

1. Ensuring benefits are accessible

1.1 All subsequent paragraphs relate to Q3 - *What are the main challenges that vulnerable claimants face when trying to make a new benefit claim?*

1.2 Preparing, making, maintaining and ending a claim incur negative impacts on claimants. These adverse effects, experienced while gaining and sustaining access to benefits, arise in many ways (e.g. time, resource, mental, physical, financial, reputational, abuse by others) and may materialise directly to individuals themselves, or indirectly through other citizens, their communities, or other parts of their ecosystems. A two-tier categorisation of these negative impacts arising in digitised services has been developed* during the research. Some negative impacts only occur later – anxiety and effort to avoid the future harms are current burdens, but the future harms may or may not materialise i.e. an accrual of risk. The latter comprise 1) future reputational effects including damage to an individual claimant as perceived by other citizens and as perceived by the state and other parties, and reputation of the systems where this would affect other individuals/communities; 2) future obsolescence including the deterioration and failure, for example due to others' lack of maintenance, insufficient resources, damage, depreciation or retirement; also effort wasted if threshold to achieve access is not met; and 3) future misuse of claimant information, identities and money, including surveillance, fraud, financial loss, identity theft, unauthorised personal data access or use by third parties and the state itself.

1.3 Abuse of claimants (a misuse of power and control) can occur arise through negative effects of welfare benefit services in many ways, such as:

- Psychological pressure on citizens not to claim through the use of punitive rhetoric, stigmatisation and negative connotations
- Depriving claimants contact with people who can help them access benefits
- Humiliating and blaming claimants by treating them as untrustworthy, lazy and undeserving
- Pressurising claimants to comply with obligations to maintain an award, despite other life events and matters outside claimants' own control
- Not protecting claimants from benefit-related scams, fraud and benefit theft
- Discriminatory decision-making such as algorithmic biases against living arrangements which are not considered "normal"
- Loss of access to welfare benefits also removes eligibility for other support
- Organisational neglect by not guiding claimants how to achieve and maximise their claim, and neglect by not informing claimants of other support they may be or are eligible for
- Organisations restricting claimants' freedom to achieve the best outcome that matters to each person

* <https://www.digitalbenefits.uk/number1/>

- Ignoring individual claimants' medical, emotional or physical needs for them to make and maintain claims
- Requiring claimants to give up their privacy rights in order to claim
- Citizens not claiming at all, or dropping out making a claim, or ceasing to maintain the award, may be a form of self-neglect.

1.4 Abuses could be part of policy choices (e.g. in regulations and legislation) which others have provided evidence to the committee about. However, there are also choices being made during the implementation of welfare benefit services (enactment of the legislation), which have been explored much less. My research examined how discretionary decisions in the creation and operation of remotely-accessed digitised welfare benefit services can lead to negative impacts on claimants. Like other software systems, the requirements and actual implementation of digitised services requires choices to be made about how it is meant to work.

1.5 To respond to Q3a - *How effective is the Universal Credit "Help to Claim" service at supporting vulnerable claimants to register a claim?*, this is only available once citizens choose to make a claim, and up to submission of the claim; not before, nor to maintain a claim, nor post award. This remote help service, with limited coverage of claimants' own whole experience of Universal Credit, is not sufficient to counter all the negative impacts built into the enactment of the legislation (i.e. during implementation). A focus on Help to Claim ignores the much more significant contributions of other people and organisations claimants receive help, support and advice from (their wider ecosystems), which also support the state by contributing to service adoption and government efficiency. During my research Personal Independence Payment advisors explained they believe no claimant should ever make a claim without getting timely independent professional advice. There are certain claimant circumstances or situations when the same is necessary for making and maintaining a claim for Universal Credit.

1.6 Determining what matters arise which affect vulnerable claimants, and how they are countered, requires that the scope for consideration is not simply service touchpoints when/where a claimant interacts directly with the state. The scoping needs to include everything a claimant has to do, to gain and sustain access to welfare benefit services. Thus also:

- as an ordinary citizen in advance of any needs or thoughts about claiming (e.g. knowledge of benefits available, effects of news coverage about benefits);
- while deciding/preparing to make a claim (e.g. checking eligibility, finding out what to do, whether to apply and how to apply);
- during the claim-making processes but not touchpoints (e.g. gathering information, keeping devices working, checking for state mistakes and errors, avoiding fraud targeting them, dealing with stigma, getting help and advice from a third party, helping some other claimant); and
- after a claim has ended (e.g. keeping records, avoiding future identity fraud).

