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National Data Strategy

Greater Manchester response

December 2020

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# National Data Strategy: Greater Manchester response

## Context

The Government published its National Data Strategy on 9 September 2020. The strategy is currently open for consultation until 2 December 2020. A response to the consultation will be published in 2021.

<https://www.gov.uk/government/publications/uk-national-data-strategy/national-data-strategy>

The purpose of the strategy is to “set out how best to unlock the power of data for the UK.” It sets out a framework for how Government will approach and invest in data to strengthen the UK economy and create opportunities in the future.

The remainder of this document sets out the Greater Manchester response to the NDS consultation. It reflects the views of the Greater Manchester Combined Authority, Greater Manchester Police, Greater Manchester Fire and Rescue Service Transport for Greater Manchester and the Greater Manchester Health and Social Care Partnership. We have also shared this response with the 10 Greater Manchester local authorities and [Health Innovation Manchester](https://healthinnovationmanchester.com/).

## Introduction

At the beginning of 2020, the Greater Manchester Combined Authority launched the Greater Manchester Digital Blueprint, which set out our ambition to be recognised as a world leading digital city-region that puts our residents at the heart of our plans. This Blueprint reflects a Greater Manchester ambition and is more than the Combined Authority – it includes the perspectives and views of a wide cross section of stakeholders in the city region including public sector, academia, industry and the voluntary & community sector.

This ambition focuses on 5 priorities and two cross cutting enablers: Empowering People; Enabling Innovative Public Services; Digitally Enabling all Businesses; Creating and Scaling Digital Businesses; and being a Global Digital Influencer; plus the enablers of Digital Talent Pipeline and World Class Digital Infrastructure.

The Blueprint encompasses how data, digital technologies, skills and people combine to fulfil the ambitions set out in our Greater Manchester Strategy – for Greater Manchester to be one of the best places to Grow Up, Get On and Grow Old.

Greater Manchester’s ambitions can only be realised if we harness the power of data and use it responsibly and proactively to improve outcomes for the citizens and businesses of Greater Manchester.

*“We want the people of Greater Manchester to feel empowered and have their lives bettered by the opportunities that digital provides.”*

– Cllr Sean Fielding, Leader of Oldham Council and GMCA Lead for Employment, Skills and Digital

The range of activities underpinning this illustrates how central digital transformation is to our city region. Digitisation has played an important role through the pandemic, enabling us to identify and support vulnerable people, mobilise volunteers for community responses and provide better care through our GM care record. Alongside this we are digitising Early Years for our 200,000 0-5 year olds, supporting digitally excluded people, upskilling and reskilling people, applying emerging technologies to our transport network and building out over 2,700km of new fibre connectivity.

Furthermore, our Local Industrial Strategy, launched in 2019, reiterated the importance of the digital sector to our economy, and highlighted how data – especially public sector data – can be a huge asset to help drive productivity growth and innovation in the city region. Our Local Data Review is currently exploring the challenges the GM public sector faces in opening up its more valuable data assets for wider re-use, and the challenges businesses, academia and the voluntary sector face in accessing our data. By doing so, we can identify the actions we need to take to realise the full potential of our information.

## Greater Manchester’s approach to data

GM is developing its Information Strategy – a broad strategy focused on our information, how it is managed, shared and used. Our Information Strategy will ensure information will be a valued and effectively used resource to support the delivery of services for the People of Greater Manchester.

Our work is governed by a GM Information Board. The GM Information Board provides strategic oversight and coordination of the GM system approach to better use of information and data. It does this through maintaining and supporting a consistent set of principles and standards with regards to information governance and data sharing. We are continuing to develop partnership governance arrangements to provide system leadership for information governance through the GM Information Board.

By coordinating and aligning work across multiple organisations, the GM Information Board has supported a range of workstreams that have achieved significant successes in public service delivery in recent years:

* Greater Manchester Combined Authority is the first Combined Authority in the country to meet the NHS Data Security and Protection Standards. This supports our wider work on the integration of health and social care services, and better coordination between health services and public services.
* The COVID pandemic has accelerated the development of the GM Digital Platform, a multi-tenanted cloud platform that supports data integration between a range of public services, and the expansion of the Local Health Care Records Exemplar with Salford Royal NHS Trust. We are the first city-region in the country to focus our efforts on better integration of health records with other public services, and this shows our commitment to creating a single public service system in GM.
* Our Troubled Families programme has supported over 40,000 families through a coordinated information sharing approach, focusing on what works, improving decision making and providing better referrals in the first instance. It offers Greater Manchester a chance to explore proactively responding to, and preventing, issues rather than simply reacting once an issue reaches a crisis point.

