

## Annex 2A: Identity Verification in UC for the most complex claims

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

1. In following DWP's guidance for housing benefit document checks,<sup>1</sup> councils specify 'originals required' for the 20% of all cases, which are the focus of 75% of verification resources, as DWP requires 20% of cases be deemed 'high risk'.<sup>2</sup>
2. Councils report in housing benefit checks that 'complex cases' are almost always 'high risk', which suggests 'risk' *may* be a measure of complexity, not risk.<sup>3</sup> (This seems testable.)
3. If 'high risk' is in practice a proxy for complexity, this may be decision-making based on legally protected characteristics (such as those involving children).
4. For those who are on Universal Credit, DWP does the risk assessment, rather than the Council – those on UC are "passport"ed" by DWP.
5. To identify claimants in Universal Credit, the usual route for claimants is to be directed by DWP towards GOV.UK Verify.
6. DWP decided upon the level of identity checking it wanted from Verify, which is 'Level of Assurance 2' (LOA2) – the equivalent of checking a 'scanned copy' of a legal document, notably *not* requiring sight of an original document (which is LOA3).<sup>4</sup>
7. It is DWP's choice alone what evidence it subsequently requests from claimants within UC.
8. The upper tiers of civil society support services, i.e. those who deal with the most complex cases, suggest "Verify didn't work" in *any* case that they see, as those claimants are *always* asked to bring their original documents – which may indeed be why they end up needing the services of upper tier support services...
9. **It therefore appears that, by DWP's explicit design, 20% of all claimants cannot possibly make a successful claim through the 'automated' Universal Credit service as they are required by DWP to show original documents in person.**

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<sup>1</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633018/s11-2011.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633018/s11-2011.pdf)

<sup>2</sup> e.g. Table on page 7: <https://democracy.west-norfolk.gov.uk/documents/s3445/Housing%20Benefit%20and%20CT%20Support%20Risk%20Based%20Verification.pdf>

<sup>3</sup> <https://www2.harrow.gov.uk/documents/s161655/RBV%20GARMS%20report%20Jan%202020%20v2%20-%20final.pdf>

<sup>4</sup> <https://www.verify.service.gov.uk/understand-levels-of-assurance/>