

**Universal Credit data sharing between DWP and local support providers, to enable them to assess and provide support to vulnerable people as part of the Universal Support (formerly Local Support Services Framework) initiative**

**Consultation response**

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## Introduction

In 2014, the Department for Work and Pensions launched an external consultation on the draft Social Security (Information Sharing in Relation to Welfare Services etc) (Amendment) Regulations 2015. This took place in two parts:

- The first consultation on proposals for sharing information with social landlords only ran between 19 September and 19 October 2014.

The consultation document ‘Universal Credit data sharing with social landlords’ may be viewed at: <https://www.gov.uk/government/consultations/universal-credit-data-sharing-with-social-landlords>

- The second consultation ran between 15 December 2014 and 12 January 2015, on draft regulations for Universal Credit data sharing between DWP, local authorities, citizens advice bureaux, credit unions, social landlords and relevant registered charities to enable them to assess and provide support to vulnerable people as part of the Universal Support (formerly Local Support Services Framework) initiative.

The consultation document ‘Universal Credit data sharing between DWP and local support providers’ may be viewed at:

<https://www.gov.uk/government/consultations/universal-credit-data-sharing-between-dwp-and-local-support-providers>

## Responses to the consultation

### Data sharing with social landlords

We received 172 responses, of which 99% were positive. See [Annex A](#) for a list of respondents, and [Annex B](#) for a summary of responses.

The main issues raised in the responses were:

- Whether DWP would share data with housing associations operating as charities
- Whether DWP would share data with private landlords

Our response to the concerns above is:

- DWP would not share personal data with organisations which are not bound by registration requirements which social sector landlords are subject to.
- As private landlords do not usually provide welfare support to tenants, the legislative proposals would only be applicable to social landlords

## Data sharing with local support providers (including social landlords)

We received 113 responses, of which 96% were positive. See [Annex C](#) for a list of respondents, and [Annex D](#) for detailed responses.

The main issues raised in the responses were:

- Whether data sharing between DWP and local support providers would be mandatory
- Assurance that DWP would protect claimants' personal information

Additionally, a number of responses commented that care would need to be taken when implementing data sharing, but were supportive overall of the draft regulations.

Our response to the concerns above is:

- UC claimants will be informed about the proposed information sharing in keeping with the Data Protection Act 1998 so that they have an opportunity to object. If someone prefers not to share information, it could make it more difficult for them to get the kind of support they need from other partners – but it would have no impact on their UC claim.
- DWP handles all data in accordance with the Data Protection Act 1998 ('DPA') and the Human Rights Act 1998, so data will only be shared if it is relevant and not excessive to the purposes for which it is shared.

## Conclusion

Having carefully considered these responses, we intend to continue as stated in the consultation documents and lay these regulations on 23 January 2015, which will come into force on 13 February 2015.

## Annex A – List of respondents to data sharing with social landlords consultation

A1 Housing Bassetlaw Ltd  
A2 Dominion Group  
Aberdeenshire Council  
Aberdeenshire Housing Partnership  
Accord Housing Group  
Affinity Sutton Group  
AHP-MHP  
Arhag Housing Association  
Ashford Borough Council Tenants Panel  
Ashford Borough Council  
Aspire Housing  
ASRA Housing Group  
Baker Lomax and Shankley Ltd  
Barnsley Federation of Tenants and Residents  
Birmingham and Solihull Women's Aid  
Birmingham City Council  
Bolton at Home  
Boston Mayflower Ltd  
BPHA  
Bro Myrddin  
Bromford Housing Group Ltd  
Caerphilly County Borough Council  
Cambridge Women's Resources Centre Ltd  
Cardiff City Council  
Cartrefi Conwy  
Castle Residential  
Castle Rock Edinvar Housing Association  
Castle Vale Community Housing Association  
Cestria  
Charter Housing  
Chartered Institute of Housing  
Christine West  
City and County of Swansea  
City of Edinburgh Council  
City of York Council  
CityWest Homes Ltd  
Clwyd Alyn Housing Association  
Colchester Borough Council  
Community Housing Cymru Group  
Cornwall Housing Ltd  
Councillor Furey – West Lancs. Borough Council  
Dane Housing Group Ltd  
Darlington Borough Council Tenants Board  
Darlington Borough Council  
Dartford Borough Council  
Dudley MBC  
Dumfries and Galloway Housing Partnership  
Dunedin Canmore Group  
East Renfrewshire Council  
East Riding of Yorkshire Council  
Eastlands Homes  
Edinburgh Tenants Federation  
EMH Homes  
Estuary Housing Association Ltd  
Falkirk Council  
Fife Council  
First Choice Homes Oldham Ltd  
First Wessex  
Flintshire County Council  
Friendship Care and Housing  
Gateshead Council (Housing Benefit Section)  
Genesis Housing Association  
Gentoo Group  
Glasgow and West of Scotland Forum of Housing Associations  
Glasgow City Council

