

Consumer Council Response to the Department of Finance and Personnel's consultation on data sharing



Our reference: PD 20080/181
September 2008

The Consumer Council welcomes the opportunity to respond to the Department of Finance and Personnel's (the Department) consultation on data sharing.

From the outset the Consumer Council would like to commend the Department on taking the consumer's view into account at an early stage of this process through engaging with our consumer panel.

1. Support for targeted benefits up-take campaign

The Consumer Council agrees with the widely recognised need to increase the up-take of benefits. We strongly support the Department's initiative to deliver this aim and ensure that people are getting all the benefits they are entitled to.

We agree with the proposal to target those most likely to be entitled to Lone Pensioner Allowance, Disabled Persons Allowance, Rates Relief, and Housing Benefit through the secure sharing of data. This will be an important step towards the improvement of benefit take-up.

2. The benefits of joined up Government

The advantages of a joined up government approach are there to be realised. The truism that most people see government as one agency was reflected at the Consumer Council's Consumer Panel and is noted in the consultation document. By improving services enabled by securely sharing specified data Government can move towards delivering this expectation.

3. Safe and secure data handling

The Consumer Council feels that the benefits of a joined up government approach can outweigh the potential risks. All steps must be taken to protect the security of the data shared. Recent high profile incidents of data loss by Government departments heightened concerns over identity theft. Consumers have genuine and deep felt concerns about the storage of their personal information and how this will be used.

Tight security of personal data is paramount. The Consumer Council agrees that a senior manager should be appointed to oversee data sharing and be accountable and responsible for its safe handling. This manager should control a selected and specially trained staff. The Consumer Council recommends that data access should be limited to these staff members. We

recommend that data should not be removable either on laptops or on removable memory devices.

NI Government has produced data protection plans and policies that all staff must adhere to. These fully support and comply with the Data Protection Act 1998. The Consumer Council would stress that legal compliance in data handling must be the minimum. Best practice must be employed at all times.

4. Communicating with the Consumer

The Consumer Council feels that the potential impact on benefit take-up from data sharing will be diluted unless the information is used alongside the simplification of forms, the pre-population of forms and making verification easier.

We recommend that triggered letters should be easy to read and in plain English. The accompanying information leaflets must also follow this format. The Consumer Council stresses that triggered letters are only a starting point in providing help and guiding people through their application. Simple easy to follow steps must be developed for the rest of the process.

The letter must include information on how the Department has identified the recipient and got their details.

5. Single point of contact for consumers

The Consumer Council recommends that the letter and all publicity material should include just one freephone telephone number that is equipped to handle all benefit enquiries.

NI Direct is mentioned in the consultation document as a long term solution to provide a one stop shop for all Government services. In the short term the Consumer Council strongly advocates that the Department provide a single point of contact to give information and guidance to the general public. We see this as a vital part of simplifying the benefits system and integral to any programme to increase benefit take-up and target those in need.

This telephone line must be operated by well trained staff. Staff at the first point of contact on a telephone must be able to direct consumers first time to the right department. These staff must be capable of guiding applicants through checking their entitlement, completing the application form and answering the full array of enquiries likely about rating reliefs.

6. Wider dissemination strategy required

The sharing of data to identify those who may be entitled to benefits must not be used as a substitute or alternative to a wider dissemination strategy that goes beyond the benefits uptake campaign.

The intended introduction of data sharing primary legislation and subordinate legislation by April 2010 exemplifies the need for increased and sustained work on benefit take-up campaigns. Without this continued work there is the

potential for Lone Pensioner Allowance, Disabled Persons Allowance, Rates Relief and Housing Benefit to go unclaimed to 2010

7. Clarification regarding legislation

The Consumer Council would seek clarification from DFP if the primary and subordinate legislation will be subject to public consultation.