Digital welfare as essential to ensuring the right to food

Submission by the SOAS Food Studies Centre to The Right to Food UK Commission, in response to Questions 2, 3, 5,7, 10, 11, 12.

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Introduction

This evidence is based on our ESRC-funded research entitled *Digitalisation of Food Assistance: Political economy, governance, and food security effects across the global North–South divide*. Our research examines how the digitalisation of welfare and food assistance in England shapes access to food for marginalised populations, and how these changes interact with broader political and economic processes. Our working paper can be accessed here: https://digitalisingfood.org/food-poverty-digital-power-the-social-realities-of-digitalising-food-assistance-in-england/.

Our evidence draws on qualitative fieldwork conducted across Birmingham, Newham and Barnet in London, Gateshead and Hartlepool, including participant observation in food banks and community centres, and interviews with local authorities, charities, community organisations, and people experiencing food insecurity. The research focused on the lived experience of accessing digitalised welfare and food assistance, including Universal Credit, Healthy Start prepaid cards, free school meals, and supermarket vouchers.

We are submitting evidence because our findings highlight that digitalisation has made it harder for marginalised populations to apply for welfare thus exacerbating food insecurity, that the failure of government to provide sufficient support for digital inclusion has led to a fragmented and unaccountable system, and that the fear and reality of surveillance is hindering access to welfare and food. We elaborate on these points below.

1 – The digitalisation of welfare exacerbates food insecurity

Since 2010, successive governments have pursued a ‘digital-first’ or ‘digital-by-default’ strategy across welfare, healthcare, local government services, and job-seeking support (UK Government, 2012). Digital-by-default government services require citizens to interact with the state primarily through online platforms. Universal Credit was introduced in 2013

and requires claimants to apply online and maintain ongoing digital communication and reporting with work coaches. To set up an online account, an individual must have access to the internet and a laptop or smartphone, an email address, and a mobile phone number to receive verification codes (as well as a bank account and a valid ID document).

Despite early concerns about the risk of exclusion of people on low income (Alston, 2018), digitalisation has continued. The case for cashless free school meals was made more strongly since 2012 (having been introduced since the early 2000s) to reduce stigma (Freeman, 2026), and the Healthy Start scheme that provides funds for vegetables, fruit and milk for new mothers and young children, was fully digitalised by 2022 (as a prepaid debit card). In addition, several apps were developed in 2015 to distribute supermarket surplus food, and supermarket vouchers are often distributed in food banks and community centres to support food insecure people.

Our research shows that food-insecure and marginalised populations face multiple barriers in accessing digitalised welfare and food assistance.

First, poverty influences both food insecurity and digital exclusion. While poverty clearly results in an inability to purchase sufficient and healthy food, especially when food prices are rising, it also acts as a major barrier to digital inclusion. Limited access to devices such as smartphones or laptops, or being dependent on shared devices, came up frequently during our interviews. Even if people had a device, this did not equal digital access, as people could not afford to purchase data, or broadband, and public spaces with free Wi-Fi have declined over the past decade.

Secondary barriers include digital skills, language, and cultural factors. They do not operate independently but become more difficult to navigate when experienced alongside the material constraints of poverty. Education, income, job status, social networks, gender, cultural background, language and available time influence not only access to digital tools but also how effectively people can use them (Van Laar et al. 2020). We found, for example, that basic digital skills such as use of social media, did not equip people to complete Universal Credit or Healthy Start applications. English language and literacy skills are essential but even for native English speakers, the language used on the application forms is hard to comprehend. The psychological stress caused by the fear of making mistakes adds to the multiple and overlapping barriers.

Third, the design of digital welfare systems creates barriers. Application forms are long and complicated and are hard to complete on a mobile phone, the most common digital device that people have. In addition, the process may require obtaining, scanning and uploading ID documents, verification codes requiring email accounts and passwords, and more.

These hybrid systems can be extremely elaborate and time-consuming. For example, supporting one family with PIP forms took more than 12 hours of support over four weeks because of the numerous documentary proofs needed (see case study on p49 in our working paper). People almost always needed help in applying, often from volunteers in food banks (see below), or simply gave up.

Food project and community workers in east London reported systematic application failures with Healthy Start; some did not bother to encourage applications among their community anymore, as they never had anyone at the food bank who successfully enrolled. A charity worker in north London reported that it's hard to find out what caused the rejection. The latest figures show that 34% of eligible families were still not accessing Healthy Start support (Barrett et al., 2024). One community centre manager, who had a Healthy Start card, had simply given up on the card because of its erratic functioning.

