

To: UC Programme Board Members**From: Mark Cousen****Sponsor: Stuart Ison****Author:****Date: 18th April 2023****UC Assurance Recommendations - Update and Closure (Below the Line Paper)****Issue:**

To update Programme Board on the current status of assurance recommendations being managed by the UC Assurance Team, including the six recommendations made by the Infrastructure Projects Authority (IPA) at the Gate 0 review of the UC Programme in November 2022.

Recommendations/Decisions required:

Members are asked to note the status of the recommendations as described in this paper.

Timing: *No timing issues*

Introduction and Background

1. This paper sets out the latest position regarding open recommendations from previous assurance reviews of the UC Programme.
2. The position and updates are shown in relation to each review body.

Infrastructure Projects Authority (IPA)

3. The six IPA recommendations from the November review were discussed and accepted by Programme Board in January 2023. The recommendations are now being actively managed through the Programme's formal control process, whereby:
 - Director level owners and action managers have been assigned;
 - Action plans have been created with steps and timescales for implementation;
 - Regular tracking of progress is in place;
 - Independent scrutiny of implementation action / evidence by the IPA underway, to assess progress and agree closure when appropriate;
 - Final endorsement of closure by the UC PDE.
4. We are proposing that four of these six recommendations are now implemented (or further activity sufficiently logged in plans to be considered implemented) and have submitted our evidence to support this view to the IPA (see Annex 1 – Open recommendations pending closure decision by reviewing body).

5. These recommendations will be reviewed by [REDACTED] (IPA Review Team chair) as part of a short, light-touch follow-on review of M2UC readiness to scale, later in April.
6. The remaining two IPA recommendations are currently open and in delivery (see Annex 2) and have due dates at the end of April. We will also ask [REDACTED] to review progress on these as part of her April review.

National Audit Office (NAO)

7. We have recently secured agreement from the NAO to close four outstanding recommendations as fully implemented.
8. We have also been in discussion with the NAO about a further two recommendations (Getting to First Payment (2020) rec A3 and Rolling Out UC (2018) rec D). We submitted detailed evidence in February to support our view that these recommendations are implemented; however, the NAO were still not content to close.
9. Given these two recommendations have been open for several years, and are not aligned to the UC service goals, the SRO has decided to treat them as closed. We will not be doing further work on them but instead focus our efforts on service goal-related activity. See Annex 3 for all NAO closed recommendations.

Government Internal Audit Agency (GIAA)

10. We currently have four GIAA recommendations open and in delivery (see Annex 2) and one recently closed by the GIAA (see Annex 3).

Overall position

Universal Credit: Recommendations				Position: April 2023
Review Body	Assigned	Open In Delivery	Open Pending Closure by review body	Closed (to be removed following PB paper)
Parliamentary Accounts Committee (PAC)	0	0	0	0
National Audit Office (NAO)	6	0	0	6
Infrastructure and Projects Authority (IPA)	6	2	4	0
Government Internal Audit Agency (GIAA)	5	4	0	1
Total	17	6	4	7

11. Updates on the status and progress made on all recommendations is shown in the following annexes: Annex 1: Open pending a closure decision by reviewing body / Annex 2: Open in delivery / Annex 3: Closed recommendations (to be removed from the tracker).

Action required

12. Programme Board members are asked to note the status of the recommendations as set out in this paper. A full audit trail can be provided if required.

