



**Oifig an Ard-Rúnaí, An Roinn Gnóthaí Fostaíochta agus Coimirce Sóisialaí**  
**Office of the Secretary General, Department of Employment Affairs and Social Protection**

25 October 2019

Ref: PAC32-I-1604

Ms Éilis Fallon,  
Committee Secretariat,  
Committee of Public Accounts

Dear Éilis,

I refer to your letter of Friday 11 October in which you requested a copy of the business case for the Public Services Card (PSC).

As preciously advised to the Committee in the Comptroller and Auditor General's *Report on Accounts of the Public Services* for the year ended 31 December 2015 which included a chapter on the Roll-out of the Public Services Card (PSC), and as confirmed to the Committee by the then Secretary General at a subsequent meeting which discussed the matter there is no single Business Case document relating to the development of the SAFE identity authentication process of the PSC.

While I agree that it would be preferable if such a document did exist I also believe that it is important to stress that, as discussed in the meeting in 2016, the absence of a single document did not, and does not mean, that the project was not properly or coherently planned or authorised. At each stage in its development, since and prior to 1998, the project which was overseen by an inter-departmental committee, was the subject of Government decisions and legislative provision and all expenditure was properly sanctioned in accordance with Public Financial Procedures.

This point was acknowledged by the Comptroller and Auditor General in his report in 2016 where he found that 17 out of 19 identified elements of a good practice business case were, in fact, in place. (See attached table).

By way of background I also believe that it is important to note that the verification of identity and issue of identity tokens was not a new development that commenced with the introduction of SAFE/PSC. In fact the Department has a long-standing practice of verifying identity and issuing tokens such as the Free Travel Pass and the Social Services Card. In this context the development of SAFE/PSC represented an evolution of pre-existing practice in order to improve the delivery of service and administrative efficiency.

This point is, I believe, relevant to the issue of assessing the value for money delivered through the development of SAFE/PSC. I have previously provided the Committee with up to date information of the costs incurred to date in conducting SAFE identity authentication and issuing PSCs. These amount to €67.8m, the largest proportion of which is accounted for by the allocation of staff time to the SAFE process.

These costs need to be considered in the context of the counterfactual costs that would, in any case, have been incurred through the continuation of the pre-existing process if SAFE/PSC had never been introduced and the additional benefits that have accrued as a consequence of moving to SAFE/PSC.

In this regard I can advise the Committee that the costs that the Department would have incurred, if the pre-existing processes had been retained, are conservatively estimated at some €30m. This indicates that the nett additional costs of moving to a higher standard SAFE/PSC are, at most, in the order of €37m.

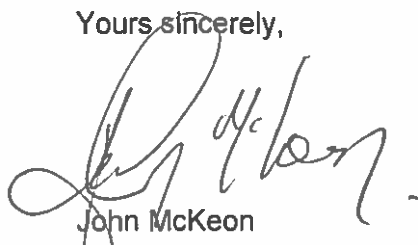
This additional cost needs, as a minimum, to be offset against the additional benefits realised both in terms of the deterrence and detection of fraud and the facilitation of online/digital service delivery which is entirely reliant on a high standard of identity verification.

The Department is currently finalising up to date estimates of these savings and benefits and I expect to be in a position to furnish these prior to my attendance before the Committee on 7 November next. I will of, course, endeavour to answer any questions that the Committee may have on these matters or other matters relating to SAFE/PSC, when I appear at the Committee.

Separately, the Department, as in previous years, is currently preparing briefing material for the Committee which we will forward to you in advance of the meeting of 7 November. In order that we might ensure that this briefing material is relevant to the matters of interest to the Committee, and in order that we can deal comprehensively at the meeting with any questions that members might have, we would welcome any indication that members might be able to give in respect of particular issues of interest to them.

In the meantime if I can be of any further assistance, please do not hesitate to contact me.

Yours sincerely,



John McKeon  
Secretary General

Department of Employment Affairs & Social Protection

**Figure 10.4 Assessment of project plan against good practice business case**

Good practice contents of business case	Issues covered in at least one document
<i>Project specification</i>	
Problem definition	●
Project objectives/scope	●
Key stakeholders	●
Assessment of organisation capacity to undertake project	○
Dependencies	●
Procurement	●
Consequences of not proceeding with project/alternatives	●
Information security/data protection	●
Timeline and work plan	●
Risks	●
<i>Costs and resources</i>	
Staff resources required to support project	●
Projected costs	●
<i>Benefits</i>	
Qualitative and quantitative benefits to the Department	●
Qualitative and quantitative benefits to the customer	●
<i>Project governance and management</i>	
Project structure	●
Project roles	●
Project initiation document	●
Benefits realisation plan	○
<i>Conclusions and recommendations</i>	●

Source: Analysis by the Office of the Comptroller and Auditor General of the consultant study 2003, Memorandum to Government 2004, SAFE Business Requirements - 2005, Memorandum to Government 2005, DSP papers and correspondence to DPER in 2009 seeking sanction to proceed with the project and paper on deployment of PSC 2011.

Notes: ● - included  
○ - not included  
● - partially covered