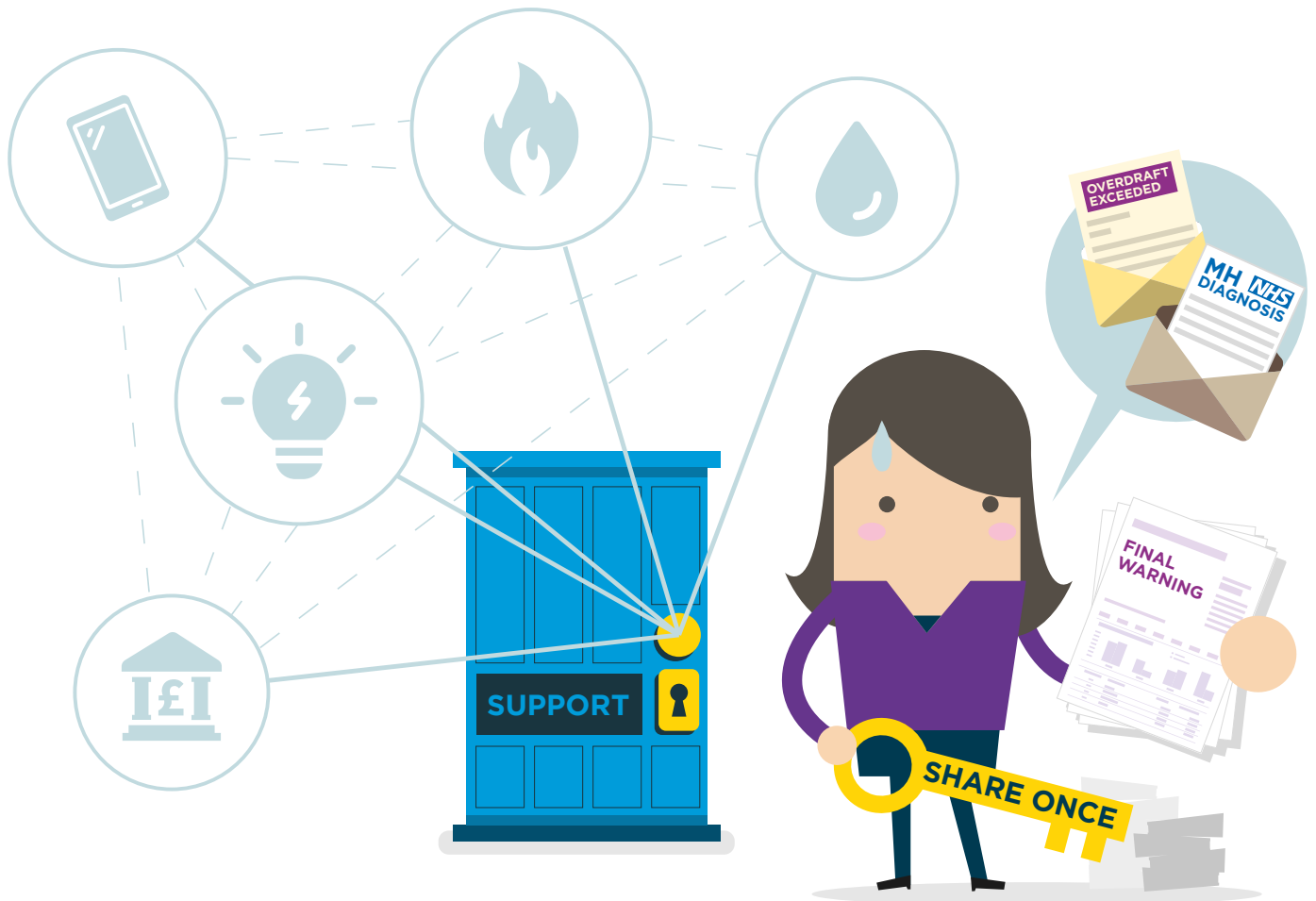


MONEY AND  
MENTAL HEALTH  
POLICY INSTITUTE



# STUCK ON REPEAT

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Making it easier for people with mental health problems to share support needs across essential services providers

Chris Lees and Kate Wells

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# Executive summary

## **How data sharing relates to money and mental health**

- While there is support available for people's money and mental health, actually accessing that help consistently can be challenging. This means people are missing out on potentially life-changing assistance.
- Data sharing has been put forward as one means through which takeup of that support could be increased, but comes with important questions including on privacy and control.
- This report is the first in a series that explores the potential benefits, and risks, that sharing key pieces of data can have for people with mental health problems.
- The series will consider what people with mental health problems think about data sharing and how to make sure that it actually works for people who want to share without putting those who choose not at a disadvantage.
- This first report focuses on the sharing of support needs – adjustments providers can make, as well as information related to mental health problems – across essential services. This information could be shared by a provider with other providers following a disclosure by someone or by someone through a single platform.

## **The potential need for the sharing of support needs across essential services**

- Services like water, energy, telecoms and financial services are essential. But common symptoms, like difficulty processing information or shortened attention spans, can combine with poor service design to make it challenging for people with mental health problems to access these services and interact with their providers.
- This can contribute to worse financial outcomes – people with mental health problems typically pay more for these services than other consumers – and lead to avoidable psychological harm.
- While there is help available to support people to better access essential services, like sending key information to a trusted person, takeup is low.
- There can be both practical and emotional barriers – such as limited communication channels or mental health stigma – to overcome in order to share your support needs and access support with one provider, let alone each provider you are a customer of.
- The sharing of support needs people have between different essential service providers could be a potential solution to this problem, but comes with crucial considerations.

## **There is support for the sharing of support needs across essential services but also concern**

- Nationally, 46% of UK adults said they would be likely to use a service to share their needs once across essential service providers if they were in a situation where they needed extra support. Around a third (34%) of respondents said they would be not likely to use such a service.
- Favourability towards such a service seems to increase as the need to use it also increases:
  - » Over half (53%) of people with recent experience (within the last two years) of mental health problems said they would be likely to use such a service, while nearly three in ten (29%) said it was unlikely.
  - » Nearly two thirds (64%) of those who have currently or have previously needed extra support to access essential services or interact with providers answered “likely”.
- Many members of our Research Community – a group of 5,000 people with lived experience of mental health problems – felt there could be some key benefits to a system that shared their support needs across essential services. Crucially, they believed it would allow them to share their needs once rather than having to go through the difficult and emotionally draining experience of telling each provider individually – what is referred to as ‘tell us once’.

“It would make it much easier not having to explain yourself over and over again. Especially when you're not always feeling well enough to deal with things, knowing you only had to do it once would be a very big bonus.”

– *Expert by experience*

- There are also some key concerns that many people with mental health problems have around this type of data sharing:
  - » For example, just over eight in ten (81%) people with recent experience of mental health problems are concerned about not having control over what information is shared and with who.
  - » There are also worries about how the data will be used, for example whether it would be used to restrict access to a product or service, and whether it will be stored securely or be vulnerable to hacking.

“The sharing of my medical information and associated support needs is down to me to decide and not something I would like these companies sharing without my consent. In my experience these types of companies cannot be trusted not to take advantage of their customers’ vulnerabilities.”

– *Expert by experience*

- The range of nuanced and complicated views on this topic need to be taken into account and meaningful action taken in order for people to feel that the benefits of sharing their support needs outweigh the risks.

## **There have been developments in this type of data sharing**

- In the water and energy sectors, information recorded on Priority Service Registers – the mechanism for providing extra support in these sectors – can be shared between suppliers and distributors. Additionally there are several independent systems that allow individuals themselves to share their information with different providers.
- Each of these systems has taken different approaches when it comes to how the data is shared, what is shared, who it is shared with and who runs the system. Some of these approaches more closely match what people with mental health problems generally told us they would prefer from a system that shares their data. This raises questions about how ‘in control’ of their data people feel, how securely the data is stored and how the data is actually being used.
- Before the 2024 general election, the Department for Business and Trade (DBT) set out plans for a ‘Share Once Support Register’ that would have expanded data sharing between water and energy providers to the telecoms sector. However, progress has stalled under the current government, leaving us at a pivotal fork in the road.
- The path we are currently on risks multiple ‘tell us once’ systems that lack a common framework of rules, standards and support needs. This disjointed landscape could cause confusion and expose people to harm:
  - » Someone may still have to repeat their story and ask for help multiple times, or inaccurately believe that their needs have been shared and leave them at risk of being unable to access essential services.
  - » Systems might not be designed to meet the needs of people with mental health problems or other circumstances, potentially meaning those who most need to share their information cannot do so.

## **A vision and guiding principles for the future of ‘tell us once’ in essential services**

- The government, regulators and others must ensure that we do not continue on our current path of multiple disparate systems and instead create a network of systems or a single system. This must allow people with mental health problems to easily share the information they want to share with the organisations they want to share it with.
- Our engagement with people with mental health problems has highlighted that it is essential for a system that shares support needs to have these principles at the heart of its design:
  - » Informed and dynamic consent – People should be able to give, revisit, and withdraw consent with confidence.
  - » Control and choice – Individuals should control and have choice over what data is shared, with whom, and when.
  - » Transparency at every step – Clear information on what data is shared, why, and with which organisations.
  - » Ethical and proportionate use – Only the necessary data being shared accurately and only used for agreed purposes, with clear benefits.

- » Strong safeguards and accountability – Robust security, clear rules, and real consequences for misuse.
- » Inclusive design to be accessible for all – Should be designed with those with lived experience to ensure it works for everyone.

We have created a practical guide for how these principles could be applied to any system that shares support needs across essential services.

## Recommendations for change

### Setting up a future system that shares support needs across essential service sectors

- DBT should restart plans for a 'Share Once Support Register' to bring the telecoms sector into the existing data sharing system between water and energy. DBT should also consider how this could then be expanded into financial services.
- To build the foundation for a cross-sector 'support needs' sharing system, regulators of essential service providers – the Financial Conduct Authority (FCA), Ofgem, Ofwat and Ofcom – should come together with the UK Regulators Network, industry, consumer organisations and people with lived experience to align the taxonomy of support needs and terminology across their sectors.
- To ensure that there is trust in a cross-sector 'support needs' sharing system:
  - » Government departments and essential service regulators should work with the Information Commissioner's Office (ICO) to develop a framework of rules and standards, as well as guidance, for this type of data sharing in essential services.
  - » Essential service providers should be required to facilitate the sharing of support needs and extra detail should be added to existing regulation and guidance to ensure they are facilitating good outcomes and avoiding harm.
  - » A cross-government and regulator taskforce should be tasked with overseeing this type of data sharing to ensure that the framework is put in place.
  - » A redress mechanism, such as a data ombudsman, should be created to empower individuals if a company or data sharing system breaks the rules.
  - » Steps should also be taken to support those who do not want to share their information, such as setting out or reinforcing expectations for essential services firms to ensure that products and services are inclusively designed

## **Managing the existing systems**

- Utilities companies should be required to check-in periodically with those who have had their support needs shared through the existing PSR sharing system and ensure that the option to opt-out of sharing is prominent.
- To bring the existing systems into the new framework for the sharing of support needs across essential services:
  - » An independent audit of the existing data sharing systems should be undertaken.
  - » A kitemark accreditation scheme should be created, which any system wanting to share data in essential services would need to be part of.
  - » Steps should then be taken to move from a set of systems under a shared framework to a network of systems or a single system with the ability for someone to control and manage their data centrally.



# Introduction

## Our work on data sharing

This year, Money and Mental Health celebrates our tenth anniversary. Throughout those ten years we have highlighted the challenges that people with mental health problems face across essential services, support services and in the economy. There is now a lot of support available for people facing the cycle of mental health problems and financial difficulty – from mental health crisis breathing space,<sup>1</sup> to integrated money and mental health support,<sup>2</sup> to innovative tools like gambling blocks.<sup>3</sup> However, often people are unaware of this support or come across challenges trying to access it. During the period we've existed, the amount of information organisations, such as essential service providers, know, or need to know, about us has dramatically increased. The question that must be asked though, is to what extent that data use is actually benefiting people with mental health problems. Instead of data being something we don't really have control of, could it be a solution to that challenge?

This report is the first in a series that explores data sharing and its potential benefits for people with mental health problems. This series looks at two case studies of data sharing, chosen because of the progress so far and the potential developments that could occur. The first is the sharing of support needs in essential services – energy, water, telecoms and financial services. The second is open banking and the future of open/smart data. In both, we aim to understand the potential benefits and risks of these types of data sharing, and crucially, what people with mental health problems think about them. The final report will apply what we have learnt so far to other existing and potential use cases for data sharing across the world of money and mental health.

## Focusing on essential services

We all need energy in our homes to stay warm and water in our pipes to keep clean. We all need access to money to pay for goods and services, and with so many services now provided online, we all need digital access. These are essential services. However, accessing those services isn't always as easy as it should be, especially if you have a mental health problem. Common symptoms of mental health problems can include low motivation, difficulty processing information and memory challenges. These symptoms can make it hard to engage with your essential service provider, especially when services aren't designed to meet people's needs. However, there are adjustments and support options that essential service providers can provide to customers.

Our research has consistently found that it can be really difficult to disclose that you have a mental health problem and associated support needs (such as a required communication channel) to one provider, let alone all the firms you are a customer of. In our ten years we have produced a range of reports and recommendations on how providers can make their services more accessible and make it easier for people to disclose their needs.<sup>4</sup> Instead, this report considers whether the sharing of support needs with and between essential service providers could help people access support more consistently across all their providers. A particular focus is whether data sharing would enable

1 Crine S. *Recovery Space – you did it!* Money and Mental Health Policy Institute. 2018.

2 Smith F. *Field trip! How Neighbourhood Mental Health Centres can help break the link between financial difficulty and mental health problems.* Money and Mental Health Policy Institute. 2025; UK Government and NHS. *Fit for the Future: The 10 Year Health Plan for England.* 2025.

3 Gaffney K. *Gambling blocks: the odds are that your bank now offers one.* Money and Mental Health Policy Institute. 2019.

4 <https://www.moneyandmentalhealth.org/publications/>

people to only have to tell their story and disclose their needs a single time – what is often referred to as ‘tell us once’.

## Why now?

At the end of 2023 we published a short policy note, *Too much information*, which examined people with mental health problems' views on data sharing in essential services.<sup>5</sup> It highlighted support for the concept but also concern. We produced that piece of research because there was momentum at the time behind the sharing of support needs across essential service providers becoming a reality. In April 2023, CEO of Ofgem, the energy regulator, spoke publicly about a data sharing system *“where families who have vulnerabilities tell one agency about this and, with their permission, this is shared across all others with a single, reliable source of data to anticipate, identify, and respond to the needs of those customers.”*<sup>6</sup>

Not long after our policy note, the then Conservative government published a consultation on strengthening the economic regulation of the energy, water and telecoms sector.<sup>7</sup> This consultation included a proposal for a single, multi-sector Priority Services Register – in effect, data sharing in essential services. The consultation resulted in the government publishing a White Paper which set out steps to create a ‘Share Once Support Register’.<sup>8</sup> This would bring together information held by energy and water companies with those held by telecoms companies. More recently, the Department for Science, Innovation and Technology included the sharing of vulnerability data and the cross-sector identification of vulnerability within its Statement of Strategic Priorities for telecommunications.<sup>9</sup> Given these developments, we felt it was essential to explore in more detail what the potential of this type of data sharing would be, what the risks might be and most importantly what the views of people with mental health problems were. Although the ‘Share Once’ plans have not progressed since the change of government in 2024, the problem it sought to solve remains as important.

## This report

The type of data sharing that this report focuses on is the sharing of information about customers' extra support needs between their essential service providers. This can also include information related to a mental health problem or other circumstances. Extra support needs are adjustments providers can make, from communication adaptations to support during service disruption. By essential services we mean: financial services; energy, both the supply and distribution; water; and telecoms, mainly broadband and mobile. We focus on systems that share information that has been disclosed by someone to one of their providers with their other providers, or allow someone to share information with different providers through one platform. There are other ways that data can be shared in essential services, such as data pooling or Open Banking, but these are not the focus of this report.<sup>10</sup>

5 Bond N, D'Arcy C and Lees C. *Too much information? Key considerations for vulnerability data-sharing*. Money and Mental Health Policy Institute. 2025.

6 *Jonathan Brearley's speech to Ofgem's Vulnerability Summit*. Ofgem. 2023.

7 Department for Business and Trade. *Smarter Regulation: Strengthening the economic regulation of the energy, water and telecoms sectors*. 2023.

8 Department for Business and Trade. *Smarter Regulation: Delivering a regulatory environment for innovation, investment and growth*. 2024.

9 Department for Science, Innovation and Technology. *Draft Statement of Strategic Priorities for telecommunications, the management of radio spectrum, and postal services*. 2026

10 The second report in this series will explore Open Banking and the final report will look more broadly at data sharing.

We examine what sharing related to support needs is currently happening in essential services and what future plans exist. We explore what people with mental health problems think about this type of data sharing, including their hopes, concerns and what they would like to see in place.

