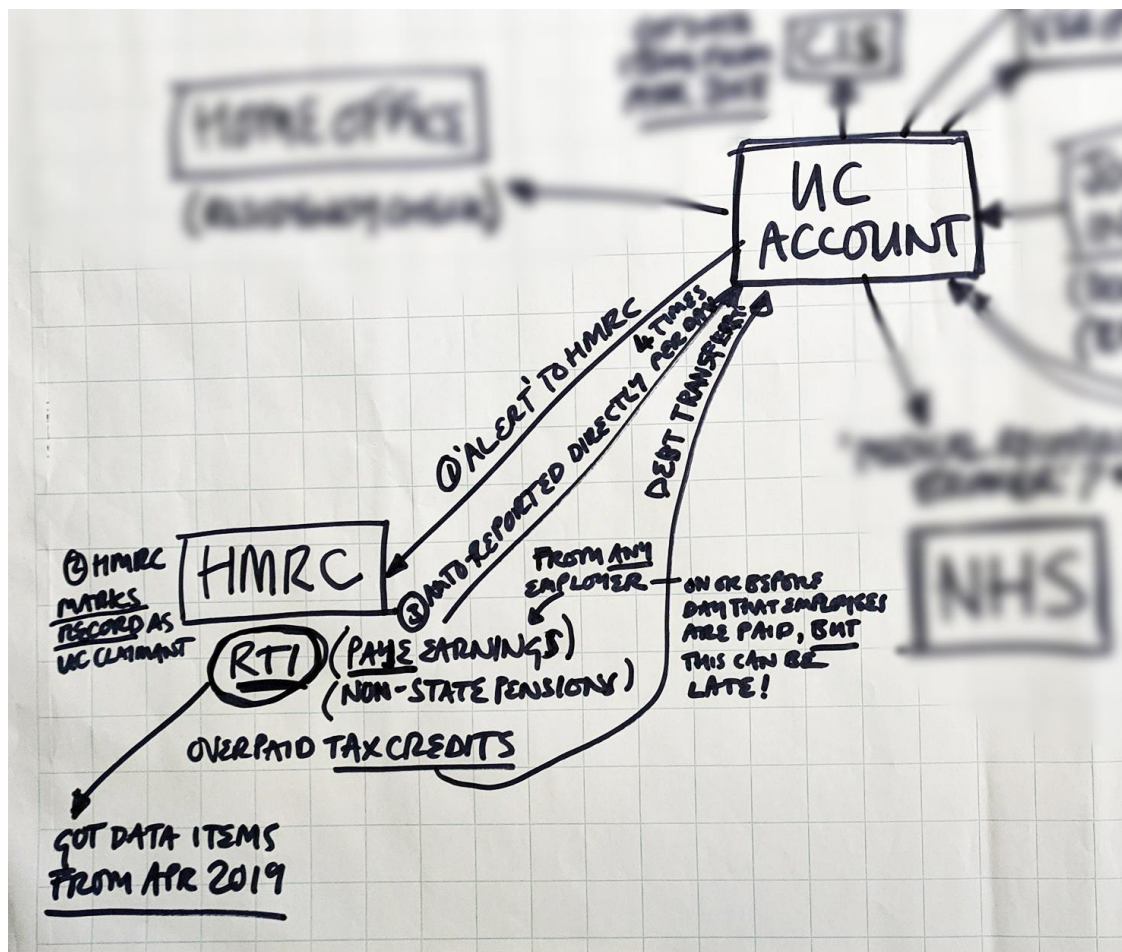
3.19.   This first map provides a view of the main 'high-level' connections into and out of UC, and hopefully illustrates clearly that while people believe they may be dealing with DWP, they are in fact exposed to systems across a whole range of other government Departments and bodies – not to mention (their) commercial providers. In the next section, we shall focus more inwards on DWP itself.

