**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. A consultation on draft Regulations.  
Community Housing Cymru Group response**

**About Us**

**The Community Housing Cymru Group (CHC Group)** is the representative body for housing associations and community mutuals in Wales, which are all not-for profit organisations. Our members provide over 158,000 homes and related housing services across Wales. In 2013/14, our members directly employed 8,400 people and spent almost £2bn (directly and indirectly) in the economy, with 81% of this spend retained in Wales. Our members work closely with local government, third sector organisations and the Welsh Government to provide a range of services in communities across Wales.

**Our objectives are to**:

* Be the leading voice of the social housing sector.
* Promote the social housing sector in Wales.
* Promote the relief of financial hardship through the sector's provision of low cost social housing.
* Provide services, education, training, information, advice and support to members.
* Encourage and facilitate the provision, construction, improvement and management of low cost social housing by housing associations in Wales.

**Our vision is to be**:

* A dynamic, action-based advocate for the not-for-profit housing sector.
* A ‘member centred’ support provider, adding value to our members’ activities by delivering the services and advice that they need in order to provide social housing, regeneration and care services.
* A knowledge-based social enterprise.

In 2010, CHC formed a group structure with Care & Repair Cymru and CREW Regeneration Wales in order to jointly champion not-for-profit housing, care and regeneration. CHC also runs Your Benefits Are Changing (YBAC), a highly successful project, unique to Wales, which comprises awareness-raising campaign, money advice and consultancy support.

**General Points**

CHC welcomes the opportunity to respond to the proposed inquiry into Universal Credit (UC) data sharing between DWP and local support providers. Our members provide homes and services to some of the most vulnerable members of our communities, many of whom claim welfare benefits and will be (or, in some cases, already are) receiving UC payments. As a sector, we consider it imperative that data sharing between the DWP and social landlords is given high priority as we prepare for the full roll-out of UC. The implications for CHC’s members, should we be unaware that potentially vulnerable and financially disadvantaged tenants are in receipt of UC, are significant and have the potential to severely undermine our abilities to provide a high quality service to a major proportion of Welsh society. As such, we welcome the opportunity to add the voice of the Welsh social housing sector to the debate about the future of data sharing between our members and the DWP. Opinion on this response has been sought from all of our members, via our mailing-list.

Given the close similarities between the two consultations, our response to this consultation will follow similar themes to that which we made to October 2014’s consultation on draft regulations regarding UC Data Sharing with social landlords.

Principally, we are concerned that a failure to achieve multi-directional, multi-agency data sharing when Universal Credit becomes fully realised (or, indeed even before that point, given the gradual roll-out being undertaken) will lead to vulnerable people struggling financially and building up rent arrears before our members are able to put in place appropriate support. The issue of data sharing was one of the key points raised in the Direct Payments Demonstration Projects Landlord Learning Document released in March 2014, which found that: “Prompt and meaningful liaison between landlords and the service administering benefits is essential in instances where the tenant does not pay their rent in order to safeguard the tenant and the landlord’s income stream”.[[1]](#footnote-1) We appreciate that the DWP is aware of the issue, as outlined in paragraph 2.16 of the consultation document, which states: “Sharing data will ensure timely and ‘joined-up’ support for the most vulnerable in our society” and we are keen to see that the sharing of data is undertaken in a sufficiently effective manner that neither tenants nor social landlords are significantly disadvantaged by the introduction of UC.

We are further concerned by the level of support which will be required from social landlords, in light of the cuts in funding to advice and support services. Our members are organisations with a strong social focus and the wellbeing of tenants is of the utmost importance, as is demonstrated by the numerous projects we run to support vulnerable tenants or to help unemployed tenants into work, but we are apprehensive at the prospect of having to meet the demand caused by cuts to support agencies while simultaneously meeting the increased support needs of tenants who are in transition onto Universal Credit or have had their benefits sanctioned by the DWP, without the provision of any further resources.

We wish to stress that, in order to provide appropriate support for vulnerable tenants, data must be shared by the DWP with social landlords at the earliest possible point, for both Universal Credit claims (please note, it is key that we receive the information at the point the claim is made rather than when awarded) and benefit sanctions, so that our members can intervene in a tenant’s situation before it spirals out of control. This is particularly important given the issue regarding resources mentioned above. The earlier that this intervention can take place, the more effective the support offered can be, thus diminishing the drain it will have on social landlords’ resources.

Additionally, we wish to state that the trusted partner framework that we have helped to form, along with the National Housing Federation and a number of housing associations, through the DWP’s core landlord group should be implemented in full to enable effective data sharing.