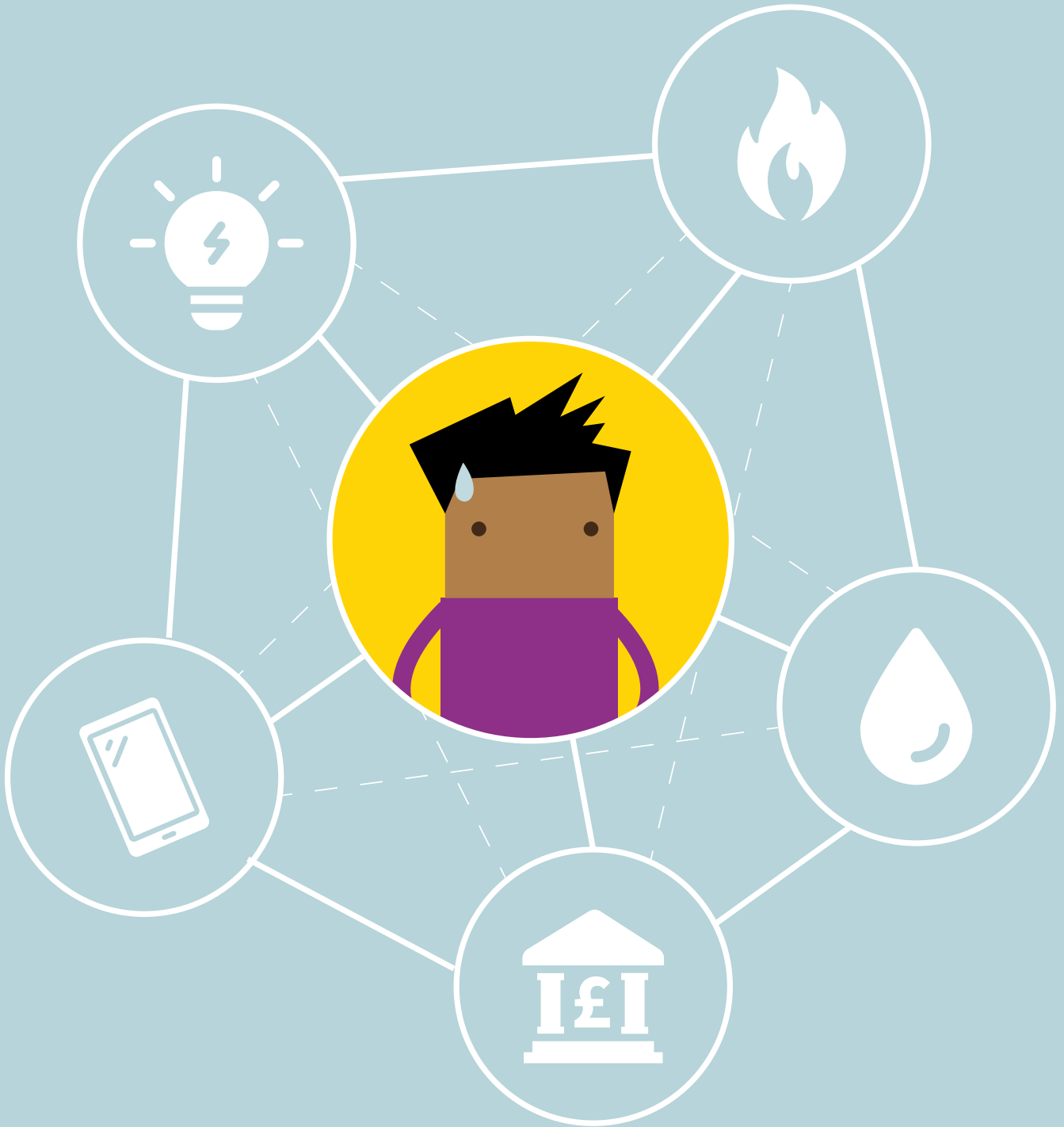
When it comes to these views, we draw on our Research Community, a group of over 5,000 people with personal experience of having a mental health problem or of caring for someone who does.

**This report is set out as follows:**

- Section One outlines the case for why data sharing could be a solution to the challenges people with mental health problems face in essential services.
- Section Two highlights the views of people with mental health problems on the idea of the sharing of support needs across essential services, including what principles they'd like to have in place to guide this type of data sharing.
- Section Three examines what sharing currently exists, how these systems work and what people with mental health problems think about them.
- Section Four sets out what a blueprint for the cross-sector sharing of support needs could look like and what changes are needed in order to put the key principles into practice and ensure this data sharing works for people with mental health problems.

We draw on and have analysed a number of different data sources, with more information available in our methodological annex:

- Two surveys with Money and Mental Health's Research Community. A survey of 214 people with lived experience of mental health problems and a survey of 29 people who have supported someone with mental health problems, both between 15 November and 25 November 2024.
- An online focus group with six of those respondents with lived experience of mental health problems, which took place in February 2025.
- A People's Panel of twelve members of the Research Community with lived experience of mental health problems. Members met online over April and May 2025 to discuss the key issues identified in the research and to develop principles for this type of data sharing.
- Analysis of a nationally representative online poll of 2,054 UK adults, conducted between 11 December and 12 December 2025 and carried out by YouGov. The figures have been weighted to be nationally representative of all UK adults (aged 18+).
- Conversations with experts in data sharing and essential services.
- A roundtable attended by representatives from charities and consumer organisations.
- An 'ideas sprint' which took place on 6 November 2025 and was attended by experts in data sharing, vulnerability and experts by experience to develop solutions to the challenges our research had identified.



## Section One: The need for the sharing of support needs across essential services

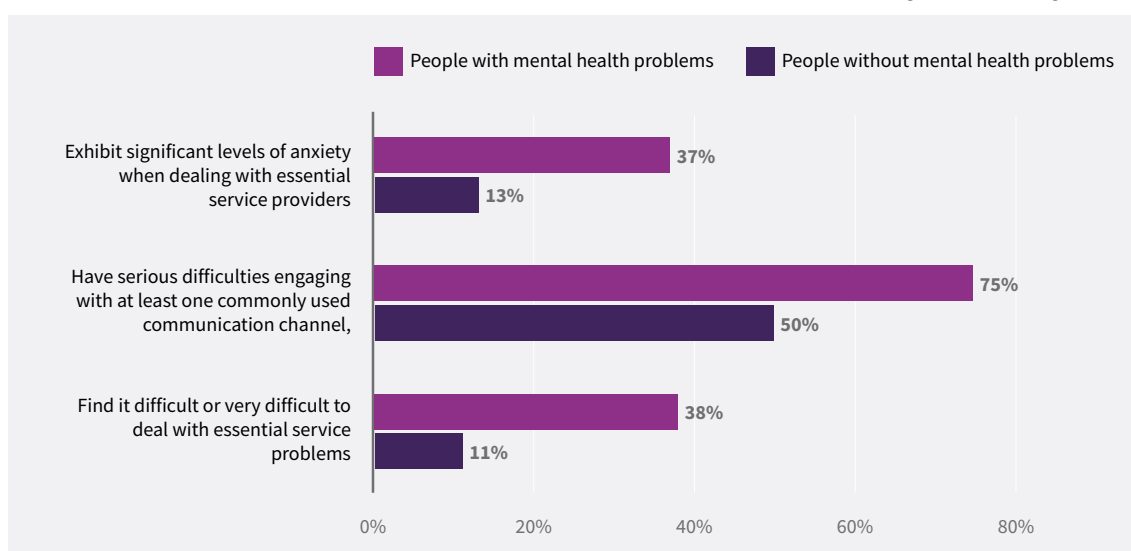
Energy, water, the internet, mobile phones and banking – these are all services that are essential in our modern society. However, our past research has highlighted that people with mental health problems are more likely to experience challenges using these services than other groups.<sup>11</sup> For example, as Figure 1 shows, in national polling, compared to people without mental health problems, people with mental health problems are:

- Almost three times more likely to exhibit significant levels of anxiety when dealing with essential service providers.
- 50% more likely to have serious difficulties engaging with at least one commonly used communication channel, like the telephone or letters.
- Nearly four times more likely to find it difficult or very difficult to deal with essential service problems.

This difference can often be due to common symptoms of mental health problems, like difficulty processing information or shortened attention spans, combining with poor service design that doesn't take the needs of people with mental health problems into account.<sup>12</sup> This can contribute to not just a psychological impact but worse financial outcomes – people with mental health problems typically pay more for essential services than other consumers.<sup>13</sup>

**Figure 1: People with mental health problems are more likely to experience poor outcomes in essential services**

*The differences in people with and without mental health problems for experiencing the following:*



Source: Holkar M, Evans K and Langston K. *Access essentials*. Money and Mental Health Policy Institute. 2018.

<sup>11</sup> Holkar M, Evans K and Langston K. *Access essentials*. Money and Mental Health Policy Institute. 2018.

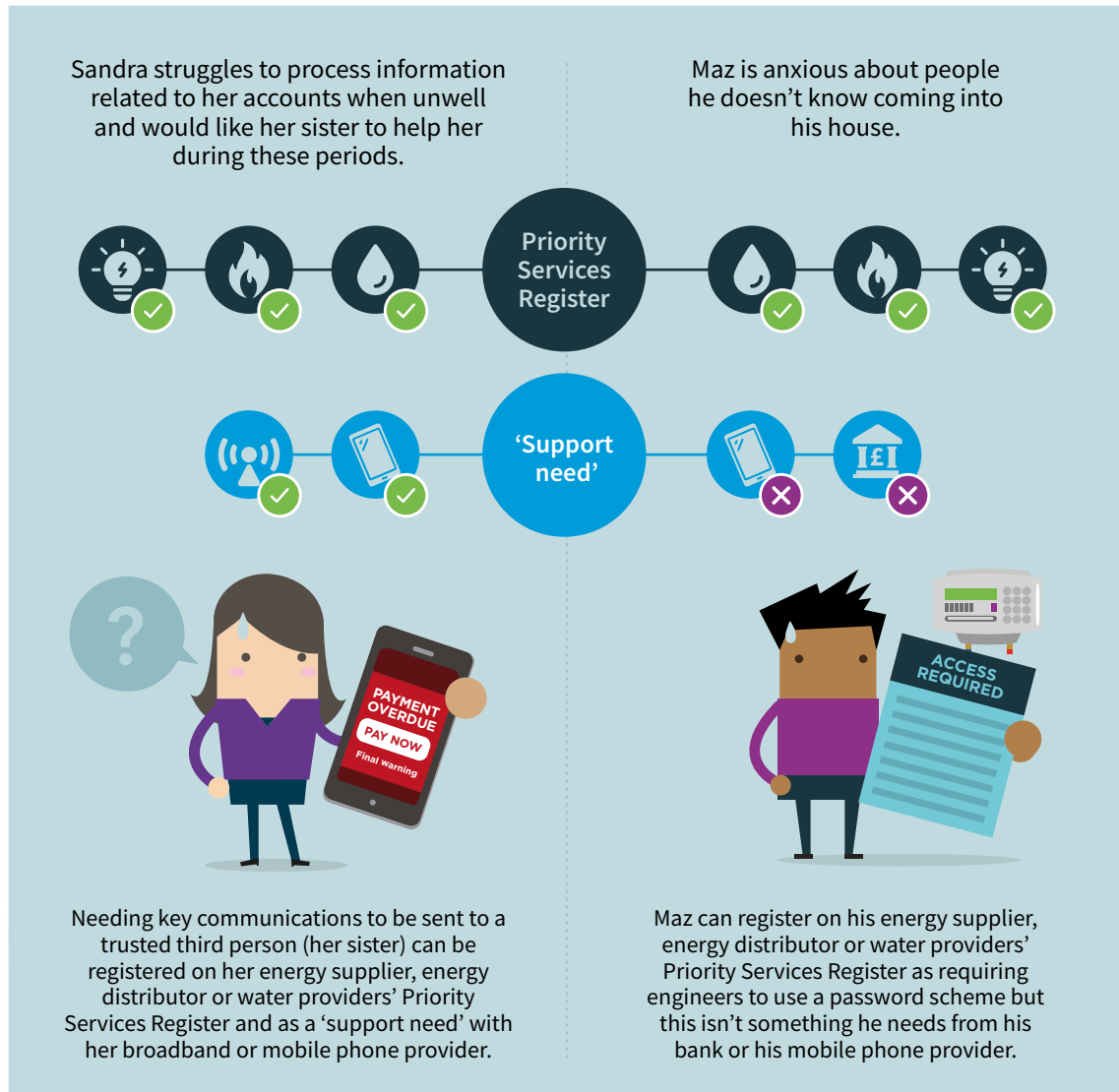
<sup>12</sup> Ibid.

<sup>13</sup> Rogers C, Poll H and Isaksen M. *The mental health premium*. Citizens Advice. 2019.

**There is support available to make it easier to access essential services**

Essential service providers do have ways to make their services more accessible for people in a range of different circumstances, including experiencing mental health problems. The specific support on offer, and what it is called, varies between services; however, there can be some common adjustments that work well for people with mental health problems. Diagram 1 gives examples of where there is overlapping, as well as differing support.

**Diagram 1: examples of support that is consistent and different across essential services**



Different sectors are subject to different regulatory requirements as to what support **must** be provided versus what **could** be provided. Across all sectors, however, there is a requirement to follow the Equality Act which sets out that providers should anticipate the needs of disabled people and make reasonable adjustments.<sup>14</sup> Table 1 sets out the different requirements placed on firms in different sectors and the type of support available to people with mental health problems.

14 This includes mental health problems if they meet the definition of disability – Gov.uk. [Definition of disability under the Equality Act 2010.](#)

**Table 1: There is a range of support available across essential services**

Sector	Name of support	What support does it provide	Examples of support needs that are relevant to people with mental health problems	Regulatory requirements
<b>Water</b>	<b>Priority Services Register</b>	<p>This includes support in an emergency, such as additional communications, contact, or support around outages or incidents.</p> <p>It also includes support with accessing the service or interacting with the provider.</p> <p>People's circumstances can also be recorded.</p>	<p>Additional communication during incidents can be beneficial to people with mental health problems who might be anxious about the issue.</p> <p>Allowing a trusted person to receive communications and requiring staff visiting to use a password can be beneficial for people with mental health problems.</p> <p>Having a mental health problem can be recorded.</p>	<p>The regulator, Ofwat, requires all companies with household customers to have a PSR and provides guidance on what this could include.<sup>15</sup></p>
<b>Energy supply</b>	<b>Priority Services Register</b>	<p>This includes support with accessing the service or interacting with the provider.</p> <p>People's circumstances can also be recorded.</p>	<p>Allowing a trusted person to receive communications and requiring staff visiting to use a password can be beneficial for people with mental health problems.</p> <p>Having a mental health problem can be recorded.</p>	<p>The regulator, Ofgem, requires companies with an electricity or gas supply licence to provide a PSR with a list of services this should enable.<sup>16</sup></p>

<sup>15</sup> Ofwat. Priority Services Register standards. 2025.

<sup>16</sup> Condition 26 of the Standard conditions of electricity supply licence and the Standard conditions of gas supply licence. Ofgem

Sector	Name of support	What support does it provide	Examples of support needs that are relevant to people with mental health problems	Regulatory requirements
<b>Electricity distribution network</b>	Priority Services Register	<p>This includes support in an emergency, such as advance notice of planned power cuts or priority updates during unplanned power cuts.</p> <p>It also includes support with accessing the service or interacting with the provider.</p> <p>People's circumstances can also be recorded.</p>	<p>Advanced notice of incidents can be beneficial to people with mental health problems who might be anxious about the issue.</p> <p>Allowing a trusted person to receive communications and requiring staff visiting to use a password can be beneficial for people with mental health problems.</p> <p>Having a mental health problem can be recorded.</p>	The regulator, Ofgem, requires companies with an electricity distribution licence to "establish and maintain" a PSR. <sup>17</sup>
<b>Gas distribution network</b>	Priority Services Register	<p>This includes support in an emergency, such as being provided with alternative heating and cooking facilities if the gas supply is interrupted.</p> <p>It also includes support with accessing the service or interacting with the provider.</p> <p>People's circumstances can also be recorded.</p>	<p>Priority support during incidents can be beneficial to people with mental health problems who might be anxious about the issue or can't leave the house, due to their condition, in order to find alternative places to stay or cook.</p> <p>For example, allowing a trusted person to receive communications and requiring staff visiting to use a password can be beneficial for people with mental health problems.</p> <p>Having a mental health problem can be recorded.</p>	The regulator, Ofgem, has a special condition for gas transporter companies to offer eligible customers "specific priority services." <sup>18</sup>

17 [Condition 10 of the Standard conditions of the Electricity Distribution Licence](#). Ofgem.

18 [Standard Special Condition D13](#). Ofgem.

Sector	Name of support	What support does it provide	Examples of support needs that are relevant to people with mental health problems	Regulatory requirements
<b>Broadband</b>	<b>Priority Fault Repair</b>	Customers with a proven need, such as a disability covered under the Equality Act, will receive priority when experiencing a fault with their landline or broadband service.	Priority support with faults can be beneficial to people with mental health problems who can be covered under the Equality Act and can rely on access to the internet when unwell, for example needing to access emergency mental health support.	The regulator, Ofcom, has a requirement for firms to provide a priority fault rapid service to relevant customers. <sup>19</sup> Firms are also required to allow customers to nominate a trusted person to act on their behalf in some way and receive bills. <sup>20</sup> Ofcom also has a broader requirement to treat customers in vulnerable circumstances fairly and guidance which firms can follow. <sup>21</sup> But there is no regulatory requirement on what support should be provided or what it should be called.
	<b>Various names like 'support needs'</b>	More widely providers can offer adjustments to support customers to access the service or interact with the provider.	Allowing a trusted person to speak to a customer's provider or receive bills on their behalf can be beneficial for people with mental health problems.	

