



Department
for Work &
Pensions

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[DWP Website](#)

Our Ref: FOI2022/78470

2 November 2022

Dear Owen Stevens,

Thank you for your Freedom of Information (FoI) request received on 5 October. You wrote:

"The DWP ARA 2021-22 states that: 'The Committee of Public Accounts has also recommended that the Department make progress in tackling advances fraud. As part of its response, the Department has trialled a risk model to detect fraud in Universal Credit advances claims. This model analyses information from historical fraud cases to predict which cases are likely to be fraudulent in the future. Cases scored as potentially fraudulent by the model are flagged to caseworkers, who then prioritise the review and processing of such cases accordingly. In 2021-22 the model has been run to detect fraud in advances claims already in payment. The Department expects to trial the model on claims before any payment has been made early in 2022-23. If successful this could improve its ability to prevent fraud before these benefits are paid out, avoiding the need to seek recovery.'

This letter states that an Equality Analysis was completed for the 'overall project' of which the risk model was a part:

https://secure-web.cisco.com/1eBzoPhT8hU2VdTztJeAUcxST-7VO2tmaqlSg1qoDVJh_V7K3WFEI-Zo5gUz7EtM8y69CNyvvuVZkJvTC-qZo4BD8neCptD1ujtqhroj1oRGRGiY4CSfeYR1n5yBsLNHsOmbV8PHUy4XqgivvRxU6dWRg89bSJ0BI1eo3yOuWDTPMB9ZP-0qCBQ_qRV0QOUWYJ7kGjka4vkVb6QTbEfnKANz7jPlOW2n9KH801iSc99Dyp7LQzbcoZwjTP1foHOehlruX4_8TX3Cb5rVMb7F3tGoZ6X-A7wTSGHRBQ5uyEKtvqvbwTDg6uiz9Olu9WIZjnuVY_lwC5LAAv1cqQA6CMg/https%3A%2F%2Fcommittees.parliament.uk%2Fpublications%2F28808%2Fdocuments%2F173903%2Fdefault%2F

Please provide, for the overall project of which the risk model is a part, the following:

1. all Data Protection Impact Assessments (DPIAs); 2. documents containing information indicating whether or not each DPIA was sent to the ICO; 3. any written advice or formal warnings provided by the ICO regarding each DPIA; 4. (if relevant) documented reasons for not carrying out a DPIA."

DWP Response

1. all Data Protection Impact Assessments (DPIAs)

I can confirm that a Data Protection Impact Assessment has been done for this and the information you have requested is held by DWP.

However, we would not give further details as this would compromise the effectiveness of our response to fraud and we would therefore withhold any specific details of such work on the basis of the provisions contained in Section 31 of the Freedom of Information Act ("the Act"), which covers the prevention of crime.

Section 31 is a qualified exemption and, as such, a public interest test needs to be applied. While there is a legitimate public interest in ensuring the Department gathers and uses information legitimately to check accuracy and eligibility in the award and payment of benefits, we would not be able to provide more specific information as it would enable a perpetrator to understand our services.

Our DPIAs are highly detailed documents describing the specific data attributes used, the techniques used, how the model is interpreted, the business process and what the controls are to monitor and mitigate risks. They are intentionally highly detailed to ensure they can be understood by non-technical colleagues, primarily the Data Protection and Legal teams reviewing them. We would only share this outside DWP if any high risks were highlighted which we could not take measures to reduce. In this instance, we would share them with the Information Commissioners Office (ICO) as required. Furthermore it is not a mandatory requirement to share all DPIAs with the ICO.

Providing the level of detail contained in these documents along with the data requested would enable a perpetrator to understand the way our IT systems work, as well as where and how they could circumvent them. This would enable an offender to make false claims to benefit, divert public funds, affect the way the government pays benefits to claimants or collects taxes, and could otherwise compromise the provision of essential public services. This is not in the public interest.

DWP is always careful to process data lawfully, proportionately, and ethically with meaningful human input and safeguards for the protection of individuals. We do not use Artificial Intelligence (AI) to replace human judgement to determine or deny a payment to a claimant, a human agent always makes final decisions. The department is conscious to take into account impact of decisions on protected groups under Equality Act and carry out Data Protection Impact Assessments for large scale transformative initiatives that involve personal data, aligned with data-ethics frameworks, codes of practice, and working principles.

DWP is committed to ensuring individuals rights are protected when personal data is processed for its functions. DWP has outlined in its [Personal Information Charter](#) how we use data for fraud and error purposes.

2. documents containing information indicating whether or not each DPIA was sent to the ICO

I can confirm none of our DPIAs have been referred to the ICO as a result of risks we had to manage.

3. any written advice or formal warnings provided by the ICO regarding each DPIA

As none of our DPIAs have been referred to the ICO as a result of risks we had to manage we have not received any written advice or formal warnings in relation to this.

4. (if relevant) documented reasons for not carrying out a DPIA

DWP is always careful to process data lawfully, proportionately, and ethically with meaningful human input and safeguards for the protection of individuals. We therefore follow the DPIA process for initiatives involving the use of personal data.

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

Yours sincerely,

DWP Central Freedom of Information Team
Department for Work and Pensions

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@dw.gov.uk or by writing to: DWP Central FoI Team, Caxton House, 6-12 Tothill Street, London, 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.
Website: [ICO FOI and EIR complaints](#) or telephone 0303 123 1113.