



Department  
for Work &  
Pensions

**THE RT HON THERESE COFFEY MP**  
**Secretary of State for Work and Pensions**

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Rt Hon Sir Stephen Timms MP  
Chair  
Work and Pensions Committee  
House of Commons  
London  
SW1A 0AA

15 July 2022

Dear Sir Stephen,

Thank you for your letter of 15 June 2022 regarding the Publication of DWP research and reports.

I and my Ministerial colleagues have engaged with this matter on a number of occasions now, both via correspondence and in person to the committee. We have been clear that where requests relate to research that is informing ongoing policy development, the Department reserves the right to withhold it. It is important that Ministers consider research and its publication on a case-by-case basis.

I do understand the close interest of the committee in research that informs policy, but it is not the case that we committed to publish all research commissioned by a Secretary of State, including research commissioned by my predecessors.

As for the handling of Freedom of Information (FOI) requests, you have referred to an FOI response as being “rejected”. This implies that we have not responded to a request, which is not the case. To avoid any misunderstanding, the Department would only reject an FOI request if it were deemed not to be a valid request, as set out under Section 8 of the FOI Act.

Where the Department sends a response to an FOI request that cites an exemption e.g. Section 35 (Policy in Development) this is not a rejection. This is the Department responding to the request, using an exemption to withhold information. Where a request has received this type of response, it is therefore not a rejection.

We receive over 2000 FOIs a year and last year 97% of FOI requests were responded to within the statutory 20 working day time limit.

Turning to the specific questions you have raised in your letter,

## **1. Evaluation of lowered benefit cap**

**a) When will the Department publish the evaluation of the lowered benefit cap completed in Spring 2019?**

**b) Given that the Secretary of State must review the level of the benefit cap in each Parliament, when will the next review take place?**

The commitment was offered by Ministers of a different administration in a previous parliament. I am not intending to publish, however this may be reconsidered alongside any future review of the benefit cap.

Due to recent political events and the prospect of a change in administration by September, I cannot give an expectation of the date of the next review.

The statutory review obligation changed on 24 March 2022. There is a statutory duty to review the levels at least once every five years and this will happen at the appropriate time. I would suggest that the timing of undertaking the review would be best done when the significant social and economic impacts of the global pandemic are not affecting volatility.

## **2. Report on unpaid carers**

**c) Has the research on the barriers to carers employment been completed? If not, when will it be completed?**

**d) Once the research has been completed, will the Department publish this research, as previously promised to the Committee? If not, why not?**

Yes, the research on “Experiences of claiming and receiving Carer’s Allowance” has been completed.

We are currently considering the results from the research, and should we decide to publish any findings we will of course endeavour to share them with the Committee.

## **3. Internal reports on inaccessible digital services**

**e) What policies is the Department exploring in connection with the accessibility of the Department’s digital services that prevents publishing monthly reports on their accessibility?**

**f) We are pleased that some information relating to the accessibility of DWP’s digital services is in the public domain. If the Department is unable to publish monthly reports, would the Department consider publishing quarterly information on this?**

We have released “Summary Accessibility Reports” covering December 2021 to February 2022 and are currently exploring opportunities to publish those reports in the future.

The Department has used Section 35 (Policy in Development) to exempt release of the lower-level data from the reports following an FOI request earlier this year. This is because the Accessibility Compliance Tool, which contains the information, also contains information relating to the formulation and development of government policy. The information contained within the tool itself changes every day and therefore any lower-level reports on any given day could be very different and would likely be misinterpreted. I understand why there may be public interest in the release of this information; however, in this case we believe the balance is weighted strongly in favour of withholding the information because releasing it would give a misleading picture of our progress.

Officials must be free to record all potential risks, including unlikely scenarios, as well as their priorities for management of those risks and any mitigating actions together with an estimation of their likelihood and impact.

Policies developed by the Department are high profile and complex. Officials must be allowed to use management tools such as the Accessibility Compliance Report freely. Making this information publicly available would compromise the quality and usefulness of the reports as a basis to define the level of risk for any particular service in being compliant with the Accessibility legislation or not, as well as informing any advice to Ministers, Senior Officials, and decision-making authorities.

#### **4. Internal Process Reports (IPRs) on deaths of benefit claimants**

##### **g) Would the Department share the recommendations from the Internal Process Reviews relating to the death or serious injury of benefit claimants with the Committee?**

Internal Process Reviews (IPRs) are an internal learning tool designed to help the Department understand how we can improve our level of engagement with customers. IPRs may make recommendations to help the Department to improve its processes. IPRs are designed to look at whether processes were followed correctly and what learning we can derive from this, rather than apportion blame.

