

DWP Central Freedom of Information Team

e-mail: [freedom-of-information-request@dwp.gov.uk](mailto:freedom-of-information-request@dwp.gov.uk)

Our Ref: FOI2020/40726

17 August 2020

Dear Mark Abraham,

Thank you for your Freedom of Information (FoI) request received on 28 July. You asked:

*Thank you for your reply. I'm interested in your reply about security risks, and the categories allowed. As you said, it's been a learning experience, and I'd be interested to learn what information the department has learned. I'd be very interested to see information about the unacceptability to be able to upload bank statements in particular.*

*It seems counter-intuitive and unnecessary of the DWP to make easily suppliable electronic bank statements of a claimant, unacceptable if sent electronically or to be uploaded, in order to verify information sought by the DWP. Instead the claimant has to print these, and bring them physically down to the Job Centre, with a specific appointment to do this task. Where time pressure is a factor, this then delays the progress of the claim also. I know this in my own experience. I have three times had to present the same statements - once when only part of the documents were copied and uploaded. A second time when the documents were lost, and a third time when they were finally copied and uploaded by a colleague of yours in the DWP. In each case, I raised the need for urgency, and asked to send the documents electronically. I was told that wasn't possible.*

*I am generally aware of IT security risks generally with uploading of documents, but fail to understand how a type of claim can affect the inherent risk factor. By what you say, the department allows uploading on these categories. Presumably it's possible to extend those categories, and if so what procedures are there to actively review and extend those categories? I understand that requests have been granted in the past to allow individual claimants the ability to upload documents also, presumably the claimants have shown reason why that request is important, and the DWP has agreed?*

*I am seeking available under FOI rules, and you'll reply and help if you can and are allowed, and it doesn't cost too much, and if it's published. I get that, and thank you for your efforts. I don't know if you feel your work is rewarding, but I do, even if I may be seen as an irritant at times. What you do is important, and possibly you won't get recognised for that. But I do and am very grateful to you.*

*Which leads me to my final question and it's one concerning the workings of FOI staff. In looking into these matters, is it a matter of enquiries strictly down a searchable source of information, or does the FOI team talk to people in the respective areas, to seek their knowledge as to where to look? Presumably it is a combination of the two?*

**DWP Response:**

It may be helpful if I explain the role of the Freedom of Information Act. The Act provides a legal right of access to recorded information held by a public authority like DWP, subject to certain exemptions that may apply. The Act does not oblige a public authority to create new information to answer questions; nor does it require a public authority to give advice, opinion or explanation, generate answers to questions, or create or obtain information we do not hold.

If you ask a question, rather than requesting recorded information, we will provide you with the recorded information that best answers the question. Once we have provided the recorded information, we have met our obligations under the Act; interpreting the information provided is up to you.

However, to be helpful; the Universal Credit Secure Design risk team have assessed risks around insiders stealing or misusing personal data. In order to comply with GDPR and DPA18 we have to demonstrate we can protect personal data and threat intelligence shows that financial information is high value for the criminal fraternity.

These risks have to be balanced against business and claimant needs whilst remaining compliant with legislation. We have controls that mitigate the risks where the data is held in fields within the database.

The requirement to upload evidence is one that has increased in need during COVID-19, as has the types of evidence, therefore it has increased risk. We have mitigated this by removing the need to upload certain pieces of evidence such as anything that may contain financial data.

It is not within DWPs risk tolerance to put such high value personal data at risk. We are designing a secure service to facilitate the upload of such details. Only at a time when we believe we can afford the correct level of protection for such data will we request that it is uploaded. Until such time we have to resort to a physical inspection of such documents if it is needed.

On your question regarding the handling of FoI requests you may find the following information helpful: a network of around 20 business unit FoI Focal Points has been set up to coordinate and allocate requests received via the central FoI mail-box. These Focal Points are spread across all the department's key business units and FoI is only part of their duties.

The FoI Focal Points identify an author in the part of their business which "owns" the information in question. This ensures that FoI responsibility is embedded within the Department. Since FoI is devolved in this way there is no record of the Department's costs in delivering its FoI obligations.

The Focal Points are supported by a Central FoI Team, who provide advice and guidance on responding to FoI requests.

If you have any queries about this letter, please contact me quoting the reference number above.

Yours sincerely,

DWP Central FoI Team

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**Your right to complain under the Freedom of Information Act**

If you are not happy with this response you may request an internal review by e-mailing [freedom-of-information-request@dwp.gov.uk](mailto:freedom-of-information-request@dwp.gov.uk) or by writing to DWP, Central FoI Team, Caxton House, Tothill Street, SW1H 9NA. Any review request should be submitted within two months of the date of this letter.

If you are not content with the outcome of the internal review you may apply directly to the Information Commissioner's Office for a decision. Generally, the Commissioner cannot make a decision unless you have exhausted our own complaints procedure. The Information Commissioner can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow Cheshire SK9 5AF  
Web: [ico.org.uk/Global/contact\\_us](http://ico.org.uk/Global/contact_us) or telephone 0303 123 1113 or 01625 545745