



Department  
for Work &  
Pensions

DWP Central Freedom of Information  
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Neddim  
Nic

[DWP Website](#)

Our Ref: IR2022/78044

Date: 31 October 2022

Dear Pamela Carysforth,

Thank you for your Freedom of Information (Fol) request received on 4th October. You wrote:

"I am writing to request an internal review of Department for Work and Pensions's handling of my FOI request 'UC Managed Migration Impact Assessment'.

In parliamentary questions on 20th April, it was confirmed that an impact assessment on UC migration had been completed, so I am confused by the reply saying it doesn't exist. I think if it exists but is not open to the public the response should be different. Possibly the impact assessment had a different title, perhaps it is looking into 'migration plans' rather than managed migration, but could you review and release the impact assessment referred to in prime ministers questions please.

[https://secure-web.cisco.com/1Vg-umaORnhiflw3Y-](https://secure-web.cisco.com/1Vg-umaORnhiflw3Y-bpDrgY2qUlavuQM2JSbyCgapmHeopmUg9Os1DkfCTDE57eqKxixb_ZQFGT64wxCr2K)

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[AHqFvkck1m1iX5k3nnKSzV2rqWUYz7TULR4bzb2NP95KuBHjltQGd3ACztuBNEdNmyG](https://secure-web.cisco.com/1Vg-umaORnhiflw3Y-bpDrgY2qUlavuQM2JSbyCgapmHeopmUg9Os1DkfCTDE57eqKxixb_ZQFGT64wxCr2K)  
[c0yLlkLD47HFyFa7rp-](https://secure-web.cisco.com/1Vg-umaORnhiflw3Y-bpDrgY2qUlavuQM2JSbyCgapmHeopmUg9Os1DkfCTDE57eqKxixb_ZQFGT64wxCr2K)

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[Mqojv24RKwt3clX\\_pQG0Zid7lqeX4WrHC6sTYGENqRGPNHwajVAy30P5KF5MIR1f2g4](https://secure-web.cisco.com/1Vg-umaORnhiflw3Y-bpDrgY2qUlavuQM2JSbyCgapmHeopmUg9Os1DkfCTDE57eqKxixb_ZQFGT64wxCr2K)  
[26Gc1HGNA4HvdY3APjXKSIJDjWdjyq4gM-aXm1w/https%3A%2F%2Fquestions-](https://secure-web.cisco.com/1Vg-umaORnhiflw3Y-bpDrgY2qUlavuQM2JSbyCgapmHeopmUg9Os1DkfCTDE57eqKxixb_ZQFGT64wxCr2K)  
[statements.parliament.uk%2Fwritten-questions%2Fdetail%2F2022-04-20%2F156348](https://secure-web.cisco.com/1Vg-umaORnhiflw3Y-bpDrgY2qUlavuQM2JSbyCgapmHeopmUg9Os1DkfCTDE57eqKxixb_ZQFGT64wxCr2K)

Quote "We have conducted detailed Equality Assessments of migration plans as part of our Public Sector Equality Duty. We will test and evaluate our approach to managed migration and will reassess equality impacts in accordance with the evaluation results."

## **DWP Response**

In response 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.

We find that the original decision was not correct and as such your complaint is upheld.

We are able to confirm that the information you seek is held by the Department. However, the information you have requested engages section 35(1)(a) – formulation and development of government policy – of the FOI Act. This is a qualified exemption and we are required to balance the public interest between disclosure and non-disclosure. This is because the

information requested relates to the development of processes and policies as part of the Discovery phase the Department is running to move claimants who have not had a relevant change of circumstances to Universal Credit from the benefits or credits it is replacing. As part of this the Department will evaluate and test such processes and policies for moving claimants to Universal Credit before rolling them out more widely.

In relation to the release of the information which relates to the Discovery phase, we recognise that there is an inherent public interest in transparency and accountability of public authorities. We also recognise the broad public interest in furthering public understanding of the issues which public authorities deal with such as policy considerations in implementing welfare reform in the UK. There is a clear public interest in the work of Government departments being transparent and open to scrutiny to increase understanding of the issues we deal with.

Balanced against this is the public interest in protecting the Government's ability to discuss and develop policies and to reach well-formed conclusions. The Information Commissioner has recognised that policy development needs some degree of freedom to enable the process to work effectively and we consider that there is a strong public interest in protecting information where release would be likely to have a detrimental impact on the ongoing development of the processes and policies. There is a strong public interest in protecting against encroachment on the ability of Ministers and officials to develop such processes and policy options freely and frankly.

In this case, we consider that disclosing the information held, which relates to an area of live development of these processes and policies, would be likely to prevent officials from conducting ongoing assessments of the current options available to them, and that disclosure would risk closing off discussions and the development of options now and in the future.

On balance DWP is satisfied that in this instance the public interest in maintaining the exemption outweighs the public interest in disclosure. Therefore, the information you seek will not be released.

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

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### **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.

Website: [ICO FOI and EIR complaints](#) or telephone 0303 123 1113.