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[33] This illustration is taken from the original hand-drawn map, based on FOI responses from DWP and HMRC. Our aim is to map each 'branch' more fully as our and others' research proceeds.
[34] HMRC's April 2020 list of the data fields within RTI, retrieved 20/8/20: https://assets.publishing.service.gov. uk/government/uploads/system/uploads/attachment_data/file/880137/RTI-Data-Item-Guide-20-21-v1-2.pdf

Connections between the Back Offices

3.20.   Another way to map things is to look at the 'back office' systems of DWP; how they interrelate, and how they themselves pass data to and receive data from both internal and external systems. Such a view makes it easier to see which parts of UC's systems are still unknown, and which parts lack even the most basic transparency required to understand what may be going on (generally, or in any particular case).

3.21.   While at the 'heart' of UC lies an algorithm – the 'calculator' that works out what someone should be paid in any particular time period[35] – it is entirely wrong to think that simply 'fixing the algorithm' would make all the problems go away. Indeed, you will note that the map on the following page omits such an algorithm. This is deliberate; what this second map does is illustrate the complexity of the ecosystem *within which that algorithm sits* – and attempts to unpack[36] the 'layers' of interacting systems from within which the data on which the algorithm works are drawn.

3.22.   It should be noted that Universal Credit is also a mix of older ("Live Service") and more recently developed ("Full Service") systems. As has been documented extensively elsewhere,[37] the original implementation of UC failed in 2013 and its development was taken 'in-house'. While serious questions remain about the disconnect between policy and delivery, DWP now has a credible agile[38] capacity, and new versions of UC's software are released on a two week cycle.

3.23.   That is not to say DWP uses this capacity well – its COVID-19 response shows it does not – but simply underlines that the speed at which DWP improves its systems is entirely a matter for DWP. It could indeed do and be much better if it had greater confidence in some of the digital tools it has built.

3.24.   Another significant consideration is the extent to which different parts of the process have been automated, and the basis on which this has been prioritised. Changes to the system tend to benefit DWP officials and the Department itself, rather than claimants, as described by Richard Pope in his 2020 report:[39]

> *In addition to issues of digital inclusion, which have been covered in detail by others, there is a key question about the digitisation of the welfare system:* ***are the benefits of digital being shared equally with the public?***

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[35] DWP has approved four 'calculators' to exist: DWP's internal version (which previously included a separate 'spreadsheet' for manual checks) that enables the logic of UC's systems as implemented to be validated against current state of the law; a version for local authorities and organisations that advise and support claimants; the Turn2Us benefits calculator; and one for 'think tanks' and policy development. Links to the three UC calculators outside Government are listed at: https://www.gov.uk/benefits-calculators

[36] To the extent that we have been able to, from materials provided by DWP under FOI and others. This research had to be paused during the pandemic response, and further work is still needed.

[37] e.g. multiple PAC and NAO reports, and pages 28-31, https://pt2.works/files/universal-credit.pdf

[38] https://www.gov.uk/service-manual/agile-delivery and https://dwpdigital.blog.gov.uk/2020/08/17/what-ive-learned-about-gds-assessments-as-a-user-researcher/

[39] https://pt2.works/reports/universal-credit-digital-welfare

> *Currently, the answer appears to be no.*
>
> *Critical parts of the Universal Credit policy, such as appeals, have not been digitised at all, and **options that empower claimants to take greater responsibility by choosing how Universal Credit works for them are obfuscated or missing.***
>
> ***DWP's focus on automation prioritises its efficiencies over those of the public.** There are huge opportunities to use the data that DWP holds to reduce administrative burden, speed up payments and improve how it communicates with claimants, but these have not been prioritised. It is also not sufficiently transparent to claimants when and how automated decisions have been made.*

3.25. While it is known, for example, that annotations can be added to an individual's account[40] which can be seen only by DWP staff and officials, there is no clarity on what these might cover – nor indeed of the 'administrative view' that DWP officials and staff can take internally on claimants' accounts and personal information, at different levels. So while some of the processes and reporting interfaces or access to relevant systems may be devolved 'out' to JobCentre Plus staff, other systems reside more centrally and can only be accessed by (maybe) a few hundred officials. One example of this multi-tiered approach would be the number of interlinked systems around fraud.

3.26. Formerly run by DWP's Matching Intelligence Data Analysis Service (MIDAS), the centrally-based General Matching Service (GMS) has, since the late 1990s, compared information held on different benefit systems as well as with external data sources,[41] identifying cases that *"indicate potential fraud and incorrectness"* [42] for investigation and further action by DWP staff and officials across other parts of the system. Staff may use GMS RMS in JobCentre Plus, and GMS RMS or RMS4D in the Pension Service. (A similar but separate 'matching service' is run for Housing Benefit.)