**Responses to consultation questions:**

**Q1 We envisage that JCP, lxocal 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?**

CHC’s members provide a broad range of support to their tenants. As a sector, we offer far more than just housing. As an example, our recent ‘Leading the Learning’ survey, which was completed by 37% of CHC members, found that these housing associations provided 1,806 employment, skills and learning opportunities in 2013/14, averaging 129 opportunities per association.[[2]](#footnote-2)

Taff Housing Association’s Lighthouse Project is one, specific, example of the innovative and necessary support offered by CHC’s members to vulnerable people, which goes beyond housing.[[3]](#footnote-3) The Lighthouse Project supports vulnerable and older tenants for an average of two years, serving as a link between housing associations, social services and healthcare professionals. Many of the project’s tenants have recently been discharged from hospital. As at July 2014, it housed 159 tenants, and had 222 people on its waiting list. The project’s staff help tenants to manage their homes and money, preventing evictions and applying to rehouse those whose needs are no longer met by their living situation because of disability or old age. To quote from an Inside Housing article written on the project: “The Lighthouse Project is particularly innovative for a housing support service because of its close ties with the local Royal Gwent Hospital. Its hospital discharge project has a staff member based at the hospital. This has lightened the load on social workers and bridged a gap for vulnerable people who need support after being discharged.”[[4]](#footnote-4) This project relies on shared data, in this case between hospitals, the local authority and the housing association.

In addition to the projects provided directly by our members, it is important to note that, in many cases, tenants are reliant on third party advice & support agencies, often following referrals from our members. These agencies are in turn reliant upon funding streams, such as Supporting People, which have faced significant cuts, in recent years. We would echo the response submitted to this committee by Bron Afon, who state that: “there is absolutely no prospect of social landlords like Bron Afon plugging the huge gaps that would result in the availability of much needed local support services & initiatives aimed at ‘making work pay’ should these funding streams be curtailed and cut.” While these agencies have their own bodies to represent them, their support to our members is of such importance that we would call for the Government to provide sufficient funding for advice & support agencies as part of its Welfare Reform programme.

**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?**

Our members would benefit from an understanding of the level of active bank use that their tenants engage in. Straightforward figures demonstrating the number of people with bank accounts do not provide a clear indication of the number of people who are able to use their accounts and actively do so. As an example, Cadwyn Housing Association are involved in a direct payment trial, currently. Their triage work has uncovered that the vast majority of those involved (90%) had bank accounts. A significant minority, however, did not actively use them (38%). As such, it can be expected that many new UC claimants will need support with banking, as well as budgeting.

Additionally our members must also be informed at the point DWP imposes sanctions on tenants claiming or in receipt of UC. The impact of benefit sanctions to tenants is already significant and the numbers affected have increased significantly in the last year. To be able to provide support to vulnerable tenants our members must be made aware of new sanctions at the earliest opportunity, so this information can be incorporated into the triage process, which is so crucial to the success of the UC transition.

Regarding the organisations listed as being included in this data sharing, it has been noted by our members that this list does not cover vital partners, such as the Police, Probation, and Health services, all of whom are key to identifying vulnerable tenants who are likely to meet the DWP’s Tier 1 alternative payment trigger.

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

The implications for social housing providers and their tenants, should data be withheld by the DWP would be severe. Should our members be unaware of which of their tenants are on UC, particularly during a phased roll-out when many tenants will be signed up and others will not, there is a possibility of tenants falling into arrears (if they are not already behind with payments). There is added danger of these tenants then compounding their situation by, for example, approaching loan sharks, falling into worse debt and undergoing significant, damaging stress and anxiety. To quote from the results of the Bron Afon Direct Payment Demonstration Project: “One in four of our tenants who participated in the CRESR baseline survey said they were suffering from some form of stress or anxiety. Not surprising then that people with mental health issues and families with multiple and complex needs figured large in the cohort of tenants who were switched back to landlord payment”.[[5]](#footnote-5) Should a tenant fall into difficulty, having used the rent element of their UC payment to pay for other services or goods, their landlord may be able to support them before the situation gets out of hand. However, pre-emptive support based on effectively shared information would mean that far fewer tenants fall into debt, with positive implications for health and wellbeing as well as for the landlords’ ability to use rental income in a socially positive manner (for example by building more, much-needed social housing).

On this last point, it should be highlighted that the recent report on the DWP’s Direct Payment Demonstration Projects noted the “financial impact on landlords (a total of £1.9m of rent owed was not paid over the 18 month period)”. The report goes on to say that the negative financial impact for landlords “is a pattern likely to repeat unless mitigating action is taken”.[[6]](#footnote-6) We strongly advise that the mitigating action referred to here is the introduction of effective data sharing practices.

Replication of work is another serious concern, should a data sharing system not be comprehensively applied; many of our tenants receive support from a variety of providers. Should those providers be unaware of the work undertaken on the same case by another support provider, the potential for duplication of labour is clear. This drains resources from support providers, many of whom are already stretched and with the threat of impending reductions to Supporting People funding in Wales adding to their concerns, and wastes clients’ time, which could otherwise be more productively spent looking for employment opportunities. It is vital that minimising landlords’ resource use is at the forefront of the DWP’s minds; the DPDP undertaken by Bron Afon and Charter Housing found that: “the whole project was resource hungry. Contact rates with tenants doubled and personal visits increased four-fold during the process of transition to direct payment”.[[7]](#footnote-7)

On the reverse of this issue, the potential for data sharing between support providers (particularly if this is done using data in a format which is universally applied) means that the service provided can be more efficient and more effective, with greater overall benefit for the individual in receipt of support.

