

## Request for Information – ATISN 27304 – Annex D

28. Whether the DAF application-processing system uses any automated or computerised process to assess whether an applicant meets any eligibility criterion.

Applicants are restricted from making applications if they have reached maximum eligibility criteria (3 awards in 12 months). The public website blocks these applications.

29. Whether the system automatically recommends, generates or determines whether an application should be approved or refused.

No, it does not.

30. Whether any circumstances are capable of producing an automatic refusal or approval without a DAF decision-maker substantively reviewing the applicant's individual circumstances.

No.

31. Each eligibility criterion or decision rule that is automatically checked by the system, including where applicable:

- number of previous DAF awards; Eligibility blocker, as explained in Q28 (Annex D).
- dates of previous awards; Eligibility blocker, as explained in Q28 (Annex D).
- repeat-application restrictions; Eligibility blocker, as explained in Q28 (Annex D).
- benefit status; No
- household composition; No
- income, savings or available resources; No
- reason for application; No
- crisis category; No
- requested amount; No
- previous applications or refusals; Eligibility blocker, as explained in Q28 (Annex D).
- information held by DWP or other government bodies. No

32. Whether the system uses any form of risk scoring, fraud scoring, profiling, anomaly detection, data matching, predictive analytics, machine learning or artificial intelligence.

Data matching.

33. If any of those processes are used, the purpose of each process and what effect its output can have on an application.

Data matching is used to help detect potential fraud/risks to prevent fraudulent applications being awarded.

34. Whether DAF decision-makers are shown a computer-generated recommendation, eligibility result, score, flag, classification or suggested outcome before making their decision.

Processes are used to help flag potential fraud/risks, not for decision making purposes.

35. Whether a DAF decision-maker can override an outcome, recommendation or rule produced by the system and, if so:

- in what circumstances;
- whether a reason for the override must be recorded; and
- whether override rates are monitored.

No decisions are made by the system, decisions on all applications are made by a decision maker.

36. Whether Welsh Government or NEC audits DAF outcomes for:

- false positives or false refusals;
- systematic errors;
- discriminatory or disparate outcomes;
- inappropriate application of automated rules; and
- differences between computer-generated recommendations and final human decisions.

Monthly audits are carried out on a sample of approved and refused applications; however this is to determine whether the guidance and criteria have been applied appropriately. Decisions are not made by the system, therefore systematic errors, inappropriate application of automated rules and the difference between computer generated recommendations and human decisions are not audited as this does not apply.

37. Any reports, equality assessments, data protection impact assessments, algorithmic impact assessments or audits addressing those issues.

There is no automation as part of the decision making, therefore no information held.

38. Whether a Data Protection Impact Assessment has been completed concerning the DAF application and decision-making system and, if so, a copy subject to appropriate redaction.

As there is no automated decision making, a DPIA was not required, so no information is held.

39. Whether Welsh Government has considered whether any part of DAF processing constitutes automated decision-making or profiling within the meaning of UK GDPR Articles 4(4) and/or 22, and any recorded assessment or determination.

As there is no automated decision making, this is not required, so no information is held.

40. The respective roles of Welsh Government and NEC Software Solutions in:

- designing the DAF decision process;

The decision making process has been designed by NEC in line with criteria set by Welsh Government.

- establishing decision rules;

Criteria set by Welsh Government.

- configuring the software;

This is the role of NEC.

- changing eligibility rules;

Eligibility criteria are set by Welsh Government.

- making individual decisions; and

Decision makers assess applications based on criteria set by Welsh Government.

- auditing decisions.

Audit samples are undertaken by Welsh Government.