3.27. While use of this General Matching Service (GMS) – now also referred to internally as "Customer Centric"[43] – continues to the present day, DWP's Fraud and Error Service (FES) systems were further 'updated' in 2008 with the introduction of the Fraud Referral and Intervention Management System (FRAIMS), which partially automated referrals and case management, and which is still used routinely by staff and officials across the system.

3.28. Alongside the roll-out of Universal Credit, DWP jointly developed a Single Fraud Investigation Service (SFIS),[44] exchanging data with HMRC and local authorities, that

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[40] For example, UC's staff interface has a banner showing whether 'control measures' for, e.g. "Unacceptable Customer Behaviour" are present in a claimant's record: http://data.parliament.uk/DepositedPapers/Files/DEP2019-0980/137._UCB_v4.0.pdf

[41] e.g. Home Office systems to check for partners who are in prison; page 190, Data Matching User Guidance FOI: https://www.whatdotheyknow.com/request/181664/response/470958/attach/4/Data%20Matching%20User%20Guidance.pdf

[42] page 186, ibid.

[43] page 3, Fraud and Customer Compliance Guidance FOI: https://www.whatdotheyknow.com/request/181664/response/470958/attach/5/Fraud%20and%20Customer%20Compliance%20guidance.pdf

[44] https://www.gov.uk/government/publications/single-fraud-investigation-service

launched in 2013. And in 2018, DWP established a Fraud, Error and Debt (FED) Board, merged its fraud and debt operations together into a Counter Fraud Compliance and Debt directorate (CFCD), and launched a new Risk and Intelligence Service (RIS) that is said to be *"exploring, with other Government Departments, the optimum use of data across Government"* as well as *"utilising existing 3rd party frameworks to bring data in from trusted partners".*[45]

3.29.   As far back as its 2017-18 annual report, DWP claimed to be using *"cutting-edge artificial intelligence to crack down on organised criminal gangs committing large-scale benefit fraud"*,[46] and despite vague media reports of an "intelligent automation garage" in 2019,[47] some functions remain so secret as to be almost invisible – for example, DWP's ongoing development of its Risk and Intelligence Service (RIS) using Machine Learning and "AI" in its 'air gapped' Analysis and Intelligence Hub. (See the cover of Annex 3.)

3.30.   In its 2018 report to the National Audit Office on the roll-out of UC, DWP admitted RIS was barely working post-launch, even after its first phase of development:

> The Department intends to develop a fully automated risk analysis and intelligence system on fraud and error. **But it has not developed this sufficiently to understand and assess fraud and error or to provide staff with effective reporting to enable them to identify potential fraud.**

DWP claimed two further stages of development of RIS were intended; "the second from October 2018 to April 2019, and the third from April 2019 onwards". And by June 2019, the Department boasted in its annual report:

> RIS is using increasingly sophisticated data and analytical tools to uncover **cases of undeclared capital** and **failing to declare a partner (living together)** with threat alerts now helping our service staff identify and prevent fraud.

which may sound quite impressive, until you realise such 'living together' checks are largely outsourced to a credit reference agency, and have been since 2016.[48]

3.31.   This is not the only branch of the map indicating DWP's use of checks with credit reference agencies. It should be noted that such checks are not necessarily always full credit checks – although such 'enhanced' checks may be done, e.g. for those deemed to be 'High risk' – but rather they are checking to confirm whether or not an individual has a 'footprint' at the CRA. This became a significant issue during COVID-19 (see Annex 4B) and we understand that DWP is looking to use credit reference checks should it replace the GOV.UK Verify identity system.

