



Department
for Work &
Pensions

Minister for Welfare Delivery
4th Floor
Caxton House
Tothill Street
LONDON
SW1H 9DA

www.dwp.gov.uk

Rt Hon Stephen Timms MP

Dear Stephen,

Thank you for your letter concerning data sharing in Universal Credit (UC).

Following the Social Security Advisory Committee's report into consent in UC on 8 September 2020, we are considering how best to safeguard personal data going forward. This will be balanced with allowing those claimants needing support from representatives to do so in a safe and secure manner. With regard to explicit consent, we will need to carefully consider the feasibility and desirability of the measures mentioned.

At this stage, it is important to note that areas that may seem attractive to those lobbying for policy changes do not always lend themselves to process design. For example, "tick boxes" need to connect to something in an automated way or generate additional activity, potentially of a manual nature. As ever, we will continue to find the best balance between improving Universal Credit to respond to claimant need and ensuring the service is technically and operationally scalable regardless of claimant demand.

Regarding the Healthy Start scheme, it is administered by the Department of Health and Social Care and includes qualifying conditions that do not directly correspond with those for UC. With that in mind, it is unlikely that the issue surrounding Healthy Start take up can be resolved through UC changes. I am not aware of any discussions between our departments.

Finally, we are focussed on supporting the successful implementation of our ambitious Plan for Jobs, tackling fraud and completing the move to UC for claimants of legacy benefits and tax credit. As I am sure you will appreciate, this is a complex challenge and we must prioritise.

Kind Regards,

David Rutley MP
Minister for Welfare Delivery



Work and Pensions Committee

House of Commons, London, SW1A 0AA
Tel 020 7219 8976 Email workpencom@parliament.uk

Will Quince MP
Minister for Welfare Delivery
Department for Work and Pensions

14 July 2021

Dear Will

Data sharing in Universal Credit

In the Committee's report on the wait for a first payment in Universal Credit, we noted that support organisations had expressed concern that DWP's approach to data sharing and consent is having a detrimental effect on their ability to support vulnerable claimants. We urged you to publish more information about the work that the Department is doing to improve its model of explicit consent, and echoed the Social Security Advisory Committee's recommendation that DWP should consider applying the implicit consent model to UC, or at least consider what improvements it can make to the model of explicit consent.

In response, the Department said:

We recognise that a number of organisations have raised concerns as to whether the explicit consent rules are sufficiently flexible. The Department agreed to explore options for improving the process of explicit consent in conjunction with the Social Security Advisory Committee (SSAC) and stakeholders. SSAC have commented that they are pleased with the work that the Department has done to develop a prototype in a positive collaboration with end users.

1. Please could you let us know what stage that prototype has now reached, and what progress has been made since SSAC gave its view?

On a related point, I would be grateful for your view on a proposal for how DWP could help to improve take up of Healthy Start vouchers by encouraging data sharing through the UC system.

Healthy Start helps low income families with young children to afford basic foods, like fruit or milk. Households that are eligible for the scheme can get vouchers to spend on food, as well as coupons that can be exchanged for pregnancy and breastfeeding vitamins and vitamins for young children.

Eligibility is determined by receipt of certain benefits and by household income. Universal Credit claimants are eligible for the scheme if their income from employment is less than £408 per month (£4,896) per year. Take up of the vouchers stands at just 64%, however, so many households will be going without support that they are entitled to. Around £1 million of vouchers are going unclaimed each week.

The attached proposal from Feeding Britain, a food poverty charity, suggests that rather than having to "opt in" to Healthy Start, the vouchers could be offered on an "opt out" basis. This

would raise issues around claimants' consent to their data being shared, and it is likely that greater clarity would be required, potentially through legislation, around where the responsibility for automatic registration, and for the handling or sharing of accompanying data, should sit within different layers of central and local government.

Feeding Britain proposes, however, that in the meantime the UC application forms could be used to register eligible households for Healthy Start automatically. This would require the UC forms to be amended to include a tick box, which claimants could use to give their consent to their data being shared for the purpose of automatic registration.

I would be grateful if you would answer the following questions about this interesting suggestion.