19 C5.13 of the General Conditions of Entitlement, Ofcom.

20 C5.14 of the General Conditions of Entitlement, Ofcom.

21 Ofcom. Treating vulnerable customers fairly: A guide for phone, broadband and pay-TV providers. 2020.

Sector	Name of support	What support does it provide	Examples of support needs that are relevant to people with mental health problems	Regulatory requirements
<b>Mobile</b>	Various names like 'support needs'	Providers can offer adjustments to support customers to access the service or interact with the provider.	Allowing a trusted person to speak to a customer's provider or receive bills on their behalf can be beneficial for people with mental health problems.	The regulator, Ofcom, has a requirement for firms to allow customers to nominate a trusted person to act on their behalf in some way and receive bills. <sup>22</sup> Ofcom also has a broader requirement to treat customers in vulnerable circumstances fairly and guidance which firms can follow. <sup>23</sup> But there is no regulatory requirement on what support should be provided or what it should be called.
<b>Financial services</b>	Various names like 'support needs'	Providers can offer adjustments to support customers to access the service or interact with the provider.	Providing private spaces in branches, staff speaking slowly and clearly or registering a trusted person on an account can be beneficial for people with mental health problems.	The regulator, the Financial Conduct Authority, has guidance on the fair treatment of vulnerable customers which firms must follow. <sup>24</sup> But there is no regulatory requirement on what support should be provided or what it should be called.
		Additionally, providers can offer customers tools that allow them to manage their money more effectively.	Spending blocks and limits, as well as saving pots can be beneficial for people with mental health problems.	

22 C5.14 of the General Conditions of Entitlement. Ofcom.

23 Ofcom. *Treating vulnerable customers fairly: A guide for phone, broadband and pay-TV providers*. 2020.

24 Financial Conduct Authority. *FG21/1 Guidance for firms on the fair treatment of vulnerable customers*. 2021.

This support is not something that is just for a small group of customers. In our polling, 14% of people with recent experience of mental health problems<sup>25</sup> said they currently need extra support to access essential services or interact with an essential service provider, with an additional 22% saying they have needed this in the past.<sup>26</sup>

People with recent experience of mental health problems are also overrepresented in the group of people with a support need.<sup>27</sup> While in the polling, people with recent experience of a mental health problem make up 26% of the total population, they comprised 60% of those who currently have a support need.<sup>28</sup>

Our past research, such as Access Essentials, suggests that there is a larger group of people with mental health problems who would benefit from support but, unlike those discussed in the paragraphs above, might not consider that they have an immediate 'need'. Beyond this, the regulators for financial services, the Financial Conduct Authority, and water, Ofwat, estimate that around half of adults/households could be given this type of support.<sup>29</sup> However, there are several challenges that currently exist that data sharing could help tackle.

### There is low takeup of the available support

While this support is available and there is a clear need for it, takeup across the different sectors is low. Specifically among people with mental health problems, our past research has found that only a small minority have disclosed their mental health problem to a provider:

- Just 11% of customers with mental health problems have disclosed to their water company;
- 12% have disclosed to their energy company;
- 13% have disclosed to a telecoms firm; and
- 14% have disclosed to their financial service provider.<sup>30</sup>

Looking more widely at the national population, the picture is not brighter. In the water sector in England and Wales, just 10% of customers had registered on their company's PSR in 2023-24, significantly lower than the 50% that Ofwat estimates would need support.<sup>31</sup> In energy, an Ofgem survey found that just 16% of respondents in Great Britain were on their company's PSR. The survey also highlighted the gap between eligibility and takeup with four in ten (39%) saying they were likely to be eligible but weren't signed up.<sup>32</sup> In Northern Ireland there are different utilities

25 We define recent as within the last two years.

26 Money and Mental Health analysis of YouGov online polling of 2,054 UK adults, carried out 11-12 December 2025. Data is weighted to be nationally representative of all UK adults (aged 18+).

27 When referring to polling data, we define support need as needing extra support to access essential services or interact with an essential service provider – this could be currently or in the past

28 Money and Mental Health analysis of YouGov online polling of 2,054 UK adults, carried out 11-12 December 2025. Data is weighted to be nationally representative of all UK adults (aged 18+).

29 FCA estimates that 49% of UK adults have one or more characteristics of vulnerability – FCA. Financial Lives 2024 survey: Vulnerability & financial resilience Selected findings. 2025; and Ofwat estimates that up to 50% of households in England and Wales are eligible for PSR services – Ofwat. Priority Services Register standards. 2025.

30 Bond N and D'Arcy C. The state we're in. Money and Mental Health Policy Institute. 2021.

31 Ofwat. Water company performance report 2023-24. 2024.

32 BMG and Ofgem. Consumer Impacts of Market Conditions Survey Wave 5. 2024.

providers compared to Great Britain. The figures are even lower, with just 2% signed up to their energy company's PSR and 1% signed up to a critical care register.<sup>33</sup> There is one bright spot, the energy network sector – that provides the infrastructure – has managed to add 62% of customers onto relevant PSRs.<sup>34</sup>

Essential service providers not having a full picture of who in their customer base needs support can lead to harm when things go wrong. In energy and water, this can be during incidents or loss of supply when it is vital that providers support those at most risk of harm. The recent changes in telecoms infrastructure from analogue to digital highlighted the harm that can occur when companies don't have enough information recorded about their customers.<sup>35</sup> At the moment, some providers will have information on their customers that would be relevant for other providers, particularly during incidents. The sharing of support needs across essential services could potentially help boost takeup of support as it would mean someone would only need to disclose their needs once and they would then be able to access the relevant support across sectors. Additionally, it would help reduce the risk of harm during incidents.

### There are a range of factors driving this low takeup

Our research<sup>36</sup> and that of other organisations has highlighted several drivers of this low takeup of support. This includes low awareness, not thinking the support is for 'you' and not knowing what will happen next. One key barrier that could be best addressed by the sharing of support needs is that there are significant challenges to actually disclosing and asking for support.

#### Low awareness, not thinking the support is for 'you' and the question of 'what will happen next'

A key factor for why takeup of support is low is that people can be unaware of it. Surveys testing awareness of PSRs have found a range for the percentage of the population who are aware,<sup>37</sup> for example, less than 20% being aware of PSRs generally to 50% being aware of water PSRs.<sup>38</sup>

Additionally, people don't sign up for support because they don't think the support is for them. Half (50%) of people who had not told an essential services provider about their mental health problems said they didn't think their condition was relevant.<sup>39</sup>

Concerns over how the information that is disclosed will be used and received can also be a barrier to disclosure. This can include concern around how staff might react as well as fears that they will be discriminated against by a provider, for example being denied access to a product.<sup>40</sup>

33 Perceptive Insight and the Utility Regulator. [Domestic Consumer Insight Tracker Survey](#). 2023.

34 Energy Networks Association. [EIP031: How can we increase uptake of the PSR?](#). However, there are clear targets for PSR registration for DNOs as part of RII0-ED2 price controls and financial penalties for missing these – Ofgem. [RII0-ED2 Final Determinations Core Methodology Document](#). 2022.

35 Mitchell A. [Virgin Media fined £24m for leaving vulnerable customers 'at risk of harm'](#). BBC. 2025.

36 See our [disclosure guides](#).

37 For example, BMG and Ofgem. [Consumer Impacts of Market Conditions Survey Wave 5](#). 2024; Perceptive Insight and the Utility Regulator. [Domestic Consumer Insight Tracker Survey](#). 2023; Ofwat. [Regulators and industry drive plans to step up support for vulnerable consumers](#). 2024.

38 Towers S. [80% of UK adults have never heard of the Priority Services Register, new research reveals](#). Vulnerability Registration Service. 2023; and CCW. [Water Matters May 2024](#). 2024.

39 Bond N and D'Arcy C. [The state we're in](#). Money and Mental Health Policy Institute. 2021.

40 Ibid.

## The challenges of disclosing

One of the biggest challenges for people to get support is that it can be very difficult to disclose a need and ask for help, both emotionally and practically. While there has been progress on reducing the stigma around mental health problems, it is still a very sensitive issue to discuss, especially with an essential service provider. Research Community members have told us about how they have built up to disclosing and then have felt emotionally drained afterwards.

Beyond this emotional barrier, the process isn't always the simplest. The channels to disclose can vary across sectors, which might not always meet the needs of people with mental health problems, and getting through to the right person or form can be difficult.<sup>41</sup>

These factors mean that two thirds (63%) of people with mental health problems who are protected under the Equality Act struggle to ask providers for help when they are unwell.<sup>42</sup>

Without data sharing, someone has to disclose their needs to each of their individual providers. Given the challenges of disclosing to one provider, let alone all providers, this can be a mountain too high for many people with mental health problems to climb. Taking the initial step of talking to one provider, only to be met with unsympathetic staff or inflexible systems, could put off someone from repeating the process with their other providers.

## The crucial element to ensure data sharing offers a solution to these challenges

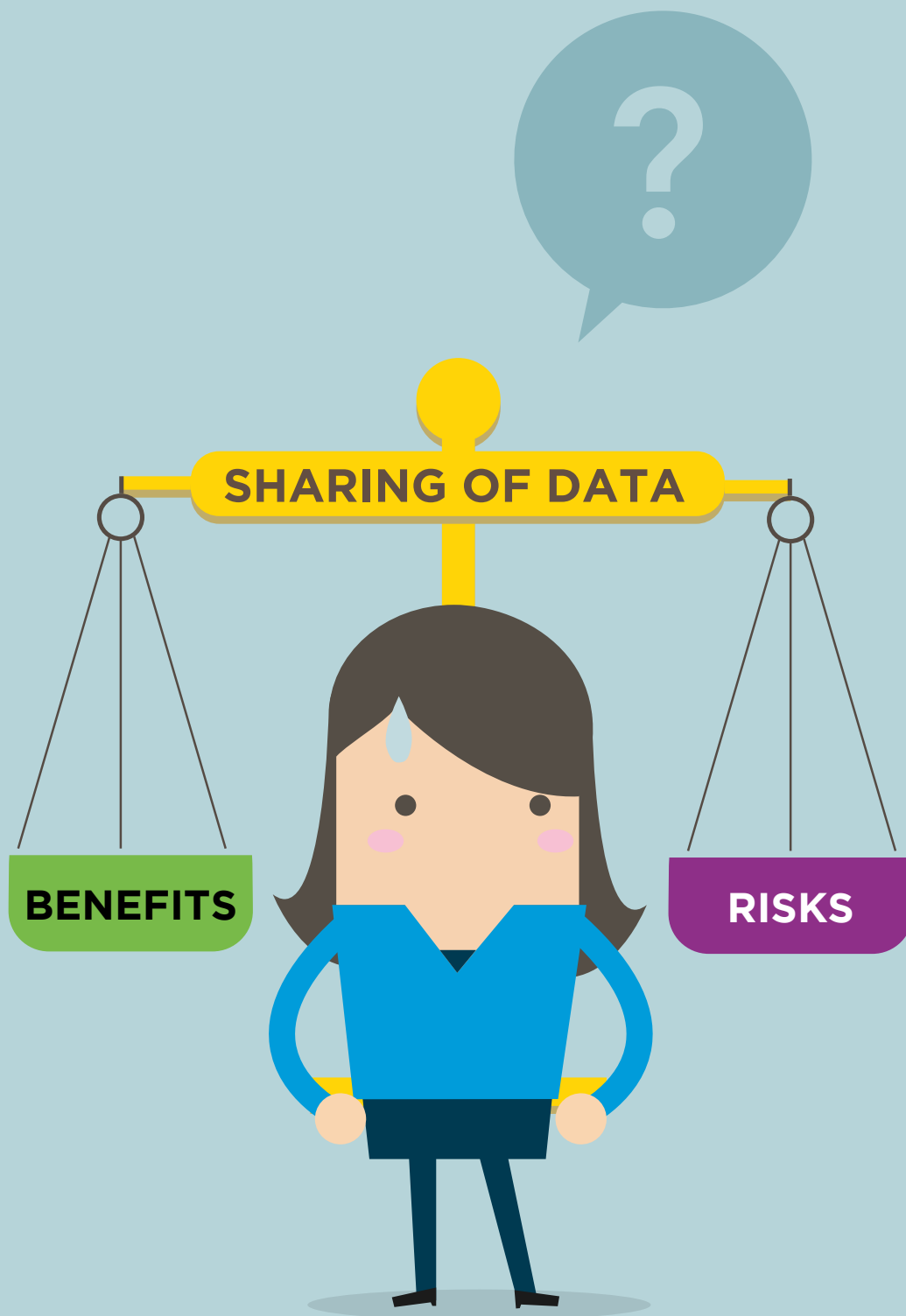
Creating a way for someone to disclose their needs once and that to then be shared between their providers so that they can get the support they need, could be a solution to the challenges that currently exist in essential services. However, the views of people with mental health problems must be considered if this solution is to work.

### Summary

- People with mental health problems can face challenges accessing essential services and interacting with their providers, particularly when common symptoms interact with poor service design.
- There is help available to support people to access essential services, such as the Priority Services Register in energy and water. However, takeup of this support is low. For example, between 11% and 14% of people with mental health problems had disclosed to one of their essential service providers.
- This low takeup can be driven by a combination of factors, such as not being aware of the support, thinking it isn't for you, and fears about how the information will be used. One crucial barrier is that it can be very difficult to disclose mental health problems and extra support needs to one provider, let alone each provider you are a customer of.
- Data sharing could be a potential solution to this problem.

41 Towers S. 80% of UK adults have never heard of the Priority Services Register, new research reveals. Vulnerability Registration Service. 2023; and Savanta and O'wat. [Priority Services Customer Journey Pilot](#). 2024.

42 Holkar M. [Time to act](#). Money and Mental Health Policy Institute. 2022.



## Section Two – What people with mental health problems think about the sharing of support needs across essential services

In our nationally representative polling, 46% of all respondents said they would be likely to use a service to share their needs once across essential service providers (via one of their providers or a third party portal) if they were in a situation where they needed extra support.<sup>43</sup> Around a third (34%) of respondents said they would not be likely to use such a service.<sup>44</sup>

Support for data sharing was higher among people with recent experience of mental health problems – with over half (53%) saying “likely” compared to three in ten (29%) saying “not likely.” This level of support further increased among those with a current or past support need in essential services – with nearly two thirds (64%) of this group saying “likely” compared to a quarter (24%) saying “not likely.”<sup>45</sup> This suggests that support for data sharing is connected to the level of need for such a service, with those currently or previously requiring support in essential services being particularly supportive.

Our survey of Research Community members similarly found a majority (64%) would be likely to want their information to be shared between different essential service providers, while a, still significant, minority (26%) said they would either be not that likely or not at all likely.<sup>46</sup> However, our survey also revealed that the above statistics do not tell the full story. Just because someone said they were likely to share doesn't mean they didn't have concerns. While someone saying they wouldn't be likely to share, doesn't mean that they would never share, instead they might have some key things they would need to see in place first.

The complicated nature of people's views on this type of data sharing was further reinforced by the polling. Nationally, just over a third (34%) of people agreed that the benefits of having their information about their support needs shared outweighed the risks, with a quarter (24%) disagreeing with the statement.<sup>47</sup> As Figure 2 shows, while the views of people with recent experience of mental health problems were not dissimilar to the wider population, there was a bigger gap between those with a support need and those without, and between those who said they were likely to share and those who were not. This adds to the argument that those who would most need to use such a service would feel that they would be willing to accept risks in order to get the benefits they require. Sharing your data can be seen as a transaction, with the costs – such as the risks of sharing or how difficult it is to share – set against the benefits of sharing. How much weight an individual places on either side of that transaction depends on what situation they are in. There is the potential risk that those designing data sharing systems take advantage, intentionally or unintentionally, of those most willing to share as this group are more likely to accept risks.