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[45] Page 74, DWP Annual Report, 2019-20: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896268/dwp-annual-report-and-accounts-2019-2020.pdf

[46] page 63, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721224/dwp-annual-report-and-accounts-2017-2018.pdf

[47] https://www.theguardian.com/technology/2019/oct/14/fears-rise-in-benefits-system-automation-could-plunge-claimants-deeper-into-poverty

[48] See DWP Living Together Data & Analytics PIA: https://www.whatdotheyknow.com/request/589574/response/1416586/attach/3/Annex%20A%20Privacy%20Impact%20assessment.pdf
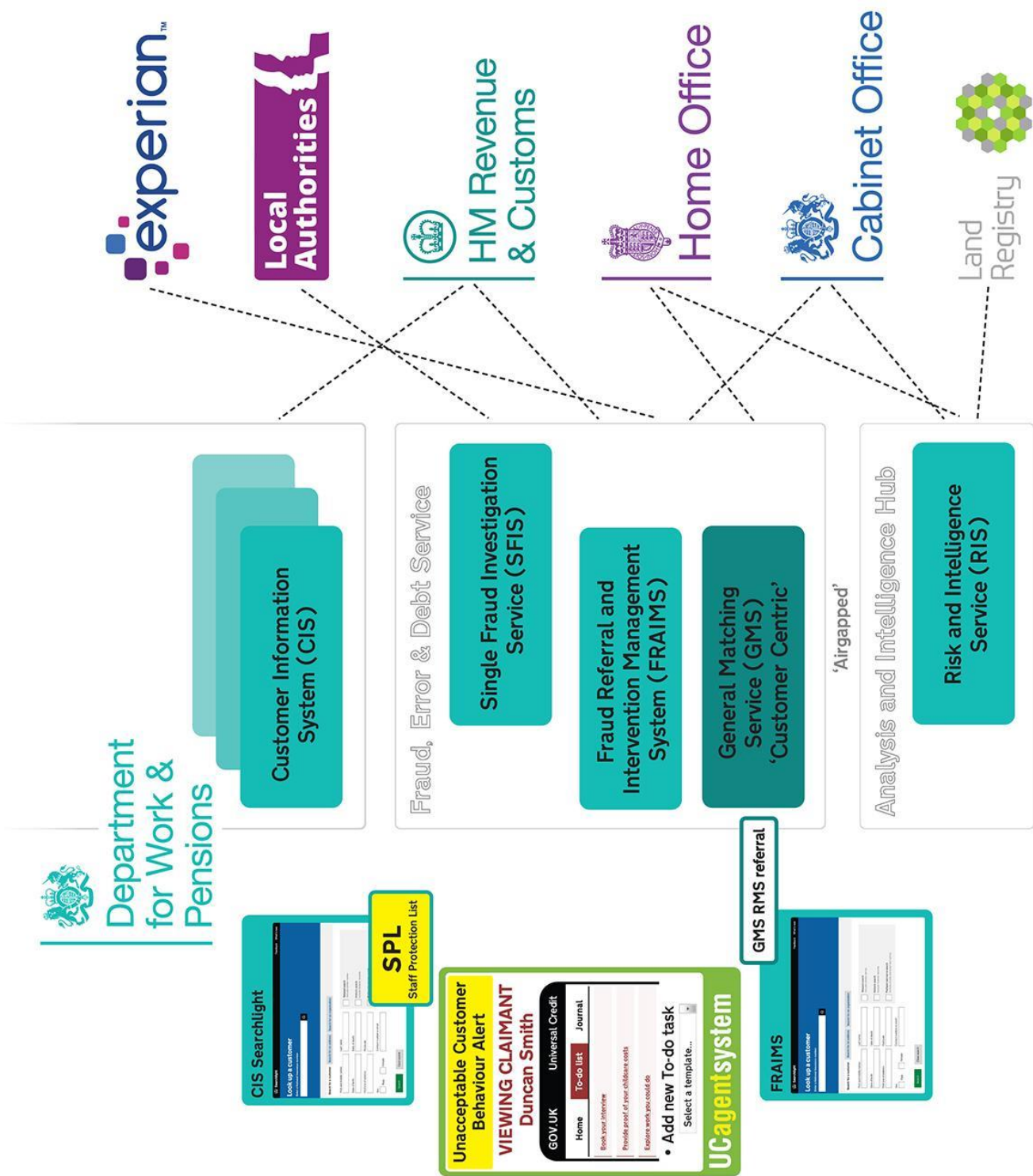
3.32. Elsewhere it has been possible to map, down to *individual data field level* in some instances, the exchange of data under Memoranda of Understanding between DWP and the Land Registry, and the Student Loan information held by the Cabinet Office. And also *bulk data* transfers between, e.g. Home Office, HMRC and DWP – data that feeds into a massive central data warehouse which reportedly contains over 200 TB of data,[49] incorporates over 200 regular data feeds and serves over 600 (internal Directorate) users.[50]