Specifically regarding two of the data sets which are highlighted, our members are intrigued as to whether there is an agreed method of measuring individuals’ personal budgeting ability and level of digital skills. We would appreciate if the DWP would feed-back how they intend to judge these areas.

**Q4 What concerns do you think the claimant may have about their information being**

**shared between DWP and local support service providers?**

In our experience, our members’ tenants are not concerned about data sharing; tenants are routinely profiled by landlords, anyway, with consent. To quote from NPT Homes’ response to this consultation: “As a Social Landlord, through work with our tenants, we understand that what matters to a tenant above everything else is keeping a roof over their and their families’ head”. Welfare reform has improved the quality/ quantity of data held by landlords on their tenants, as triaging for UC trials and Direct Payment Demonstration Projects has meant that landlords are taking particular note of their tenants’ circumstances and situations. For example, Housing Officers at Cadwyn in Cardiff, as part of their UC trial, have been spending time in the homes of tenants, ostensibly to discuss their tenants’ preparedness to undertake the trial, but while they are there, engaging them, building up their profiling information on them and taking time to understand their individual needs. We appreciate that this organisation deals with a relatively low number of people and larger organisations will not be able to maintain the same level of intense profiling, but this case is indicative of tenants’ willingness to share their data with those who support them.

As stated in our previous response, tenants in social housing are generally very happy with the current arrangement, whereby rent is paid directly to their landlords. If the upheaval caused to this system by the introduction of UC can be mitigated for them by the sharing of their data, we anticipate that tenants will be content for data sharing to continue.

As a sector, we are well placed to meet any concerns that tenants have regarding the appropriate use of confidential data. Several of our members are signed up to Wales Accord on the Sharing of Personal Information (WASPI) – 16 housing associations, as at 16/12/14.[[8]](#footnote-8)

The WASPI framework complies with the Information Commissioner’s 'Data Sharing Code of Practice' and helps ensure compliance with legislative requirements and national and international standards and policies, so participation within it clearly evidences the sector’s commitment to working with personal data in a responsible and legally compliant manner.

Having stated our concerns regarding vulnerable claimants, it should be noted that many of our members’ tenants will need no support with managing their rental payments. Data sharing will not be needed to such an extent in these cases and deciding the amount/ type of information shared will thus need to be a responsive, individual and user-led process.

**Q5 These regulations would allow JCP, 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 UC 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?**

From the point of view of the Welsh housing sector, the outlined proposals absolutely constitute a proportionate use of data. As socially minded organisations, it is in our interests and those of the people we support, to ensure that their data is treated confidentially and used only for purposes which benefit the tenants.

Ideally, a universal system across which data could be shared would be promoted by the DWP. This would cut down hugely on the amount of time that would be spent converting data into a useable format. CHC’s Your Benefits Are Changing service uses Advice Pro to record client’s data, as do many other members of the sector and we endorse the universal use of this effective system. Certainly, we feel that some government IT expertise should be brought to bear on how data can most compatibly be shared between the various agencies who are involved. One, potentially major, issue for our members (and, doubtless, for the many voluntary agencies involved) is that of who will meet the costs of collating and inputting data which is not immediately compatible with agencies’ different systems, should a universal system not be agreed.

In Wales, we are exploring how organisations and tenants can better manage and share personal information with relevant organisations. A number of our members are keen to develop a portal that mirrors Birmingham City Council’s Digital Log Book which is an on-line tool for people to create, manage and share their personal information with whomever they like. Birmingham Council has saved £125,000 in administration costs from using the system and 80% of tenants can use it with little or no help, with the remaining being supported by a member of staff. The council has also saved £400,000 by helping about 60 people avoid being evicted by managing their money better, since each eviction that does go ahead cost the council £7,000. Other savings have been realised by putting rent statements online rather than posting them out, and in digitising tenants’ handbooks, which had previously cost £20 per tenant to print, saving up to £120,000. Our members recognise the significant benefits that this type of portal can have to both their organisation and Welsh tenants. Additional funding and support toward digital inclusion projects of this nature would be valued and would make data sharing, and thus UC, more effective.

**Community Housing Cymru Group**

**12th of January 2015**

1. <http://www.cih.org/resources/PDF/Policy%20free%20download%20pdfs/Landlord%20Learning%20Document.pdf> [↑](#footnote-ref-1)
2. <http://www.bbc.co.uk/news/uk-wales-30153121> [↑](#footnote-ref-2)
3. <http://www.taffhousing.co.uk/node/140> [↑](#footnote-ref-3)
4. <http://www.insidehousing.co.uk/a-light-in-the-dark/7004517.article> [↑](#footnote-ref-4)
5. <http://www.whq.org.uk/main/articleDetailPrintable.php?ART_id=1338> [↑](#footnote-ref-5)
6. <https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/388565/rr890-direct-payment-demonstration-projects-key-findings-of-the-programme-evaluation.pdf> [↑](#footnote-ref-6)
7. <http://www.cih.org/resources/PDF/Policy%20free%20download%20pdfs/Landlord%20Learning%20Document.pdf> [↑](#footnote-ref-7)
8. http://www.waspi.org/page.cfm?orgid=702&pid=50306 [↑](#footnote-ref-8)