43 Combined 'very' and 'fairly'. Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

44 Combined 'not very' and 'not at all'. Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

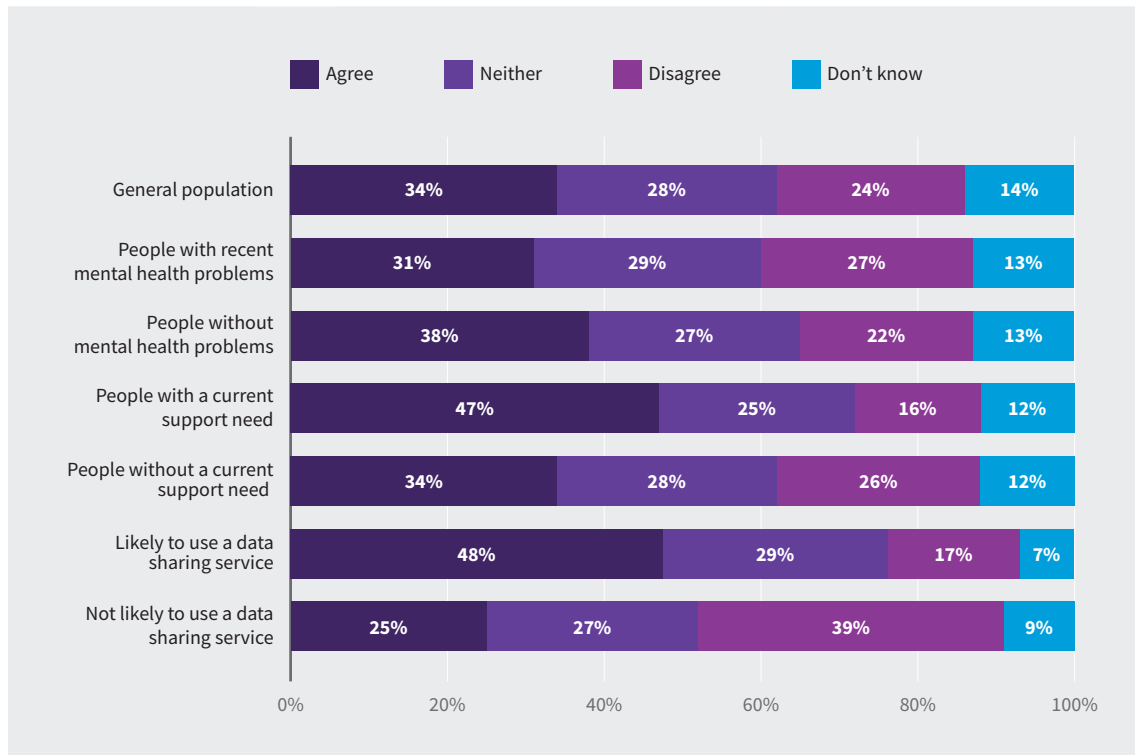
45 Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

46 Likely is by combining 'very' and 'quite'. Money and Mental Health survey of 214 people with lived experience of mental health problems. Base for this question: 179 people with mental health problems.

47 Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

## Figure 2: The feeling that a system that shares support needs is worth using even with risks is highest among those who could benefit the most

The percentage of different groups of polling respondents who agreed or disagreed that the benefits of data sharing outweighed the risks



Source: Money and Mental Health analysis of YouGov online polling of 2,054 UK adults, carried out 11-12 December 2025. Data is weighted to be nationally representative of all UK adults (aged 18+).

It's clear that information related to someone's mental health problem or the extra support they need can be very sensitive and the sharing of it is not a trivial issue.

### There were several benefits that Research Community members saw in this type of data sharing

Research Community members raised the following benefits:

- Being able to share once
- Making it easier to get support
- Ensuring providers better support people with mental health problems.

## Being able to share once

One of the key benefits that Research Community members felt could be achieved through having information about their support needs shared between providers was that it would help make the process of disclosing these needs easier. Rather than having to repeat the same information with each provider, people with mental health problems would just have to 'tell them once'. Respondents believed that this would take a lot of stress and mental burden out of the process. This isn't an isolated experience, nationally, three in ten people with recent experience of mental health problems who had needed support have had to repeat their story and ask for support from each of their essential service providers individually when they interacted with them.<sup>48</sup>

"It would make it much easier not having to explain yourself over and over again. Especially when you're not always feeling well enough to deal with things, knowing you only had to do it once would be a very big bonus."

*Expert by experience*

"Sharing once would make my life immensely better. It gets extremely stressful and negatively affects my mental and physical health having to tell a company all of this every time."

*Expert by experience*

## Making it easier to get support

Expanding beyond this many respondents would want to use a data sharing system in order to get the support that they needed in as simple a way as possible.

"Because it would enable me to get the support I need and I don't mind people or businesses knowing about my mental health."

*Expert by experience*

## Ensuring providers better support people with mental health problems

In turn, several respondents believed that by receiving this information, essential service providers would better understand the needs of people with mental health problems and thus reduce the stigma around mental health problems.

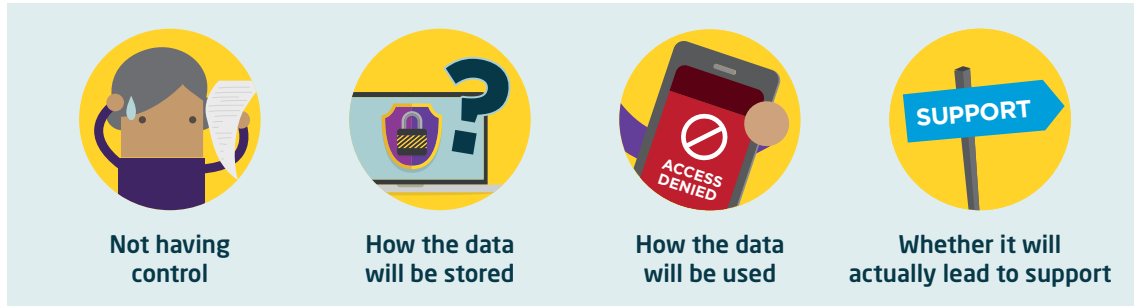
"Would hope that providers are non judgemental more and have better understandings of my needs and lessen my frustration when dealing with them."

*Expert by experience*

<sup>48</sup> Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

## There were several concerns Research Community members raised

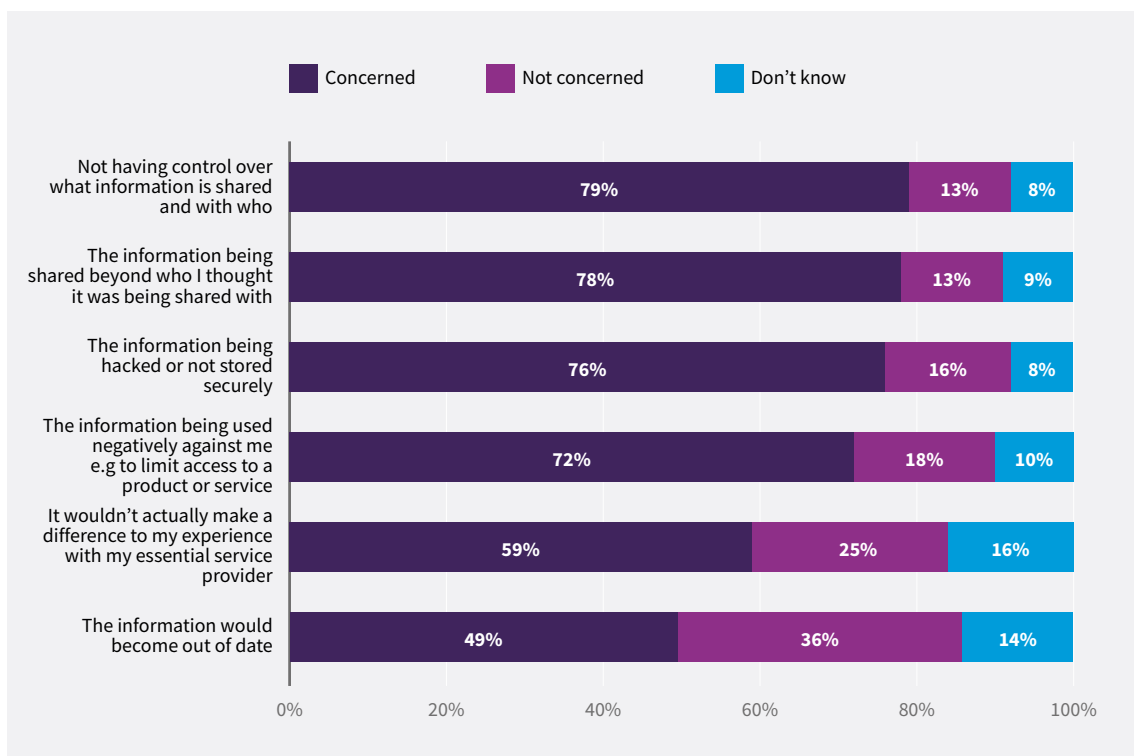
While Research Community respondents could see the benefits of a data sharing system in essential services, many had concerns that affected whether they would ever use it:



As shown in Figure 3, this order was reflected in the nationally representative polling. Not having control over what information is shared and with who, and the information being shared beyond who they thought it was being shared with were the two options that had the highest percentages of the general public saying they were concerned.<sup>49</sup>

**Figure 3: Majorities of the general public are concerned about control, security and usage of their data**

The percentage of the public who were concerned about the following areas:



Source: Money and Mental Health analysis of YouGov online polling of 2,054 UK adults, carried out 11-12 December 2025. Data is weighted to be nationally representative of all UK adults (aged 18+).

<sup>49</sup> Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

## Not having control

A key concern for Research Community respondents was that they wouldn't have control over who the data was shared with. In particular that the data would be shared without their knowledge or permission. Over eight in ten polling respondents with recent mental health problems were concerned about not having control or the information being shared beyond who they originally thought (81% and 80% respectively).<sup>50</sup>

"You do not have control of what is being shared and may not want things shared with a particular provider for your own reasons. You are in danger of removing people's control over their own lives."

*Expert by experience*

Members of the People's Panel were also concerned about what would happen to the data if the company they had shared the information with or who had received the data then went bust or transferred hands. The experience of the energy crisis,<sup>51</sup> as well as high profile takeovers and mergers in other sectors,<sup>52</sup> was at the front of members' minds. Other Research Community members were concerned about what would happen to the data if they switched companies from the company they had originally shared the information with.

"I also feel that if I were to tell my supplier and then change supplier I would not know if I needed to share the information again or what my previous supplier would do with that information."

*Expert by experience*

## How the data will be stored

One other area of concern was about how the data that was shared would then be stored. Respondents were fearful that the data would be vulnerable to hacking and given that the data might include information about their mental health problem, leave them at risk of being taken advantage of by scammers. Nationally, over three quarters (77%) of people with recent experience of mental health problems were concerned about their information being hacked or not stored correctly.<sup>53</sup>

For some respondents data that was seen as more 'medical' carried a greater level of concern around its safety. Across our engagement with Research Community members, it was clear that prominent news stories about hacking had made people particularly concerned about the safety of their data and less confident in organisations' ability to protect it.

"I would also be concerned that the more organisations who knew of my disability the greater the likelihood of that being discovered in a data breach and potentially used against me by scammers and others."

*Expert by experience*

50 Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

51 The Energy Shop. [Find out which energy suppliers have gone bust.](#) 2025.

52 For example, BBC. [Nationwide strikes deal to buy Virgin Money for £2.9bn.](#) 2024; and BBC. [BT takeover of EE gets final Competition and Markets Authority clearance.](#) 2016.

53 Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

These concerns aren't isolated to this type of data sharing. Research by the Department for Science, Innovation and Technology found that people's main concerns around data are the potential for insecure storage which could lead to hacking or theft, or it being sold to another organisation for profit.<sup>54</sup> However, it's clear from the Research Community that information related to someone's mental health problem is particularly sensitive.

## How the data will be used

Alongside how the data would be stored, respondents were also concerned about how the data would be used. Just as with disclosing to one provider, there was a real concern from Research Community members about the data then being used in a negative way against them. Nationally, over three quarters (76%) of people with recent experience of mental health problems shared this concern.<sup>55</sup>

"The sharing of my medical information and associated support needs is down to me to decide and not something I would like these companies sharing without my consent. In my experience these types of companies cannot be trusted not to take advantage of their customers' vulnerabilities."

*Expert by experience*

In particular, Research Community respondents were concerned that providers would use the data to limit access to a financial product, such as credit or insurance. In insurance, we have found that people with mental health problems can face higher premiums or are more likely to experience exclusions compared to people without mental health problems.<sup>56</sup> There was a concern from some people that a data sharing system would not just impact them in this way individually, but also affect people with mental health problems, or wider groups of people, as a whole.

"This is information that could easily be misused, if not very strictly controlled. It could be very valuable information to a life insurance company. They could store this information in their database and could increase premiums for anyone seen to be on the list, whether justified or not."

*Expert by experience*

"But if it was just to boil down to a tick box, they can say, okay, people tick this box, therefore we're not going to offer them these products Or we'll treat them differently in this way."

*Expert by experience*

54 Centre for Data Ethics and Innovation and Department for Science, Innovation and Technology. [Public attitudes to data and AI: Tracker survey \(Wave 3\)](#). 2024.

55 Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

56 Lees C. [Written off?](#) Money and Mental Health Policy Institute. 2023.

Other factors such as ethnicity can also impact people's concerns about how a company or organisation would use this data. Research on trust in how the NHS uses data shows that people from minoritised ethnic backgrounds can be more likely to have concerns over how the data will be used, protected and shared, in part driven by past experiences.<sup>57</sup> This relationship was highlighted at our roundtable and echoes our previous research, in particular on ethnicity and data.<sup>58</sup> Past experience of discrimination at the hands of institutions, including financial services,<sup>59</sup> can lead to people becoming more reluctant to share information moving forward.

### **Whether it will actually lead to support**

While there were concerns around the data being used negatively, respondents were also worried that sharing the data wouldn't actually lead to them being supported. Nationally, nearly two thirds (65%) of people with recent experience of mental health problems were concerned it wouldn't make a difference to their experience with their essential service providers.<sup>60</sup>

In part, this concern was around providers and staff not knowing what to do with the information or it not being shared accurately. For many respondents, this was driven by poor past experiences of disclosing their needs to an individual firm and it not leading to any change in their experience.

"I have told companies I suffer with anxiety and depression, but always feel like I am judged, and feel I wasted my time, because the second time I contacted the same company it had not been logged."

*Expert by experience*

"Unfortunately, I would be reluctant to share information that is so very personal with companies that do not inspire confidence in how they treat consumers. This is regrettable, as the concept of information sharing is a good one that, in principle, could assist individuals who have additional needs due to their mental health difficulties."

*Expert by experience*

Mental health problems can often fluctuate and some respondents were concerned that the information that was shared would become out of date as their condition changed over time. Nationally, nearly half (48%) of people with recent experience of mental health problems also had this concern.<sup>61</sup>

57 Douthwaite L et al. [Public Adoption of and Trust in the NHS COVID-19 Contact Tracing App in the United Kingdom: Quantitative Online Survey Study](#). J Med Internet Res. 2021; and Wilson B et al. [Diverse voices on data](#). Clearview Research. 2022.

58 Smith F and Stacey B. [Fairer finances](#). Money and Mental Health Policy Institute. 2025.

59 Ibid.

60 Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

61 Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

## There is nuance to these views

Our engagement with the People's Panel highlighted that people's views on data sharing are not clear cut and contain lots of nuance. Additionally, it is difficult to consider the sharing of extra support needs between specific essential service providers in isolation. Instead, concerns around the sharing of other types of data or past evidence of data misuse heavily influence how someone considers this issue. However, people are sharing their data throughout online spaces and likely do not give the same time or consideration as they have when considering this type of data sharing for our research. Therefore there should be an element of understanding how people act in the 'real world' rather than in more hypothetical situations.<sup>62</sup> What is clear though is that, understandably, there is a particularly emotional connection to information related to mental health problems given people's poor past experience across health, government and essential services.

"We've been so overloaded with it [sharing data] as well. As you were saying, you go on the computer and you're buying something and they're taking cookies to find out who you are to see whether you want to buy more you know and it's all of those things. But it spoiled it really and it's a shame because this ['tell us once'] could be used for such good. There's such good work for people to support people, to help people, but that's not what it's about. It's all about making money and that's sad."

*Expert by experience*

"But the practicalities of that are just so big. As I was saying, using the NHS as an example, basically they have a share model, which in theory is absolutely brilliant because if you're in A&E they can look at your doctors and things like that. But in the practice of sharing it, not half the staff don't understand it. People open shares that shouldn't open them without the patient's permission. People don't open shares that should be open, you know and it's an absolute minefield."

*Expert by experience*

## Developing principles for the sharing of support needs across essential services

One of the key aims of this project was to co-develop with our Research Community a list of principles that should be applied to data sharing in essential services in order for it to work for people with mental health problems.<sup>63</sup> The survey and focus group provided the beginnings of principles that matched the concerns that people had raised, such as around control and transparency. We then developed these early principles further through our People's Panel by getting members to express their hopes for and concerns about this type of data sharing in essential services.<sup>64</sup>

62 For example see Acquisti A, Brandimarte L and Loewenstein G. Privacy and human behavior in the age of information. Science. 2015.

63 Other organisations have also set out principles: see Fitch C et al. A once in 25 years opportunity. WhatWeNeed.Support and the Money Advice Trust. 2024; and Citizens Advice. Getting support to those who need it. 2020.

64 The People's Panel was a group of twelve members of the Research Community with lived experience of mental health problems who met online over April and May 2025 to discuss the key issues identified in the research and to develop principles for this type of data sharing.

We were then able to categorise the large number of principles members created into a smaller group which we tested with a group of representatives from a range of consumer organisations and charities. We wanted to understand whether these principles would also work for people in other circumstances beyond experiencing mental health problems and if there would be any unintended consequences for these groups. One key learning from this was that trust, which we had considered a principle, was actually a crucial outcome that the other principles would achieve.

We took this feedback into consideration and we produced a final set of principles:

- **Informed and dynamic consent** – People should be able to give, revisit, and withdraw consent with confidence.<sup>65</sup>
- **Control and choice** – Individuals should control and have choice over what data is shared, with whom, and when.<sup>66</sup>
- **Transparency at every step** – Clear information on what data is shared, why, and with which organisations.
- **Ethical and proportionate use** – Only the necessary data being shared accurately and only used for agreed purposes, with clear benefits.
- **Strong safeguards and accountability** – Robust security, clear rules, and real consequences for misuse.
- **Inclusive design to be accessible for all** – Should be designed with those with lived experience to ensure it works for everyone.



