



Department
for Work &
Pensions

DWP Central Freedom of
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[DWP Website](#)

Our Ref: IR2021/20034

4 October 2021

Dear Mr Stevens,

Thank you for your Freedom of Information (Fol) internal review request received on 9 March 2021. You wrote:

“Thank you for the response. Please carry out a review of the response.

These documents don't sound like they involve policy formulation. To the extent that this is the case then presumably the documents could be redacted to account for this.”

DWP Response

We apologise for the delay in our response.

In reply to your internal review request, we can confirm that the handling of your original request and response has now been appropriately reviewed by someone unconnected with the handling of your original request.

As a result of this review, we find that the original decision was partly correct - and your complaint is therefore partially upheld. We can confirm that we hold some information within the scope of your request. The information we are able to provide in response to your request is therefore as follows:

You requested '**a vulnerable customers strategy proposal**' cited in 'the foreword to the ICE Annual Report' – which we took to mean the Independent Case Examiner annual report for 2019-2020. You also requested the '**safeguarding framework**' mentioned in SSAC (Social Security Advisory Committee) occasional paper 24. We can confirm that the 'vulnerable customers strategy proposal' and the 'safeguarding framework' are terms used to describe the same document which was developed throughout 2020. This document evolved into 'Guidance- Helping Customers Who Require Advanced Support' – an internal guidance document for DWP staff, which was published internally in March 2021. At the time of your original request this was exempted under s.35(1)(a) FOIA2000. However, we are now able to provide you with this document (please see Annex A).

Finally, you requested the **DWP Excellence Plan** referenced in the Secretary of State's letter to Stephen Timms MP dated 20.03.2020. We find that the original decision to withhold this document is upheld. This document contains policies that remain under development, in line with s.35(1)(a) FOIA2000. This exemption protects the private space within which Ministers and their policy advisers can develop policies without the risk of premature disclosure.

As required by the Act, we have also assessed the public interest for and against disclosure. There is a public interest in greater transparency which makes government more accountable to the electorate and increases trust. There is also a public interest in being able to assess the quality of advice being given to ministers and subsequent decision making.

However, good government depends on good decision-making and this needs to be based on the best advice available and a full consideration of all the options without fear of premature disclosure. If this public interest cannot be protected there is a risk that decision-making will become poorer and will be recorded inadequately

On balance, DWP is satisfied that in this instance the public interest in maintaining the exemption outweighs the public interest in disclosure and redactions have been applied accordingly.

If you have any queries about this letter, please contact us quoting the reference number above.

Yours sincerely,

DWP Central Freedom of Information Team
Department for Work and Pensions

Your right to complain under the Freedom of Information Act

If you are not content with the outcome of the internal review you may apply directly to the Information Commissioner's Office for a decision. Generally, the Commissioner cannot make a decision unless you have exhausted our own complaints procedure. The Information Commissioner can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Web: [ICO Contact Information](#) or telephone 0303 123 1113 or 01625 545745