

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

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.