Understanding the impenetrable

3.33. While all of these systems, directorates, initiatives and acronyms may make sense to DWP officials,[51] they can lead to considerable confusion when members of the public are exposed to them – especially when there is little to no explanation of what the various checks and processes are, and what they do. Claimants should certainly not have to understand the complexity of DWP's systems in order to be able to get the help they need – but equally, when referred or otherwise affected by one of these systems, there must be an understandable explanation.

3.34. In addition, while the lack of transparency over DWP's internal structures, departments and directorates is unlikely to materially affect individual claimants, it does frustrate the efforts of those supporting them – and civil society more generally – in identifying what is relevant to (or even the difference between) systemic and particular problems.

3.35. DWP's lack of published performance statistics and dashboards has been thrown into sharp contrast with other parts of Government and the public services during the pandemic. That 1000-page counter-fraud manuals have been published, but we don't even know the organogram or the names and numbers of its systems is indicative of a toxic secrecy in DWP culture.

3.36. While it may make sense to redact some operational and all personal details, the failure to provide evaluation methodologies and goals / targets, baselines and ongoing performance statistics undermines trust and accountability. 'Fraud' (not to mention *official* error) is used as justification for programmes and approaches that not only represent poor value but – as RBV has proven to be in local authorities – are a failure, both in terms of financial return as well as in process.

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[49] https://careers.dwp.gov.uk/our-teams/dwp-digital-data-science/
[50] https://pssmagazine.co.uk/the-dwp-turns-to-the-g-cloud-to-solve-big-data-issues/
[51] Though at 1,000-pages, the Staff Guide for Fraud Investigations takes some digesting: https://www.gov.uk/government/publications/fraud-investigations-staff-guide

4. Part 4 - Digital implementations of DWP policy choices

4.1.　UC is a 'digital-first' system so, whatever the details, all changes will have some level of digital facilitation and implementation.

4.2.　It should be stated that many, but not all, of the criticisms of UC's digital approach are a consequence of *non-digital* policy choices. That there are four official instances[52] of the UC 'calculator' – what might be thought of as 'the UC algorithm' – suggests DWP is pretty confident that it has manifested the core logic of the system correctly. But being able to calculate a payment consistently is not the same as doing so fairly, or even justly. Especially when the data being fed into that logic can be, and is, treated so differently.

4.3.　In order for anything in UC to change significantly, the decision-makers have to care – not just about the system itself but about everyone who is on Universal Credit, in a manner which is equitable.

'User Research' vs User Needs

4.4.　The gap between policy and operations at UC, between decisions and delivery, was illustrated by Tom Loosemore – former deputy director of GDS, and part of the Major Projects Authority's 2013 review of UC that resulted in the reset of the programme – at the Work and Pensions Select Committee hearing on 1 July 2020.[53] Tom said:

> *I'm afraid the thing that doesn't work well with Universal Credit as a whole within DWP at the moment is you still have a significant gap between those who make policy and those who deliver and operate the system. They are not on the same floor.*
>
> *I think there are only a couple of policy people embedded in the team, whereas there are literally dozens and dozens of operational people embedded in every team. You have a separate labour market policy team and a separate Universal Credit policy team, for reasons I simply fail to understand. I'm not even sure the Director General of Universal Credit actually has control of those policy people.*
>
> *I think some of the issues that are challenging here come from a policy caste wilfully staying separate from the dirty, difficult, messy reality of people's real lives because it is nicer that way.*

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[52] See footnote 35.

[53] Work & Pensions Select Committee 'Universal Credit: the wait for first payment' oral evidence session, 1 July 2020; page 26: https://committees.parliament.uk/oralevidence/613/default/

4.5. 'User research' can be used to justify almost any decision, especially if (silent) constraints are applied to that research – in such instances, the 'research' is no different to a push poll in politics. Our choice to frame UC as a monster factory exposes a fundamental underlying truth: that those doing the work do not believe their actions to be the actions of monsters.

