

## Annex 5: Burdens upon burdens on the most in need

Each unreformed service and each neglected corner within services adds to the burden on citizens in genuine need, and those who face the most burden in one service will likely face it in others as well.

Going digital *necessitates* service redesign; it is not an optional extra.

And redesign is not just about replacing paper forms with PDFs, nor even PDFs with online forms. Savings may well be had – even the Cabinet Office admits that HTML forms are cheaper and better than PDFs<sup>1</sup> – but, as with other parts of the process, those who are excluded from a digital form for whatever reason in one place are disproportionately likely to be excluded from digital forms in other places, compounding the burdens on those with greatest need.

Elsewhere we specifically focus on newborns,<sup>2</sup> where things are more transparently obvious and where one would expect policy intent to be “We’re keen to help, we just need to check a few things first”. But process failure exists in many places and creates burdens upon burdens for the most in need.

### Process failure as public task

All of the different burdens on citizens we uncover and unpack in this Annex will have been justified at some point. Sometimes those justifications may even have made sense. But every one of those justifications will have been based in a Departmental assumption that it is the role and function of citizens and service users to satisfy the whims of the Department.

No new technology is a tabula rasa.

While Government promises to transform itself with shiny new tech and by ‘joining up’ data, and to rationalise and improve services by making them “digital first”, each new round of automation drags with it a history of policy and design decisions – often remaining reliant on outmoded legacy systems<sup>3</sup> deemed too difficult or costly to replace.

When those organisational dependencies falter or fail,<sup>4</sup> the consequences play out across entire systems, causing widespread chaos and very real human consequences.<sup>5</sup>

More prosaically, and despite endless strategies and promises of a paperless future, every Government process usually has a form attached to it in some way. Many of these have been converted into PDFs; you may even be able to fill in some on screen, before printing them and posting them off – but the unavoidable truth is that the Government has to receive information in order to process it.

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<sup>1</sup> <https://gds.blog.gov.uk/2021/11/17/why-we-think-online-html-forms-are-usually-better-than-document-based-forms-in-government/>

<sup>2</sup> Annex 7 <https://medconfidential.org/2020/universal-credit/>

<sup>3</sup> <https://ntouk.wordpress.com/2021/09/30/the-political-cost-of-legacy-systems/>

<sup>4</sup> Such as with the Home Office e-Gate system in September 2021: <https://news.sky.com/story/prepare-for-more-digital-failures-like-the-chaos-at-heathrow-theyre-going-to-come-12416777>

<sup>5</sup> <https://news.sky.com/story/massive-queues-as-e-gates-go-down-at-heathrow-and-other-airports-around-the-uk-12416605>

## Helping people

It is the role of civil society to help people. In a digital world, that requires understanding the digital processes that people are made to go through. Civil society should not just be demanding ‘better IT’, it also needs the expertise (and access) to be able to understand both what’s going on and the art of the possible, and to scrutinise new data systems against both.

There are for example services that DWP will never build, but which civil society might be able to use to support victims *by delivering themselves* – and through which the public purse might also save significant sums of money from them doing so.<sup>6</sup>

It is fundamentally self-defeating for a Department to on the one hand to fund organisations to help people, while simultaneously and systematically obscuring the information and insights<sup>7</sup> necessary to help them with the other.

It is the job of (parts of) government to help people too. And while that job is taken seriously by many civil servants, it is striking how much automation tends to serve Departmental or official user needs\* over the needs of citizens. This is why it is so important to keep asking the questions:

- What/who has been left out?
- What isn’t being done here? (and for whom)
- What is not automated, and for whom?

Even the processes used to *improve* services – such as A/B testing, which DWP uses to evaluate the experience of how services are used, and to test assumptions behind some changes – can be harmful when there is no effort to count those who drop out of the process, and (as is currently the case) where there is no policy in place to mitigate ‘adverse effects’.<sup>8</sup>

We expect the proposal to move NHS data and information access into a subordinate directorate of NHS England will result in the NHS showing several of these lessons to DHSC and the rest of Government in fairly short order. Whether any other part of Government will learn from this, however, remains to be seen..

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<sup>6</sup> E.g. <https://medium.com/code-for-america/overcoming-barriers-how-getcalfresh-helps-applicants-submit-verifications-f2082823f64f>

<sup>7</sup> <http://data.parliament.uk/WrittenEvidence/CommitteeEvidence.svc/EvidenceDocument/Justice/HMCTS%20Court%20and%20Tribunal%20reforms/Written/103279.html>

<sup>8</sup> See, e.g. Annex 5P: <https://medconfidential.org/wp-content/uploads/2021/03/5P-AB-testing-practices.pdf>

## Current list of examples

This list of Annexes is likely to be extended from time to time. Please check online at <https://medconfidential.org/2020/universal-credit/> for the latest complete list.

- Annex 5A: [DWP and health](#)
- Annex 5B: [DWP's UC release schedule](#)
- Annex 5C: [DWP's planning timescale](#)
- Annex 5D: [Digital failure – Home Office](#)
- Annex 5E: [HMRC's CH2 form](#)
- Annex 5F: [Complaint numbers and tribunal losses](#)
- Annex 5G: [Access to Forms](#)
- Annex 5H: [Carers Allowance and Attendance Allowance](#)
- Annex 5J: [Settled Status Revisited](#)
- Annex 5K: [Changes to the UC Taper Rate](#)
- Annex 5L: [NCC1 form](#)
- Annex 5P: [A/B testing has legal obligations that are not being met](#)
- Annex 5Q: [A/B test example - two factor authentication for claimants](#)

The examples of Annex 7 are also within the scope of this Annex, but they focus particularly on digital (and lack thereof) around new parenthood, and how the public task of bureaucracy creates maximally-increased burdens at a time when people have least ability to deal with them.

While this is a temporary phenomenon for those with newborn children, those on Universal Credit are subject to such consequences indefinitely.