Written evidence submitted by Automating Universal Credit (Research project based at the University of Edinburgh)

1. We are academics from the University of Edinburgh and Lancaster University investigating how automation in the Universal Credit system impacts claimants. Additional information about our project and its aims is available here: https://automatinguc.co.uk.

2. In 2025, we carried out an analysis of Freedom of Information (FOI) requests sent to the DWP about their automated systems.[1] We used the platform WhatDoTheyKnow to collect 51 such requests and analysed how successful they were in terms of receiving answers to questions about automated data matching and risk modelling used to detect error and fraud in benefits claims.

3. The research findings show that DWP takes a non-standard approach to answering FOI requests. Requesters who take the time and have the knowledge of legal FOI Act procedures achieved much greater success than other requesters asking for the same information. For four requests in our dataset, DWP released documents only after a complaint to the Information Commissioner's Office (ICO) – as a result, requesters seeking the same information but not taking this onerous step did not receive these documents.

4. In particular, the project found that the DWP was inconsistent in the release of Data Protection Impact Assessments (DPIAs) – key documents used in the design phase of data-intensive technologies to understand their potential impact on citizens. In many cases, requests for DPIAs were rejected unless the requester complained to the ICO. We also found that one DPIA, for the Universal Credit Advances Model (a machine learning (ML) model that risk scores people applying for a Universal Credit advance during the first month of being approved for the benefit) was redacted differently across different requests.

5. Further, the DWP only released the 2024 'Advances Model Fairness Analysis,' which assessed how the Universal Credit Advances Model performs on some protected characteristics, to one requester, despite two other requesters asking for this document after the Fairness Analysis was carried out.

6. The DWP most frequently cited FOI Act Section 31, applied when releasing information would harm an agency's ability to enforce the law, to justify not releasing more information. It is undoubtedly an important goal to decrease fraud in the benefit expenditure, to root out people and organised crime groups deliberately defrauding DWP through illegitimately gained payments, and there is legitimate concern that fraudsters could game the system further if more is revealed about DWP's fraud detection techniques.

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[1]https://era.ed.ac.uk/bitstream/handle/1842/43635/Algorithmic_Accountability_Report.pdf?sequence=3&isAllowed=y

7. However, the DWP could make available in a more coherent form (e.g. on their website) information that is already in the public domain through FOI requests.

8. Further, charities and researchers have questioned the likeliness that people can game fraud detection systems when more is disclosed about them.[2]

9. Overall, our findings indicate that there is an argument for the DWP to be more forthcoming to the public about its automated fraud and error detection tools – including disclosing information about the internal safeguards deployed to protect claimants from their potential risks – and to be more consistent in releasing information about these technologies.

Recommendations:

Recommendation 1: It would benefit both the DWP and the public to make already released and other relevant documents available either through the DWP's website or through the UK government's Algorithmic Transparency Recording Standard Hub, a searchable database of algorithmic tools used by public agencies. Particularly, DWP could disclose information about the machine learning models it uses – including name and intent – and the risk (DPIAs) and Fairness Analyses carried out for these.

Recommendation 2: We recommend the DWP be more consistent in its answers to public requests for this information and to disclose information that it makes available to one requester to others seeking the same information.

10. The DWP can engender greater public trust by disclosing more information about its adoption of automated tools for error and fraud detection. It would therefore be advantageous for the DWP to provide more details – and in a more consistent manner – about the automated data matching and machine learning analytics that it is using to assess Universal Credit claims.

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[2] Written evidence submitted by Public Law Project (DCSA0003) https://committees.parliament.uk/writtenevidence/131474/pdf/, Big Brother Watch Suspicion by Design report https://bigbrotherwatch.org.uk/wp-content/uploads/2025/07/Suspicion-By-Design-2.pdf, Cofone, Ignacio and Strandburg, Katherine J., Strategic Games and Algorithmic Secrecy (October 18, 2019). 64.4 McGill Law Journal 623 (2019), NYU Law and Economics Research Paper No. 20-08, http://dx.doi.org/10.2139/ssrn.3440878. These sources argue that there is a narrow range of situations that actually allow people to game automated decision-making systems, and that gaming becomes even less likely when the systems' decision-making factors cannot be easily altered (as is the case with a person's immutable characteristics).