Greater Manchester is committed to developing trust and implementing ethical and responsible use of data, and thereby raising and realising the importance and value of information. This aim is illustrated by several programmes and workstreams:

* We look forward to working in partnership with the [Centre for Data Ethics and Innovation](https://www.gov.uk/government/organisations/centre-for-data-ethics-and-innovation) to explore data ethics and data governance for responsible technology, and to develop a use case for responsibly maximising the value of data.
* As co-creators of and signatories to of the MHCLG Local Digital Declaration we are committed to designing safe, secure and useful ways of sharing information to build trust among our partners and citizens, to better support our communities especially the most vulnerable, and to target our resources more effectively. This will allow us to better serve citizens and reduce the need to ask them for the same information multiple times.
* Open Data Manchester has worked with Greater Manchester residents, businesses, public sector and third sector organisations to co-design a Declaration of Responsible and Intelligent Data Practice. Greater Manchester Combined Authority was one of the first signatories to the Declaration, aimed at better and more responsible use of information. This Declaration sets a standard for us to achieve in our wider plans, ensuring we focus on the value to the people and businesses of Greater Manchester.
* The Citizen-led data standards project with The Federation which is part of The GM Responsible Tech Collective’s work as a cross-sector community of organisations working to establish Greater Manchester as an exemplary region for ethical tech.
* Greater Manchester is home to an internationally significant and thriving cyber and digital security sector. This is strongly tied with our focus on ethical and responsible data use and understanding the importance of cybersecurity not only as an important part of our daily lives, but also as a valuable and important sector in developing digital skills.
* On the back of the development of the GM Local Industrial Strategy, we have implemented a Local Data Review, to understand and address the challenges of opening up more public sector data. Our work has focused on both the internal challenges faced by the public sector in GM, and the external challenges faced in accessing public sector information. This Review is due to report in early 2021 on the steps we will take to make Greater Manchester’s information ecosystem more open, to support productivity growth and innovation.

## Headline messages

We recognise that not all areas are starting from the same place with regards to their approach to data. Nevertheless, we feel there are a range of issues, concerns and priorities that must be addressed if we are to level up all areas of the UK to achieve the missions detailed in the National Data Strategy. In preparing this response, we have been mindful of the work and responses of other city regions, as well as the people and organisations – public, private and third sector – of Greater Manchester.

Our responses to each of the consultation questions are listed below, but our headline messages to Government for this consultation are:

1. Overall, **we support the aims and missions of the National Data Strategy**. But it is important for us to consider how this Strategy is implemented both nationally and locally.

Our recommendations are:

* + Government should provide greater opportunities for local areas to input to data standards for locally collected or derived information. This should include active engagement with city regions, combined authority areas, local authorities, and the local public sector around the UK.
	+ **Local areas should be provided with greater responsibility to choose the data that it feels is of value to collect.** The devolution agenda, and more recently the COVID pandemic, has shown the different priorities and needs across the UK. Local areas should therefore have greater control and responsibility for the data they collect and have the ability to identify the data that is of value to them. This should be supported by central government, and national bodies.
	+ **Regional expertise should be represented in future policy design.** Local, combined and mayoral authorities have developed significant expertise over the last decade with successful pan-authority data platforms (e.g. London Datastore, MappingGM, GM Digital Platform) that could help with the design of future data, digital and information policy.
1. **Current enabling legislation (the provisions of the Digital Economy Act 2015) were drawn up without local government in mind.** Data-sharing arrangements and practice between Whitehall and Combined and other local authorities varies significantly – and are inadequate. Poor data-sharing can have consequences that range from inconvenience for citizens, to poor use of public funds or even failure to prevent serious harm to vulnerable individuals. The pandemic has highlighted the need for a change in culture, design and practice around data-sharing between local and national government and public service organisations. Designs for data-sharing, and subsequent practice, have not sufficiently taken account of the role, capabilities and existing knowledge of local authorities with respect to vulnerable citizens, to the detriment of the most speedy and targeted response in the early weeks and months of the Coronavirus pandemic. The strategy – and resultant delivery plan – should address these issues.

Our recommendations are:

* + The strategy should focus more on the involvement of the local public sector, and the role it plays in creating, collecting, and sharing vital data for public services and policy development. As a result, the strategy should also focus more intently on ensuring that there is sufficient investment in data capabilities in local government, to reduce barriers to the timely collection, sharing and use of information.
	+ Government should consider how the National Data Strategy would be implemented locally, similar to the approach taken for Local Industrial Strategies. We see GM as an exemplar and a potential test bed for a strong focus on leadership and innovation in good data practice. We would like to discuss the opportunity to deliver this in collaboration with DCMS and other local areas.
	+ Government should engage directly with Greater Manchester to address existing and future challenges around data-sharing between central and local government. Our experience in this area, as well as the scale and ambitions of Greater Manchester, place the city-region as an ideal testbed for developing appropriate local responses to data sharing between central and local government.
	+ Government should work with Combined Authorities and upper tier local authorities to explore additional data-sharing powers in the provisions of the Digital Economy Act 2015.
1. **We do not believe that there should be a separation between the ‘National Data Strategy’ and the proposed ‘Data Strategy for Health and Social Care’.** In Greater Manchester our public services aim to work together, sharing information and in many cases resources, to support our overall ambitions. We therefore do not feel that a separation of strategy at a national level supports cooperation and collaboration at a local level.

Our recommendations are:

* + The National Data Strategy, and the proposed Data Strategy for Health and Social Care should be brought together, to ensure that approaches to data are consistent.
	+ Government should actively involve the expertise of local health and social care data experts in the development of the joint strategy. Greater Manchester’s experience in this area would also be crucial to ensuring a focus on all aspects of health and social care data are fully considered in the full National data Strategy.
1. We feel that **equalities and ethics should be more fully considered in the strategy**. If people cannot access data, they cannot benefit from its use. [Reducing digital exclusion](https://www.greatermanchester-ca.gov.uk/what-we-do/digital/digital-inclusion-agenda-for-change/) is a key plank of our work here in GM, and we feel this could be brought to the fore more in the strategy, linked to the equalities agenda. More widely, there is a greater need for a focus on data ethics within the Strategy and within public sector approaches to data.

