

16 Use of Revenue real-time data in social welfare means and income assessments

- 16.1** The Department of Social Protection (the Department) incurred social welfare scheme expenditure totalling €24.2 billion in 2023, funded through the Vote for Social Protection (Vote 37) and the Social Insurance Fund (SIF). Expenditure on social assistance schemes was €12.1 billion, accounting for just over half of the total welfare spend.¹
- 16.2** There are over 40 social assistance schemes funded through Vote 37. Most social assistance schemes are means assessed, with eligibility dependant on the financial resources of the claimant and also, in some cases, the financial resources of a spouse, civil partner, co-habitant or a dependant.
- 16.3** The Office of the Revenue Commissioners (Revenue) implemented a 'pay as you earn' (PAYE) income tax modernisation project with effect from 1 January 2019. This allows employers to report payroll information to Revenue on each occasion that they pay their employees. The modernisation project eliminated the need for a number of periodic payroll-related returns to Revenue.²
- 16.4** The Revenue Real Time Lookup system (RTLUL) was initially developed to allow staff of the Department to access information on cessation of employment which had previously been available on the claimant's P45 form. The purposes for which RTLUL data is used by the Department have developed. Through RTLUL, Department staff can now access real-time payroll information to verify information provided by claimants to assist in the assessment of scheme eligibility.
- 16.5** This examination was undertaken to assess whether the Department is maximising the use of Revenue real-time information, to ensure the efficiency and effectiveness of the means assessment process and to reduce the burden on claimants. The examination team reviewed key documents and data produced by the Department, interviewed relevant members of Department staff, and undertook data analysis.

1 Social assistance schemes are mainly funded through the Vote and are usually means assessed payments. SIF schemes are based on social insurance, where benefits due are based on the claimant's recorded PRSI contributions.

2 PAYE modernisation abolished the need for quarterly (P30) and annual (P35) returns on payroll information and returns signalling cessation of employment (P45).

3 There were an additional 74,000 income assessments carried out for the Working Family Payment scheme. The means test for this scheme does not include capital assets or savings. It is based solely on assessable income.

4 This figure is not monitored and reported on by the Department and is a best estimate of the level of means assessment activity for the year.

Means assessed social protection schemes

- 16.6** The Department carries out a large number of means assessments each year for new claims, claim renewals and claim reviews. There were approximately 405,000 means assessments completed in 2023.^{3,4}
- 16.7** This review focuses on five schemes accessed through a means assessment process (see Figure 16.1). Together, they accounted for 43% of the social assistance expenditure in 2023. Each scheme has specific rules on the amount and type of income that can be disregarded (or excluded) from the means assessment. There are also scheme-specific eligibility criteria used to determine if applicants qualify for the scheme.

Figure 16.1 Overview of a sample of means assessed schemes

Scheme name and cost in 2023	Key eligibility criteria	Employment income disregard	Means assessed	Additional payments
State Pension (Non-contributory) €1,229 million	Aged 66 and over. Does not qualify for a State pension (contributory) payment.	Up to €200 per week. The spouse, civil partner or cohabitant of the claimant can also earn up to €200 per week.	The first €30 per week of means does not affect the rate of social assistance paid. After the first €30, the amount payable is reduced by €2.50 for every €2.50 of means.	Increased rate can be provided for an adult dependant of the claimant. ^a An increased rate can also be provided for a qualified child dependent.
Jobseeker's Allowance €1,823 million	Unemployed for four days in any consecutive seven days. ^b Does not qualify for jobseeker's benefit.	Claimants can work up to a maximum of three days per week. The weekly assessable earnings is calculated as 60% of the amount earned, less a €20 deduction for each day worked (up to a maximum of €60).	Total household means is deducted from the maximum payment pertaining to the claimant, giving the amount to be paid.	Increased rates are payable in respect of a qualified adult and/or child dependant.
One Parent Family Payment €680 million	Caring for a child or children without the support of a partner. At least one child is under seven years of age. ^c	€165 of the weekly gross earnings is disregarded in the means assessment and half the balance is assessed as means.	The first €7.60 per week of means does not affect the rate of social assistance paid. After this the amount payable is reduced by €2.50 for every €2.50 of means.	Increased rate for each relevant child.
Carer's Allowance €1,082 million	Providing full-time care and attention to a person aged 16 years or over.	€350 of the gross weekly income is disregarded for a single person. €750 of the combined income for those married, in a civil partnership or cohabitating.	The first €7.60 per week of means does not affect the rate of social assistance paid. After this the amount is reduced by €2.50 for every €2.50 of means.	If a carer is giving full-time care and attention to more than one person, the rate is increased by a maximum of 50%. The payment also increases in cases of a qualified child dependent.
Working Family Payment €392 million	Engaged in full-time remunerative employment i.e. work for 38 hours or more in a fortnight that is expected to last at least three months. Have at least one qualified child.	Payable at 60% of the difference between the set income limit for a given family size and the weekly family income. Family size is determined by the number of qualified children.	Minimum of €20 per week. Amount depends on set limits based on family size.	N/A