In England and Wales coroners investigate unexpected deaths and those where the cause of death is unknown. Their investigations and conclusions are made at public hearings. The coroner has a duty to write a report following an inquest, which are available to the public once the inquest has concluded. In Scotland there is a different process involving procurators fiscal.

In DWP we release IPRs and their recommendations within the boundaries of the Freedom of Information Act (FOIA). On occasion, when required, the Department exempts information from release under a number of FOI exemptions:

- Section 35 (Policy in Development)
- Section 40 (Personal Information)
- Section 41 (Information given in confidence)
- Section 44 (Prohibitions on disclosure)

I am not intending to share any IPRs with the committee, but I will provide a list of some recommendations that have arisen from IPRs. Please see **Annex A – IPR Recommendations**.

**h) What work is the Department currently undertaking to safeguard vulnerable claimants?**

We do not have a statutory duty of safeguarding, though of course that we do care about our claimants. We engage with other public authorities (including those that have statutory safeguarding responsibilities) to help gather and share information about claimants who may be particularly vulnerable. The Department has already made changes to support vulnerable customers, including processes for colleagues to follow before stopping customer benefits and paying large underpayments to customers safely. We have also increased the number of Advanced Customer Support Senior Leaders (ACSSLs), from 30 to 36 over the last year. These ACSSLs support, coach and engage colleagues across the Department and build and maintain relationships with external organisations that support our most vulnerable customers.

The Department has published information regarding the Serious Case Panel and ongoing work to support vulnerable customers in this year's Annual Report & Accounts. This includes information around:

- Strengthening customer experience measures as part of an Enhanced Quality Assurance Framework which is due to be implemented during July 2022
- Supporting the prioritisation of a bespoke Mental Health training package which is being rolled out across the Department
- Considering “customer correspondence” with a view to reducing the volume of written correspondence which requires manual intervention

Specifically in relation to the Mental Health training, the Department has a detailed mental health training package which includes modules on supporting customers at risk of suicide or self-harm. This is for all customer facing staff, to provide colleagues with learning that they can then apply in different scenarios with which they may be faced. The Department is constantly learning, and work is ongoing to strengthen guidance and training as part of continuous improvement activities, ensuring colleagues have the necessary tools and confidence to deal with these challenging declarations.

**5. UC Programme Board papers**

**i) Now that the Completing the move to Universal Credit has been published, are you able to provide us with an unredacted, or less redacted version of this document, to enable improved scrutiny, particularly in relation to the restart of managed migration?**

Attached with this letter is a copy of the “Move to UC User Research Findings” (**see Attachment 1**), which was presented to the UC Programme Board on 18 February 2020.

**j) Are you satisfied, in this instance, that the DWP has contributed to the transparency of the Universal Credit Programme?**

A previous Secretary of State agreed to publish papers two years after the day of the meeting. This process happens every six months and the papers are deposited in the House of Commons library. I think that strikes a balance between being transparent and protecting the Department's space to develop policy and not release information until it is in a reasonable position to do so.

**6. Cabinet Office Research on Universal Credit**

**k) Will the Department publish the report on How effective is support for vulnerable Universal Credit claimants?**

We withheld this document from release under Section 36 of the FOI Act (Prejudice to effective conduct of public affairs) and currently have no plans to release it.

**7. Benefit sanctions**

**l) Will the Department provide the Committee with a copy of the evaluation of benefit sanctions, as it previously committed to doing?**

We no longer plan to publish the report. This was commissioned by a previous administration. The notion of a sanction acts not only through its imposition on a claimant but importantly also through its effect as a deterrent. Due to the way the report was commissioned, we were unable to assess the deterrent effect and therefore this research does not present a comprehensive picture of sanctions.

**m) On what grounds was this evaluation exempted from being released under the Freedom of Information Act?**

The information was exempted from release under Section 36 of the FOI Act (Prejudice to effective conduct of public affairs).

**8. Work Capability Assessments**

**n) Why hasn't the Department published statistics on WCA decisions in Universal Credit?**

There are currently no plans to develop official statistics on UC claimants undergoing a WCA. While we will keep this position under review, I anticipate there will be fewer resources available and I am not committing to developing new statistics at this time.

