

Q1 We intend to revise the code to address the impact of changes in data protection legislation, where these changes are relevant to data sharing. What changes to the data protection legislation do you think we should focus on when updating the code?

Anonymisation and re-identification (especially from combining multiple data sources) Security requirements (cross reference to NIS) and the roles of Data Controllers (single and joint) and Data Processors

Q2 Apart from recent changes to data protection legislation, are there other developments that are having an impact on your organisation's data sharing practice that you would like us to address in the updated code?

Yes

No

Q3 Please specify
NIS and PECR

Q4 Does the 2011 data sharing code of practice strike the right balance between recognising the benefits of sharing personal data and the need to protect it? Please give details.

Yes

No

Q5 In what ways does it achieve this?

Q6 In what ways does it fail to strike the right balance?

More details on onward sharing between data controllers (ie when does a third party become a data controller and how much control does the original data controller have

Q7 What types of data sharing (eg systematic, routine sharing or exceptional, ad hoc requests) are covered in too much detail in the 2011 code?

None - There needs to be a greater library of worked examples and analysis of decision making

Q8 What types of data sharing (eg systematic, routine sharing or exceptional, ad hoc requests) are not covered in enough detail in the 2011 code?

All of themk - There needs to be a greater library of worked examples and analysis of decision making

Q9 Is the 2011 code relevant to the types of data sharing your organisation is involved in? If not, which additional areas should we cover?

More details about additional controls around sharing children's details especially when they are too young to give consent. How do we provide additional controls

Q10 Please provide details of any case studies or data sharing scenarios that you would like to see included in the updated code?

Anonymisation of data and how you ensure the data remains anonymised

Q11 Is there anything the 2011 code does not cover that you think it should? Please provide details.

NIS

Q12 In what other ways do you think the 2011 code could be improved?

The case studies to be more structured against a framework so you read the example and then have a sheet with a breakdown covering all the elements eg what evidence is needed for security and governance

About you

Q13 Are you answering these questions as:

- A public sector worker?
- A private sector worker?
- A third or voluntary sector worker?
- A member of the public
- A representative of a trade association
- A data subject
- An ICO employee
- Other

Q14 Please specify

Q15 Please provide more information about the type of organisation you work for, ie a bank, a housing association, a school.

Department for Education

Q16 We may want to contact you about some of the points you have raised. If you are happy for us to do this please provide your email address:

[REDACTED]

Thank you for taking the time to share your views and experience.