Recommendations currently open pending a closure decision by the reviewing body

Annex 1

Review Body	Ref	Recommendation	Owner	Due Date	Status and progress update
IPA Gate 0 Review November 2022	01/22	The Programme should adapt its planning approach to reflect the challenges of the scale up phase – making milestones (outputs and outcomes), assumptions and dependencies more visible to internal and external stakeholders. In addition, the artefacts relating to risk and dependency management should be reviewed to make them more action-oriented and specific	Stuart Ison	April -23	<p>Status: Currently open but we have asked the IPA to now consider closing in light of the action taken – summarised below.</p> <p>A number of actions were agreed, and these have now been completed. Developing and successfully assessing progress against a detailed set of Readiness criteria, required full transparency with support and agreement from all key stakeholders and partners. We remain committed to continuous ongoing engagement with all stakeholders to ensure they remain actively involved and sighted on developments.</p> <p>Our planning & controls, and in particular robust assessing of detailed readiness criteria, have proved pivotal in identifying areas of concern, establishing mitigating actions and tracking and controlling progress. Consequently, Programme Board recommended we commence scaling from 3 April.</p> <p>Action Plan - set 23.1.23:</p> <ul style="list-style-type: none"> - We have confirmed through governance up to PB the revised volume profile through to end of Programme. Completed - We have agreed at PB revised high level planning assumptions and the remaining planning phases through to closure. Completed - We have established and agreed through governance a set of detailed readiness criteria to assess and assure progress for delivery against the revised volume profile. Completed - We have undertaken four rounds of assessments of readiness to start scaling securely and safely. Latest round of assessments completed in March with an overall readiness rating of AMBER/GREEN with Programme Board recommending to SRO, based on this evidence, that the Programme is ready to start scaling. Completed - Since January, and the agreement to the revised volumes and high-level planning, a number of additional milestones have been added to plans, including establishing operating model, resources and rollout schedules for delivery from April, alongside tracking a number of key enabling automations between DWP and HMRC. Once we have confirmed the rollout schedule post July (Milestone due end of April) will be add in more milestones (but at a proportionate level) focussed on the current and next phase. Completed - On the back of agreeing revised volumes/assumptions etc, risks/dependencies have been reviewed and updated with dependencies broken down to a more granular level, particularly in respect of HMRC IT delivery. These have been tracked through to successful delivery to support scaling from April. Completed - In terms of critical path, we have now updated the planning artefacts to reflect the “phases” of Move, as agreed at Programme Board in December, along with the agreed volume profile and a more detailed delivery plan, reflecting the key rollout activities and supporting enabling deliveries. Completed

Recommendations currently open pending a closure decision by the reviewing body

Annex 1 cont

Review Body	Ref	Recommendation	Owner	Due Date	Status and progress update
IPA Gate 0 Review November 2022	02/22	Beyond Spring 2023, the Programme should extend Discovery to include broader testing and learning – looking at more variables/cohorts, rather than going faster.	Will Garner	April -23	<p>Status: Currently open but we have asked the IPA to now consider closing in light of the action taken – summarised below.</p> <p>All legacy benefit types have been included in Discovery to date - we only recently pivoted to TC only tests. ETS, Alpha, Bravo and Delta all include a mix of legacy claimants.</p> <p>Discovery will continue to test and learn, and our learning will be reviewed and iterated with non-Tax Credit cases, however the timing of when we can do further Discovery outside of TC scaling needs further planning to be done in coming weeks.</p> <p>Learning from earliest testable service (ETS) of 499, the initial cohort is now completed and shared with the Ministerial team.</p> <p>Update against action plan:</p> <p>General</p> <ul style="list-style-type: none"> • Learning from the earliest testable service was published in January • Self-employed tax credits claimants have been brought forward in 2023 to enable us to test and learn with some of the more complex cases. <p>Couples</p> <ul style="list-style-type: none"> • We have done user research with couples to understand their needs and potential challenges to inform the design of the journey for couples. • Work has begun to design and build the products and processes necessary to start notifying couples. • We will start notifying couples in May, to test the journey, before scaling to couples through 2023. <p>Other benefit combinations</p> <ul style="list-style-type: none"> • Research is being done to understand how claimant support needs are best identified and the effectiveness of different types of support. • We are holding a number of collaborative workshops with stakeholders to gain insights and inform service design. • Work is being done to develop hypotheses we will want to test with different benefit combinations from the middle of 2023, ahead of scaling in 2024.
IPA Gate 0 Review November 2022	03/22	The Programme should review / clarify the roles of Programme Board and Programme Delivery Executive in decision making, and consider whether some decisions should be reserved Programme Board, to ensure that members contribute to and are accountable for decisions. Subject to the agreement of Ministers, the Programme should also consider the appointment of a critical friend to bring an external perspective.	Ian Wright (Neil Couling for Programme Board part)	Mar -23	<p>Status: Currently open but we have asked the IPA to now consider closing in light of the action taken – summarised below.</p> <p>In October the UC Programme received a substantial assurance rating from the Government Internal Audit Agency (GIAA) for its governance; however, we accepted this recommendation as it is always helpful to review how governance is maturing and operating.</p> <p>Since the IPA review, more decisions have been reserved for the Universal Credit Programme Board and we will continue to ensure that this happens going forward.</p> <p>Ministers were consulted on the recommendation to appoint a critical friend to bring a further external perspective. Ministers rejected this suggestion so Programme Board membership will not be expanded. This recommendation is now closed.</p>