Source: Department of Social Protection, operational guidelines for each scheme

- Notes:
- a An adult dependant is a spouse, civil partner or cohabitant of the claimant who the claimant is wholly or mainly supporting financially.
 - b A person is not regarded as unemployed in respect of any day on which s/he is working under a contract of employment (written or otherwise) or is in receipt of wages. If a person is working three days a week or less, they may be entitled to Jobseeker's Allowance for the other days.
 - c There are some exceptions to the age limit, where the claimant is receiving the domiciliary care allowance, half-rate carer's allowance or blind pension or after the death of a spouse, partner or civil partner.

- 16.8** The means assessment is an important step in the claim application and renewal process. If a claimant's means change over time, it can also alter the entitlement to the eligible support amount. If means are not correctly calculated, or are not updated in a timely way, it may result in an overpayment or an underpayment to the claimant.
- 16.9** The Department carries out a programme of surveys of scheme payments in order to determine the level of excess payment that is occurring, and why this occurred. For example, a Jobseeker's Allowance control survey was published in March 2024 and from a total overpayment rate identified of 8.3% of expenditure, incorrect means represented the largest contributor of this, at 4.3%.¹

Access to Revenue real-time information

- 16.10** The Department has structures and procedures in place that govern its access to and use of the RTLU system.

Data sharing agreement

- 16.11** A formal data sharing agreement is in place between the Department and Revenue to govern the sharing of personal data between the bodies in relation to the effective management, administration and/or operation of the tax and social welfare systems, and certain other statutory functions. The agreement states that data can be shared between the parties "for purposes that support the delivery of services to the public in line with each party's statutory functions and responsibilities".
- 16.12** The agreement lists the relevant functions and responsibilities, including
- administration of the social welfare system, the payment of benefits and assistance and provision of social welfare services
 - sustaining, supporting and enhancing the effective and efficient delivery of integrated customer-orientated services by both parties by the re-use and processing of personal data collected by each party.

The terms of the agreement explicitly encompass the means assessment process of the Department.²

- 16.13** There is also a separate schedule to the data sharing agreement which sets out in greater detail the instances of where personal data is transferred between the two bodies. The schedule specifically refers to the transfer of data through the real-time facility and includes a list of the exact data items (e.g. employment start and end date, gross pay, PRSI class and PRSI paid) that can be transferred, the frequency of this, and the legislative basis.³

Service level agreement





- 16.14** A technical service level agreement (SLA) also exists between the Department and Revenue outlining the nature of the relationship between the two bodies and the technical support available in relation to the real-time Application Programming Interface (API) service. The SLA provides details on the number of transactions that can be facilitated, the optimum times as regards availability of the service and the expected response time for requests made (see Figure 16.2).

¹ See *Report on the Accounts of the Public Services 2023*, chapter 13, Regularity of social welfare payments.

² The agreement also sets out the legislative basis for data sharing: the Social Welfare Consolidation Act 2005; the Taxes Consolidation Act 2007; the Data Protection Act 2018, the General Data Protection Regulation (EU) 2016/679; and the Law Enforcement Directive (EU) 2016/680.

³ Department staff can only access information in the stated categories. If any additional information is required, a business case must be prepared and submitted to Revenue for consideration.

Figure 16.2 Service level agreement — key elements

	<ul style="list-style-type: none"> API service can facilitate up to 8,000 look-ups a day during business hours.^a
	<ul style="list-style-type: none"> Business hours are Monday to Friday 8am – 9pm and Saturday 9am – 4pm.
	<ul style="list-style-type: none"> A response to the request will be provided in less than five seconds.
	<ul style="list-style-type: none"> A bulk query can be run between 12am and 2am daily, supporting 100,000 look-ups. Pandemic Unemployment Payment (PUP) bulk query can be run between 9.35pm and 9.55pm (Monday to Friday) facilitating 16,000 look-ups.