Our recommendations:

* + Sufficient resource needs to be allocated by DCMS to develop local government data expertise, to understand and address concerns or misperceptions about government use of data and data-sharing.
	+ Government should explore the opportunity to appoint specialist Data Commissioners to champion minority communities. Greater Manchester would like to explore this opportunity with Government, to ensure that equalities considerations are fully embedded within our work.
	+ **Government should identify and adopt a clear, public framework for government data.** The framework should embed a focus on data ethics and equalities information within the framework.
	+ The National Data Strategy should prioritise maintenance and repair of datasets and infrastructure alongside innovation. This would involve revisiting information through a new lens, such as that of equalities.
	+ Government – both central and local – should more fully recognise data ethics as an important strand of the National Data Strategy. Actions to implement this could involve greater promotion and engagement with ethics frameworks, such as the Declaration for Responsible and Intelligent Data Practice, codesigned by Open Data Manchester and numerous Greater Manchester organisations.
1. **Greater Manchester agrees with the focus of the strategy on the use and re-use of public sector information to support commercialisation, productivity growth, and innovation.** It is important, however, that the benefits of this approach are fully realised, and that local areas are supported to fully realise the value of their information. Our work has shown that there are local and regional variations in skills and capacity for making the most of public sector data. Yet information is most valuable when it is accessible, consistent, and of good quality. The Strategy should focus more on the importance of levelling up local area data skills, capacity and strategic alignment.

Our recommendations:

* + **Government should support the wider opening of public sector data to support productivity and growth.** This needs to involve a culture change to consider the wider economic benefits of opening data beyond transparency and accountability.
	+ Local areas should be supported in conducting Local Data Reviews – identifying locally what data is of value, and how it might be used or released to provide greater benefit. Greater Manchester’s experience in this area, along with organisations such as the Open Data Institute, should be included in the development of a national framework to support these assessments.
	+ **Local public sector organisations should be supported to work across areas to develop appropriate data standards.** These data standards should then be expanded across multiple areas, with active engagement from local leaders and data experts. This approach will support more relevant local data development, and ensure that data infrastructures, collection and sharing are better aligned.

# Detailed Responses to consultation questions

**Q1. To what extent do you agree with the following statement: Taken as a whole, the missions and pillars of the National Data Strategy focus on the right priorities. Please explain your answer here, including any areas you think the government should explore in further depth.**

* **Strongly disagree**
* **Somewhat disagree**
* **Neither agree nor disagree**
* **Somewhat agree**
* **Strongly agree**

Somewhat agree. In general, we believe that the five missions are the appropriate areas of focus for the National Data Strategy, and that the pillars will support these missions.

We believe that the pillars supporting the actions and missions could be strengthened. We agree that data foundations pillar should focus on standardisation and quality of information - information has the greatest value when it is usable, useful and used. Without basic data standards for some datasets, there is a risk of these datasets having nothing but theoretical value (e.g. the varying planning applications, or business rates data). However, we feel that these standards should reflect local expertise about the collection and use of this information. Businesses, academia and the voluntary sector should work closely with the local public sector to drive new standards for data. Furthermore, a focus on data standards should also consider the importance of metadata standards, to better support users’ understanding of information. Data that is useable and useful is also essential in terms of our efforts to improve digital skills and reduce digital exclusion, in particular in relation to motivation and confidence issues which act as a barrier to engaging digitally.

At the same time, we must understand and address the impacts of using, sharing and releasing poor quality, incomplete or biased data. At its worst, poor information can sometimes result in worse outcomes for residents and for businesses and perpetuate or exacerbate inequalities. It is critical that standards address the risk of bias being ‘baked in’ to datasets, systems, processes and standards, and thus and feeding through to decision-making and outcomes. We believe that the fourth pillar should be strengthened through a clearer focus on data ethics, including ensuring that data skills take account of the importance of responsible, ethical and intelligent data practice.

We would be keen to work with Government to examine these issues - including the extent to which predictive analytics can entrench bias and inequality. We would also be keen to work with Government to identify and embed associated mitigation measures.

**Q2. We are interested in examples of how data was or should have been used to deliver public benefits during the coronavirus (COVID-19) pandemic, beyond its use directly in health and social care. Please give any examples that you can, including what, if anything, central government could do to build or develop them further.**

**For question two, we are only looking for examples outside health and social care data. Health and social care data will be covered in the upcoming Data Strategy for Health and Social Care.**

During the crisis there has been a strong sense that local authorities and other local public services have consistently been omitted from initial thinking on designs for data sharing. This manifested itself in challenges related to shielding lists, access to testing data and tracing of complex cases, as well as access to relevant data about people who are furloughed or economically vulnerable. For example, in the case of shielding lists, different lists were being sent to councils and CCG leads with explicit instructions for them not to be shared even though many CCGs share chief officers with councils. Councils with responsibilities for splitting out data for other councils were not told that they had this responsibility for some days after they had started receiving the data.