Recommendations currently open pending a closure decision by the reviewing body

Annex 1 cont

Review Body	Ref	Recommendation	Owner	Due Date	Status and progress update
IPA Gate 0 Review November 2022	04/22	Subject to the agreement of Ministers, the Programme should accelerate engagement with stakeholders to ensure that they can play a role in supporting claimants in the managed migration process.	Stuart Ison	March -23	<p>Status: Currently open but we have asked the IPA to now consider closing in light of the action taken – summarised below</p> <p>Action plan:</p> <ul style="list-style-type: none"> - On 10th January 2023 we published a document outlining the initial learnings and data from the first cohort of managed migration cases in Bolton and Medway ("ETS" cohort) and subsequently held a large stakeholder event (in excess of 100 organisations were invited) to provide further detail on the findings and to give stakeholders an opportunity to ask questions. This more open approach was widely welcomed by stakeholders, and we are now looking to build on this to continue ramping up our engagement with stakeholders over the course of 2023, including through: - Building on our refreshed Terms of Reference and encouraging stakeholders to be more proactive in shaping the agenda of our monthly meetings. - Actively considering how and when to share further insight on subsequent Discovery cohorts with stakeholders. - Working with the Product teams to identify key topics to collaborate with stakeholders on over the coming months. We anticipate running focus group type sessions with a representative subset of our wider stakeholder network to focus on key issues in the Move to UC process in order to harness stakeholder's insight and help us improve the design of the service. - Continuing to seek regular feedback from stakeholders on our engagement approach to inform our future engagement and topics for discussion. <p>20.03.23 update</p> <ul style="list-style-type: none"> - We have continued our monthly stakeholder forums, providing updates on the latest Move to UC activity and giving stakeholders the opportunity to ask questions and feed in their views. We are also in the process of reviewing membership of these forums with a view to expanding out to additional organisations where appropriate. - In addition to the monthly forums, we have now launched our first 'collaboration workshops'. The first of these is being held on 29th March on the specific issue of couples, and we are also planning a workshop in April to support the Communication campaign activity. The aim of these is to work with a smaller group of stakeholders to specifically get their insight and feedback and to identify how they can support Move to UC activity. - Ministers have now agreed to publish further learnings on our Move to UC Discovery work, building on the success of January's publication. We are proposing to publish the latest data and learnings on a quarterly basis and in the coming few weeks will be providing a draft of the next publication for Ministers to consider.

