

To: UC Programme Board Members **From:** Cheryl Stevens
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Remote Digital Identity Verification

Background:

On 24th September 2019, an update was given to UC Programme Board on the future use of GOV .UK Verify within the programme post March 2020 and our plans for alternative remote identity verification.

This paper includes:

- An update on GOV.UK Verify progress since February 2019.
- Findings and outcomes from our joint work with UC and HMRC on Tax Credit natural migration claimants.
- Findings and option decisions for the broader usage of HMRC Identity Verification for all UC claimant types over time.

Summary:

There is commercial clarity with GOV.UK Verify beyond March 2020 and this now gives time to develop an alternative identity verification solution with HMRC, using the HMRC IV platform. An incremental delivery approach will provide best results, whilst safeguarding UC planning assumptions and delivery risks. Post March 2020, tax credit and HMRC customers with an acceptable level of identity could apply for UC without the need for an identity check. Remaining UC claimants will continue to use GOV.UK Verify for a period of up to 9 months, to be determined by a test phase, as it is now an affordable and viable proposition in the short term.

Recommendation:

Agree the suggested milestones for the plan.

GOV.UK Verify Progress since February 2019

1. It was previously agreed at UC Programme Board in January 2019, that GOV.UK Verify would continue to support Universal Credit (UC) until March 2020 with an alternative solution to be developed to reduce our reliance on Verify for remote identity verification.
2. The alternative solution has to be at least comparable to current Verify performance and in line with UC 2020/21 planning assumptions of at least 25% remote identity verifications that are successfully matched to their UC account. These rates for Verify have improved although the volume of claimants attempting has decreased, this has resulted in the success rate remaining at c26% overall.
3. Since Feb 19 there has been a number of reports and investigations into GOV.UK Verify. The National Audit Office investigation was followed by a Parliamentary Accounts Committee hearing in March 19 with the final report published in June 19, neither of the reports were complimentary as to the future viability of GOV.UK Verify. We are working with GDS to respond to the PAC recommendations. In July IPA gave Verify a revised rating of Red from Amber, meaning successful delivery of the project appears to be unachievable.
4. We are continuing to work with GDS on an improvement plan that runs to March 2020. Early findings are not promising and there is nothing to lead us to believe that the success rates through Verify will significantly or sufficiently improve during Phases 8 and 9 of the UCFS Programme.

GOV.UK Verify: The position post March 2020.

5. The current GOV.UK Verify Framework begins to expire from March 2020. There will be a transition period from March 2020 to April 2021 during which GDS have agreed an interim funding model. During this Services are able to continue using Verify under existing contractual and recharge arrangements with no fixed running costs, volume or timing commitments.
6. The Post Office and Digidentity (**Commercially Sensitive**) have re-signed for sign-ups for new users to April 2021. 3 Identity Providers have not re-signed so will cease to provide sign-up from March 2020, they are committed to providing sign in facilities for 12 months to March 2021.
7. However, Post Office and Digidentity have the market share (51%) of the UC customer base, with success rates comparable to the current c26%. All 5 existing ID providers will continue to provide sign-in capability for existing users for 12 months at nil cost, as sign in is now part of the sign-up fee, this enables a smoother transition of customers off Verify and onto the alternative solution.
 - Sign up will be at a cost of s43 per successful ID. The DWP Identity & Trust team (ID&T) are responsible for these costs centrally.
 - Verify (GDS) run costs will transfer to UC Operations for 20/21, this amounts to approximately s43 in 2019/20.
8. These are welcome developments and enable DWP the space for 2020/21 as part of winter planning to develop our successor approach - and deploy it.