**9. Universal Credit research**

**o) When does the Department expect to publish the above two reports?**

We have published the findings from the Universal Credit Labour Market Impact work. As you have noted a summary of the findings from both sets of analysis were included within the recent Completing the Move to Universal Credit publication.

The full methodology covering both sets of analysis has recently been released through an FOI, accessible via this link - [Universal Credit Full Service employment impact evaluation](#).

Yours sincerely,

A handwritten signature in blue ink that reads "Thérèse Coffey". The signature is written in a cursive style with a large, stylized 'C' at the end.

**ENC.**

Attachment 1 – UCPB180220 – Paper 5b M2UC User Research

## **Annex A – IPR Recommendations**

<b>Ref</b>	<b>Action</b>
1	Employment and Support Allowance to assure Internal Process Review Group (IPRG) that learning will be shared when customers transition between product lines
2	Retirement Services to assure IPRG that all existing checks tasked to team leaders are undertaken timeously and this action is embedded in the quality assurance framework to improve compliance.
3	Employment and Support Allowance to assure IPRG they will communicate operational instructions regarding the use of Reg.34 of the Claims and Payments Regulations (Split Payments) and this action is embedded in the quality assurance framework to improve compliance
4	Retirement Services to assure IPRG that Visiting Officers carry clerical forms on all visits to mitigate the risk of system unavailability.
5	Employment and Support Allowance and Personal Independence Payment to assure IPRG that they will communicate Core Visit operational instructions, that this action is embedded in the quality assurance framework to improve compliance.
6	Work and Health Decision Making to assure IPRG that customer call-backs are made in line with service level agreements.
7	Universal Credit to assure IPRG where there are manual changes to Universal Credit customer correspondence, they adhere to Departmental communications standards.
8	IPRG to be assured by Retirement Services they will communicate operational instructions for the referral of high value overpayment notifications to DWP Visiting and these actions are embedded in the quality assurance framework to improve compliance.
9	IPRG to be assured by the DWP Complaints Team that quality assurance processes have sufficient rigour to ensure that factual inaccuracies are identified before responses are issued.
10	Employment and Support Allowance to assure IPRG that they will communicate living together operational instructions to telephony agents and maintenance teams, that this is embedded in the quality assurance framework to improve compliance.

11	DWP Complaints team to assure IPRG that the new quality assurance processes have sufficient rigour to ensure that responses are comprehensive and factually accurate
12	Employment and Support Allowance to assure IPRG that they will communicate operational instructions regarding referrals for home visits and this action is embedded in the quality assurance framework to improve compliance
13	Personal Independence Payment to assure IPRG that they will communicate complaints operational instructions, that this is embedded in the operational framework to improve compliance.
14	Employment and Support Allowance to assure IPRG that closed claims are withdrawn timeously.
15	Universal Credit to assure IPRG that operational instructions includes information to notify the Customer Information Service when a customer has passed away with an unverified date of death.
16	Universal Credit to assure IPRG that operational instructions are updated to confirm a Universal Credit claim should be closed one month after notification of an unverified date of death.
17	Service Planning and Design, with DWP Visits and Retirement Services to assure IPRG that there is a mechanism in place for identifying when documents have not been received at the Mail Opening Unit following a Visit.
18	Retirement Services to assure IPRG that difficulty contacting Big Word translation service is not a broader issue.
19	IPRG to be assured that Retirement Service act promptly when lost documentation is identified by customer calls.
20	Retirement Services to assure Internal Process Review Group that staff are aware that if a claimant dies abroad without a UK National Insurance Number, evidence verification of the death is required.

# Move to UC

# User Research Findings

**Redacted under Section 40(2) Personal  
Information**

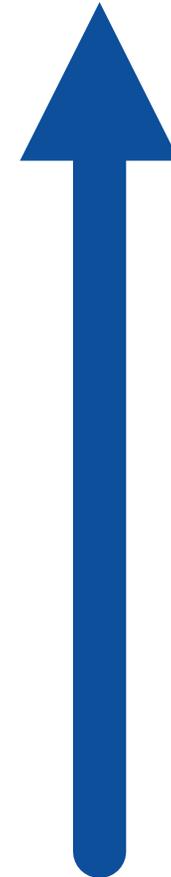
## User research in Move to UC

- Observations of all the interactions between claimants and Work Coaches
- Small numbers to qualitatively understand the journey for each claimant
- Aim is to understand claimant barriers to and concerns about moving
- This allows us to respond and change products, process and tools to move claimants along the move journey