We would further question the Government’s rationale for dealing with Health and Social care data in a different strategy. While health and social care data could be argued to be a special case, the same argument could be made about a myriad of other data assets (e.g. tax records, Companies House data, geospatial data etc).

This separation implies a variation of approach between ONS (which has its own statistics strategy), Geospatial Commission (geospatial data) and this proposed Health and Social Care data strategy. In GM, health and social care are one part of the overall system and have the greatest impact when working with other services.

At the same time as the arguably arbitrary distinction between health and social care and all other data, we are concerned that there may be insufficient consideration to the variations in type and sensitivity of all other data covered by the National Data Strategy. A better approach would be a single National Data Strategy, but with a framework that recognises the different types of data and the different implications of its use in decision-making and policy and service design. We would argue that a simplistic distinction between personal and non-personal doesn’t give the granularity to assess those implications fully.

Again, this makes a further case for a strengthening of the pillars around responsible data practice and ensuring that an ethical approach does not exacerbate or perpetuate inequalities.

More widely, greater access to more detailed data about the Job Retention Scheme, the spatial distribution of Eat Out To Help Out Scheme take-up, business loan schemes and support for the self-employed would help to strengthen the targeting of existing local support schemes. Understanding the local scale of need can also help local leaders to make more informed choices about future planning for the city region.

In GM, it is our whole-system approach across all data sets held by all local public organisations that has enabled the most considered and targeted response, and the fullest consideration of any trade-offs or unintended consequences of the sharing and use of data.

**Q3. If applicable, please provide any comments about the potential impact of the proposals outlined in this consultation may have on individuals with a** [**protected characteristic**](https://www.equalityhumanrights.com/en/equality-act/protected-characteristics) **under the Equality Act 2010?**

In addition to the points above about taking a more active approach to tackling inequalities, it is important to note that equality considerations go broader than protected characteristics. For example, it is clear that the worst effects of the pandemic have traced and amplified pre-existing patterns of inequality in our communities and that the manifestation of structural inequalities goes beyond the provisions of the Equality Act. It would be useful to understand what consideration has been made of the impact on those who are vulnerable and more affected by those proposals as a result of low income, poor health and well-being, unemployment and insecure employment and/or higher use of public services, who may not necessarily have any protected characteristics.

This broader approach to addressing structural inequalities is being modelled in Greater Manchester through the recently established [Independent Inequalities Commission](https://democracy.greatermanchester-ca.gov.uk/documents/s10587/11%20GMCA%20-%20GM%20Independent%20Inequalities%20Commission%20Update%20November%202020.pdf), chaired by Professor Kate Pickett of the University of York. The Commission will respond to long term systemic inequality issues present in Greater Manchester. It will examine power inequalities; resource inequalities; social exclusion and participation; and quality of life. The Commission will report in March 2021. We would be happy to share more details about the work of the Commission.

We would also echo some of the questions and concerns around the risk of centralising power and entrenching structural biases raised by technology expert Rachel Coldicott OBE, in her [response to the NDS consultation](https://docs.google.com/document/d/19CEC-qsBUSF7gKslHh5oIfYWDFyUAprKK5phcYfsKZw/edit). We would urge that the four policy recommendations she makes in that response are given careful consideration.

The proposals in the NDS make it even more imperative that all members of society are fully digitally-enabled as per [Greater Manchester’s Agenda for](https://www.greatermanchester-ca.gov.uk/what-we-do/digital/digital-inclusion-agenda-for-change/) Change and [The Good Things Foundation’s campaign to #fixthedigitaldivide](https://www.goodthingsfoundation.org/fix-the-digital-divide). If people cannot access data, they cannot benefit. Reducing digital exclusion is therefore a key part of our work. There is a correlation between those who are digitally excluded and those about whom the most data is held digitally, informing decisions that affect them. Digital inclusion for all is necessary but not sufficient to build public trust in how publicly held data is collected, stored and used.

**Q4. We welcome any comments about the potential impact of the proposals outlined in this consultation on the UK across all areas, and any steps the government should take to ensure that they take account of regional inequalities and support the whole of the UK?**

We feel there would be benefit in greater opportunities and greater responsibilities for local areas in implementing the National Data Strategy. In particular, Government should work closely with local government to consider how the National Data Strategy would be implemented locally, similar to the approach taken for Local Industrial Strategies. We see GM as an exemplar and a potential test bed for a strong focus on leadership and innovation in good data practice. We would like to discuss the opportunity to deliver this in collaboration with DCMS and other local areas.

We also feel that Government should provide greater opportunities for local areas to input to data standards for locally collected or derived information. This should include active engagement with city regions, combined authority areas, local authorities, and the local public sector around the UK. Furthermore, we feel that local areas should be provided with greater responsibility to choose the data that it feels is of value to collect. This should be supported by central government, and national bodies.

We would welcome the opportunity to work with Government on solutions regarding the stated obstacles mentioned in the Nation Data Strategy. We believe that the insight that can be provided by working with Greater Manchester on the “..real and perceived legal and security risks of sharing data; a lack of incentives, skills or investment to drive effective governance…”. Enabling an implementation that would not only be practical but also welcomed nationally. We agree with the National Data Strategy that “these obstacles are not insurmountable, and we have both the ambition and the commitment to tackle them”. The National Data Strategy setting a direction of travel and potentially a road map would be valuable, potentially complemented by the ICO providing useful tools and support.