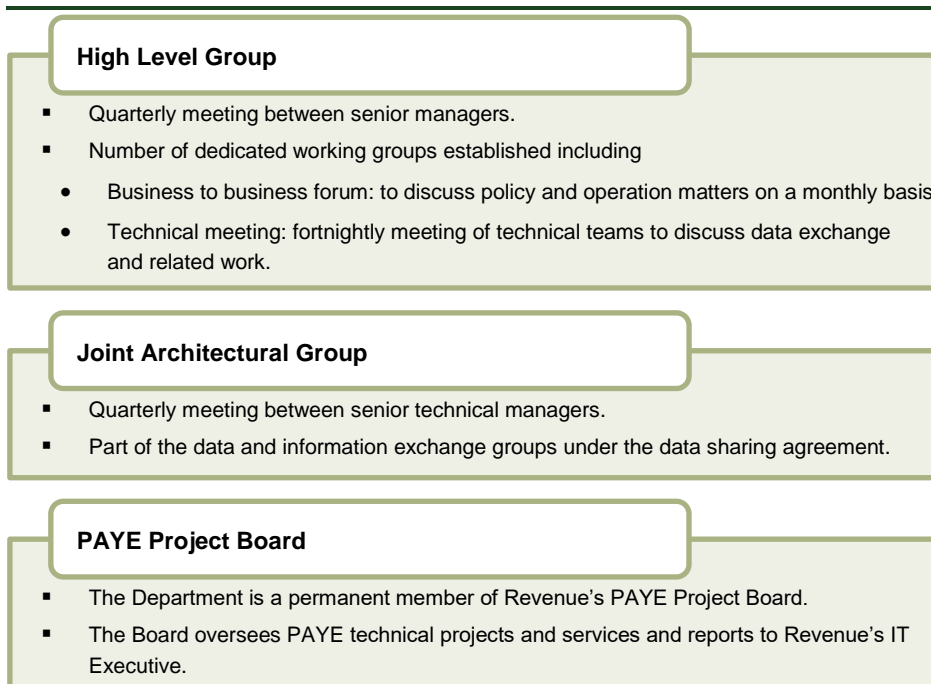
Source: Department of Social Protection, Technical Service Level Agreement

Note: a Look-ups refers to the calling up of information as a result of a query or request sent to the system.

- 16.15** The Department does not monitor or track its usage level of the RTLU system against the terms of the SLA. From interviews held with Department and Revenue staff, the examination team noted that there is no automatic block or alert if the usage is exceeded. The SLA sets out the level of service that Revenue can guarantee to the Department before the service quality might be impacted. Issues can be discussed as part of regular meetings held between the bodies, and any technical service incidents can be raised through a helpdesk operated by Revenue.
- 16.16** From a technical perspective, Revenue can monitor the level of use of the RTLU system to ensure that the service is operating correctly. Information is available on the number of transactions made by the Department for the previous 12-month period, and on the daily response time. However, regular reporting of the usage is not in place and the Department has not requested information on usage from Revenue.
- 16.17** The SLA provides that approximately 42 million look-ups to RTLU can be supported on an annual basis.¹ The examination team obtained details for the number of look-ups for the period 1 April 2023 to the 31 March 2024. A total of 20.7 million look-ups were made in this period, which is comfortably within the total service level guaranteed under the SLA, and indicates that there is significant capacity available within the existing agreement to facilitate any required increase in usage.
- 16.18** The SLA was due for review in March 2022 but this does not appear to have occurred, and the March 2021 SLA remained in place as of June 2024.² The Department advised that a new SLA is currently being negotiated and will be updated to encompass changes and further developments.
- 16.19** The Department has regular engagement on data-sharing with Revenue through a number of different groups and fora (see Figure 16.3). Any service issues regarding use of RTLU can be discussed at these meetings and the groups also consider any further developments required.

1 Certain other information is also provided to the Department outside of RTLU, for example regular notification of commencement and cessation of employment changes. This is set out in the data sharing agreement.

2 The SLA states that the agreement should be reviewed at a minimum once per fiscal year. However, it also provides that in the absence of a review, the current agreement will remain in effect.