Similar issues apply to vouchers, including those distributed during school holidays: accessing vouchers requires multiple digital steps, including emails, links, website navigation, app downloads and account creation. During school holidays in particular, parents are frequently required to move between platforms and complete online "shopping-style" processes that assume a level of digital literacy and access that many do not have. Even when families can navigate the system, access can still be constrained. Parents reported receiving vouchers restricted to specific supermarkets, sometimes more expensive or located further away than their usual shop. This further embeds supermarkets within food assistance systems at a time when the UK groceries sector is increasingly consolidated, with just four major retailers accounting for two-thirds of market share (DEFRA, 2026). Expanding voucher schemes to support independent retailers and local markets could help diversify food supply and reduce reliance on a highly concentrated supermarket system.

Finally, automated decisions on eligibility, benefits levels, and potential fraud make challenging them difficult or impossible. This results in either lower benefit levels (compared to entitlements) or payments being stopped for a period. For example, an Uber driver in Newham worried about submitting a change of circumstances as Universal Credit algorithms wouldn't reflect new payment structures, meaning his Universal Credit payment was reduced. Failure to keep appointments or provide regular updates may lead to sanctions. People experiencing poverty may miss key notifications due to lack of internet access, devices, or mobile credit. In the North East, food charities reported that even practical constraints such as transport disruptions or caring responsibilities can lead to missed appointments. Previous research has found that sanctioning is closely associated with increased food bank use (Loopstra et al., 2018).

As such, digitalisation creates new forms of exclusion and compounds existing food insecurity.

2 – A fragmented and unaccountable system

Over the past decade, the number and range of charitable food assistance initiatives in England have expanded significantly, leading to a fragmented system that provides uneven access across England. These include food banks linked to Trussell and the Independent Food Aid Network as well as many independent or alternative projects that aim for more sustainable models. Alternative projects don't rely solely on donations and surplus and emphasise wider support activities than emergency food parcels. These projects are variously called: affordable food clubs, low-cost community food support, social supermarkets or food hubs.

Without sufficient government support for digital inclusion, responsibility for addressing digital exclusion as well as food insecurity has increasingly shifted onto local authorities, charities, volunteers, and communities themselves. Services offered by alternative food support organisations often include a broad range of 'wrap-around' support alongside food provision. 'Wrap-around' may include anything from access to computers and free Wi-Fi, support with digital welfare applications, digital skills training, cooking and budgeting classes, and signposting to housing, health, and other state services. People receiving Universal Credit are among the most frequent users of these services, in food assistance projects.

While food support projects are broadening in their scope, community spaces are declining and those that remain are increasingly turning into hubs, where a combination of food, digital, and welfare support is delivered. While alternative food projects and community hubs can mitigate some immediate effects of food insecurity and digital exclusion, they have also produced a fragmented and often unaccountable landscape of provision that varies significantly between places and providers.

Our research reveals that access to support is inconsistent, often difficult to navigate, and heavily dependent on local capacity and voluntary labour. Many volunteers report being overstretched and insufficiently trained to provide complex digital literacy support or to manage the sensitive information involved in online welfare applications. Even in spaces that have developed targeted digital inclusion services, maintaining consistent access to devices, internet connectivity, and mobile data remains a significant challenge. One space adopted a digital champions model in which volunteers supported food bank users;

however, it lacked adequate internet connectivity because the premises available free of charge were located in a poorly serviced area. Although these organisations play an essential role in supporting people experiencing hardship, reliance on uneven and insecure local provision cannot substitute for adequate social security or a coordinated national strategy to address poverty, hunger, and digital exclusion.

Ultimately digital inclusion as part of charitable food aid projects or community hubs does not provide an accountable or efficient system of support, nor does it address the structural causes of food insecurity. More broadly, our evidence suggests that some of the most marginalised groups are still not being effectively reached by existing systems of support, in part because of persistent digital exclusion.

3 – The fear and reality of surveillance

One important aspect of the digitalisation of welfare and food assistance systems is the expansion of surveillance and data extraction into the lives of marginalised populations. Our findings show that digital systems were often experienced not simply as administrative tools, but as mechanisms of monitoring, control, and corporate expansion within the food and welfare system.

The requirement for Universal Credit claimants to maintain an online journal for regular communication with the Department for Work and Pensions, combined with the nature of precarious work, has created a system of ongoing surveillance for poor and marginalised populations. People move in and out of Universal Credit and Healthy Start depending on changing levels of income thus leading to long-term monitoring of work, income and welfare for certain sections of the population. This applied, for example, to a man on an uncertain zero-hours contract with Amazon, who previously worked with with UberEats. A couple in Hartlepool explained: ‘people need permanent jobs to be able to get off Universal Credit, [it is necessary to] get rid of zero-hour contracts’. This raises two issues: first, that for those whose work is precarious and variable, both work and Universal Credit payments vary from month to month, thus making it difficult to plan or budget (a reason often given for food insecurity). Second, people on precarious wages are under continuous surveillance, having to provide information on their income on a weekly basis. At the same time, they had no choice but to provide personal information as a condition of receiving benefits.

