

From: [REDACTED]
To: [datasharingcode](#)
Subject: ICO data sharing code of practice - RAEng publication on data sharing
Date: 16 September 2019 17:32:15

Dear Data Sharing Code team,

Many apologies that this email comes after the close of your consultation deadline, I hope it is okay that I am emailing you with this now.

The Royal Academy of Engineering recently published [Towards trusted data sharing: guidance and case studies](#), which may be of interest in relation to your draft data sharing code of practice.

The publication is aimed at organisations that have identified the opportunity to create value through sharing data and are considering setting up arrangements for data sharing. It explores the key enablers and constraints, including governance, business models, technologies and regulation. A data sharing checklist guides organisations through the main areas for consideration as they work towards a data-sharing solution, including consideration of whether the data-sharing opportunity is legal and how the nature of the data and its use affect the principles around data is shared.

The case studies highlight the many benefits of sharing data for society, organisations and individuals. The case studies cover a range of data-sharing activities across public and private sectors, and include examples with both personal and non-personal data. Although not falling under the data protection act, non-personal data may be sensitive for commercial or national security reasons, and similar principles around privacy and security, and controlling access to and use of data, are likely to apply.



Findings from the report that may be of interest include the following:

- The report finds that the development of robust and trustworthy frameworks for sharing data are key to making data sharing practices more acceptable to organisations and the public, and we therefore welcome the ICO's draft data sharing code of practice.
- Indeed, the effort required to share data often reflects an imperfect context in which data sharing occurs; frameworks and guidance, among other aspects, will help in decreasing the friction involved in data sharing.
- Mechanisms go beyond securing data-sharing agreements and include:
 - Technologies and architectures that facilitate security or privacy
 - Robust processes for checking quality
 - Mechanisms for ensuring the various parties are compliant with terms and conditions
 - Ensuring various parties have the skills and resources to deliver their parts of the agreement
 - A user-centric approach, with easy-to-understand tools and policies.
- A central hub or trusted intermediary can facilitate trusted sharing, but it needs its own business model and governance framework to be sustainable and underpin trust.
- Data must be assembled, structured and managed over its lifecycle so that it meets privacy or business requirements, for which a robust engineering approach is needed. Data sharing may be just a small, but potentially significant, part of the requirements and its success relies on the engineering being done well.

- It will be vital to ensure that data is being managed in line with data-sharing agreements between parties exchanging and using the data. Commitments to manage and use data appropriately may extend over many years. This is even more important where tensions exist, for example, between the need for an organisation to meet its own aims and the need to maintain privacy or other regulatory or legal requirements.

I would be happy to discuss further if useful,

Best wishes



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