Universal Credit Remote Identity post March 2020

9. HMRC's Identity Verification platform (IV) has been recognised as a viable alternative to Verify so we have been working together and with DWP Legal team to discover how it can be adapted to meet our future needs.
10. HMRC do not require access to UC data in order to provide identity verification, the data that HMRC uses is provided by the claimant. Matching claimants to their UC account is undertaken by DWP. Therefore, there is no increased risk to data security.
11. The discovery outcomes identified that a tiered, phased approach to using HMRC IV would provide best results, while safeguarding UC planning assumptions and delivery risks.
 - (a) **Phase 1** – March 2020, there is no longer a GOV.UK Verify cliff edge since the transition period runs for a further 12 months. Following extensive work with Lawyers, UC Secure Design and Security team we have confirmed that the level of risk around identity is the same for customers known to HMRC as those known to UC, these are existing HMRC Personal Tax Account holders as well as Tax Credit customers. Therefore, this provides the opportunity to allow these customers to “sign in” using their HMRC credential (CL200 account) when making a claim to UC, as opposed to “sign up” and a full identity check through GOV.UK Verify. We have recommended a 3-6 month phase 1. This initial phase will see c15% of HMRC customers being able to re-use their HMRC credential.
 - (b) **Phase 2** – Summer 2020, for customers new to UC, unknown by HMRC but known to DWP, and thin file customers who are unknown by either, we will be augmenting HMRC IV with additional capabilities. These will include address, bank account and deceased check to achieve the confidence levels we require for each new claimant. We have presented our proposals to lawyers and UC Secure Design and they have endorsed our approach. We continue to meet the acceptable level of identity assurance in order to pay benefits. The cost is s43 per successful ID. We will start utilising our own data as we progress through the customer groups, further reducing reliance on Verify.

Verify Post March 2020

12. During Phase 1 (ability to apply for UC using an existing HMRC credential), we propose to keep GOV.UK Verify for new claimants who are unknown to HMRC. They will also be able to use Verify to sign in. From Phase 2, our reliance on Verify (sign up and sign in) will diminish as HMRC IV will take over. We expect this transition to take approximately 9 months.
13. This will ensure that we can control the roll out of HMRC IV and monitor performance. This staged delivery will remove any cliff edges and ensure Verify remains commercially viable for smaller government departments due to DWP volume.

Risks

14. The key risks that require mitigation are:

- To prevent deviation from standards and to ensure the endorsed approach is implemented, there will be ongoing engagement with Lawyers, UC Secure Design and Security assurance teams.
- To understand the impact of additional UC development work to integrate with HMRC IV and create new capabilities, such as the address check. P8 planning is complete and this development work has been factored in.
- Successful Integration with HMRC IV, this will be mitigated through the test and learn phases Oct-Dec '19.
- A requirement for continued support from HMRC colleagues. We have a dedicated, ring fenced resource and Memorandum of Understanding in place alongside continued collaboration and joint working.

Governance and Reporting:

15. We have implemented further governance and reporting at UC Programme Delivery Executive, including milestone plans and regular tripartite meetings between our DWP Identity and Trust team, HMRC and the UC programme. We will continue to receive endorsement and agreement on our plans through UC Governance Boards such as Working BDA, Secure Design (TDA/DDA) and PDE. We will report back to UC Programme Board in January 2020, with an update around the testing of the HMRC IV solutions and the DTH commercial activity and deployment.

Milestones

16. We have agreed the following milestones for the delivery plan:

- (a) **Phase 1:** Ability to apply for UC using an existing HMRC credential without the need for an identity check. 31st March 2020.
- (b) In order to achieve (a) we first need to undertake a test and learn in a job centre with real users/data + technical interactions between Identity and Trust, HMRC and Matching (Findr) service in our test/staging environment for:
 - i) Known to HMRC CL200 users, complete 31st December 2019
 - ii) Phase 2: Test and Learn for users that do not have a CL200 complete 31st March 2020
- (c) Decision required on timing of when to deploy Phase 2, HMRC IV for all UC claimants, decision point 30th June 2020.

Conclusions

17. This paper outlines a number of strategic objectives and agreed solutions including: -

- GOV.UK Verify will be available and financially affordable beyond March 2020 for a 12-month period, with DWP looking to utilise for up to 9 months.
- We will enable existing HMRC Government Gateway account holders with the right level of identity proofing to reuse their credentials to claim UC from March 2020
- We are proposing a 9-month transition period off Verify, with a recommendation to pivot to HMRC IV between 3-6 months if testing and performance supports this.
- We will continue to support GDS improvement activity to ensure that current Verify levels of performance does not deteriorate further.
- Lawyers and UC Secure Design are content that the HMRC IV solution for existing HMRC Government Gateway account holders is within risk tolerance for non-repudiation and Fraud and Error.

18. The incremental approach and detailed governance outlined enables continued assessment of achievement of objectives, safeguarding funds and resources without detriment to delivery.