



Information Commissioner's Office

The Information Commissioner's Office response to the Department for Work and Pensions Green Paper consultation 'Strengthening families, promoting parental responsibility; the future of child maintenance'

The Information Commissioner has responsibility for promoting and enforcing the Data Protection Act 1998 and the Freedom of Information Act 2000. He is independent from government and promotes access to official information and the protection of personal information. The Commissioner does this by providing guidance to individuals and organisations, solving problems where he can, and taking appropriate action where the law is broken.

The Information Commissioner welcomes the opportunity to respond to this Green Paper; The Information Commissioner's Office and DWP have a long standing and positive relationship. Our comments below reflect the Commissioner's role in promoting and enforcing the Data Protection Act 1998.

We note the stated intention of the Green Paper to deliver joined up services to the benefit of individual families dealing with marital separation.

At various points in the Green Paper reference is made to replacing the existing child maintenance arrangements with a streamlined procedure providing a calculation service which will enable an annual review of cases through links with HMRC's tax systems and provide information on parental income.

The Information Commissioner wishes to stress the importance of ensuring that that any data-sharing arrangements between Departments or agencies is as transparent as possible so that individuals are aware such processing will be taking place. It will be important therefore that privacy statements and fair processing notices clearly reflect this and are, where necessary, updated as a priority to ensure that the arrangements are clearly explained and detailed.

Additionally, it will be important to consider whether there is a need for additional staff training, internal guidance and information leaflets to assist in effectively explaining any data sharing arrangements in operation to the individuals concerned at what will be a very distressing time.

April 2011