Figure 16.3 Department and Revenue working groups

Source: Office of the Revenue Commissioners and Department of Social Protection

Use of RTLU on an individual means assessment basis

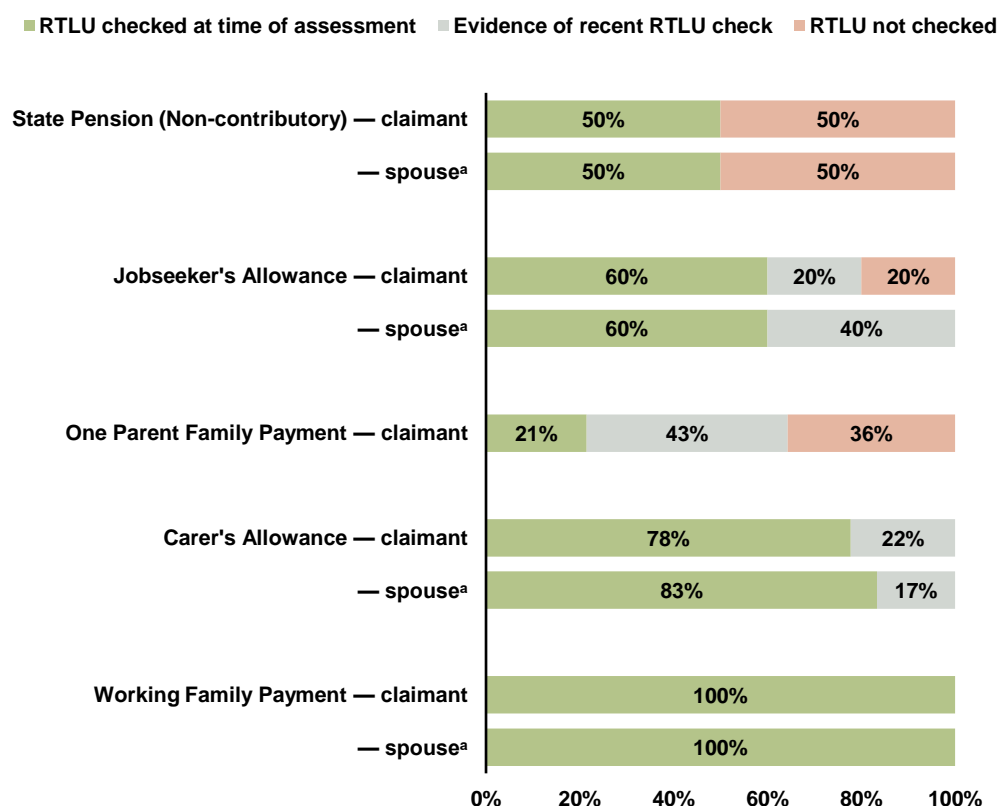
- 16.20** The Department has issued guidance to staff on the use of RTLU for all relevant schemes. The guidance requires that there must be a legitimate business purpose to use RTLU to retrieve information on claimants.¹ It allows for the use of RTLU
- to verify information in support of a claimant's application for any Department payment, or ongoing payment
 - to verify information about both the claimant and their dependant(s) to determine if there is a need to review a claim in payment.
- 16.21** If the details on RTLU differ from those provided to the Department, then a review can be initiated or a payment may be suspended. A decision to reduce or terminate a payment will usually not be taken solely on the basis of RTLU data. Instead, if a discrepancy in means is noted, the claimant will be notified and provided with the opportunity to clarify the matter.²

¹ The Department's IT system flags the claimant's account each time RTLU is checked. The time and date of access, along with the name of the Department staff member who accessed the information are recorded.

² Every customer is entitled to have their claim considered in accordance with the principles of natural and constitutional justice and in the context of determinations of entitlement under the social welfare legislation.

Assessment of the use of RTLU on an individual scheme basis

- 16.22** For each of the five schemes selected for review, the examination team reviewed scheme procedural guidelines and interviewed staff of the Department to assess how RTLU formed part of the scheme means assessment process. There was evidence that RTLU had been incorporated into relevant internal procedure documents and staff training material.
- 16.23** The examination team also tested a sample of claimants in payment from each scheme to ascertain the extent to which RTLU was being used as part of the means assessment process. The testing included whether RTLU was checked for the claimant, and also the spouse, civil partner or co-habitant where relevant (see Figure 16.4).

Figure 16.4 Use of RTLU — sample testing results

Source: Department of Social Protection. Analysis by the Office of the Comptroller and Auditor General.

Note: a Spouse includes civil partner or co-habitant. These cases were tested where relevant. No such test required for One Parent Family Payment.

16.24 The examination team found that RTLU appears to be used with greater consistency in some scheme areas than for others. For example, there was evidence of RTLU being checked at the time of the means assessment in all of the Working Family Payment cases reviewed (ten cases) compared to 21% of the One Parent Family cases (three cases from 14 reviewed). The Department stated that this largely reflects the fact that all Working Family Payment claims are reviewed each year and that as Working Family Payment recipients are in employment, RTLU data is available in all cases.

16.25 The Department provided explanations as to why the deciding officer may not have checked RTLU in some cases. For example, a check would not be undertaken if a State pension claimant is residing in a nursing home and/or had declared no other income source or had no contribution history for a long period of time. However, as the basis for the decision not to use RTLU is not documented as part of the means assessment task on the system, the examination team could not assess if there were valid reasons why the cases had not been checked.

16.26 The Department staff also use RTLU to identify if the declared income from employment differs from that recorded by Revenue. However, there are a number of other scheme eligibility rules to be considered to determine whether or not a claimant passes the means test. This decision is made by a deciding officer in the Department who reviews the case.¹ The examination team found that the impact that the RTLU check had on a given means assessment cannot easily be determined from the information on file.

