



HM Revenue
& Customs

Mr John Slater

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Date 6th February 2018
Our ref IR2018/00069

Dear Mr Slater

Thank you for your Internal Review request dated 9th January 2018 regarding FOI request FOI2017/01614 in which you asked for the following information from HMRC:

Her Majesty's Revenue and Customs ("HMRC") real-time information system ("RTI") is essential for Universal Credit ("UC") to operate correctly. It has been widely reported that the DWP and the HMRC work closely together to identify and resolve any problems with the RTI.

It is reasonable to assume that there is a formal process by which the HMRC notify the DWP of any problems (sometimes known as incident reports or bug reports within the IT sector) that it is experiencing with the RTI. It is also reasonable to assume that there is a process for the DWP to notify HMRC of the same.

HMRC will note the Information Commissioner's guidance on interpreting requests as widely as possible. Therefore if the method of communicating the type of problems described is not known as incident reporting that does not allow HMRC to state that it does not hold the requested information.

RFI1 – Please disclose all incident reports submitted by HMRC to the DWP in the previous 12 months in respect of the RTI system (e.g. bugs, faults, performance issues, inaccuracies in the data etc).

RFI2 – Please disclose all incident reports or problems related to the RTI submitted by the DWP to HMRC in the previous 12 months in (e.g. bugs, faults, performance issues, inaccuracies in the data etc).

RFI3 – Please disclose the approach employed by HMRC and the DWP to collaborate on the RTI system. For example there may be a joint steering committee or it could be a specific item discussed at UC programme board meetings. Please explain how the work of any such group/team (e.g. decisions, actions etc) are recorded.

The purpose of an Internal Review is to assess how your FOI request was handled in the first instance and to determine whether the original decision given to you was correct. This is an independent review: I was not involved in the original decision.

Your original request confirmed the information requested is held but your request exceeded the FOIA cost limit.

After careful consideration I have concluded that this response was partially compliant with the requirements of the FOIA.

Statutory deadline

The statutory deadline for your request was 2nd October 2017 and the response was provided on 5th January 2018. The response was therefore noncompliant with the requirements of the FOIA. Please accept our sincerest apologies.

Advice and assistance

In our original response we advised you that you could narrow the scope of your request by being more specific on the information that you wish to obtain. We also informed you that if you were to do this, that the information could be exempt under section 44(1) (a) of the FOIA due to taxpayer confidentiality. The response was therefore compliant with the FOIA.

The scope of the request in RFI3 is very wide and the work on this is overseen by a number of different areas within the Department. We therefore estimate that collating all of the information that you've requested would also exceed the cost limits under section 12(1) of the FOIA. In order to narrow the scope of your request you might wish to ask this question individually, whilst also being more specific about the information that you wish to obtain.

Outcome

I have reviewed this decision and I find our application of section 12(1) of the FOIA in relation to your original FOI request to be correct.

In order to provide the information that you've requested, an expert would need to manually go into every one of the incidents that had occurred during the timeframe that you specified. If the expert was to review each incident they would need to take the following actions:

1. Read and understand all of the incidents to confirm if the incident is relevant to your request.
2. Trace back the history to understand if it is relevant.
3. Extract relevant detail on any incident appropriate.
4. Review and validate the information to ensure accuracy

We estimated that it would take an employee a minimum of 5 days to locate, retrieve and extract the information you have requested which would exceed the FOIA cost limit.

The FOIA cost limit applies to an entire response, meaning that it doesn't reset for each question within your FOI request. Where section 12 applies to one part of a request we refuse all of the request under the cost limit as advised by the Information Commissioner's Office.

In conclusion, I'm satisfied that the response you received on 5th January 2018 was correct.

Appeal Rights

If you are not satisfied with this response you have the right to apply to the Information Commissioner's Office (ICO). The Commissioner is an independent regulator who has the power to direct us to respond to your request differently, if she considers that we have handled it incorrectly.

You can contact the ICO at the following address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow

Yours sincerely

Freedom of Information Team