Lastly, it is important that regional expertise is represented in future policy design. Local, combined and mayoral authorities have developed significant expertise over the last decade with successful pan-authority data platforms (e.g. London Datastore, MappingGM, GM Digital Platform) that could help with the design of future data, digital and information policy.

## Mission one: Unlocking the value of data across the economy

Data is an incredibly valuable resource for businesses and other organisations, helping them to deliver better services and operations for their users and beneficiaries. However, there is increasing evidence to suggest that the full value of data is not being realised because vital information is not getting to where it needs to be.

Our first mission is to create an environment where data is appropriately usable, accessible and available across the economy – fuelling growth in organisations large and small. We will create a clearer policy framework to identify where greater data access and availability across and with the economy can and should support growth and innovation, in what form, and what government’s role should be, in the UK and globally.

Data availability: For data to have the most effective impact, it needs to be appropriately accessible, mobile and re-usable. That means encouraging better coordination, access to and sharing of data of appropriate quality between organisations in the public sector, private sector and third sector, and ensuring appropriate protections for the flow of data internationally.

**Q5. Which sectors have the most to gain from better data availability? Please select all relevant options listed below, which are drawn from the**[**Standardised Industry Classification (SIC)**](https://onsdigital.github.io/dp-classification-tools/standard-industrial-classification/ONS_SIC_hierarchy_view.html)**codes.**

* **Accommodation and Food Service Activities**
* **Administrative and Support Service Activities**
* **Agriculture, Forestry and Fishing**
* **Arts, Entertainment and Recreation**
* **Central/Local Government inc. Defence**
* **Charity or Non Profit**
* **Construction**
* **Education**
* **Electricity, Gas, Steam and Air Conditioning Supply**
* **Financial and Insurance Activities**
* **Human Health and Social Work Activities**
* **Information and Communication**
* **Manufacturing**
* **Mining and Quarrying**
* **Transportation and Storage**
* **Water Supply; Sewerage, Waste Management and Remediation Activities**
* **Wholesale and Retail Trade; Repair Of Motor Vehicles and Motorcycles**
* **Professional, Scientific and Technical Activities**
* **Real Estate Activities**
* **Other**

All sectors of the economy stand to gain to some degree from better data availability. In Greater Manchester, we have a particular focus on the areas of strength and opportunity identified in our Local Industrial Strategy: health innovation, advanced manufacturing and materials; digital, creative and media; and clean growth. These sectors are where better quality, more value-rich data will stimulate significant innovation and economic growth opportunity. There are also positive economic impacts that will cut across all sectors, for example, real-time, whole-system visibility of planning data (as opposed to individual projects separately) will create greater clarity and certainty for investors and help to de-risk future infrastructure investment.

Greater Manchester’s Local Data Review will seek to identify the challenges the public sector faces in opening more of its valuable data assets, and the challenges businesses, academia and the third sector face in accessing this data. By doing so, we hope to identify a range of mitigation measures to improve data accessibility and value. In this respect, our work may benefit organisations that utilise data assets more effectively – and these organisations work across multiple sectors.

**Q6. What role do you think central government should have in enabling better availability of data across the wider economy?**

Central government’s role should be to support coordination, and to provide a framework for local areas to be more actively involved in setting standards and drawing up sharing arrangements on datasets that they collect. Central government should also seek to engage with sectors at a local level, utilising effective local networks within local government, to identify what data is required / of value, and the barriers to accessing this information.

The Local Data Review that Greater Manchester are undertaking is one model of how to do this. The Local Data Review has involved collating a series of open data case studies to gain an understanding of the internal challenges faced when trying to open up more data, and to identify potential mitigations to those challenges. Alongside the case study review, which focused on a public sector perspective, the Local Data Review is running an external consultation to understand how businesses, academia and voluntary organisations use public data. This consultation built up a picture of the wider value of public sector data, as well as the challenges faced externally when accessing and using public data. The combination of internal and external insight gained through this model allows for a deeper understanding of what data is required and valuable at a local level.

We feel there is value in the Government working with a group of areas to explore how improved central-local collaboration and support could enable better availability of data across the wider economy. Furthermore, we see value in central government supporting the rollout of Local Data Reviews on a wider scale, to input to the wider understanding of what data is most widely valued.

**Q6a. How should this role vary across sectors and applications?**

Central government should consider the roles of individual and local business bodies, especially Chambers of Commerce, and local business voices. Whilst national body representation is vitally important, it is also crucial that regional and local variations in data demand and usage are reflected in national approaches. Local government can help to facilitate this, with adequate support, and we would welcome the opportunity to discuss how this might work within Greater Manchester.

***Data foundations:****The true value of data can only be fully realised when it is fit for purpose, recorded in standardised formats on modern, future-proof systems and held in a condition that means it is findable, accessible, interoperable and reusable. By improving the quality of the data we are using, we can use it more effectively, and drive better insights and outcomes from its use.*

**Q7. To what extent do you agree with the following statement: The government has a role in supporting data foundations in the wider economy. Please explain your answer. If applicable, please indicate what you think the government’s enhanced role should be.**

* **Strongly disagree**
* **Somewhat disagree**
* **Neither agree nor disagree**
* **Somewhat agree**
* **Strongly agree**

Somewhat agree. The Government does have a role in supporting data foundations. However, it is important to understand what that role is, and how it applies at a local level. Data foundations, for example, should consider elements of data standards, metadata standards and data quality. These can be improved through a supportive framework that takes a ‘levelling up’ approach to data.