¹ Deciding officers are Department staff who are given the power through the Social Welfare Consolidation Act 2005 as amended and other social welfare legislation to accept or reject claims made for social welfare payments.

Figure 16.5 Working Family Payment — automatic renewal based on RTL

Scheme details	<p>The scheme is a 52-week income assessed scheme. The rate of payment is established at application and is paid for 52 weeks.^a</p> <p>Claimants can apply for renewal at the end of the 52-week period.</p>
Integration with RTL	<p>Since 2021, the scheme is managed on the same IT platform that hosts the RTL application. This presented an opportunity for greater integration between the scheme and RTL.</p>
Automatic renewal checks	<p>Rules built into the IT system for Working Family Payment renewals automatically verify that</p> <ul style="list-style-type: none"> ▪ there has been no change in the claimant's employment ▪ the claimant's income is within an allowable amount of the income earned in the previous year.^b <p>If the case satisfies these checks, the claim can be automatically renewed.</p>
Automatic awards	<p>Approximately 30% of renewal applications are automatically awarded.</p> <p>10% of these cases are subject to quality review by a deciding officer prior to payment being made.</p> <p>There were 13,193 renewal cases automatically awarded in 2023.^c</p>

Source: Department of Social Protection

- Notes:
- a The claimant must notify the Department if they cease employment or are working less than 38 hours per fortnight, as this may affect their continued entitlement.
 - b The allowable amount for the movement in the year is set by the Department and is changeable based on current conditions. Most recently, the allowable difference between previous year income and current year assessable income was set at €50 per week.
 - c New claims are also subject to the automatic rule checks and 1,039 claims were automatically awarded in 2023. From February 2023, new claims are no longer automatically awarded.

16.27 In addition to a deciding officer checking RTL manually, it is also possible for an automatic check against RTL to be completed. This check has been embedded into applications and renewals for the Working Family Payment scheme since 2021 (see Figure 16.5).

Business Analytics Unit use of RTL

16.28 In addition to data matching at the time of a new individual claim or on the periodic renewal or review of an individual claim, RTL is also used to identify discrepancies in means as part of an automated bulk-review process carried out by the Business Analytics Unit (BAU) of the Department.

16.29 The BAU performs a control check of the Department's recorded means against real-time information for certain means assessed schemes on a periodic basis, and for others on a risk-assessment basis. The checks result in the generation of a list of cases for investigation for each scheme area, flagged on the system as 'analytic reviews'. Figure 16.6 sets out details of the frequency and basis of assessment for the analysis of these schemes.

Figure 16.6 Business Analysis Unit scheme reviews of means, 2023

Scheme	Frequency	2023 number of cases identified ^a	Basis of assessment
Jobseeker's Allowance	Monthly	14,300	Automatic comparison of means recorded against RTLU.
Carer's Allowance^b	Monthly	2,600	Automatic comparison of means recorded against RTLU.
Disability Allowance	Monthly	3,200	Automatic comparison of means recorded against RTLU.
Basic Supplementary Welfare Allowance	Quarterly	200	Automatic comparison of means recorded against RTLU.
Farm Assist	Monthly	1,100	Risk assessed based on scheme rules.
State Pension (Non-contributory)	Annual	3,200	Annual: population extracted to assess continued entitlement.
	Every two months		Self-service dataset with updated information created approximately every two months to generate reviews.
Widow's Pension	Annual	14,700	Risk-factor model. Rules include calculation using age and length of claim. Cases are selected using a total risk score by adding the scores for all rules.
State Pension (Contributory)	Every two months	9,500	Risk-factor model and scheme specific rules. Cases are selected by date of last means review where increase for qualified adult is paid on the claim. Claims paid by cheque and customers aged over 100 are also selected.
Total		48,800	

Source: Department of Social Protection. Analysis by the Office of the Comptroller and Auditor General.

Notes: a Includes cases raised in 2023 as a result of BAU automatic checks. These cases may not have been investigated in 2023.

b For the Carer's Allowance scheme, new cases are not added for two months in the year to allow for any back logs to be cleared.

1 Most of the completed analytics reviews were generated in 2023. Some reviews completed in 2023 were generated in 2022.

2 The control savings amount is the sum of the value of any overpayment debt raised plus the Department's estimate of the value of future excess payments prevented.

16.30 The details of claimants and their qualified adult dependants on the means assessed schemes are extracted to a file, which is then bulk-processed overnight. For the four schemes automatically checked against RTLU, a number of scheme-specific rules are built into the query to identify potential discrepancies in means (see Figure 16.6).