In the next section, we consider how the existing data sharing systems work and how this relates to what people with mental health problems want to see in practice. We then set out recommendations to ensure that these principles are at the heart of any system that shares extra support needs, including a guide to putting them into practice.

<sup>65</sup> The use of consent in this principle reflects the everyday language used by Research Community members meaning to give permission for information to be shared. This is similar but distinct from the more precise, technical and legal definition of consent within UK data protection rules – “any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.” This principle does not aim to prevent the sharing of data through a basis other than consent where appropriate, as per data protection rules, including UK GDPR. Instead, it highlights how important being able to give permission is for people in order for them to feel in control of their data and make them more likely to want their information to be shared.

<sup>66</sup> Although symptoms can fluctuate and impact people’s ability to make certain decisions, such as sharing their data, having a mental health problem does not automatically mean someone lacks mental capacity and is unable to be in control of their data and make decisions about it, instead individuals should be given appropriate tools and support.

## Summary

- Over half (53%) of people with recent experience (within the last two years) of mental health problems would be likely to use a service to share their needs once across essential service providers if they were in a situation where they needed extra support.
- Research Community members felt that being able to share their support needs across essential services could make it significantly easier for them to get the support they need to access essential services and interact with their provider.
- However, nearly three in ten (29%) people with recent experience of mental health problems said they would be not very likely or not likely at all to share their information.
- More widely there are some key concerns that many people with mental health problems have around this type of data sharing. For example, just over eight in ten (81%) people with recent experience of mental health problems are concerned about not having control over what information is shared and with who.
- There are also concerns around how the data will be used and whether it will be stored securely, in particular whether it will be hacked or used negatively to limit someone's access to a product or service.
- There are some key principles that we have developed, based on what many people with mental health problems have told us they want to see, to guide the sharing of extra support needs so that it best works for as many people with mental health problems as possible, as well as working for other groups of people.



## Section Three – The current state of the sharing of support needs across essential services

In this section we set out how this type of data sharing currently happens in essential services and how this relates to what Research Community members would want to see in practice, beyond the principles we have outlined.

### The sharing of support needs in essential services is a diverse and complicated landscape

This type of data sharing in essential services is not a new idea and has been happening to some extent for several years. Table 2 sets out some of the key developments in this space.

**Table 2: there are a range of systems that share support needs across essential services<sup>67</sup>**

Data sharing system	What it is	How people access or use it, and how the data is shared	Percentage of people who have needed support in essential services who've used this system <sup>68</sup>
<b>Sharing of Priority Services Register (PSR) data across utilities</b>	Allows people to register additional support needs as part of the PSR (e.g. health, communication, or access needs) with their energy supplier, energy distributor or water provider. These details are then shared between energy suppliers, distributors and water companies to ensure continuity of support.	Customers self-register on their supplier or distributor's Priority Service Register; data about their support needs is then shared between relevant firms under Substantial Public Interest provisions, rather than consent.	Nearly a third (32%) have told their energy or water providers about their support needs and this was then passed on.

<sup>67</sup> There are other digital assessment tools that allow firms to identify vulnerability and tailor support, such as MorganAsh, Comentis and TellJo. There are also other potential data sharing systems in this area such as Support Point being developed by Sopra Steria and Digital Spine being developed by Arup. Beyond these, there are also the systems we will explore in the next phase of our work: Open Banking, Open Finance and Smart Data. An upcoming report by Chris Fitch and Ben Bennetts will outline a more extensive list of the systems that share data related to support needs in several sectors, including essential services.

<sup>68</sup> Those with either a current or past support need – Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

Data sharing system	What it is	How people access or use it, and how the data is shared	Percentage of people who have needed support in essential services who've used this system <sup>68</sup>
<b>Experian Support Hub</b> <sup>69</sup>	<p>An online portal developed by Experian that lets people share information about their extra support needs (but not circumstances) securely with essential service providers, mainly financial services at the moment.</p>	<p>Individuals can submit their support needs, choose which providers to share these with, consent to have their data shared and then view and manage their data through the portal; firms access this data through an API that links to their internal systems.</p>	<p>8% have used Support Hub.</p>
<b>Vulnerability Registration Service (VRS)</b> <sup>70</sup>	<p>A cross-sector register that allows people to record that they are in a vulnerable situation. The data can then be accessed by external organisations, such as financial service providers.</p>	<p>Individuals self-register online by selecting their vulnerable circumstances from a list of flags, which includes 'mental health' and 'financial difficulty', and then selecting an associated support need; firms can access this data via an online system by searching for an individual or through an API that links to their internal systems. Data can also be shared onwards by intermediaries.</p>	<p>11% have used the VRS.</p>
<b>Northumbrian Water "Support for All"</b> <sup>71</sup>	<p>A pilot across the utilities sector led by Northumbrian Water through the Ofwat Innovation Fund. It aims to create a platform to allow data related to someone's extra support needs, including information recorded on PSRs, to be shared between different providers so that customers can get consistent cross-sector support. It aims to allow customers to self-manage their data. This is separate from the main PSR sharing system discussed above.</p>	<p>Providers can share and receive data about customers' support needs through uploading and downloading to the platform; and customers will be able to log-in to manage their data.</p>	<p>*Given this system is still a pilot, we did not ask about it in the polling.</p>

69 <https://supporthub.experian.co.uk>

70 <https://www.vulnerabilityregistrationservice.co.uk>

71 <https://waterinnovation.challenges.org/winners/support-for-all>

As shown in the table, only a small group of people who would benefit from having their data shared have used one of the existing services, with the PSR data sharing system being the most commonly used. This higher usage could partly be explained by the way that the system was developed between industry and regulators, see the box on page 43, as well as the increased engagement someone is likely to have with their utility provider compared to the other systems. Not knowing about the system was the most common reason for why people who have needed support (currently or previously) in essential services have not used a system to share their data – 52% selected this option.<sup>72</sup> Just over one in five (21%) didn't think the systems were for people like them, while 16% didn't want their information to be shared. This suggests that there are common barriers and concerns that exist whether someone is disclosing to an individual provider, using individual systems to share their information or just considering the general idea of cross-sector data sharing.

Beyond these developments, in recent years there has been discussion of bringing together several essential service sectors together into one data sharing scheme. In Northern Ireland, where there is a different utilities sector, the Utility Regulator has set out plans to reduce the number of customer care registers (equivalent to the PSR) down from nine to two (energy and water) and then to one single register.<sup>73</sup> This would require information to then be shared between the different providers involved. Outside of Northern Ireland, the most prominent was the proposal and plans from the Department of Business and Trade during the then Conservative government for a 'Share Once Support Register' across energy, water and telecoms.<sup>74</sup> This would create a system for data around extra support needs to be shared across the different sectors. However, progress has stalled since the 2024 general election and the Labour government has not publicly discussed the proposal.

## The differences between the existing systems

As Table 2 illustrated, there are a variety of approaches in what data is shared and how.

## A key difference between the systems is how the data is shared

One of the key differences is who manages the sharing and under what grounds. In the utilities sector, while a customer might disclose their needs to a provider through a PSR, their provider then shares it with their relevant providers in other sectors. This is done through the Substantial Public Interest (SPI) condition of the UK's data protection rules.<sup>75</sup> There are 23 conditions for this to be appropriate, including: protecting the public; regulatory requirements; support for individuals with a particular disability or medical condition; and safeguarding of economic well-being of certain individuals.<sup>76</sup> This can mean that providers don't necessarily need to have someone's consent to share the data. Although it follows data protection rules, this way of sharing could impact how 'in control' people feel about their data.

"A company being able to pass it on means they could share it with anyone. I want to know who knows about my issues."

*Expert by experience*

72 Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

73 The Utility Regulation. [Best practice framework: Customer care register project](#), 2025.

74 Department for Business and Trade. [Smarter Regulation: Strengthening the economic regulation of the energy, water and telecoms sectors](#), 2023; Department for Business and Trade. [Smarter Regulation: Delivering a regulatory environment for innovation, investment and growth](#), 2024.

75 UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 – <https://www.gov.uk/data-protection>.

76 The Information Commissioner's Office. [What are the substantial public interest conditions?](#)

However, other models are more consumer-led. For example, someone logs into an online portal and they select who they want their data to be shared with. This model focuses more on the individual consenting to have their data shared.

### **Research Community members had a preference for a ‘portal’ model**

When we asked our Research Community about which sharing model a system in essential services should use, there was a clear preference for a central consumer-led portal. Nearly seven in ten (68%) said they would prefer a portal where they could add information and choose which providers to share it with.<sup>77</sup> Only one in ten (9%) had a preference for telling one provider who then passed it on. A slightly higher percentage (12%) would want to see a mix of the two. This highlights a tension between the existing landscape and what people would actually like to see in place.

One of the key drivers of the preference for a portal was that it would give them more control, choice and knowledge over what data was being shared and with whom. Others felt a portal would be more secure and easier to use. Additionally, there was a feeling that it would allow them to update their information and ensure accuracy as they would be recording it, rather than a staff member at an essential service provider.

“I think the central portal is better because then the person with the health condition is in full control of what information is shared, when it is shared and when it is changed... Being in control is important to me.”

*Expert by experience*

Those who supported the provider-led approach felt that it would be more of a natural way of doing it. This was because they would likely only be aware of the support when interacting with their provider and the sharing would be taken care of, rather than them having to remember to then log on to a portal later. This was a similar view taken by those who wanted to see both approaches as they felt that it would minimise people falling through the cracks – either because a provider missed the opportunity to record and share, or because they were too unwell to use a portal. Conversations with experts in essential services suggested that this approach could work better for providers, both practically and because they have multiple touchpoints with their own customers.

“Sometimes you only realise you have a support need when you are dealing with a supplier. It seems easier for them to share with others at the point where support needs are identified.”

*Expert by experience*

“It is sometimes hard for someone like me with fluctuations in my mental health to undertake life admin tasks, it depends how my mood has presented. Having it would help on the days I couldn't engage and have the option for myself personally carrying out the tasks still allows me agency and independence.”

*Expert by experience*

<sup>77</sup> Money and Mental Health survey of 214 people with lived experience of mental health problems. Base for this question: 179 people with mental health problems.

## What data is shared is another key difference

Another key variation between the different systems for this type of data sharing is what data is shared – the support need, the circumstances behind the support need or both. For example, a support need could be needing to send communications to a trusted person, while a circumstance could be having a mental health problem. This is a key challenge in data sharing, what is to be shared and how that can be consistent across the sectors that it is shared in.

The approach in utilities has been to share information related to the PSR. As shown in Table 1, this is a set of circumstances and support needs that are consistent across the water and energy sectors. Therefore, someone could be registered on one provider's PSR as having a mental health problem and needing communications to be sent to a trusted person – both a circumstance and a need – and this then shared with other providers. There have been challenges with the PSR, while it was originally developed for support in an emergency it has evolved to look at wider accessibility support. In Northern Ireland, the proposal from the Utility Regulator for a single customer care register is to have two tiers, one for medical care (who would need support in an emergency) and one for needs-based support (just recording the need).<sup>78</sup>

In other systems, the focus is just on the support needs someone has, rather than the circumstance or driver for that need. This requires a matrix of support needs that can be shared.

When DBT proposed the 'Share Once Support Register' there was some debate about what it should share, with some wanting it only to focus on support in an emergency and others seeing it as an opportunity to also share information to indicate someone was in financial difficulty. Whatever data is shared, our expert conversations highlighted the challenges with actually sharing this information between different providers and how technical systems have to be ready.

## There were some concerns among Research Community members over the sharing of circumstances

Our polling and engagement with our Research Community highlighted that this is not a clear cut issue. Nationally, just over a quarter (26%) of UK adults said they would only want to share information about their needs rather than circumstances, 6% said just circumstances rather than needs and nearly a quarter (24%) said both needs and circumstances. An additional quarter said they wouldn't want to share any information.<sup>79</sup> For people with recent experience of mental health problems, a third (33%) of respondents said they wanted to share both needs and circumstances compared to 27% who wanted to just share needs and 6% just circumstances.

Among our Research Community just over half (51%) wanted to share both their extra support needs and the reason behind it, e.g. mental health problems, while nearly three in ten (28%) wanted to just share their support needs and 8% just the driver.<sup>80</sup> When Research Community members explained their thinking, there was a clear focus on the risks with sharing the driver. Respondents were concerned that information related to their mental health problem could lead to them being negatively impacted or judged. In particular, just sharing the driver puts the decision on how to

78 The Utility Regulation. Best practice framework: Customer care register project. 2025.

79 Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

80 Money and Mental Health survey of 214 people with lived experience of mental health problems. Base for this question: 180 people with mental health problems.

treat the customer in the hands of the company, which leaves someone without agency and risks something going wrong. People's concerns were in part due to poor past experiences of disclosing mental health problems.

"I would share as long as I was confident I would not be treated differently or discriminated against. My views are informed by personal experience."

*Expert by experience*

"There's a communication barrier there that needs to be removed but that doesn't mean that it could be for any reason and processing or tired or mental health it doesn't really matter."

*Expert by experience*

For those who wanted to also share that they have mental health problems, they felt that this would allow for better understanding and support from the firm as it would give them the context for the support needed.

### **There are also differences in who runs the system**

Which organisation runs the system is also another difference between the systems that exist. In utilities, it is a shared responsibility between the different providers with the infrastructure developed by key industry bodies.<sup>81</sup> Other data sharing systems are run by individual organisations or companies, with no requirements for providers to take part. While DBT's proposal would have been a government led initiative, who would actually run the system was left open. As the existing systems are mainly run by private companies with commercial incentives, this does come up against people's views on who should actually be sharing the data and in the long term could impact people's trust in any data sharing system.

### **Trust was crucial for which organisations Research Community members wanted to run the system**

Research Community members were split on who they would want to run any future system that shares extra support needs. However, as Table 3 shows, there was a leaning towards a charity, regulator or the government, with these organisations being the most likely to be ranked first or ranked in the top three. Only a small percentage of respondents ranked certain companies such as water or energy companies, credit reference agencies (CRA), big tech companies and telecoms providers, first or in their top three.

<sup>81</sup> For more information on how this system works and was developed see box 2 in Fitch C et al. A once in 25 years opportunity. WhatWeNeed. Support and the Money Advice Trust. 2024.

**Table 3: There is preference for regulators, charities or government departments to run a system sharing support needs across essential services**

How Research Community members ranked the following organisations with the option that was ranked first being the most trusted, ordered by the top 3.

Organisation	Ranked first	Ranked in top 3
<b>A regulator e.g. Ofgem or Ofwat</b>	23%	56%
<b>A charity</b>	26%	53%
<b>A government department or agency</b>	20%	45%
<b>A financial service provider (i.e. your bank)</b>	6%	31%
<b>A water or energy company</b>	3%	10%
<b>A credit reference agency e.g. Experian</b>	2%	9%
<b>A big tech company e.g. Microsoft</b>	1%	4%
<b>A telecoms company (i.e. broadband or mobile)</b>	1%	2%
<b>Other</b>	6%	9%
<b>Don't know</b>	12%	18%

Source: Money and Mental Health survey of 214 people with lived experience of mental health problems. Base for this question: 163 people with mental health problems.

When focus group respondents and People's Panel members found out that one of the existing systems – Support Hub – was run by a CRA – Experian – there were concerns about the information that was recorded then being used as part of the credit data system and impacting their access to credit. Beyond Experian creating its own system, the VRS has partnered with a different CRA – TransUnion – to allow the CRA's clients to access data registered on the system.<sup>82</sup> While this information is included in the VRS' privacy policy,<sup>83</sup> and separately Support Hub has committed to keeping any information shared through the system independent of wider Experian credit data,<sup>84</sup> there are clear concerns from Research Community members about any connection between CRAs and this type of data sharing.

“To have somebody like Experian running it, you would think, well, then it's my credit rating and you apply for a credit card and apply for a loan and all this is collated and it's used against me and it's such a big, big thing.”

*Expert by experience*

82 TransUnion. [TransUnion Partners with Vulnerability Registration Service to Enhance Consumer Insights](#). 2024.

83 <https://www.vulnerabilityregistrationservice.co.uk/privacy-policy>

84 <https://supporthub.experian.co.uk/faq/header>

Key factors for why respondents ranked an organisation in the order they did included whether they trusted the organisation and how independent they were seen to be. Crucially, many ranked based on whether they felt the organisation would use the data positively or negatively, and whether there would be guardrails in place for this.

"I don't really trust any of them to get it right but I think the government is the 'least worse'. I do not trust big private companies at all because their priority is making a profit, not helping me. A charity could be trustworthy but may not have enough money to put in place really robust systems and procedures to protect my data."

*Expert by experience*

### Which organisations are involved also varies

An additional difference is which organisations the information is shared with. In some cases, this is just utilities companies, in others it also includes certain financial service providers and in a few, it includes wider organisations like local authorities. At the moment, telecoms aren't part of a system as a sector, but there have been some pilots involving individual firms.<sup>85</sup> This divergence means that people will have to use multiple 'tell us once' systems in order to share their needs with all the providers they want it to be shared with.