We believe that standards should be informed by availability of data, and capacity to produce good quality data, not just by identifying what information is needed. The creation of data standards without the involvement of those who collect or collate the data will lead to limited engagement, and poorer quality data overall.

Furthermore, data users - such as the private sector, third sector, the general public and public sector - should be included within the creation of these standards. Collaboration between data users and data publishers has been an effective engagement tool and supported the increase of data quality. In Greater Manchester, for example, we have had a particular focus on the consistency of planning data across the city region, reflecting the lack of national standards for this data and the variance of policy across local areas. This has evolved into a single data schema for land supply information in Greater Manchester, through effective collaboration between data users and strategic planning leads.

Standards should be driven from the bottom-up, not top-down. Greater Manchester’s pioneering work on citizen-led security standards has focused on the importance of this approach, and the collaborative collation of standards that are practically usable, not theoretically useful.

Government’s role should therefore be in commissioning rather than creating data – and metadata – standards. These should be developed with citizens, business and the relevant organisations that provide this data. Government’s role should then be to adopt and embed these standards, which will have been made easier through the work of relevant groups.

Local authorities have a key role in supporting strong data foundations in places and sufficient resource needs to be allocated by DCMS to develop local government data expertise sufficiently and to support public engagement to understand and address concerns or misperceptions about government use of data and data-sharing.

Government should also have a significant role in working with relevant organisations to ensure that data standards are met – that is, that data are fit for purpose, findable, accessible, interoperable and reusable as described in the Strategy. However, this should take a ‘levelling up’ approach as well and focus on supporting the creation of data to specific standards, rather than on a sanctions-based approach.

We would be interested in working with Government to understand how this might be implemented, and in particular we would also support the proposal for a specific role around data and information within government.

**Q8. What could central government do beyond existing schemes to tackle the particular barriers that small and medium-sized enterprises (SMEs) face in using data effectively?**

Local authorities, Growth Hubs, Chambers of Commerce and Universities have relationships with SMEs that will enable them to have practical conversations, to identify and overcome the barriers they face in using data effectively. Devolving funding and support around data and innovation to places to engage with local SMEs will enable more targeted and effective tackling of the issues faced by SMEs.

For example, extensive engagement with SMEs in the manufacturing sector as part of the North West Made Smarter pilot has identified systems and processes for collecting, storing and usage of data as a key enabler of digital transformation. There will be a stronger focus on this in future work. Additionally, the Local Data Review in Greater Manchester is taking exactly this kind of approach – listening to businesses (especially SMEs), academia and the third sector, to understand their needs and challenges. We believe this approach could be rolled out in multiple areas across the country to identify local data needs.

*The* [*Smart Data Review*](https://www.gov.uk/government/consultations/smart-data-putting-consumers-in-control-of-their-data-and-enabling-innovation) *in 2019 consulted on ways to make evolving schemes more coordinated across banking, finance, telecoms and energy. The focus of Smart Data is citizens asking their providers to share information about them with third parties.*

**Q9. Beyond existing Smart Data plans, what, if any, further work do you think should be done to ensure that consumers’ data is put to work for them?**

We feel that the Strategy needs to include more of a focus on the benefits to consumers of the use of their data. For example, could their data be used for research purposes, rather than simply ported between different providers of services? Energy use is an important area for consideration locally: individual property-level information on energy use could be valuable to customers looking to switch suppliers, as well as being useful to public services as aggregated data that would allow a better targeting of support services.

Additionally, sectors such as health innovation and transport may also benefit from a Smart Data approach. Crucially, better information sharing and use of consumer data in these areas could have the potential to transform public services – for example, through supporting better preventative healthcare, and better transport choices to minimise environmental impact. There is also a significant potential benefit for the potential involvement of the public sector, with Greater Manchester already exploring better data sharing on health and care records and between partner public agencies.

A further consideration might also be on the technology and data standards around Smart Data. The ODI and a number of other organisations have explored the wider potential of data trusts and data co-operatives in making. These might be useful avenues to explore with local areas. For example, the use of data from energy firms and smart meter technology might significantly benefit an understanding of the importance of local energy markets.

Again, Greater Manchester would like to engage with central government on the next steps of existing programmes such as our GM Digital Platform, and to explore further opportunities around data co-operatives and data trusts.

## Mission two: Maintaining a pro-growth and trusted data regime

Building on our status as a world leader in technological innovation and our robust data protection standards, we will maintain a data regime that supports the future objectives of the UK outside of the EU and promotes growth and innovation while maintaining public trust. This regime will not be overly burdensome for the average company, nor will it be unnecessarily complex or vague; it will help innovators and entrepreneurs use data legitimately to build and expand their businesses, without undue regulatory uncertainty or risk at both the domestic and international levels.

To encourage the widespread uptake of digital technologies, we will also work with regulators to provide advice and support to small- and medium-sized businesses to help them expand online, and develop sector specific guidance and co-regulatory tools to accelerate digitisation across the UK economy.