16.31 In total, 48,800 analytic review items were generated for investigation in 2023. Of these, 42% were generated as a direct result of the RTLU automatic checks. The Department has stated that in total, 32,134 analytic review investigations were completed in 2023, resulting in control savings of €83 million being recorded.^{1,2}

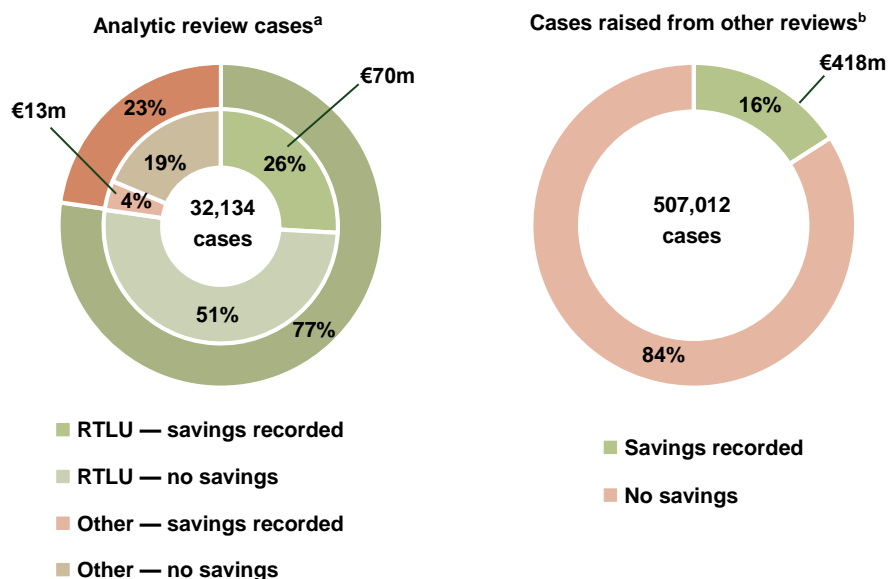
Figure 16.7 Analytic review flagged cases identified through automatic RTLU checks, by scheme, 2023

	Jobseeker's Allowance	Carer's Allowance	Disability Allowance	One Parent Family Payment ^a	Total
Average number of claimants per month in 2023	90,500	95,800	164,000	42,000	—
Cases opened following RTLU checks in 2023	14,300	2,600	3,200	—	20,100
<i>(as % of average claimants)</i>	16%	3%	2%	—	—
Total analytical reviews 2023^b	17,801	2,613	3,387	1,022	24,823
Control savings (€ million) in 2023 attributed to analytical reviews^c	22.7	19.2	25.9	2.5	70.3

Source: Department of Social Protection. Analysis by the Office of the Comptroller and Auditor General.

- Notes:
- a Certain controls were suspended for the One Parent Family Payment scheme in 2023 due to changes in the means assessment requirements. See *Report on the Accounts of the Public Services 2023*, chapter 13, Regularity of social welfare payments.
 - b This includes cases identified from BAU checks prior to 2023.
 - c Control savings include the value of overpayments raised plus the Department's estimate of the value of averted future excess payments. The Department stated it is not possible to disaggregate the value of overpayments raised due to analytic review cases from the total amount.

- 16.32** The automatic RTLU checks carried out in 2023 identified means discrepancies for investigation in over 20,000 Jobseeker's Allowance, Carer's Allowance, and Disability Allowance cases (see Figure 16.7). The Department has stated that such cases are prioritised for investigation, and that 94% of the cases identified through RTLU checks in 2023 had been investigated and closed by the year end.
- 16.33** Almost 25,000 RTLU analytic review investigations (including a number identified for review in prior years) were completed in 2023 in respect of four schemes (see Figure 16.7). The Department recorded control savings amounting to just over €70 million in respect of these RTLU analytic review investigations closed in 2023.
- 16.34** RTLU cases accounted for over three quarters of the analytic review cases completed in 2023, with the remainder initiated through other analytic procedures (see Figure 16.8). One in three of the RTLU cases investigated resulted in control savings being identified. The comparable detection rate for other analytic review cases was around one in six.
- 16.35** In value terms, RTLU-initiated cases accounted for 85% of the control savings generated by analytic review cases in 2023. The average control savings for such cases was around €8,500. The average for other analytic review cases was somewhat higher, at almost €10,000.
- 16.36** Overall, analytic review cases typically result in more and higher average value control savings when compared with the incidence and average value of control savings estimated from other reviews.

Figure 16.8 Control savings from case reviews, 2023

Source: Department of Social Protection. Analysis by the Office of the Comptroller and Auditor General.