### Some providers were seen more negatively than others by the Research Community

There were concerns from some Research Community members about having their data shared with particular providers. These were mainly telecoms, insurance companies and CRAs. For the former there was a lack of trust in them due to poor customer service, increasing prices and security breaches. This did extend to other utilities companies for some respondents. In terms of insurers, there were concerns that they would use the information to deny access to an insurance product. Our past research has highlighted how declaring a mental health problem when buying travel insurance can lead to being declined or facing excessive increases in the premium offered.<sup>86</sup> There were also concerns from respondents about the data being accessed by a big tech company as they were seen to have a poor record with sensitive information and selling it on. Some didn't want the government to have access to the data, which was driven by poor experiences related to mental health problems with departments like the DWP.<sup>87</sup>

"Definitely not telecoms companies because in my experience they take advantage of their customers regardless of whether they are vulnerable or not."

*Expert by experience*

"Especially with the type of conditions I have, there's just big red flags for insurance companies and I just wouldn't want them to know that I had them because it still does escalate my premiums. So I'm never ever happy to disclose to insurers unless I'm fully in control of what I say."

*Expert by experience*

85 For example, [Support for All 2](#)

86 Lees C. [Written off? Money and Mental Health Policy Institute](#). 2023.

87 For example, Bond N, Braverman R and Evans K. [The benefits assault course](#). Money and Mental Health Policy Institute. 2019.

## What can we learn from the development of the existing systems

From our discussions with experts, there are some key factors that helped the existing systems develop that are essential to understand in order to consider how the future of this type of data sharing in essential services could be developed:

### Coordination from regulators

Joint action, both pushing and coordinating, from regulators was particularly important for data sharing to develop between the energy and water sectors. While sharing was not mandated by the respective regulators, Ofgem or Ofwat, they still played a key role in encouraging and supporting the steps to bring the sectors together.<sup>88</sup> There are now expectations from the regulators for providers to be using data sharing as a way of supporting customers in vulnerable circumstances.<sup>89</sup>

### The involvement of industry and other stakeholders

Without mandation, it's clear that getting industry involved is very important. Firms can think that data sharing is not for them and not take part if they are not required to. Trade bodies in water and energy were key drivers for the system, which helped get firms involved and take part in pilots. Northumbrian Water has been innovating with its Support for All pilot and outside of utilities, several financial service providers have led the way by signing up to Experian's Support Hub. Although, other firms have been slower to join. Additionally bringing together a wider body of stakeholders is also important. The Safeguarding Customers Working Group, which included charities and consumer organisations as well as suppliers, led a lot of the work that facilitated data sharing between the water and energy sector.

### Aligning what can be shared

A challenge different systems have had to overcome is ensuring that the data that is shared is applicable across sectors, with each sector having differences. In utilities, there was considerable ground work to align the needs codes of the PSR before any data sharing could begin.<sup>90</sup> Experian's Support Hub had detailed processes with experts – by profession and by experience – to understand what support people would like and what support can be offered by providers to create the list of needs people can select from.<sup>91</sup>

### Being clear on what grounds data is being shared on

In utilities, a sticking point was how the data could be shared between the different firms under data protection rules. The intervention of the ICO to say that the system could use Substantial Public Interest helped break down this barrier and facilitate data sharing.

### Working out the practical and technical side of data sharing

A further hurdle that each data sharing system has had to overcome is the technical side of how to actually share the data. While pilots could use more basic ways of sharing, a more complex technical solution was needed for sharing to work on a larger scale.

88 There are requirements for energy distributors to share with the relevant electricity/gas distributors and suppliers, see the Standard conditions of the Electricity Distribution Licence and Standard Special Conditions for Gas Distribution.

89 Ofwat. Priority Services Register standards. 2025; and Ofgem. [Consumer vulnerability strategy](#). 2025.

90 For more information on how this system works and was developed see box 2 in Fitch C et al. A once in 25 years opportunity. WhatWeNeed. Support and the Money Advice Trust. 2024.

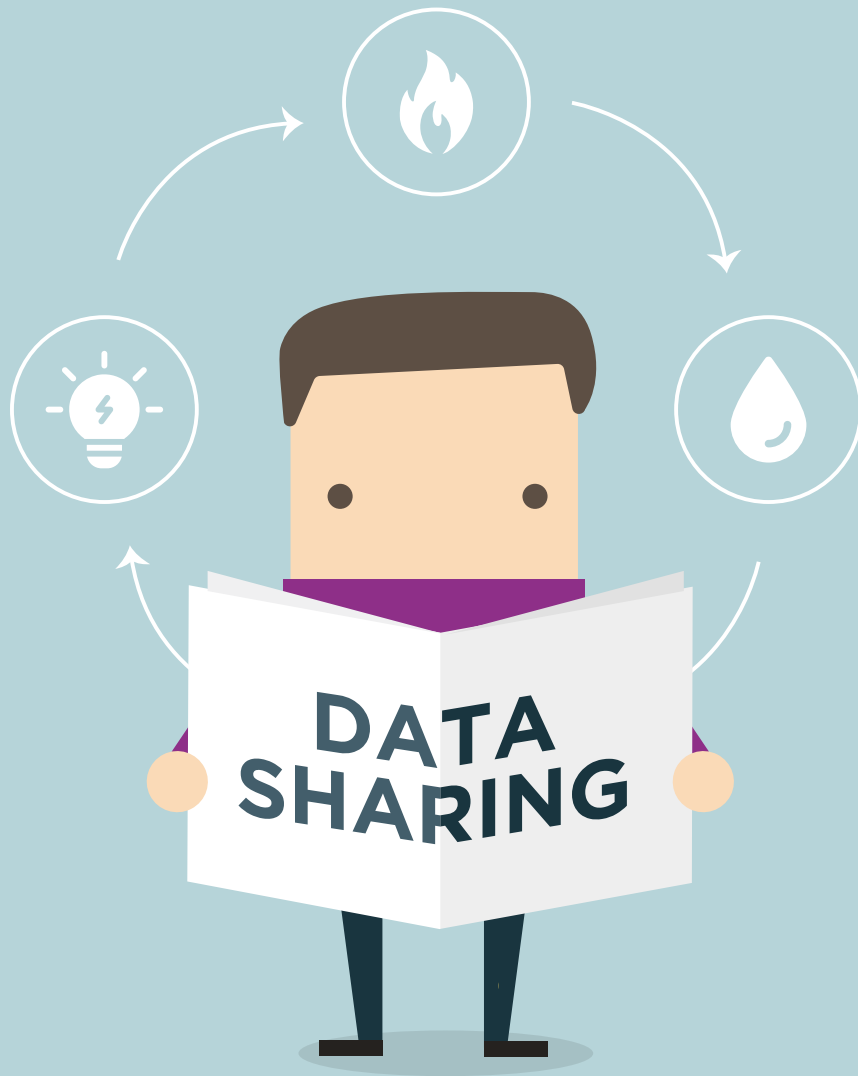
91 Holloway D and Fitch C. [A problem shared: a new way of building accessibility into financial services and beyond](#). 2023.

## Where does this leave us?

As this section has shown, there has been progress on the sharing of support needs across essential services. But there is currently an array of systems run by different organisations that allow different types of data to be shared in different ways with different providers. Use of these systems by people who would benefit from data sharing varies, but there is still a significant group of people who are missing out. The systems show that this type of data sharing is possible, but we are at risk of not having a 'tell us once' system but 'tell each system once'. A disparate landscape with disjointed and disconnected systems leaves us exposed to a range of risks. Action is needed and the next section explores how this challenge could be addressed, as well as making sure data sharing works for people with mental health problems.

### Summary

- There have been some key developments over recent years around the sharing of extra support needs across essential services. Data around the PSR is shared between water and energy companies, and there are several systems that allow individuals to share their information with different providers.
- Takeup of these systems is relatively low, although nearly a third (32%) of those with a current or past support need have had their data shared between water and energy providers.
- Each of these systems has taken different approaches when it comes to how the data is shared, what is shared, who it is shared with and who runs the system. Some of these approaches more closely match what people with mental health problems have generally told us they would prefer from a system that shares their data.
- While DBT put forward plans for a 'Share Once Support Register' that would have expanded data sharing between the energy and water sector to the telecoms sector, this has stalled under the current government.
- This leaves a risk of multiple and different 'tell us once' systems that could limit the potential benefits of the sharing of support needs across essential services.



## Section Four: How to develop a blueprint for tell us once in essential services

Our research has highlighted that while there are some key benefits and opportunities for the sharing of support needs across essential services, there are also some crucial concerns and challenges.

### Key challenges

Our research has highlighted several key challenges with creating a data sharing system that works across all essential services, and crucially meets the needs of people with mental health problems:

- There are currently a range of existing and proposed systems that share different types of information related to someone's circumstances and support needs with different essential service providers in different ways. This leaves us at risk of multiple 'tell us once' systems. This potentially means that someone still has to repeat their story and ask for help multiple times, or believes their needs are being shared with all their essential service providers when they are only shared with those within the specific system they have used. In order to meet the needs of people with mental health problems, these systems either need to be brought together or replaced.
- While there were proposals from DBT before the 2024 general election to bring telecoms into the energy and water data sharing system, this has not been progressed under the Labour government. This has left essential service firms unsure of what they should be doing with data sharing.
- Any data sharing system needs to make it clear, simple and realistic for people to understand what they are signing up for while balancing legal and complicated processes, as well as cognitive loads.
- People want genuine control over their information but a system sharing extra support needs has to work across different sectors, and people's circumstances and ability to engage might change.
- Data needs to be shared, stored and used in a secure and transparent way in order for people to trust the system, but how is this to be enforced?
- Technology can help make a data sharing system more efficient and automatic, but people still want to have human and empathetic support.
- Currently, each sector has their own taxonomy of support needs they can offer their customers, with different requirements on what support has to be offered (see Table 1), this diversity could make cross-sector sharing tricky. Additionally, there is a range of terminology for this support which could cause confusion among people wishing to share their information.
- There are top level questions to be answered, such as who runs the system or how the system is managed, as well as more specific practical issues to consider, like what happens to data if the company it is shared with goes bust.

- Most importantly, if a data sharing system in essential services is not designed to meet the needs of people with mental health problems or consider other circumstances and wider issues like digital exclusion, it risks leaving people behind and unable to get the support they need.
- However, our research did find that there will still be a group of people who do not want to share their data no matter how inclusive or accessible the system is. A crucial question therefore is how do we make sure that they are not disadvantaged.

We explored these challenges as part of our Ideas Sprint.

### The Ideas Sprint



In order to explore what the future of this type of data sharing could look like in essential services and what policy solutions were needed to get there and overcome the above challenges, we held an 'ideas sprint'. We grouped the challenges into six areas and brought together experts from across essential services, regulation, technology and consumer organisations with members of our Research Community to tackle them.

Each group had to come up with an intervention to address a problem statement based on the challenge. There was a lot of consistency across the groups despite the variety in the background of attendees. All but one group came up with a single system solution. The other group explored how the existing data sharing systems could be connected together.

A key theme across every group was that governance was crucial for any data sharing system to work as that would help build trust. Attendees set out how this would need to come from both top-down alignment and shared standards and from bottom-up legitimacy through co-design with people with lived experience. The discussion also highlighted that transparency could only grow people's trust in the system if it wasn't just about promising that nothing would go wrong, but clearly setting out what would happen if it did.

Attendees raised the importance of putting control of data at the heart of any future system. There was also discussion of how consent could work with people's varying cognitive load and the necessity of clear and human communication. Inclusion and accessibility were seen as non-negotiables and attendees examined how technology could be balanced with empathy.

The ideas generated by attendees and the wider discussion both threw up new challenges for us to consider, but also helped us understand what direction data sharing could go in. The Ideas Sprint helped inform the recommendations we make below. For a more detailed analysis of the Ideas Sprint, see the accompanying annex.

## What the future of data sharing in essential services could look like

There are at least four potential routes that this type of data sharing in essential services could take:

- 1. Status quo:** The first is to continue as currently is, with several different systems (including new entrants) that allow people to share different information with different providers but lack central coordination, consistency or shared guardrails. We do not recommend this option.
- 2. Separate but standardised systems:** The second brings the existing data sharing systems into a single framework of common rules, standards, support needs and oversight. As Diagram 2 shows, it would allow someone to share their information knowing that the data will be shared and stored in a consistent way. However, it would still mean they have to use multiple systems in order to share the information with all the providers they want to share it with. This would require greater coordination and alignment, but wouldn't reinvent the wheel.
- 3. A network of systems with central control:** The third would build on this and create a single network of data sharing systems. As illustrated in Diagram 3, the systems would still operate independently but there would be the ability for someone to control their data through a central place, with both offline and online access. This would move us closer to the idea of 'tell us once' but would require substantial technical infrastructure. There could be the potential to fully unite the systems into a fully integrated and interoperable network but this would require additional technical changes and oversight.
- 4. Single operator model:** The fourth would replace the existing systems with a single data sharing system, which could build on the existing technology – see Diagram 4. It would mean that there is truly 'tell us once' but would require significant structural change and intervention.