Golden Gates Housing Trust  
Golding Homes  
Grand Union Housing Group  
Great Yarmouth Community Housing  
Green Square  
Guinness South  
Hackney Homes  
Halton Housing Trust  
Hanover Housing Association  
Havebury Housing Partnership  
Helen Sharples of Southway Housing Trust  
(Personal Reply)  
Helena Partnership  
Hexagon Housing Association  
Home Group  
Housing Plus  
Hull City Council  
ISOS Housing  
Knowsley Housing Trust  
L&Q  
Lambrecht  
Leeds City Council  
London Borough of Camden  
London Borough of Newham  
Manningham Housing Association Ltd  
Manor Estates Housing Association  
Melville Housing Association  
Merlin Housing Society  
Metropolitan  
Milton Keynes Council  
Moat Housing  
National Federation of ALMOs  
National Housing Federation  
National Landlords Association  
Network Housing Group  
New Charter House Trust Group  
Newark & Sherwood Homes Ltd  
North Ayrshire Council  
North Lincolnshire Homes  
North West Leicestershire District Council  
Norwich City Council  
Notting Hill Housing  
One Housing Group  
Origin Housing  
Orwell Housing Association  
Peabody Group  
Peak Valley Housing association  
Peaks and Plains Housing Trust  
Places for People  
PlaceShapers  
Plymouth City Council  
Plymouth Community Homes  
Poole Housing Partnership Ltd.  
Progress Housing Group  
Prospect Community Housing Ltd  
Radian  
Raven Housing Trust  
Redditch Borough Council  
Regenda Group  
Renfrewshire Council  
Residential Landlords Association  
Rochdale Borough Council  
Rochdale Boroughwide Housing  
Ronalds Abolins  
Sanctuary Group  
Sandwell Metropolitan Borough Council  
Scottish Association of Landlords  
Scottish Council of Letting Agents  
Scottish Federation of Housing  
Associations  
Seren Group Ltd  
Shepherds Bush Housing Association  
Shropshire Housing Group  
Shropshire Town and Rural Housing  
South Lakes Housing  
South Lanarkshire Council  
Sovereign Housing  
Spire Homes (LG) Ltd  
Spitalfields Housing Association Ltd  
Sutton Housing Partnership  
Swan Housing Association  
Symphony Housing Group

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Tai Teulu  
Tamworth Borough Council  
Teign Housing  
The Guinness Partnership  
The Highland Council  
The Hyde Group  
The Riverside Group  
Thirteen Housing Group  
Town & Country Housing Group  
Trafford Housing Trust  
Ty Bron Afon  
Wakefield and District Housing  
Wales and West Housing Association  
Walsall Housing Group  
WASPI

Water UK  
Weaver Vale Housing Trust  
Welwyn Hatfield Borough Council  
West Lancashire Borough Council  
Wheatley Group  
Wigan & Leigh Housing  
Winchester City Council  
WM Housing Group  
Wulvern Housing Association Tenants  
Wulvern Housing  
Wyre Forest Community Housing  
Your Homes Newcastle

# Annex B – Summary of responses to data sharing with social landlords consultation questions

## A. Social sector landlords

**Q1.** We envisage social landlords would provide a range of support to their vulnerable tenants. What types of support would you as a social landlord provide your tenants?

**Response summary:**

Social landlords provide a range of support including:

- budgeting advice
- signposting to debt advice eg Citizens Advice Bureau
- maximising income / benefit take up
- signposting to other support services eg drug and alcohol services

However, the National Housing Federation (NHF) have cautioned against assuming that social landlords have sole or lead responsibility for supporting tenants. They think DWP through the agency of Jobcentre Plus has a key role in ensuring that vulnerable tenants have access to personal budgeting support. There was also a view (from one respondent) that the Support Services Framework, as yet, had not outlined any financial assistance to be provided to social landlords or other local delivery partners.