1.7 Wider scoping also reveals how negative effects can arise depending upon what is included or not in a service (digital or otherwise). For example: 1) some effort might be being optionally transferred to claimants or their wider ecosystems, apparently increasing efficiency by some measures (e.g. relying on the third sector to

assist citizens to claim); and 2) some matters might be made more difficult by not providing processes or systems that would help claimants primarily (e.g. are complaints, mandatory reconsiderations and appeals supported fully in the same way that other parts of the service exist?).

1.8 The digital welfare service design (definition, development, deployment, operation and retirement) recommendations resulting from my research related to recognising claimants' wider ecosystems, prioritising claimants' needs, and reducing burdens on claimants[†]. The recommendations A–G are reproduced here to respond to the Q3b - *What should DWP do to improve support for vulnerable people to make a claim and to ensure they do not delay making a claim?*:

- A. Support claimants' own ecosystems by: 1) recognising how wider ecosystems contribute to service delivery; and 2) ensure data is available and re-usable
- B. Acknowledge claimants as people in digital design, by: 1) prioritising claimants' interests over system efficiencies; 2) ensuring system and state accountability to claimants; and 3) providing clear and configurable communications about process and decision statuses
- C. Reduce claimants' interaction burdens with digital welfare by: 1) shifting the burden of gathering evidence from claimants towards the state; 2) giving greater flexibility and accommodations to claimants in the accuracy, precision, timeliness and permanence of the remaining information they provide; and 3) delivering full service across wider (multiple) interoperable channels
- D. Embrace a wider ecosystem and fuller claimant activity viewpoint for digitised public services by: 1) legitimising extensibility and customisation of digital infrastructure; 2) designing for the needs of claimants' lives covering their expansive activities; and 3) use claimant-related policy outcome measures to assess digitisation
- E. Design systems which support the division of labour with claimants' ecosystems by: 1) integrating accurate specific and contextual primary guidance about making claims within systems and promote secondary professional assistance; 2) expanding claimant autonomy, control and choice, backed up by transparency of actions and activities; and 3) recognising changing trust effects in design of digital systems
- F. Design to assist claimants across the full span of their own activities by: 1) providing capabilities for activities prior to, during and after direct public service interaction; 2) accepting, permitting and encouraging direct sole-use, shared-use, assisted use, and indirect intermediated use and proxy use of systems; and 3) recognising and promoting the synergistic effects wider ecosystems can offer claimants
- G. Signpost when additional assistance should be sought and recognise the time and effort needed to complete these activities by: 1) indicating to claimants when professional advice is crucial; and 2) reducing barriers for and allow time for this to occur.

1.9 These recommendations are relatively high-level and may seem separated from the detail of implementation choices which was the focus of my research. Therefore as a post-research output, a free open-source practical tool[‡] has been

[†] <https://www.digitalbenefits.uk/number2/>

created to help those who define, develop, deploy and operate digitised welfare benefit services. The tool assists groups to collectively review choices at all levels and stages of the service lifecycle. The tool links the above recommendations (A–G) to around 230 examples of negative effects on claimants, through over 70 service agnostic and technology agnostic implementation threats to claimants. These matters encompass many more aspects than what is considered "accessibility" of digital systems. The range of threats demonstrate how choices made at all stages and all levels can have adverse impacts on claimants, and how those choices could be different whilst achieving the same intent.

1.10 By considering how discretionary choices during implementation affect claimants, it is possible to define, develop, deploy and operate services in ways which reduce to potential for negative effects on all claimants, and thus also reduce such effects on those more vulnerable.

1.11 In summary, to ensure benefits are accessible requires overall consideration of all the negative and positive effects of accessing welfare benefit services, and to do so from the point of view of effects on claimants (reducing the focus on cost efficiencies with its limited scope and organisation-biased viewpoint). The adverse impacts may affect many millions of claimants but are variable and individual, and some impacts will have much more impact on some claimants than others. Some of these negative impacts might be classified as abuse for some claimants, for others they may be burdens which are suffered but can be coped with, and some will some people may be more susceptible and find them excessive individually or collectively. Negative impacts may be so deleterious for some that they contribute to consequences like self-neglect, self-harm and suicide. Factors which make some people more likely to be more severely harmed, or less able to cope, could include social exclusion, digital exclusion, lack of resources, mental health, work and care responsibilities, family problems. But some factors are inherent in the reason for the service: recent events such as those that lead to making a new claim (e.g. being made unemployed, diagnosed with a long-term health condition) affect people's capabilities to deal with impacts. Reducing harmful effects helps all claimants, and provides more significant benefits to vulnerable claimants.

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