**Q10. How can the UK’s data protection framework remain fit for purpose in an increasingly digital and data driven age?**

 The UK Data Protection Framework should support greater public engagement to increase transparency, build understanding and trust. Public acceptability is essential to data sharing activity in the public sector – activity that underpins digital innovation to deliver person-centred and place-based services. We support the findings of the CDEI’s report on ‘Addressing trust in public sector data use’, July 2020. In 2018, the GMCA commissioned its own research on ‘attitudes to data and information sharing for public benefit’ that found varying levels of public trust and understanding in relation to information sharing and information security.

Consistent interpretation and application of legal mechanisms for data sharing, as well as the adoption of different security and technical standards. In GM we have established an Information Board, provides GM system leadership for the better use of information and data, through consistent principles and standards of Information Governance and Data Sharing. Organisations represented include the GMCA, GM local authorities, the VCSE, TfGM, GM Housing Providers, GMP and the NHS in GM. The GMIB is working to develop an Information Strategy and framework for a shared GM public sector approach to information management and assurance.

*In section 7.1.2 we lay out the functions of the Centre for Data Ethics and Innovation (CDEI), set up in 2018 to advise the Government on the use of data-driven technologies and AI.*

**Q11. To what extent do you agree with the functions set out for the Centre for Data Ethics and Innovation (CDEI) - AI monitoring, partnership working and piloting and testing potential interventions in the tech landscape? Please explain your answer.**

* **Strongly disagree**
* **Somewhat disagree**
* **Neither agree nor disagree**
* **Somewhat agree**
* **Strongly agree**

Under Mission 2, we feel that there should be a fuller examination of the data ethics questions associated with the NDS recommendations. Trust in the management, sharing and use of data is key for the success of the Strategy and we would like to build upon our existing work with CDEI to understand more about how an ethical approach will be ensured and embedded as the Strategy is developed and implemented. In Greater Manchester, we are **committed to developing digital security and trust, and implementing ethical and responsible use of data**. This aim is shown across a number of programmes, including our work with the [Centre for Data Ethics and Innovation](https://www.gov.uk/government/organisations/centre-for-data-ethics-and-innovation); signing the [Local Digital Declaration](https://localdigital.gov.uk/declaration/); the collaborative development of the [Declaration for Responsible and Intelligent Data Practice](https://www.declaration.org.uk/) with [Open Data Manchester](https://www.opendatamanchester.org.uk/); and our development of the cybersecurity industry in Greater Manchester, including the GCHQ strategic hub in Manchester.

**Q11a. How would a change to statutory status support the CDEI to deliver its remit?**

We believe that the establishment of the CDEI is a welcome recognition of the importance of the data ethics and innovation agenda. We look forward to working with the CDEI to support delivery and inform and shape its remit through practical knowledge and experience gained at the local level.

## Mission three: Transforming government’s use of data to drive efficiency and improve public services

There is massive untapped potential in the way the government uses data. We will implement major and radical changes in the way that the government uses data to drive innovation and productivity across the UK. In doing so, we will improve the delivery of public services, as well as our ability to measure the impact of policies and programmes, and to ensure resources are used effectively.

To succeed, we need a whole-government approach led by a Government Chief Data Officer from the centre in strong partnership with organisations. We need to transform the way data is collected, managed, used and shared across government, including with the wider public sector, and create joined-up and interoperable data infrastructure. We need the right skills and leadership to understand and unlock the potential of data – and we need to do so in a way that both incentivises organisations to do the right thing, as well as build in the right controls to drive standardisation, consistency and appropriate data use.

The government is going to set an ambitious package of work in this space and wants to understand where we can have the biggest impact.

**Q12. We have identified five broad areas of work as part of our mission for enabling better use of data across government:**

* **Quality, availability and access**
* **Standards and assurance**
* **Capability, leadership and culture**
* **Accountability and productivity**
* **Ethics and public trust**

**We want to hear your views on any actions you think will have the biggest impact for transforming government’s use of data.**

Our responses to earlier questions have already set out Greater Manchester’s views across these five areas, including the need for clearer leadership and governance, and an enhanced role for local government, in particular on locally-designed and developed data standards with citizen input. The Strategy notes how much can be achieved through appropriate data sharing across central and local government and the private sector. Greater Manchester wholeheartedly supports this sentiment. However, in practice, there are numerous cases where data sharing is difficult or the experience across government departments is variable. Where this occurs, it often prevents local authorities from providing the best service to the public and is a source of frustration and inefficiency.

We are particularly concerned about (a) lack of access to sufficiently detailed data – examples include in-work and out-of-work poverty, and more detailed information on the Job Retention Scheme and other national support programmes; and (b) inconsistent access to the data we need for the discharge of our statutory functions / devolved powers (for example, around skills).

As noted in our headline statement we recommend that Government engages directly with Greater Manchester to address existing and future challenges around data-sharing between central and local government.Our experience in this area, as well as the scale and ambitions of Greater Manchester, place the city-region as an ideal testbed for developing appropriate local responses to data sharing between central and local government.

Greater Manchester believes that there is a benefit to releasing more open data. The city region is committed to opening more data to support economic development, productivity growth and innovation. Our Digital Blueprint also includes a wider aim to open public sector data by default, where it is of value to the people of Greater Manchester. Our Local Data Review aims to identify the datasets we should prioritise in making open. It is clear that there are barriers to releasing information that are not simply technical – these include data quality, accessibility, culture and governance, as noted above. However, there is also a skills need. This skills need is both in the release of open data within the public sector, and in the use of open data by the general public.