Diagram 2: Example of separate but standardised systems

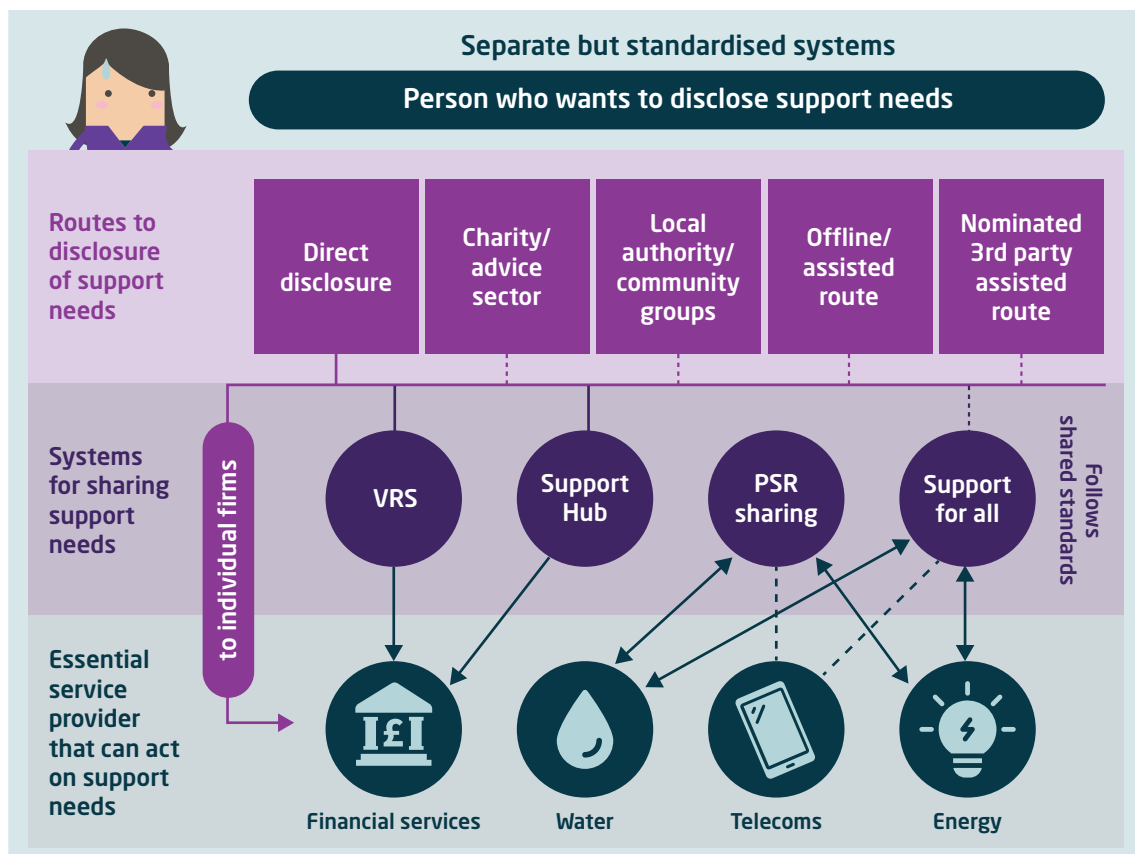


Diagram 3: Example of a network of systems with central control

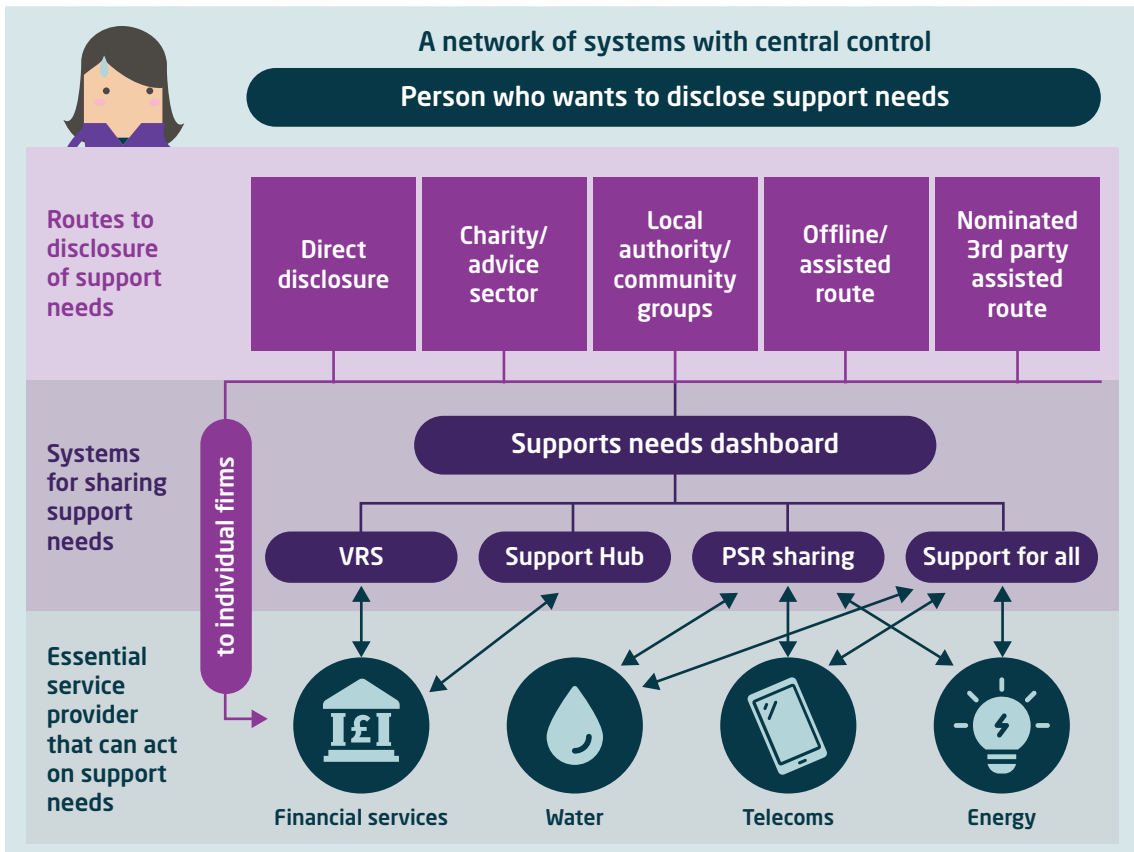
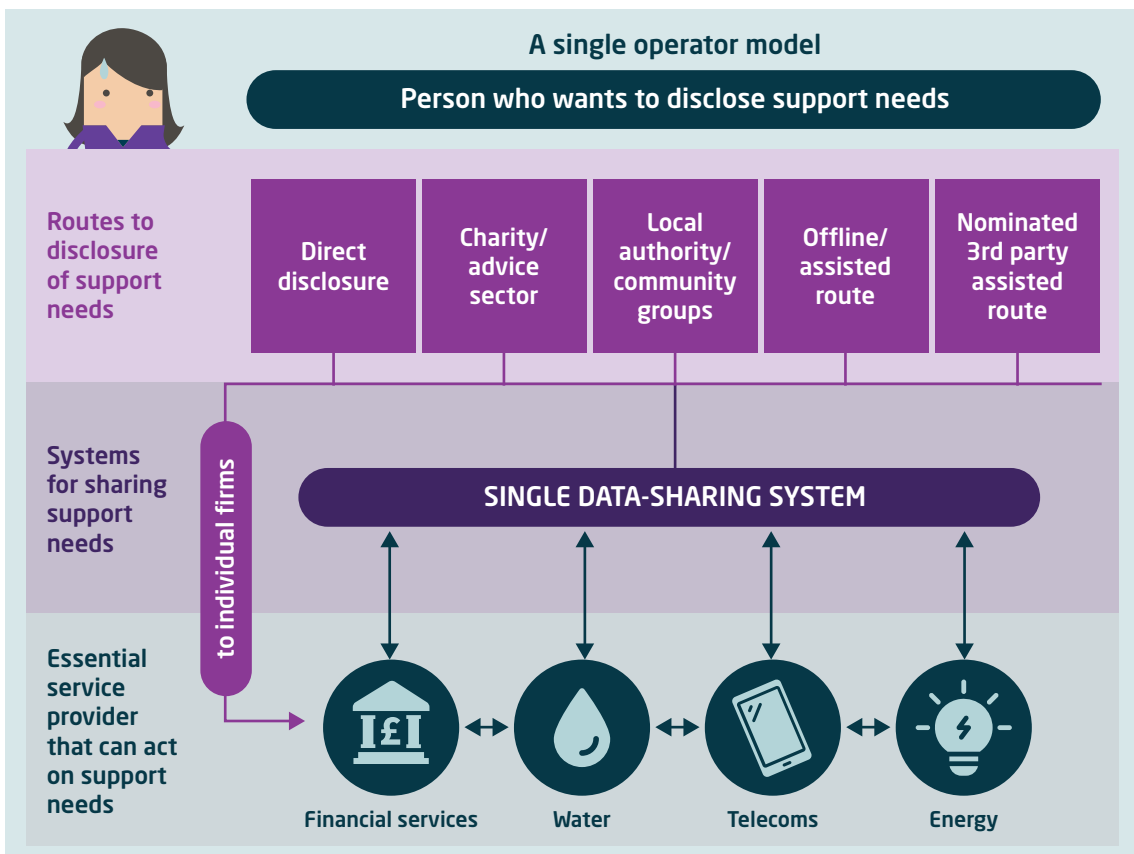


Diagram 4: Example of a single operator model



In our polling, there was a preference for a simpler system that gave as much control to the individual as possible. Nearly a third (32%) of the public said the best approach would be a system that lets them manage and control the information they share through one central account or dashboard. While 17% had a preference for a single, consistent 'tell us once' system, 14% wanted a network of systems where information is shared separately with different providers, but all systems' followed the same rules, standards and safeguards. Just one in ten (9%) opted for the current approach where information is shared separately with different providers through systems that work differently.<sup>92</sup>

Each of the options 2-4 builds on the principles we have developed with our Research Community. The recommendations we make below direct data sharing in essential services towards the alternative options and away from the status quo. We believe that option two should only be a stepping stone towards the ultimate goal of giving people the ability to share their story a single time and feel in control of their data, which options three and four would best facilitate.

### **The risks of not acting**

Without action, we risk carrying on the current path which will create a disjointed environment with too much inconsistency and put people's data at risk. As more disconnected systems are created, the landscape becomes more confusing for individuals with unfamiliar and untrusted brands. This exposes people who are at most need of support to unnecessary harm. People could believe that through using one system they have shared their needs with all their providers, but in reality only the providers that are part of that system have had the data shared with them and so the individual does not receive the support they need. Alternatively, someone would have to use several systems to share their needs with all their providers, which makes them undertake the same emotional and practical toil they have to go through to tell each provider individually. Additionally, without an accessible, transparent system, there is a greater risk of someone's information being passed on to other organisations without them being aware of this or of how it is being used.

With no guiding framework, there is a risk that existing and future systems are designed without taking the needs of people with mental health problems, and beyond, into account. This could potentially leave the people who most need support behind or having to pay a high cost to share their data in order to get the benefits they need. In our polling around a quarter (26%) of the general public, rising to 40% of those with a current support need in essential services, agreed that they wouldn't be able to use a system to share their information if it was only through an online route.<sup>93</sup>

A disparate landscape with each system recording, storing and sharing information in different ways also makes it harder for people to understand what happens to their information or for regulators to hold organisations that break data protection rules to account. Ultimately, the path we are currently on could lead to a serious breach of data protection and undermine public trust in any future digital endeavor at a time when that is a key government priority.<sup>94</sup>

Nationally, nearly seven in ten (69%) agreed that if something went wrong with a system for sharing information about support needs they would lose trust in digital systems.<sup>95</sup> Creating a system that has

92 Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

93 Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

94 For example Digital ID – Department for Science, Innovation and Technology. [Digital ID scheme: explainer](#). 2025.

95 Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

shared principles, rules and standards, with control, transparency and security at its heart, will grow people's trust and help ensure people with mental health problems can access essential services. The existing systems have made this type of data sharing possible, but without more central coordination, this hard work is at risk of being wasted and at worst doing harm. Ultimately, we must heed the words of Research Community members and design a system that works for people with mental health problems:

"The security aspect of it and the impact that that has on me and my mental health as a result of you [data sharing system/essential service provider] mismanaging it be aware that the impact is there. You make me distrustful. You made me paranoid. You made me feel a certain way about your company because of the way you use my data and how you treat me as a result of that."

*Expert by experience*

"Just echoing what everyone [in the focus group] said. I think if the principles were in place, by the right people, then I think there's huge potential for this to be life changing for a lot of people."

*Expert by experience*

## Our recommendations

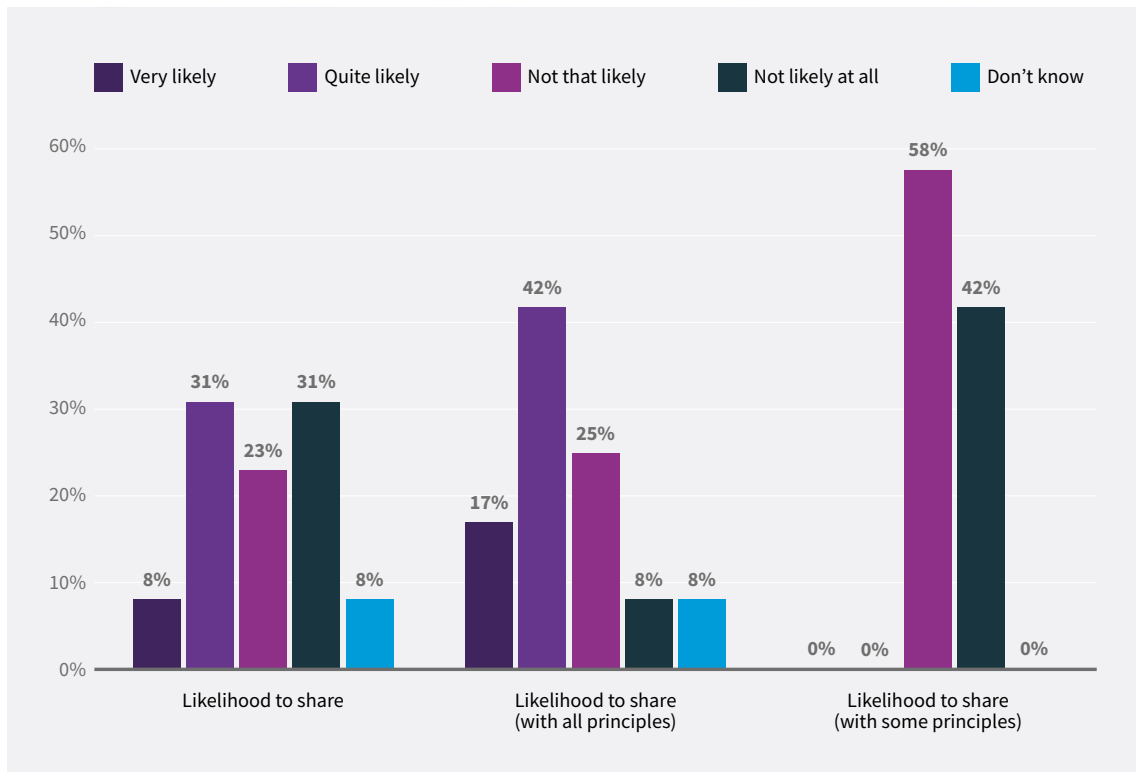
Our recommendations are guided by and aim to make the principles we have developed with our Research Community a reality:

- **Informed and dynamic consent** – People should be able to give, revisit, and withdraw consent with confidence.
- **Control and choice** – Individuals should control and have choice over what data is shared, with whom, and when.
- **Transparency at every step** – Clear information on what data is shared, why, and with which organisations.
- **Ethical and proportionate use** – Only the necessary data being shared accurately and only used for agreed purposes, with clear benefits.
- **Strong safeguards and accountability** – Robust security, clear rules, and real consequences for misuse.
- **Inclusive design to be accessible for all** – Should be designed with those with lived experience to ensure it works for everyone.

Both our work with our People's Panel and the polling highlighted how important it is to make sure the principles are embedded in any future system that shares extra support needs. While only a small sample, Figure 4 shows how the likelihood of wanting to share data of People's Panel members varied depending on whether principles were in place – fully or partially – or not at all.

**Figure 4: Having principles in place can have an impact on whether someone shares their support needs**

People's Panel members' likelihood to share data based on whether the principles were in place or not



Source: Money and Mental Health's Data Sharing People's Panel

Additionally, in our polling, a majority of respondents agreed with statements related to ensuring five of the principles were in place in order to share.<sup>96</sup> The statement related to informed and dynamic consent – “I should be able to change my mind on whether I want my information to still be shared or not” – had the highest level of support with 83% agreeing.<sup>97</sup>

**Any system that shares support needs across essential services should follow the principles we developed with our Research Community**

We have produced a separate guide that sets out more practical steps that should be taken by data sharing systems and firms that are part of them to put these principles into practice. This guide applies regardless of which approach is taken – one of the three alternative blueprints or continuing on the current route.

In this report we therefore focus our recommendations on creating frameworks that will ensure the principles are embedded in the data sharing ecosystem.

96 See the accompanying guide on putting the principles into practice for the full list, the one statement related to a principle without a majority was for inclusive design and was the figure for those unable to use a system only through an online route.

97 Money and Mental Health analysis of YouGov online polling of 2,054 people, carried out 11-12 December 2025. Data is weighted to be nationally representative.

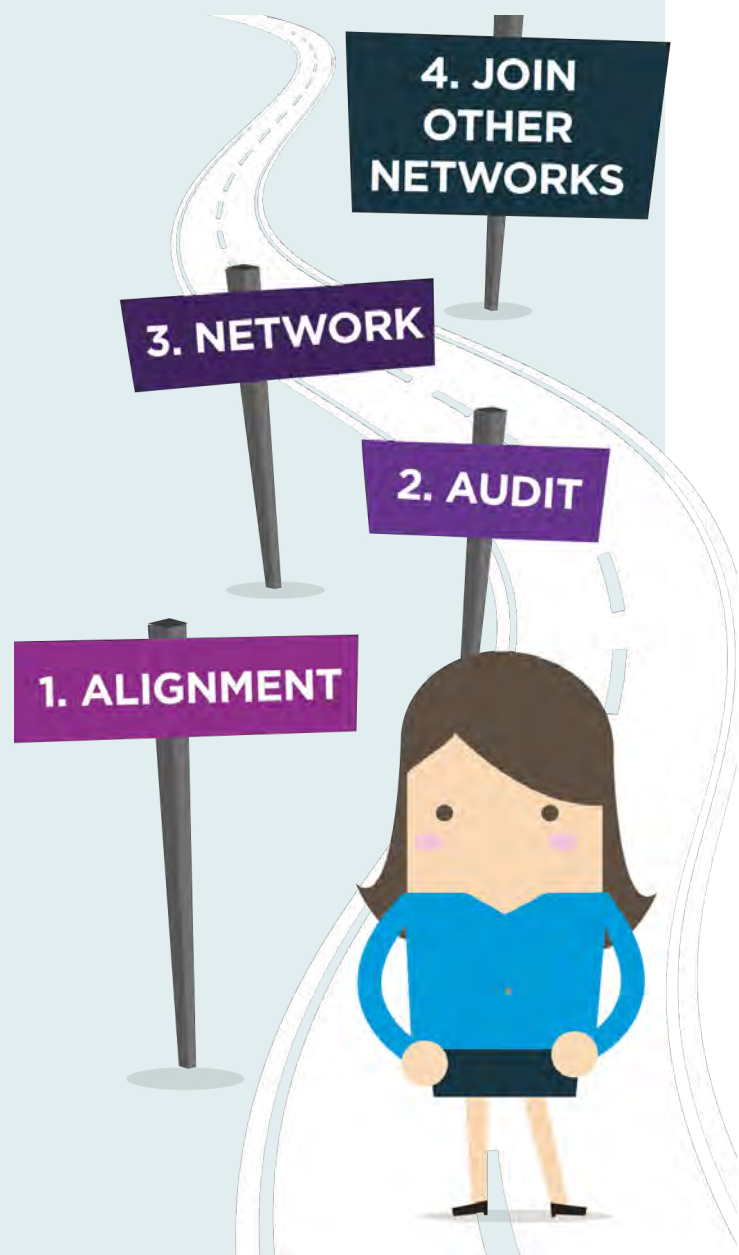
Our recommendations in the rest of the report are therefore grouped into two categories:

- How to set up a future cross-sector system that shares extra support needs across essential services that works for people with mental health problems.
- What to do with the existing data sharing systems as part of a future blueprint.

### A roadmap for the future of the sharing of support needs across essential services

Taken together the recommendations we make form a roadmap for creating a 'tell us once' system across essential services. While the roadmap will likely take years to complete, action to start it should be taken as soon as possible.

- Firstly, there needs to be alignment of what can be shared and the creation of a framework of rules and standards guiding this type of data sharing – this would ideally be done through our recommendation for the Department of Business and Trade to restart its 'Share Once Support Register' plans.
- Secondly, there needs to be an audit of the existing systems and the creation of an accreditation scheme for existing and future systems to be part of – the audit should ideally make a recommendation for which data sharing systems should form part of a future network.
- Thirdly, the accredited systems should be joined into one network and steps should be taken to create a consent dashboard that sits across it or to replace the existing systems with one single system (building options 3 or 4).
- There could then be consideration of whether this data sharing network is joined with other systems such as Open Banking.