Notes: a Includes 24,823 cases identified through RTLU checks.

b Other reviews can be triggered for a number of reasons including commencement of employment notification, time from last review, estate cases, anonymous reports etc.

Impact of introduction of RTLU on Department process and on claimants

16.37 The actual benefit of the introduction of RTLU access is difficult to quantify, and the Department does not monitor or measure the use or impact of this. However, there are a number of factors that suggest that the introduction of RTLU has had a positive impact both on the means assessment and claim approval and renewal processes from an efficiency perspective, and in reducing the burden on welfare claimants.

Application forms

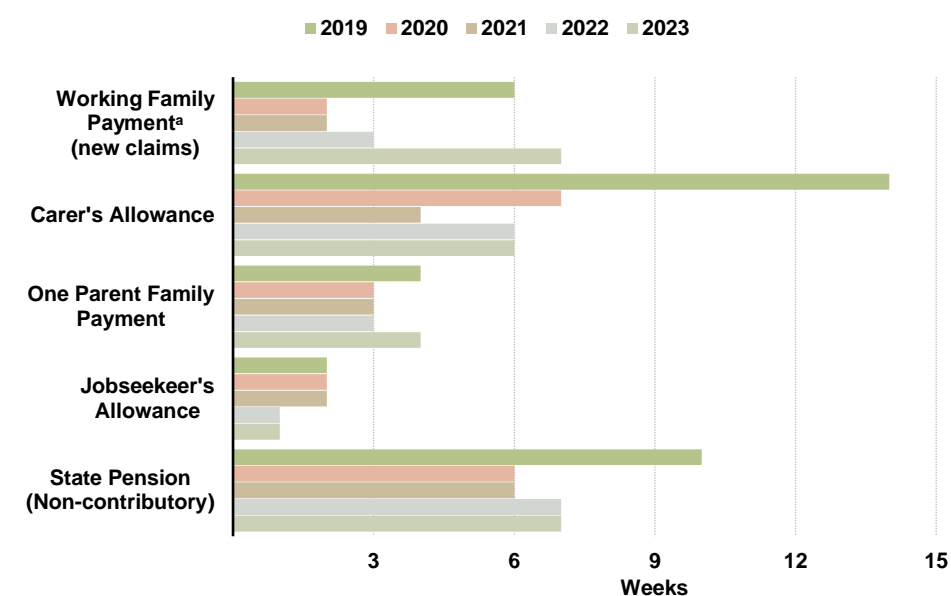
16.38 Interviews with Department staff for the five sample schemes indicate that certain information required to assess claims is no longer requested or obtained from the client but rather directly from RTLU. The examination team compared application forms and information requirements for the schemes that were in use prior to 2019, with the forms currently in place.

16.39 While the kind of details requested as part of the main application and renewal forms do not appear to have changed much, certain forms are no longer in use. In particular, forms requesting P60 and P45 (Revenue) documents and recent payslips are no longer sent or required. In addition, information from the employer is no longer requested or required to be obtained by the claimant as part of the application process. The information can be directly obtained via RTLU, thus reducing the burden on claimants, and increasing the confidentiality of the claims process.

Average lead time to awards

- 16.40** The *Statistical Information on Social Welfare Services 2022* report published by the Department sets out the average elapsed time (weeks) from application to award of claim, by scheme. For some schemes, a decrease in average lead times can be seen relative to 2019, which was the first year of operation of the modernised PAYE system (see Figure 16.9). While it is likely that the RTLU contributed significantly to the reduced average decision time (to award), it is not possible to disaggregate the impact from other potential contributing factors, including Covid-19 impacts.

Figure 16.9 Average weeks to award of claim, 2019 to 2023



Source: Department of Social Protection — Statistical information on Social Welfare Services 2022 report and internal monthly reports for 2023 information. Analysis by the Office of the Comptroller and Auditor General.

Note: a The increase in 2023 for the Working Family Payment scheme is a result of a campaign following a change in the scheme thresholds.

Business Analytics Unit

- 16.41** As referred to above, the BAU run periodic checks to identify any discrepancies between the means assessment information on hand and the real-time employment information on RTLU for certain schemes. Prior to the introduction of RTLU, this check was completed on an annual basis through a file received from Revenue. The current more frequent analytic checks can help reduce the burden on claimants by allowing data differences to be identified earlier, presenting opportunities for more timely engagement with the Department, and to allow for more targeted reviews.

Further use of RTLU

- 16.42** The pay-related benefit scheme due to be introduced later in 2024 will link a claimant's jobseeker's payment to their previous employment history. There will be three different rates of payment based on prior income and history of PRSI contributions. The Department plans to use RTLU to check claimants' employment history and average weekly earnings to determine their entitlement. The Department is liaising with Revenue about the increased usage requirements of the real-time system to support this.