# Claimant Barriers

## Through the pilot, we are understanding claimant barriers to moving

- Worries, negative social media, misconceptions to overcome
- Needing reassurance
- Claimant barriers – mental health, life issues
- Stalling and creating issues to resolve before claiming
- Needing things to be explained multiple times
- Not having right information to make the claim
- Unwilling to engage at all



More  
common  
barriers

## Groups of claimant barriers

### Mental Health

- Anxiety – too anxious to engage in process, with a new work coach or the Jobcentre
- Depression – low mood, passive, withdrawn
- Socially isolated
- Substance/ medication issues

### Support needs

- Life issues to resolve first
- From others to engage in move journey
- From others to understand information given out, or how to claim

### Practical needs

- IT skills – setting up accounts, using a mouse
- Where to access the internet
- Having access to IT equipment
- Evidence documents



# **Tackling claimant barriers – case studies**

# Case study 1 – Tackling claimant worries and misconceptions early in the move journey

## Original pilot journey



Plant the seed



Initial Conversation



Migration notice



Make the claim

- Telling claimants they'll be discussing Universal Credit at the next meeting caused worry and anxiety
- Work Coaches ended up repeating the same information multiple times to claimants – claimants have questions as soon as UC is brought up

***"I've fretted for a fortnight since you mentioned UC"***

# Case study 1 – Tackling claimant worries and misconceptions early in the move journey



- We removed the ‘Plant the seed’ conversation
- Starting with the initial conversation allows a more detailed conversation about UC straight away
- Allows Work Coaches to immediately tackle misconceptions and worries that claimants have – especially from social media/family and friends
- Claimants get the leaflet sooner and the conversation is structured around it

## Case study 2 – providing reassurance and removing issues that stop people claiming

- Claimants were struggling to understand how payment cycles worked on UC
- The difference between their current benefits and UC wasn't clear
- They also wanted to understand when was the most suitable time to claim to make sure they had money available to pay bills

***“When should I claim? I don't want to be without money”***

Move to UC Claimant

## Case study 2 – developing a calendar to reassure people about payment cycles

- We introduced a paper prototype of a calendar to use with claimants
- Used to talk about practicalities of moving
- Offers reassurance to claimants that the money will be in their account when they need it to be
- Helps claimants understand how payments cycles and MDHP works on UC
- Claimants can take away and reference in their own time

***”Everyone should have one. It didn't take me long to do.  
Everyone must get into a real pickle if they don't have this.”***

Move to UC Claimant



■ SIGN PAID JSA.

26<sup>th</sup> DEC - CLOSED OFFICE - PAYMENT AUTO SENT OUT.

December 2019

1	2	3	4	5	6	7	8
9	10	11	12	13	14	15	16
17	18	19	20	21	22	23	24
25	26	27	28	29	30	31	

February 2020

1	2	3	4	5	6	7	8
9	10	11	12	13	14	15	16
17	18	19	20	21	22	23	24
25	26	27	28	29	30	31	

March 2020

1	2	3	4	5	6	7	8
9	10	11	12	13	14	15	16
17	18	19	20	21	22	23	24
25	26	27	28	29	30	31	

January 2020

Mon	Tue	Wed	Thu	Fri	Sat	Sun
			1	2	3	4
	6	7	8	9	10	11
	13	14	15	16	17	18
	20	21	22	23	24	25
	27	28	29	30	31	

print-a-calendar.com

MOVE DATE MIN

## Case Study 3 – reassurance about using UC account online

- Some claimants worry about their computer skills for maintaining a UC account, so don't want to move.
- Worry about getting things wrong and it affecting their money or claim
- Initially explained the account in the context of a social media account – 'if you can use Facebook you'll be fine' – didn't offer the reassurance that claimants needed

# Case Study 3 – using Learn My Way for reassurance

- Work Coaches directed these claimants to 'Learn My Way' to help beginners develop digital skills
- Allowed them to view a 'safe' account before making the claim, and practice in their own time, and get reassurance through practical examples
- It helps overcome fears of the digital system – and claimants express that the digital system isn't as bad as they expected

**Reporting a change of circumstance**

If there are changes in your life or work, you'll need to report this on your Universal Credit account. Update your Universal Credit account as soon as you know about a change.

Examples of a change of circumstance:

- You get a new job, or more hours at work.
- You are too ill to work or meet your Work Coach.
- You move house or your living situation changes - for example - you move in with your partner.