## Setting up a future system that shares support needs across essential service sectors

### Restarting existing plans

Our research has highlighted the need for coordination in order to create a future cross-sector data sharing system. The government would be a crucial coordinator given its ability to make change and bring together key stakeholders. This coordination nearly became a reality when DBT set out its plans for a 'Share Once Support Register'. The silence on this under the Labour government has stalled future plans around this type of data sharing in essential services. **Therefore, DBT should restart these plans and consider how this could then be expanded into financial services.** This recommendation would greatly facilitate our wider recommendations, however, we have designed our recommendations in a way that they could still happen without DBT taking a leading role. When considering how to bring telecoms and then financial services into a data sharing system, it will be essential to consider Research Community members' views and concerns around certain providers, such as insurers, and how to ensure people remain in control of who their information is shared with.

Our conversation with experts suggested that one stumbling block DBT's proposal would have to come across was the difference in approach and powers between Ofcom and Ofgem and Ofwat. The latter were seen as having a greater ability to get their regulated firms to be part of a data sharing system, partly because they had the powers to require firms to provide certain types of support, whereas Ofcom focused more on best practice instead of mandating action. **DBT and the Department for Science, Innovation and Technology (DSIT) should examine whether Ofcom would need new powers in order to enact the 'Share Once' plans.**

There are risks that people who are less digitally confident or are currently digitally excluded are unable to use a digital-first approach. **DBT should ensure that digital inclusion is a central part of the renewed 'Share Once Support Register' plans, reflecting the government's digital inclusion action plan.**<sup>98</sup>

### Creating consistency

Before a cross-sector 'support needs' sharing system becomes a reality, there would need to be more consistency between the different sectors around what information is recorded and therefore could be shared. **Regulators of essential service providers – the Financial Conduct Authority (FCA), Ofgem, Ofwat and Ofcom – should come together with the UK Regulators Network (UKRN), industry (led by trade bodies), consumer organisations and people with lived experience to align the taxonomy of support needs and terminology across their sectors.**

This would build on the work done between energy and water to align the PSR needs codes. Beyond what is required by regulators, a reason there is less alignment is that there are different 'needs' in the different sectors that don't map across. For example, energy providers need to know if someone uses medical equipment in their home but this is not helpful to financial service providers. This piece of work would therefore consider what support is consistent across the sectors, what can be provided by firms and what people actually need and want. Any future data sharing system would still allow sector-specific information to be shared but this would facilitate

<sup>98</sup> Gov UK. [Digital Inclusion Action Plan: First Steps](#). 2025.

the sharing of information relevant to multiple sectors. There would need to be consideration of when the sharing of circumstances across sectors would also be appropriate beyond the sharing of support needs, taking into account the nuanced views we have highlighted. This work could utilise existing resources such as our best practice for essential service firms to follow the Equality Act and the repository of support needs collated in *Help! What support can firms give disabled consumers and people in vulnerable situations?*<sup>99</sup> This work should also ensure that across sectors, there is no requirement to prove a need.<sup>100</sup> Additionally, this process would help ensure there is consistent language and terminology across sectors that people who need the support can easily understand.<sup>101</sup> **The FCA and Ofcom should consider whether they would need to create new guidance for their regulated firms to create this alignment** as there is less prescription currently from these regulators.

A future system that shares support needs in essential services would need to work across the UK nations. At the moment Scottish Water is run on a different model to English and Welsh water companies, and in Northern Ireland there is a different utilities regulatory system. While there are some firms that are more focused on Northern Ireland, many financial service providers are UK-wide. **To overcome these devolutionary challenges, relevant government departments, essential service regulators – including the utility regulator, in Northern Ireland, UREGNI – and devolved governments should work together to ensure there is consistency in data sharing across nations.**

## Building trust

Our research has highlighted that in order to build trust in a system, there must be a clear framework of rules, standards and principles. While there are strong rules around data protection in the UK, such as UK GDPR and the Data Protection Act, they cover a significantly large and complicated area. This means that the rules are broad and there is little specificity about how they apply to the sharing of this type of information. Data sharing systems and individual providers are therefore having to use their judgement to apply broad rules to a specific use case, which risks divergence, misapplication and not fully considering the 'human'. This is an issue the ICO has encountered before in other specific areas of data sharing, such as sharing personal information in emergency situations at universities, and has produced specific guidance as a result.<sup>102</sup> However, given the overlap with essential service regulation, there is a need to go further.

**Therefore government departments and essential service regulators should work with the ICO to develop a framework of rules and standards guiding the sharing of support needs across essential services.** This should consider elements such as consent and data security.

**The ICO should then, with regulators, produce guidance for essential service firms and systems that share support needs on how they should follow the framework.** The ICO does currently have a code of practice for data sharing, but it does not cover this specific type of

99 Fitch C et al. *Help! What support can firms give disabled consumers and people in vulnerable situations?* WhatWeNeed.Support and the Money Advice Trust. 2025

100 For the PSR, support needs in financial services and telecoms, there is no requirement but for the Priority Fault Repair in telecoms there is.

101 There are issues with the current terminology, for example Research Community members have told us in the past about their confusion around the PSR in energy and water. Some have felt that the service is not for people with mental health problems, but rather for people with physical conditions or for older customers. See Lees C. *Money and Mental Health's submission to Ofwat's consultation on priority services registers standards for water companies in England and Wales.* Money and Mental Health Policy Institute. 2024.

102 The Information Commissioner's Office. *Data sharing.*

sharing.<sup>103</sup> This guidance would add to the ICO's existing guidance and should be informed by the principles we have developed with our Research Community.

**Essential service regulators should then add in detail around this type of data sharing into existing regulation and guidance for firms,<sup>104</sup> to help firms be confident in sharing information.** This should be based on the idea that the sharing and receiving of data should facilitate good outcomes, such as access to support, and not lead to harm, such as denial of a service or product.<sup>105</sup> **Essential service providers should be required by regulators to facilitate the sharing of such data** in order for them to achieve their requirements around the treatment of customers in vulnerable circumstances. While receiving data related to someone's support needs would help firms better support their own customers, sharing that data through a system would help other firms, including in other sectors, fulfil their obligations. This would expand the facilitation of good outcomes for a customer beyond a single firm, towards a cross-sector approach. While this is a novel way of approaching regulation, it would build on minimum expectation 4.3 in Ofwat's vulnerable customer guidance.<sup>106</sup> Regulators should then ensure that both of these changes form part of their supervision of firms.

"Legally binding assurances that this information would not be used to limit access to certain services or used to discriminate against people in any way."

*Expert by experience*

**A cross-government and regulator taskforce should then be tasked with overseeing this type of data sharing to ensure that the framework is put in place.** A working group was created after DBT confirmed the 'share once' plans were going ahead, this should be revitalised. As part of this process, there should be a review of the ICO's powers and whether it would be able to enforce the rules, and if not given more powers to do so. Given this is a cross-sector issue, the ICO and essential service providers should create memorandums of understanding.<sup>107</sup>

One area that Research Community respondents wanted to see was that there would be support if something went wrong with the system, such as a data leak or hack. At the moment, individuals can make complaints to the ICO but they cannot receive compensation without going to court.<sup>108</sup> **A redress mechanism, such as a data ombudsman, should be created to empower individuals if a company or data sharing system breaks the rules.** This would be a mechanism that would apply more widely across data protection, but our focus area of the sharing of extra support needs across essential services could be the first use case the mechanism is designed for. Additionally, consumer organisations should be given powers to make a Super Complaint to the ICO.<sup>109</sup>

103 The Information Commissioner's Office. [Data sharing: a code of practice](#).

104 For example, the [Financial Conduct Authority's Consumer Duty](#); [Ofwat's Service for all vulnerability guidance](#); Ofgem's standard licence conditions for electricity and gas suppliers; [Ofcom's Treating vulnerable customers fairly guide](#).

105 There may be circumstances when someone wants to share that they don't want to be lent to where this would be a positive rather than negative outcome.

106 Companies should consider how their records of customers' needs can be designed in a way that can help deliver wider benefits to their customers; for example, reducing communication burdens for customers through data sharing." Ofwat. [Service for all vulnerability guidance](#). 2023.

107 There are currently memorandums of understanding between the ICO and the FCA, Ofcom and Ofgem but our recommendation would focus on this specific type of data sharing – <https://ico.org.uk/about-the-ico/our-information/working-with-other-bodies>

108 The Information Commissioner's Office. [Make a complaint about how an organisation has used your personal information](#).

109 A super complaint is a complaint made by an organisation on behalf of a group of consumers about an issue in a market. Super complaints can currently be made to the FCA and CMA, as well as other regulators. Most recently this was [introduced for the Online Safety Act](#).

“Data protection / security is paramount. There needs to be robust systems to ensure sensitive information is not misused.”

*Expert by experience*

“The adoption of a strict code of conduct by the parties that information would be shared with would be useful as it would hopefully then lead to a consistent approach being adopted by all those organisations who sign up to it.”

*Carer*

**The ICO should create a good design blueprint and standards for systems that share support needs across essential services** so that they are inclusively designed and meet the needs of different groups of people, including those with mental health problems. Crucially the involvement of people with lived experience should be embedded into the design process for any future data sharing systems. This design blueprint should utilise our principles and accompanying guide on putting them into practice.

“Please ask us before they create a system that needs to work for us. People like me with lived experience, although a system would need some kind of list based organisations. It needs to know that not one size fits all, not everyone with anxiety experience the same triggers, let us help build the system, they have to listen and put agents in the role where they truly understand what it is really like on a daily basis.”

*Expert by experience*

During this work, it has been clear that there is a lot of confusion around data sharing and what people’s rights are. As this type of data sharing continues to develop in essential services it’s therefore important that people understand what should and should not be happening with their data. **There should be a public awareness campaign to help people understand their rights around data sharing and what to do if something goes wrong. Additionally relevant organisations like charities and local authorities should create data champions to access systems that share extra support needs and crucially support people when things go wrong.** The focus should still be on getting the system and framework right rather than putting the expectation on individuals, but this would be an extra layer to build trust.

These recommendations are crucial for building trust in any existing and future systems that share extra support needs in essential services. Creating frameworks to build trust has also been recommended in other types of data sharing, such as smart data,<sup>110</sup> and has been at the heart of large scale digital projects, for example the work by the Estonian government.<sup>111</sup> Without these changes, there are significant risks of harm and damage to trust if something goes wrong, regardless of which of the four routes are taken.

## Supporting those who don’t want to share

While creating clear rules and a framework will help build trust and lead to more people sharing their data, there will still be those who won’t want to share. While not sharing means people would have to disclose their needs to each of their providers in order to get the specific support they might need, there are steps that can be taken to still provide them with good outcomes.

110 Which? [Building consumer trust in Smart Data](#). 2024.

111 GovTech Intelligence Hub. [Smarter Data Exchange: How X-Road Became a Model for Digital Public Infrastructure](#). 2025.

Crucially if services are well designed from the beginning, there is less of a need for someone to have adjustments on top of that. **Regulators of essential services should set out, or reinforce existing, expectations for firms around ensuring that products and services are inclusively designed.**<sup>112</sup> Beyond this, regulators should be clear to firms that taking part in a data sharing system does not minimise the need to have good internal processes to allow someone to disclose their needs directly to them. Regulators should ensure that firms are monitoring outcomes between those who have shared their data and those who have not.

**Additionally, firms and systems that share extra support needs should be clear to customers that not sharing data will require them to individually go to each provider to register their needs, or risk facing limitations on what support the individual will receive.**

Put together these recommendations will bring us closer to the other blueprints for data sharing in essential services outside of carrying on the existing path.

### How to manage the existing data sharing systems in essential services

While the above recommendations help to shape the future of this type of data sharing in essential services, there still remains the challenge of several existing systems. There are two areas of focus, the first on fixing some of the smaller issues that exist, the other is what should happen to the systems moving forward.

### Giving people more control when data is shared between the energy and water sector

At the moment, when a water company shares with an energy distributor or supplier, this is done using Substantial Public Interest rather than consent. However, many people with mental health problems have expressed how they want to feel in control of their data and know what is happening with it. In order to help those who have had their data shared feel more in control, **utilities companies should be required to check-in periodically to ensure individuals are still happy for their data to be shared.**

Ofwat currently sets out expectations that water companies should aim to contact 90% of households on their PSR every two years,<sup>113</sup> this should be expanded to include our recommended check-in and Ofgem should introduce similar expectations. Companies would have to be cognisant of people's mental health problems which might mean they do not respond, even though they would want their data to still be shared. This could be through the use of any information they have on someone's circumstances or through inference based on needs based data. Where this is not possible, firms and data sharing systems should ensure that customers are able to easily reshare their data if needed.

In order to help those who want their data recorded on the PSR moving forward to feel in control of their data, **utilities companies should ensure they make the option to opt-out of data sharing prominent and provide more transparency during this process.** For example, firms should not just include information about data sharing in a generic data privacy policy.

<sup>112</sup> In water, one of the objectives of the [Service for all vulnerability guidance](#) is 'inclusive by design'. In Financial Services, there is a requirement in the [Consumer Duty](#) for firms to "ensure that the design of the product or service meets the needs, characteristics and objectives of customers in the identified target market", although an inclusive design approach is only suggested by the FCA. In [telecoms](#), firms are only encouraged, rather than required, to take an inclusive approach when designing services. In energy, inclusive design is part of Ofgem's Consumer Vulnerability Strategy but is not currently a requirement for firms.

<sup>113</sup> Ofwat. Priority Services Register standards. 2025.

## Protecting people's data during change

Our work with the People's Panel revealed a potential blindspot in the current systems that share extra support needs – what happens when a company that data has been shared with goes bust or is bought out, or when someone switches company. **When a company that is part of a system sharing support needs is taken over, there should be clear information on what happens to the data and the ability for someone to request their data to be deleted or ported to the new company.** In energy, Ofgem should consider whether the rules and guidance around the Supplier of Last Resort could be amended to facilitate this. **When a customer switches companies that are part of a 'support needs' sharing system, customers should have the ability to port their information to the new company.**

## Bringing the existing systems into the new framework

Our recommendations above will help bring a consistency to this type of data sharing in essential services that is currently lacking. However, decisions will need to be made about how the existing systems fit into this. As a first step **an independent audit of the existing data sharing systems should be undertaken.** This should aim to understand elements such as how they work, how data is protected and how they overlap. Ideally this would form part of the work by DBT and regulators as set out above. The audit should be undertaken by a university or trusted consumer organisation without a connection to the existing systems. The audit should use a criteria that utilises the principles we have developed with our Research Community and assess how well the systems meet them. The audit should also consider what could be learnt from the different systems and how challenges were overcome. The audit should include a recommendation on what should be done with the different existing systems, for example which of the routes we have set out should be taken. Our preference would be for models 3 or 4, with 2 being a stepping stone rather than the final destination.

Moving forward from this audit, it would be necessary to ensure that the existing systems follow the framework that will have been created. **A kitemark accreditation scheme should be created so that any system wanting to share data in essential services would need to be part of it.** The assessment criteria for this should be based on the rules and standards framework, as well as our principles, and consider elements such as how safe the data is and how accessible the system is. The data sharing system would have to follow requirements, for example having to have certain data security policies in place,<sup>114</sup> and commitments, such as around transparency.

“The adoption of a strict code of conduct by the parties that information would be shared with would be useful as it would hopefully then lead to a consistent approach being adopted by all those organisations who sign up to it.”

*Expert by experience*

<sup>114</sup> For example signing up to Cyber Essentials from the NCSC, which data suggests leads to a lower likelihood of claiming on insurance. National Cyber Security Centre. [Annual Review 2025](#).

## Creating a cross-sector network for the sharing of support needs in essential services

Combined together our recommendations will help create one of the alternative options to carrying on with the current approach to this type of data sharing in essential services. They will create consistency and provide a framework for how data should be shared, and ensure that any data sharing system follows the rules. If DBT takes forward the plans for a 'Share Once Support Register' and leads on the creation of the framework, it should take a decision on which of models 3 or 4 should then be adopted.

Ideally, the final blueprint will allow individuals to easily control their data – from sharing to changing and withdrawing, such as through a central dashboard that has offline connections. While this would require technical innovation, it is something that is being considered in other parts of data sharing where there are similar challenges in a disparate landscape. For example, Ofgem have set out plans for a single consent solution for energy data,<sup>115</sup> and there is debate over how a consent dashboard could work in smart data.<sup>116</sup>

In the future, this network could join with other types of data sharing such as Open Banking, Open Finance and Smart Data, as well as local authority and health data. Crucially, choice of what to share and with which organisations should always be paramount as more elements are added to the network. There is the potential that this could be adopted into plans for a Digital ID,<sup>117</sup> with someone being able to add their support needs. However, conversations with Research Community members suggest that there is significant concern around such an initiative. The government should think carefully about how Digital ID is taken forward and whether including the sharing of support needs within it does more harm than good.

115 Ofgem. [Consumer Consent decision](#). 2025.

116 For example, see CFIT. [Proofs of Concept and Technical Resources](#).

117 Department for Science, Innovation and Technology. [Digital ID scheme: explainer](#). 2025.

## Conclusion

Sharing support needs can be a crucial component in boosting people with mental health problems' financial wellbeing. However, it can only work if it is actually designed for people with mental health problems and takes issues around trust, security and inclusion seriously. Progress around this type of data sharing has shown what is possible, but we find ourselves at a crucial fork in the road. We're in the midst of a new digital revolution with AI changing so much, so quickly and visions of utopia and dystopia competing with each other. Without coordination, we risk sleepwalking into a crisis or being left behind while innovation moves the paradigm beyond what people actually need. The moment to create a network for the sharing of support needs across essential services is now, but it needs action.





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