**Q2.** Our intention is to enable DWP to provide minimum information about the claimant aimed at identifying tenants claiming Universal Credit or being Universal Credit recipients. Would that information be sufficient for you to provide support to your tenant?

**Response summary:**

Both social and private landlords are generally happy with the idea of DWP sharing minimum information. Specific information which the social sector landlords wanted was for the claimant's:

- name
- address
- payment date
- how much will be paid via the housing element



Social sector landlords have also identified a number of other areas where data sharing is needed. A particular area for data sharing often mentioned by social landlords is in the area of Alternative Payment Arrangements (APA); they would like DWP to notify landlords when the person is on APA. Other areas where social landlords have wanted information to be shared is when HB ends. An area of data sharing, which NHF listed, is regarding information from DWP to support their court action against tenants.

**Q3.** What do you think would be the implications of not having the information which DWP is proposing to supply under these regulations?

**Response summary:**

A large majority of responses have mentioned that vulnerable tenants would lose out on the support which landlords can provide if DWP cannot share relevant data with them. Associations working in Universal Credit live running for the first year found it very frustrating that they were unable to support tenants until significant arrears had built up which alerted the association to a problem. It was impossible for social sector landlords and housing association to offer any early intervention to support tenants with the new system unless tenants came and asked for help.

**Q4.** What concerns do you think your tenant may have about their information being shared with you as a social landlord?

**Response summary:**

Most landlord groups did not think their tenants would have any concerns about their data being shared in order for them to benefit from the support. A number of social landlord groups had actually spoken to their tenants before responding. The majority view was that tenants would not object to their data being shared.

## **B. Private sector landlords**

**Q5.** What kind of support would you be able to provide your tenants if similar information was provided to you by DWP?

**Response summary:**

Private landlords who responded to the consultation made it clear that they did not provide any support and the reason they needed the data was to address issues concerning rent arrears.

**Q6.** What concerns do you think your tenant may have about their information being shared with you as a private landlord?

**Response summary:**

Private landlords thought the provision of such information could jeopardise their tenancy. It would not be appropriate (unless agreed/authorised by the prospective tenant) to provide the information prior to the landlord/tenant relationship being established through the signing of a lease and by then the tenant is protected from unfair eviction.

**C. General (social and private)**

**Q7.** These regulations allow social landlords to make decisions about the use of data in order to support their tenants; would you think that is sufficient to ensure the proportionate use of data?

**Response summary:**

Social sector landlords thought that local authorities already share clamant data, and therefore had well developed safeguards in place already. A very large majority of respondents did not think this was an issue.

The Chartered Institute of Housing (and some other charities such as Women's Aid) suggest that the 'social landlords' category should be expanded to include all unregistered 'housing associations' whose activities are wholly and exclusively charitable.

**D. Tenants, tenant bodies and Universal Credit claimants**

**Q8.** Do you have concerns about the use of your personal data by your landlord? What could DWP do to alleviate your concerns?

**Response summary:**

Some tenants' bodies mentioned that they needed more clarity over the intended use of the data. Tenants also suggested having guidance issued regarding the use of data, clarifying how data would be shared and used and how that would be guarded against loss or theft.

Tenants thought that it was understandable that the data sharing proposals did not include private landlords as they thought private landlords may not use the information appropriately or have the means of signposting tenants for help. Private landlords could also use the information for personal gain or to remove tenants that are in receipt of Universal Credit.

**Q9.** Would you like to see more use made of the information you have provided, in order to ensure you receive appropriate support from your landlord?

**Response summary:**

Tenants generally were not against the greater use of their data, but mentioned that ensuring transparency in using data was vital, as was the option to opt out of the additional support.