4.6. In almost every example of catastrophic DWP failure, each individual involved will claim to have done the right thing. This is not uncommon in bureaucracies. In the NHS, where medConfidential mostly works, one of the most high profile scandals of recent times and the subject of a public inquiry was 'Mid-Staffs' – yet some of those involved[54] even self-published books about how it wasn't their fault, but rather everyone else's.[55]

4.7. Just as it may be used to justify doing anything, user research can also be used to justify *not* doing anything – especially where there is no genuine choice as to which system or systems are used. While it is easy to use user research to deceive oneself, it is far harder to use it to deceive oneself where there are competitors who do not share one's institutional fallacies. (This is one of the main reasons why user research does work well in the business world, where there are competitors – the absence of which has not been mitigated when moving the approach into Government.)

Competition to the DWP UC interface: A third party app?

4.8. HMRC provides its own web interface for tax submissions, and an app for PAYE submissions, but that is not the only way taxpayers can submit their tax returns. HMRC's offerings are built on well-defined interfaces, designed to allow others to build software for those who HMRC serves less well. HMRC's goal is that you pay your taxes, and it makes doing this as easy and flexible as it can; DWP's approach to claiming benefits is somewhat less user focussed.

4.9. How could HMRC's model of provision be applied to UC? There must, of course, always be a web interface to UC that is provided by DWP, but should that be the *only* interface claimants can use?

4.10. The development of DWP 'interfaces' is subject to DWP priorities; while it claims to support 'user needs', resourcing decisions go through a prioritisation exercise that on the evidence, more heavily[56] weighs the needs of Government alongside claimants' needs. This results in the sort of user interface decisions that are covered in the Child Poverty Action Group's Computer Says 'No!' reports.[57] [58]

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[54] https://www.amazon.co.uk/God-Bless-NHS-Roger-Taylor-ebook/dp/B00BKRV3WG/ref=sr_1_8
[55] https://news.sky.com/story/chair-of-embattled-exam-watchdog-owned-data-firm-that-was-involved-in-major-nhs-care-scandal-12054707
[56] pages 6-7, https://pt2.works/files/universal-credit.pdf
[57] https://cpag.org.uk/policy-and-campaigns/report/computer-says-no-stage-one-information-provision
[58] https://cpag.org.uk/policy-and-campaigns/report/computer-says-no-stage-two-challenging-decisions

Could a third party build on UC's current interface to provide an alternative?

4.11. Many UC claimants suffer from mental health issues such as anxiety, and while the DWP interface is functional, it does little to mitigate the unnecessary anxiety caused when people are dealing with DWP. A prime example of this would be the way in which UC displays letters, which is at best 'minimalistic'. Given the predictable and legitimate fears people may have about their contents, this interface could more accurately be described as 'dispassionately brutal' – by design.

4.12. What pilot projects, run by trusted third parties, could build on the current UC interface so as to provide reassurance to claimants – vulnerable or otherwise – rather than just presenting the minimum information required by law? Taking official letters as an example again, DWP letters have standard features (e.g. reference numbers and templates) which would allow a simply-automated system to 'infer' the topic of a letter and its likely contents (given the letter itself will likely use statutorily-mandated phrasing) and present it in ways that assist and support claimants, that DWP is presently unwilling or incapable of doing.

4.13. **How different would the UC interface look if the institution that designed it was capable of believing claimants when they said they had mental health concerns that could be mitigated? And how different could the process also be for those required to administer it, who may equally suffer from conditions that engage Equality legislation?**

4.14. Opening up government data and services through the use of APIs was a key recommendation of the Martha Lane Fox review,[59] back in 2010. Since then the Technology Code of Practice,[60] as well as stated Government policy and preference, is for APIs to services to be made open – something UC seemingly ignores. There are many reasons why open APIs are good practice, and not simply to facilitate better design decisions and better meet user needs; that an API is working correctly can both be an indicator of the 'health' of the underlying system(s), and provide some transparency on their performance.