Recommendations currently open and in delivery

Annex 2

Review Body	Ref	Recommendation	Owner	Due Date	Status and Progress Update
IPA Gate 0 Review November 2022	05/22	The Programme should expand its media plans to ensure that there is wider communication about Move to UC, using trusted advocates such as Martin Lewis.	Stuart Ison	28/4/23	<p>Status: Currently open and in delivery.</p> <p>Action Plan:</p> <ul style="list-style-type: none"> - The Autumn Statement has changed the landscape on communications and engagement given the delay in moving the ESA cohort. - This changes the strategy both in terms of the target audience and our messaging. - We have already engaged with Martin Lewis. - More broadly, we have agreed with Communications that we recommend to Ministers that we pursue a digital/radio campaign focussing on preparing tax credit customers to Move to UC and our plans for the next 12 months. <p>20.03.23 update</p> <ul style="list-style-type: none"> - The Minister for Employment has now agreed proposals for a communications campaign in 2023, including both paid for and non- paid for advertising. The campaign will use similar channels to the 2022 Voluntary Move to UC campaign ((e.g. social media and radio advertising) which was successful in engaging Tax Credit claimants. - The information-led campaign will prepare tax credit claimants for managed migration to UC, with a specific focus on the transition from tax credits to the first UC payment, through three key stages: <ol style="list-style-type: none"> 1) Informing Tax Credit claimants that Tax Credits are closing, and the UC switchover has started, and they will be invited to Move to UC over the coming months. E.g. 'Get ready for the UC Switchover'. 2) Making it clear that Tax Credit claimants need to claim Universal Credit in order for their payments to continue and provide more information on the main elements of the UC offer. 3) Encouraging a range of pre-commitment actions to help people prepare for a move to UC, such as using a benefit calculator, seeking more information via the Understanding UC website, DWP, HMRC or stakeholders. <p>Communications colleagues are in active discussions with the Cabinet Office to secure the relevant approvals to proceed</p> <ul style="list-style-type: none"> - Once approved, we expect activity to commence in the Spring. - In addition to the campaign activity outlined above, we will also be further engaging with Martin Lewis to work with us on messaging around Moving to UC, building on the helpful promotion from Money Saving Expert and the Martin Lewis Money Show in 2022, and working with our network of external stakeholders to hold a session to build their awareness of the key messages and seek their support to promote across their networks. <p>Proposed completion date (at which point the key actions are in train): April 2023</p>

Recommendations currently open and in delivery

Annex 2 cont

Review Body	Ref	Recommendation	Owner	Due Date	Status and Progress Update
IPA Gate 0 Review November 2022	06/22	The Programme should develop a crisper narrative about the benefits position to ensure that the holistic picture is understood by all stakeholders	Stuart Ison	28/4/23	<p>Status: Currently open and in delivery.</p> <p>We agreed that our benefits narrative, as articulated in the quarterly written updates for UC Programme Board, needed to provide more focus on what has been and is being achieved. Therefore, we accepted the recommendation with a view to including an expanded narrative in Programme Board updates, and monitoring the level of stakeholder understanding.</p> <p>Action Plan:</p> <ul style="list-style-type: none"> - To include a clearer narrative in the quarterly UC Programme Board updates - To seek feedback from stakeholders on whether the narrative is clearer and is being understood <p>20.3.23 Update</p> <p>The format and content of the quarterly written update has been reviewed with the focus on a crisper narrative providing a more holistic picture of the benefits from UC. The update provides more emphasis on what has been and is being achieved. Early drafts of the report have been shared with key external stakeholders to help ensure understanding and clarity. The report will be tabled at the April UC Programme Board where stakeholders understanding will be monitored on an ongoing basis.</p> <p>We propose that this can be closed at the end of April if Programme Board are content with the improvements made.</p>
GIAA / UC Benefit System March 2022	01/22 (rec 3)	The Underpayment Instruction (automation) to allow the option for Case Mangers to make faster payments when they agree with the system generated calculation needs to be implemented and once in place, guidance updated.	Will Garner	31/5/23	<p>Status: Currently open but requires a discussion with GIAA as the recommendation may now have been overtaken by events</p> <p>4.4.23 Update</p> <p>The team has delivered the first phase of automation for an underpayment process that spans a previous assessment period. There are plans to scale this automation to more complex processes. This work supersedes the recommendation as the process is quicker without the need for any agent intervention; thereby negating the need for a faster payment. It also removes the additional cost that each faster payment attracts. We are due to discuss this with auditors in coming weeks and will seek their view on how this impacts the recommendation – i.e. if it should be closed as no longer relevant.</p>