## Annex C – List of respondents to data sharing with local support providers (including social landlords) consultation

Aberdeen City  
Angus Council  
Axiom Housing Association  
Birmingham City Council  
Blackpool Council  
Boston Mayflower  
Bromford Housing  
Bron Afon Community Housing.  
Buckinghamshire County Council  
CCP Community Services  
Centrepoint  
Charter Housing  
Cheshire West & Chester Council  
Chichester District Council  
Citizens Advice Bureaux  
Citizens Advice Bureau Broxtowe  
Citizens Advice Bureau Scotland  
Citizens Advice Bureau Southwark  
City of Cardiff Council  
City of Stoke-on-trent  
City of York Council  
City West Housing Trust  
Coast and Country Housing  
Colchester Council  
Community Housing Cymru Groups  
Cross Keys Homes  
Daventry District Council  
Dudley Council  
Dundee Council  
Dunedin Canmore Group  
Dupe Associates  
East Dunbartonshire Council  
EMH Homes  
Enable Scotland  
Essex County Council  
Falkirk Council  
Family Mosaic  
Friendship Care and Housing  
Futures Housing Group  
Fylde Borough Council  
Gateshead Council  
Glasgow City Council  
Gravesham Council  
Green Square Group  
Gwalia  
Hanover Housing  
Home Group  
Homeless Link  
HUG (Action for Mental Health)  
Hyde Housing  
Information Commissioner  
Islington Debt Coalition  
Jeanette Miller  
Julie Fuller  
Kirklees Council  
L B Southwark  
L&Q  
LB Lambeth  
Leeds City Council  
Maidstone Borough Council  
medConfidential  
Melville Housing Association  
MHS Homes  
Milton Keynes Council  
Money Advice Service  
Ms S Westlake  
Mydex  
Natasha Fearon

National Housing Federation

Newcastle City Council

North Ayrshire Council

North Lincolnshire Homes

NPT Homes

Orwell housing

Oxford City Council

Papworth Trust

Parkinson's UK

Peabody

Places for People

Plus Dane Group

Poole Housing Partnership

Portsmouth CAB

Portsmouth City Council

Progress Housing Group

Renfrewshire Council

Riverside Group

Rochdale Borough Council

Scottish Council for Voluntary

Organisations

Scottish Federation of Housing

Associations

Shropshire Council

South Lanarkshire Council

Stirling Council

Stockport Metropolitan Borough Council

Sunderland City Council

Tenantiaid Cymru / Welsh Tenants

The Highland Council

Thirteen Group

Thrive Homes Watford

Town and Country Housing

Two Castles Housing Association

Veterans UK

Wakefield and District Housing

Wales Cooperative Centre

Waterloo Housing Group

West Lincolnshire US dl trial

West Mercia Housing

Westminster City Council

Wheatley Group

Wychavon Council

YMCA

Your Homes Newcastle

Your Own Place

# Annex D – Summary of responses to data sharing with local support providers (including social landlords) consultation questions

## A. Local support service providers

**Q1.** We envisage that Jobcentre Plus, local authorities, citizens advice bureaux, credit unions, social landlords and relevant registered charities could provide a range of support to vulnerable claimants. What types of support could you as a local service provider provide to your claimants?

### **Response summary:**

There was a huge range of holistic, joined-up support proposed by respondents incorporating the three key Universal Support elements of triage, financial inclusion and digital inclusion.

Examples of current and suggested provision include:

- The use of specialist ‘in house’ services, and one to one, face to face support to address specific needs – offering home visits where required
- Direct advice and guidance from trained staff, for example, debt liaison officers
- Practical advice such as home energy advice, healthy living, maximising income and enhancing prospects
- Promoting a range of self help solutions related to money management through third parties in the community
- Working with advice sector partners on redesign of advice services that are responsive to the needs of communities
- Proactive and early intervention to identify potential issues / triggers before they become problems
- The provision of ‘digital lounges’ staffed by volunteers who act as digital champions and provide support to help people get connected and develop online skills
- The use of ‘floating’ support and the introduction of wi-fi enabled community hubs where third sector partners are co-located.

**Q2.** Our intention is to enable parties to share information about the claimant aimed at identifying claimants who are in receipt of UC. Would the information listed in this consultation document be sufficient for you to provide support to the claimant? If not, what additional information do you need?

**Response summary:**

There was a range of responses from local authorities, social landlords, charities, and other public bodies such as Citizens Advice. The majority of responses agreed that the information listed was sufficient, but many responses also expressed support for wider information sharing.

Among the pieces of additional information requested, there were some common suggestions:

- Amount paid (including breakdown and deductions)
- Claimant Commitment
- Dates of payments and sanctions
- Rental and financial liabilities – housing cost calculations, direct payment of HB, level of debt
- Benefit Cap
- Other payments/benefits – eg spare room subsidy, Discretionary Housing Payment (DHP)
- Social worker/key worker contact details
- Client preferences in contact/engagement
- Alternative Payment Arrangements
- Previous addresses
- Claim reference number

Other suggestions included using closed/standard categories for data (rather than open ended questions), assigning key contacts for each organisation and providing access to scanned documents.