In a digital voucher scheme pilot run through a food bank in Barnet, we found that the digital format triggered unexpected resistance from people clearly in need of welfare support. Volunteers reported encountering 'a fairly serious suspicion, that if they participated, they would be tracked in some way and that information would be used against them' (see case study on page 55-56 of our working paper). These fears, whether well founded or not, reflect marginalised populations' rational assessment of digital surveillance risks, particularly for those with insecure immigration status or benefits claims. Specific evidence of this for Healthy Start was found in a recent evaluation, in particular the fear that information provided would affect other welfare entitlements or that they would have to pay money back in the future (Barrett et al., 2024: 6). A food pantry manager in east London told us how people coming to food banks and community centres linked digitalisation to everyday alienation, especially where language barriers, limited Wi-Fi, or device poverty were involved, and where fears of surveillance persist.

The growing role of private corporations in financial and data management introduces another form of surveillance. The NHS Healthy Start scheme operates through prepaid cards issued by allpay under a Mastercard licence (NHS, 2026). Palantir and Amazon have been contracted for data storage and processing with NHS and DWP respectively.

Information on the use of claimant data for machine learning and profiling, the nature of the algorithms, and the precise role of the different private companies is largely undisclosed. Freedom of information requests have had only a limited response (Privacy International, 2020). The NHS contract with Palantir states that it can use stored personal data to improve its own systems. At the same time, Palantir also builds AI technologies for surveillance and military purposes globally, and in the UK has contracts with the police and immigration authorities. Interoperability between these systems could lead to the exchange of sensitive data. Its terms of service with the NHS are subject to a non-disclosure agreement (Privacy International, 2020). The same concerns apply to Amazon Web Services (AWS). In 2016, AWS signed a cloud hosting agreement with the DWP; the Home Office (responsible for asylum seekers) and DEFRA both signed agreements in late 2023 (Butler, 2024).

Detail on the algorithm and the data the DWP uses has not been forthcoming. It is known, however, that past data on claimants is used to profile them and to predict the risk of fraud, and that this has been discriminatory. Marginalised people are less able to appeal fraud allegations and may still have their data recorded erroneously as fraudulent. Also, as past data are based on DWP staff determinations, their own biases may have come into the algorithm too. Information disclosed by the DWP confirmed disparities in age and disability beyond what are expected, showing discrimination in cases flagged as a fraud risk (Public Law Project, 2023a; Big Brother Watch, 2025).

Increased transparency is needed in government contracts, with the introduction of human rights safeguards and impact assessments (see also Privacy International, 2020). These are particularly important when contracts deal with vulnerable populations, and when we know companies like Mastercard and Palantir lobby specifically for welfare contracts (Quinn, 2023). At a minimum, safeguards are needed in order to ensure informed consent when people provide their data when applying for welfare programmes.

4 – Recommendations for a Right to Food law

"The right to food is the right to have regular, permanent and unrestricted access—either directly or by means of financial purchases— to quantitatively and qualitatively adequate and sufficient food corresponding to the cultural traditions of the people to which the consumer belongs, and which ensure a physical and mental, individual and collective, fulfilling and dignified life free of fear" (Special Rapporteur, OHCHR)

The Committee on Economic, Social and Cultural Rights, in General Comment No. 12, requires States to recognize "the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing, and to the continuous improvement of living conditions"[1].

Our evidence shows that access to food and related welfare support increasingly depends on digital infrastructure, devices, design and skills; and that digital exclusion serves as a barrier to realising the right to food in practice. Digital inclusion is therefore essential to ensure the right to food.

What a right to food law should include:

- A right to food law needs to include digital access. The digitalisation of food assistance and welfare makes this necessary, as without digital access, people are unable to receive food or welfare support. Digital access entails access to devices, data or broadband (going beyond privately provided social tariffs, and ensuring digital infrastructure covers rural and urban populations). In addition, it requires maintaining public spaces where free Wi-Fi is available, as well as design that is user-friendly, and sufficiently funded in-person support for those who need it. Responsibility for providing this support should not fall primarily on food banks, alternative food projects, or volunteers. Minimum Digital Living Standards should be used as a benchmark to ensure households can participate fully in digital society.

[1] https://docs.un.org/en/E/C.12/1999/5

- The law should be clear about the respective roles of national and local government, including how initiatives such as the Crisis and Resilience Fund are delivered in practice. Digital inclusion will play an integral part in access to crisis funds for many crisis-affected populations.

- National strategies relating to food insecurity and child poverty should explicitly incorporate digital inclusion as a right linked to the right to food.