Recommendations currently open and in delivery

Annex 2 cont

Review Body	Ref	Recommendation	Owner	Due Date	Status and Progress Update
GIAA Audit of UC Help to Claim Service April 2023	CH- 125 Rec 1	Document the roles and responsibilities for the HtC team members at DWP. This could be in the form of a RACI or similar and should include reference to key tasks such as: o Assigning ownership to one team member to undertake regular reviews of access to the SharePoint site. Admin rights for the SharePoint should be restricted. o Assigning ownership for the regular reconciliation of the IDP, milestone tracker and Grant Funding Agreement.	Stuart Ison	31/5/23	Status: Currently open and in delivery We are currently considering all options, including a RACI, to select the best way to document the detail needed.
GIAA Audit of UC Help to Claim Service April 2023	CH- 125 Rec 2	Produce meeting minutes or output notes for formal meetings which cover the key messages, discussion points and any concerns raised.	Stuart Ison	30/6/23	Status: Currently open and in delivery To commence with the start of Year 5 Help to Claim governance. We have already made Citizens Advice aware that we will be formally recording key discussion points, alongside the usual recording of decisions and actions
GIAA Audit of UC Help to Claim Service April 2023	CH- 125 Rec 3:	Collate and monitor all lessons learned and continuous improvement activities on a regular basis to demonstrate how these are actioned and the impact they have.	Stuart Ison	28/4/23	Status: Currently open and in delivery We will progress this at the next lessons learned meeting on 20th April.

Recommendations closed (to be removed from the tracker)

Annex 3

Review Body	Ref	Recommendation	Owner	Due Date	Status
NAO: Getting to 1st payment 2020	01/20	Work in partnership with organisations that support Universal Credit claimants to: A1) develop a more evidence-based understanding of why some people delay their claim for Universal Credit;	Stuart Ison,	Feb-21	NAO agree now implemented – response: We can assess how much this has helped DWP as part of our upcoming study.
		A2) develop communications and other proposals to encourage people to claim earlier when it is in their interest to do so;	Stuart Ison	Feb-21	NAO agree now implemented – response: We can assess how much this has helped DWP as part of our upcoming study
		A3) develop a better data-based understanding of the numbers of vulnerable claimants – and any direct or indirect diversity impact of its payment performance – and use this to support the needs of people who continue to struggle with making a claim for Universal Credit;	Will Garner	01/02/2021 Date to be rescheduled	Status: NAO reviewed extensive evidence provided by UC on 31.3.23 and are not content to close yet – their response: DWP has recently introduced new data capture to help identify people with barriers to getting into work and using the UC system. However, we have not yet seen any analysis using this data and understand that DWP is still to use the data to help it target people and improve its customer experience and payment timeliness. Please consider adding how DWP intends to use the data to the implementation plan and set an appropriate implementation date. SRO steer on 6/4/23: We will not be setting any future due dates for this recommendation. The Programme now considers it closed and we will not be doing further work. Our focus is what is set out in the service goals
		A4) deliver significant improvements in the clarity of its claimant communications, ensuring these are clear, appropriately tailored, and contain all necessary information.	Stuart Ison	01/02/2021	NAO agree now implemented – response: DWP has sought to improve its communication in the light of our recommendation. However, DWP does not have simple metrics to measure or provide assurance on how clear its communications are. This is especially difficult for the group of people we found DWP struggled to pay within 5. In the absence of DWP setting out further plans to address the issue, we can agree that the recommendation is implemented but may come back to this topic in our future work.
NAO: Getting to 1st payment 2020	02/20	B) Develop detailed plans to reduce fraud and error in Universal Credit	Stuart Ison & Will Garner	Feb 2021	Reviewed by the NAO Feb '23 and confirmed closure as action fully implemented
NAO: Getting to 1st payment 2020	03/20	C) Prioritise improvements to the Universal Credit digital system to help front line staff identify and support claimants who need more help	Will Garner	Feb 2021	Reviewed by the NAO Feb '23 and confirmed closure as action fully implemented