It was also suggested that DWP should consider how data sharing on a ‘case by case basis’ would operate in practice as people are often unsure how to make sufficient determination. Similarly, DWP were encouraged to think about the possibility of different levels of consent depending on circumstances.

**Q3.** What do you think would be the implications of not having the information listed that we are proposing to share under these regulations?

**Response summary:**

The majority of responses focused on three main topics:

- The risk to claimants if data sharing is not possible, where claimants without appropriate support could fall into arrears, jeopardise their housing, or fail to access support for specific needs. Many responses emphasised the significant impact this would have on vulnerable claimants.
- A large proportion of responses also recognised that data sharing should improve efficiency for organisations and reduce duplication between them, improving a claimant’s experience accessing support, whilst reducing costs for providers.

- Many responses were supportive of data sharing as it enables a proactive approach to supporting claimants, where interventions can take place to stop the escalation of issues such as arrears or sanctions.

Social landlords raised concerns about the potential impact on their income and ability to deliver services should this not take place. Advice agencies also shared concerns that it would be difficult to assess the level of support required, or direct claimants to the right support provider.

Some responses suggested a need for greater clarity in refining the data sharing process, in terms of how information is accessed, and also around streamlining the triage process.

**Q4.** What concerns do you think the claimant may have about their information being shared between DWP and local support service providers?

**Response summary:**

The majority of responses, including many housing providers, foresee no issues with data sharing since they would continue to be bound by data protection laws, and already handle large amounts of personal data which claimants are happy to share. Most identify concerns around privacy, security and misuse of data, but recognise that the benefits of data sharing to support vulnerable claimants are more urgent.

Some responses raise concerns that claimants may be reluctant to disclose specific information for fear of repercussions, or due to difficult personal circumstances. Efforts must be made to ensure claimants who object are not penalised.

Many responses highlight the importance of explaining the reason and procedure for data sharing clearly, ensuring claimants understand what consent they are giving to maintain trust, and emphasising the benefits of data sharing.

## **B. General**

**Q5.** These regulations would allow Jobcentre Plus, local authorities, citizens advice bureaux, credit unions, social landlords and relevant registered charities to make decisions about the use of data in order to support Universal Credit claimants. Would you think that is sufficient to ensure the proportionate use of data? If not, what additional protection do you think needs to be put in place to ensure proportionality?

**Response summary:**

The vast majority of respondents felt that, in conjunction with the data protection legislation, the regulations as they stood were sufficient to ensure the proportionate use of data.

A number of respondents commented that:

- Every Universal Support partnership should have clear guidance and protocols in place supported by an agreement between all parties to ensure security, proportionality and appropriate use of information
- That guidance around, and adherence to, secure storage, processing and transfer of data should be in place
- Regular and specific security training should be mandatory for all staff involved in data sharing
- Closer partnership working will be key to effective information sharing
- There should be monitoring to maintain high standards and compliance with data sharing together with a clear escalation process, penalties and redress for the claimant where data protection has been violated.

There was also a call for greater investment in digital services and the development of a universal system to enable information sharing and support the data sharing process.

The opportunity to object to information sharing was welcomed by some as an indicator of proportionality.

## C. Universal Credit claimants

**Q6.** Do you have concerns about the use of your personal data by Jobcentre Plus, local authorities, citizens advice bureaux, credit unions, social landlords and relevant registered charities? What could DWP do to alleviate those concerns?

### **Response summary:**

A limited number of replies were received in response to this question but those received centred on the need to ensure that claimant confidentiality is not compromised; that claimants are informed about the proposed information sharing and have the opportunity to object; and that claimants are not be penalised for objecting.

Respondents suggested that it would be helpful to have positive communication in place, especially for particularly vulnerable groups, that explained that data sharing is for their own protection and that it would be proportionate.

**Q7.** Would you like to see more use being made of the information you have provided, in order to ensure you receive appropriate support from Jobcentre Plus, local authorities, citizens advice bureaux, credit unions, social landlords and relevant registered charities?



**Response summary:**

Responses to this question focused on the need to ensure that where potential subjectivity came into play, for example, around evaluation of the level of digital or personal budgeting skills, that the claimant's own assessment of their capabilities would have at least equal weight during the triage process.

Claimants also sought assurances that where agreement has been given to share information, those who hold the information are trained to use it without prejudice or assumptions.