- The Labour manifesto commitment to enact the socio-economic duty in Section 1 of the Equality Act 2010 (Labour Party, 2024), which requires certain public bodies to consider how their strategic decisions might help to reduce inequalities associated with socio-economic disadvantage. This should include addressing digital exclusion.

- Like Privacy International (2020), we call for the introduction of human rights safeguards and for impact assessments into government contracts with data analytics companies. This should include transparency around how data is stored, processed and potentially used.

How this should be monitored:

Welfare and food assistance systems should be designed and regularly evaluated through funded user experience research, reflecting the diverse barriers faced by different groups. This should include reviewing the effectiveness of existing digital inclusion support and identifying what forms of assistance people actually need in practice, rather than relying on informal peer advice, fragmented 'hubs' and 'wrap-around' support models linked to food assistance projects.

- National food security surveys (e.g. through the family resources survey) should include a measure of digital inclusion or exclusion, so this can be linked to food security. In addition to food bank use, it can include food bank users who are digitally excluded.

- User experience should be systematically monitored and evaluated and used to develop user-centred digital design. This needs to be an explicit part of digital

transformation and properly funded. Accountability mechanisms for addressing the harmful user experiences associated with automated decision-making and welfare sanctions need to be strengthened.

- Further studies should be conducted on the use and effect of alternative food projects and community hubs on food security and digital inclusion, and to provide recommendations for a standardised mechanism accessible to all who need it, rather than ad hoc and fragmented services through hubs or 'wrap-around' in food assistance projects.

- The Healthy Start scheme uptake should be monitored in relation to digital inclusion and the child poverty strategy.

- A comprehensive, independent and impartial review of the use of digital technologies deployed by the DWP should be conducted.

Accountability mechanisms:

- The inclusion of those who use digitalised welfare and food assistance in monitoring and evaluation processes is essential to ensuring accountability. This should include diverse population groups, including migrants, refugees and asylum seekers, the unemployed, and those in precarious work across all ethnic groups and geographical areas. Users' lived experiences should inform understanding of why access to digitalised welfare and food assistance is successful for some groups but not for others.

- Evaluations should also systematically assess funding levels, resource allocation, and local authority capacity, to ensure that delivery systems are adequately resourced and responsive to need.

- Greater transparency is needed in government contracts with data analytics and technology companies, particularly where systems affect vulnerable populations in services such as the NHS and DWP.

References:

Alston, P., 2018. Statement on Visit to the United Kingdom, by Professor Philip Alston, United Nations Special Rapporteur on extreme poverty and human rights. UN: New York.

Barrett, M., Spires, M., Vogel, C., 2024. "The Healthy Start scheme in England "is a lifeline for families but many are missing out": a rapid qualitative analysis". BMC Med 22, 177. Available at: https://doi.org/10.1186/s12916-024-03380-5

Big Brother Watch, 2025. Suspicion by Design: What we know about the DWPs algorithmic black box, and what it tries to hide.

Butler, G., 2024. "AWS wins £94m contract with UK Gov's DWP". Available at: https://www.datacenterdynamics.com/en/news/aws-wins-94m-contract-with uk-govs-dwp/ (accessed 26 March 2025).

Freeman, S. (2026). School Meals Through The Years As We Celebrate NSMW14. Blog. https://www.iris.co.uk/blog/education/school-meals-through-the-years-as-we-celebrate-nsmw14/ (accessed 28 May 2026).

Loopstra, R., Fledderjohann, J., Reeves, A., Stuckler, D., 2018. "Impact of Welfare Benefit Sanctioning on Food Insecurity: a Dynamic Cross-Area Study of Food Bank Usage in the UK". Journal of Social Policy 47, 437–457. https://doi.org/10.1017/ S0047279417000915

NHS, 2026. "NHS Healthy Start scheme rules". NHS. Available at: https://www. healthystart.nhs.uk/scheme-rules/ (accessed 14 January 2026).

Privacy International, 2020. All Roads Lead to Palantir. Available at: http:// privacyinternational.org/report/4271/all-roads-lead-palantir (accessed 28 February 2024).

Public Law Project, 2023a. "DWP needs to assess bias in its automated systems, says committee". Public Law Project. Available at: https://publiclawproject.org. uk/latest/dwp-needs-to-assess-bias-in-its-automated-systems-says committee/ (accessed 11 January 2026).

UK Government, 2012. "GOV.UK: making public service delivery digital by default". GOV. UK. Available at: https://www.gov.uk/government/news/launch-of-gov uk-a-key-milestone-in-making-public-service-delivery-digital-by-default (accessed 11 January 2026)

Quinn, B., 2023. "Palantir lobbied UK disabilities minister to use software to tackle benefits fraud". The Guardian. Available at: https://www.theguardian.com/ politics/2023/aug/08/palantir-lobbied-uk-disabilities-minister-software benefits-fraud (accessed 30 October 2025).