4.15. Therefore, as a matter of priority, UC should be required to expose an API which allows the following specific tasks to be done:

- Users to be able to **export their journal**, and the items in their account's **audit trail**, to support service providers;

- Users to be able to **export each of their current commitments**, individually or in groups, to enable support services to help them meet their commitments;

- And **additional user needs** should be sourced from a wide variety of stakeholders, using a credible co-design process.

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[59] https://www.gov.uk/government/publications/directgov-2010-and-beyond-revolution-not-evolution-a-report-by-martha-lane-fox
[60] https://www.gov.uk/government/publications/technology-code-of-practice/technology-code-of-practice

4.16.   It is however unclear whether mitigating failure is part of DWP's institutional incentives. DWP's focus remains on DWP's needs and on legal requirements, rather than on claimants' needs and the burdens its own processes place on claimants.

4.17.   Absent a clear commitment to (co-)design and operationalise feature sets that support claimants, as discussed in this report – and without delivery of the identified 'low-hanging fruit' around the Journal, and a published roadmap for the delivery of the longer term improvements – there is no reason to believe UC's interface will meet the needs of either those with the most complex cases, or claimant support services. And that includes those services which the Government and DWP already fund to mitigate DWP's failures.

Helping the Furthest First

4.18.   In doing the thinking that led to the creation of the doteveryone organisation, Baroness Lane Fox advanced the concept of 'helping the furthest first' – i.e. helping those who are most disconnected and most disengaged – because if they can use a particular (digital) service, then so can everyone else.

4.19.   Similarly, in conversations about digital strategy with NHS friends, medConfidential often uses a reframing of the Talisman first offered by Gandhi:[61]

> *"Apply the following test. Recall the face of the poorest and the weakest, the most digitally-disengaged patient whom you may have seen, and ask yourself if the step you contemplate is going to be of any use to them? Will they gain anything by it? Will it restore them to a control over their own life and destiny? Will they have the information to make an informed decision?*
>
> – with apologies to Mahatma Gandhi and Martha Lane-Fox.[62]

4.20.   It remains to be seen whether use of the Talisman is supportable or sustainable within the hierarchies of decision making in the monster factory – or whether instead DWP will continue to help itself first.

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[61] https://www.mkgandhi.org/gquots1.htm
[62] https://medconfidential.org/2017/remember-marthas-talisman/

Annexes

In a series of Annexes, we go in more detail by examining particular topics in depth:

- **Annex 1: HMRC-DWP 'Real Time Information' income sharing** – how HMRC collects information on payments from employers, how this is fed to DWP, and what DWP does (and doesn't) do with it.

- **Annex 2: Risk Based Verification (RBV)** – how RBV is used both by local authorities and across DWP, and how to examine its use (and misuse) in practice. Also how it is outsourced.

  - **Annex 2A:** 'Identity Verification in UC for the most complex claims'

- **Annex 3: Responding to Fraud and Error as a Government Profession and in Practice** – Government has created a 'profession' out of fraud hunting; we examine the practical effects of the culture and practices of this 'profession' across DWP and more widely.

- **Annex 4: COVID-19 and the Welfare State** – top sheet and overview; proactive and responsive analysis and proposals are in the sub-Annexes:

  - Part 4A: What changed and what didn't?
  - Part 4B: COVID Credit Checks (June 2020)
  - Part 4C: 'Sending money next week' (early March 2020)
  - Part 4D: 'What DWP did instead' (26 March 2020)
  - Part 4E: Written Evidence to Parliament (responding to Oral Evidence by DWP) (April 2020)
  - Part 4F: Supplementary Illustrated and Written Evidence following our Oral Evidence (also based on other parts of our report) (July 2020) [as yet unpublished]

- **Annex 5: What is *not* automated?** – a public discovery note (ongoing).

Current versions of all Annexes can be found at https://medConfidential.org/2020/Universal-Credit

Appendix A: List of Documents

We maintain a list of citations and sources in a separate Google document that we update as we keep working and finding new documents, as well as providing links to the work of others working on similar efforts towards their own goals.

That document can be accessed here:

https://docs.google.com/document/d/19CLLtVQpRSxwYH72zdKlRzJhVHi46ohdE-NDiJShFis/edit#