- 2. What is the Department's assessment of Feeding Britain's specific recommendation on Healthy Start/Universal Credit?**
 - a. Can you see any barriers to implementing this approach, especially relating to consent to share data?
- 3. In your discussions with other Departments, has the idea of an "opt out"/automatic registration approach to Healthy Start been discussed?**
- 4. Feeding Britain says that there are areas where "greater clarity" would be needed before an automatic registration system could be introduced—for example, on handling and sharing data and on where responsibility should sit. Does the Department have a view on these issues?**
 - b. Are there any other areas that would need clarifying before an automatic registration system could proceed?

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Stephen Timms', with a stylized, cursive script.

Rt Hon Stephen Timms MP
Chair, Work and Pensions Committee

A Policy for Improving Child Nutrition – Securing Full Take-Up of Healthy Start Vouchers and Free School Meals in England

Summary

It is proposed that:

1. Legislation is brought forward to provide a firm legal basis for the automatic registration of all eligible children for Healthy Start vouchers and free school meals.
2. The Department for Work and Pensions amends the Universal Credit application form and online journal, so that new and existing claimants are given the option of ticking a box to consent to their data being used automatically to register eligible children in their household for Healthy Start vouchers.
3. Local authorities amend the Council Tax Support application form, and other forms where appropriate, so that applicants are given the option of ticking a box to consent to their data being used automatically to register eligible children in their household for free school meals.
4. A design sprint is held with families on low incomes, local authority representatives, the Office of the Children's Commissioner for England, Feeding Britain, and officials from the Department for Work and Pensions, Department for Health and Social Care, and the Department for Education, to co-produce detailed and workable policies for both securing and then maintaining full take-up of Healthy Start vouchers and free school meals.

Introduction

This proposal stems from a roundtable discussion held on 8th June 2021 which was attended by representatives from Feeding Britain, the Office of the Children's Commissioner for England, and the Healthy Living Lab at Northumbria University, as well as officers from Gateshead Council, Royal Borough of Greenwich, Leeds City Council, Leicester City Council, Liverpool City Council, Newark & Sherwood District Council, Newham Borough Council, and Nottinghamshire County Council.

The purpose of the discussion was to assess the case for automatic registration, identify the challenges associated with this idea, and begin to develop some broad proposals for a workable scheme.

The case for automatic registration

Local authorities and schools, as well as other public bodies, are putting a huge amount of time, effort, and resources into initiatives that aim to increase the take-up of Healthy Start vouchers and free school meals. Despite those efforts, 44% of potential beneficiaries are not registered for Healthy Start and, as a result, £1 million worth of vouchers go unclaimed each week. Of particular concern is the finding that some families are having to rely on food banks because they are not registered for their Healthy Start entitlement.

Reasons for low take-up include:

- a lack of awareness among both potential beneficiaries and community organisations
- language barriers
- an application process that can feel stigmatising to potential beneficiaries, and is often confusing, complex, and bureaucratic for both potential beneficiaries and officials
- concerns about the potential impact on other social security benefits

It was suggested that, as a swift and effective way of maximising take-up and removing barriers to entitlement, the basis for Healthy Start and free school meal registration should shift from 'opt in' to 'opt out', through an automated process.

Challenges and Solutions

The availability, matching, and use of data were identified as key challenges within the current system. It was suggested that data covering free school meal eligibility tend to sit within different tiers of local government, and data covering Healthy Start eligibility are likely to sit within the Department for Work and Pensions. With data sitting in different organisations, it is difficult to access and share without the relevant consent being in place.

It was suggested also that, in respect of free school meals, reforms may be needed to ensure pupils at all schools, including academies, are covered by the sharing of data and its use for automatic registration, and that children who attend school in one borough, but live in another, do not fall through the cracks.

In general, it was suggested that greater clarity would be required, potentially through legislation, around where the responsibility for automatic registration, and for the handling or sharing of accompanying data, should sit within different layers of central and local government.

Nonetheless, it was also proposed that in the meantime the existing application forms for different social security benefits, and other income-related support schemes, should be amended so as to gain from potential beneficiaries their consent to data being processed for the purpose of automatic registration. For Healthy Start, the inclusion of a tick box in the Universal Credit application form and/or online journal could work. For free school meals, the same could apply to the Council Tax Support application form.

A design sprint was presented as one potential way of co-producing a robust system of automatic registration with families and government officials. Among the advantages of this method is the collection of multiple viewpoints from the full range of stakeholders, thereby significantly reducing the risks of unintended outcomes or consequences.