- 16.43** The Daily Expenses Allowance is an income-tested entitlement for claimants in designated accommodation centres.¹ The Department has introduced income assessment testing for Daily Expense Allowance claimants with effect from June 2024. This will also result in increased demand and use of the RTLU service.

Conclusions and recommendations

- 16.44** The RTLU system was developed in 2019 by Revenue to allow officers of the Department direct access to real-time employment data of claimants and their dependants. Formal agreements and policies are in place governing use of the system including the data sharing agreement, the technical SLA and internal circulars and process documentation.
- 16.45** The SLA sets out details of the amount of usage and the particular times that Revenue can facilitate and guarantee optimum performance for the Department's data requests. While the level of use against these parameters is well within the limits set out in the SLA, usage levels are not measured and monitored by the Department. The technical SLA is under review and it would be useful to have this usage information and data to hand to allow for the key elements of the agreement to be assessed and updated.
- 16.46** The Department's increased usage requirements arising from the new pay-related benefit scheme and the changes in the Daily Expense Allowances scheme should also be considered in agreeing the new SLA.

Recommendation 16.1

The Department should consider options to monitor and report on its usage of RTLU against the terms of the SLA. The Department should develop an internal process to measure its usage of RTLU and liaise with Revenue regarding the possibility of availing of the information that is currently recorded. This information would be useful to the Department when renewing the SLA and considering its future requirements.

Department of Social Protection's Accounting Officer's response

Agreed.

The Department will monitor and report on RTLU usage against the terms of the SLA. Responsibility has been delegated to the central records system team that engages with Revenue colleagues in fortnightly technical and monthly business to business calls.

The continued on-going business and technical engagement between Revenue and the Department already allows for any issues relating to the SLA to be discussed. In future, RTLU will be formally embedded as an agenda item in these regular meetings between the Department and Revenue.

Timeline for Implementation

Consultation commenced with Revenue in September 2024 and the item will be discussed at fortnightly meetings going forward.

- 16.47** The RTLU system has become an important check and control for the means assessment process both on an individual basis for data matching against details provided as part of an application or renewal of an individual claim, and on an overall basis as part of bulk upload tasks carried out by the BAU to identify cases for investigation.

¹ See *Report on the Accounts of the Public Services 2023*, chapter 13, Regularity of social welfare payments.

- 16.48** The use of RTLU as part of the means assessment process for individual claim applications and renewals is more embedded in certain schemes. However, the rationale for not verifying information using RTLU is not recorded, and from a review of the information on the file it can be difficult to assess the impact that the RTLU check has had on the overall means assessment decision.
- 16.49** Automatic checks with RTLU have been embedded in the renewal process of the Working Family Payment scheme, and this has resulted in increased efficiencies, and allowed for approximately 30% of schemes renewals to be auto-awarded without the need for a full means assessment. This reduces the burden on both the Department and the claimants.

Recommendation 16.2

The Department should consider expanding the automatic RTLU check (as used in the Working Family Payment scheme) to other schemes where the control regime and scheme eligibility rules allow.

Department of Social Protection's Accounting Officer's response

Agreed

All projects to enhance scheme functionality and customer experience have a governance structure, with boards chaired by members of the Department's Management Board.

The Management Board and Project Office place a high priority on optimising the use of RTLU. The RTLU is used on an ongoing basis across Department schemes and it is agreed that its use should be automated where possible. The Department has embarked on modernisation projects across many of its business areas. As part of the modernisation project, the increased use of RTLU and automation are considered for all schemes that lend themselves to such automation.

For example, the Department is currently working on modernising its long-term schemes (e.g. State pensions, disability/caring schemes). The use of RTLU is a key consideration in the redesign and modernisation of these schemes. The same team will review all schemes under the remit of the project with increased RTLU usage, where relevant, at the forefront of the considerations.

In addition, the Department is working closely with Revenue colleagues to embed RTLU as a key feature of how the new pay-related Jobseeker's Benefit scheme will be operationalised. With the governance structure underpinning these projects, all new schemes and modernisation projects have a clear focus on optimising RTLU usage.

Timeline for Implementation

Ongoing.

- 16.50** The analytic review process undertaken by the BAU uses RTLU to identify cases for review for certain means assessed schemes. This process is proving effective at identifying cases for investigation, with one in three cases reviewed generating control savings. It has the potential to identify relevant changes in claimants' earnings quickly and presents opportunities for more timely engagement with claimants.

- 16.51** While the exact impact of the introduction of RTLU on the means assessment process is difficult to quantify, there is evidence to suggest that it has contributed to increased efficiencies in the means assessment process, and has reduced the burden on claimants.