Recommendations closed (to be removed from the tracker)

Annex 3 cont

Review Body	Ref	Recommendation	Owner	Due Date	Status
NAO: Getting to 1st payment 2020	04/20	D) Assess the delivery and funding model for its 'Help to Claim' service based on results from its planned evaluation and explore ways to use data to assess the impact of the service on outcomes including payment timeliness	Stuart Ison		<p>NAO response 31.3.23: DWP has reviewed the delivery model and agreed a grant competition is the best option. It has also undertaken and plans to undertake further evaluation of the HTC service. However, it is not clear to us how DWP intends to use data to understand the service it is providing such as payment timeliness. This may require DWP to include a requirement for data sharing in the grant agreement. DWP has suggested a new implementation date of February 2024 ie when the competition for the HTC provider has been completed and the provider is in place. Please decide if DWP wants to use data from HTC to assess DWP customer service by matching the customers who use HTC to what happens to them on UC (e.g., their payment timeliness). If so, please set an implementation date for February 2024. If not, then please can we agree that this is partially accepted and implemented.</p> <p>DWP Response 6.4.23: We do not intend to put in place a data sharing agreement for the HTC provider. Payment timeliness is not a KPI for the HTC service as such, however we will undertake an evaluation (via UC Analytical Division) using source data from within the UC system, that will correlate some payment timeliness findings as part of getting a broader view of the impact of the HTC service. However, as payment timeliness is not a formal recorded outcome of HTC, we are treating this recommendation as only partially accepted and implemented.</p>
NAO: Getting to 1st payment 2020	05/20	E) Ensure that it (the Department) continues to monitor variances in the whole-life cost of its major programmes against their business case and updates Parliament on major changes when they are identified.	Stuart Ison	Feb 2021	Reviewed by the NAO Feb '23 and confirmed closure as action fully implemented
NAO: VFM Study 2018 - Rolling out UC	D	<p>D) Make it easier for third parties to support claimants. This might include:</p> <ul style="list-style-type: none"> • extending the concept of the landlord portal to simplify verification processes (for example, for childcare costs); • sharing, with the claimant's consent, appropriate information with third parties, such as information on additional support requirements; • allowing the bulk upload and download of information helpful to the support of claimants, such as changes in rent; and • allowing those supporting claimants access to a version of the journal through which they can view appropriate shared information and communicate with the Department 	Will Garner	<p>Originally 01/04/2020</p> <p>Rescheduled 29/12/2023</p>	<p>Status: NAO reviewed extensive evidence provided by UC on 31.3.23 and are not content to close yet – their response:</p> <p>This still sounds like work in progress. DWP has made progress in agreeing telephone consent for third party access to information to support their claim. However, DWP has further plans to use digitalised consent and the sharing of information with third parties.</p> <p>DWP says that this will be complete in December 2023 when its digital consent feature is due to complete.</p> <p>Please can DWP set out a brief summary of its plans in the implementation plan and set December 2023 as the implementation date.</p> <p>SRO steer on 6/4/23: We will not be setting any future due dates for this recommendation. The Programme now considers it closed and we will not be doing further work. Our focus is what is set out in the service goals</p>

Recommendations closed (to be removed from the tracker)

Annex 3 cont

Review Body	Ref	Recommendation	Owner	Due Date	Status
GIAA Cyber Security Audit 2022	03/22 (3.3)	Management should ensure that scenario testing of the Disaster Recovery and Business Continuity Plans is conducted to assess the adequacy of measures currently in place and the interaction of the various teams and stakeholders involved. Upon completion of relevant tests, management should document and address any corrective actions and lessons learnt with a view to improve recovery strategies and preparedness.	Will Garner	Sept 2022	Reviewed by the GIAA Sept '22 and confirmed closure as action fully implemented