**Universal Credit: Your Online Journal**

What do I do with my journal?

Your online journal is used to maintain your Universal Credit claim

In your journal, you'll:

- Complete To Do's
- Record your job search
- Keep in touch with your work coach
- Report any changes

**Journal entry**

What's this entry about?

- A payment
- A change
- An appointment
- Details of my work search
- A message for my work coach
- Service issues

**Statement**

Your payment this month is **£556**  
This will be paid by Bpm on 22 February 2017

**How we calculate your payment**

Your payment is based on what you've told us and covers the period between

16 JAN and 15 FEB

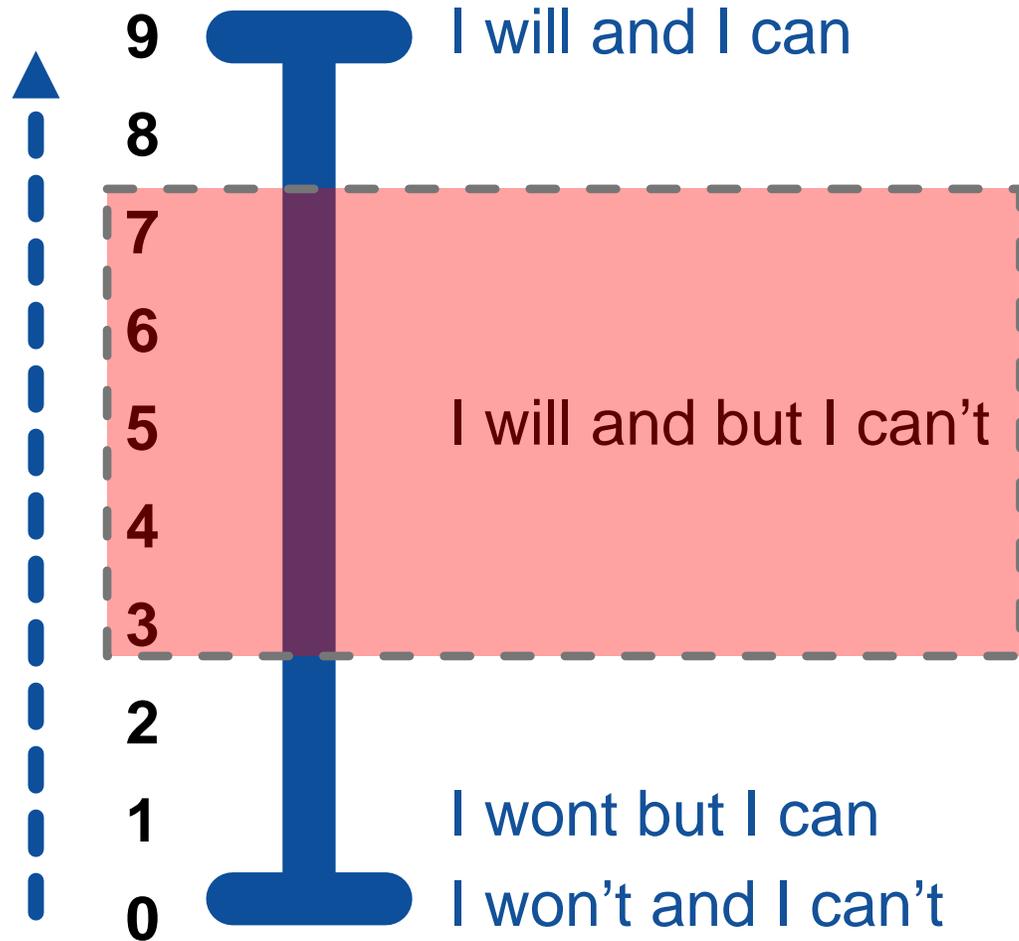
It is important to tell Universal Credit immediately about any changes in your circumstances that could affect your Universal Credit payments.

[Report a change in the circumstances](#)

<b>Standard allowance</b> You receive a standard Universal Credit allowance each month	<b>£317.82</b>
<b>Housing</b> You said that your rent is £400.00 per month, and you pay £30.00 in	<b>£420.00</b>

p3

# Understanding our claimants – complying with Move to UC



- Have a compliance scale based on our move to UC personas
- Focus on how can we move claimants up the scale and getting them to move
- Understanding the barriers and the changes to the service to help move people
- scaling up the research as the number of people increase to start to codify our learning