The value of data is realised in its use, not in its storage. Opening up data is a necessary but not sufficient condition for increasing data usage. Therefore, we believe that there is a need to support a levelling up approach to open data across the country, which should include:

* Investing in standards and data quality
* Creating greater inclusion within the decision-making process for the release of open data and the creation of standards
* Providing the infrastructure and support to open up more public data across areas where there is an identified value
* Raising digital inclusion to ensure that citizens can make the best use of open data
* Raising awareness of open data uses, and supporting more collaborative developments, especially between SMEs and the public sector

Greater Manchester’s Local Data Review – and the work of the Open Data Institute in recent years – has highlighted the challenges to opening data and increasing the usage of open data. We would welcome a collaboration with central government and other relevant organisations to explore how to implement this levelling up approach in a city region, including how to de-mystify and explain in practical terms what the benefits of open data/better data-sharing could bring.

Supporting businesses to understand the role of data in improving productivity and helping them get the basics right will overcome a foundational and major barrier to further digital transformation and needs prioritising for investment accordingly.

In terms of ethics and public trust, in addition to points already made above, we would support Rachel Coldicott’s proposal to make Data Ethics a recognised DDaT profession capability for all government teams.

For central and local government organisations, it will be critical to spend the time and resource to understand public concerns and questions about the collection, storage and use of data by public organisations, address misperceptions and have open conversations about benefits, risks and trade-offs associated with the collection and usage of data.

**Q13. The Data Standards Authority is working with a range of public sector and external organisations to create a pipeline of data standards and standard practices that should be adopted. We welcome your views on standards that should be prioritised, building on the standards which have already been recommended.**

Greater Manchester believes that there should be greater local involvement in the creation of data and metadata standards. These should be developed by and with citizens, businesses, the third sector, and the public sector. It is therefore vitally important that the DSA takes a local approach to the creation of standards, seeking to work with organisations across the country.

It is also important for the DSA not to re-invent the wheel – many areas and organisations have developed appropriate standards in isolation, but these have not been adopted at a national level. Greater Manchester has attempted to jointly develop a land supply schema for its ten local authorities, while the Greater London Authority has explored planning application data schemas.

There should therefore be two areas of focus in identifying the datasets that it is of value to standardise: firstly, the datasets most widely used by the public sector itself; and secondly, the datasets showing the greatest potential re-use value. In many cases, it is likely that the datasets that require new standards to be developed are likely to be collected or maintained by multiple organisations.

The Greater Manchester Local Data Review has sought to identify a range of public sector datasets with the most value potential as open data. Its initial research suggests 8 areas for new open data. A shorter list of potential data areas is listed below, where the adoption of national standards, developed with local areas, may benefit:

* Transport data: national and international standards adoption is critical here for comparison and re-use. Transport for London has already identified an approach that has supported wider re-use of its data, with direct and indirect benefits.
* National non-domestic rates: data currently collected and published by organisations is not easy to match up. Our research has suggested these datasets are often used to identify business lists, and there are instances of data feedback that help better deliver public services for local businesses. This will be increasingly important as the country focuses on responding to, and recovering from, COVID-19.
* Planning: this information would include a variety of aspects of planning, even where local policies differ. Data standards on everything from planning applications to Tree Preservation Orders might be more beneficial to developers and the general public. Greater Manchester has already taken strides in this area and has attempted to bring this information together on MappingGM, a website hosting a range of maps covering almost 400 different local and national datasets.
* Movement and activity: while there are several organisations providing footfall counters, or anonymised mobile phone data as a proxy for movement and activity, there is no agreed standard for datasets from local sensors. An approach to optimise this might benefit comparison between areas.
* Asset location: while this does include information held by HM Land Registry, the category is broader and would encompass information such as street furniture, and utilities access points. This might have a significant benefit in terms of infrastructure planning and investment across areas, as well as the adoption and rollout of 5G and a full fibre network.
* Infrastructure: again, related to asset location and planning, a focus on standards for information like future investment might also support the creation of local infrastructure plans, or activities similar to the Australia and New Zealand Infrastructure Pipeline.

Greater Manchester would like to explore how the DSA develops data standards with local areas and would also look to pilot new data standards across the city region, working with central government and local partners.

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## Mission four: Ensuring the security and resilience of the infrastructure on which data relies

In the UK, the government already imposes safeguards and enforcement regimes to ensure that our data is handled responsibly. But we will also take a greater responsibility for ensuring that data is sufficiently protected when in transit, or when stored in external data centres.

The government will determine the scale and nature of risks and the appropriate response, accounting for emerging trends in the market landscape. We will also determine whether current arrangements for managing data security risks are sufficient to protect the UK from threats that counter our missions for data to be a force for good. And we will consider the sustainability of data use, exploring inefficiencies in stored and processed data, and other carbon-inefficient processes.

The infrastructure on which data relies is the virtual or physical data infrastructure, systems and services that store, process and transfer data. This includes data centres (that provide the physical space to store data), peering and transit infrastructure (that enable the exchange of data), and cloud computing that provides virtualised computing resources (for example servers, software, databases, data analytics) that are accessed remotely.

**Q14. What responsibilities and requirements should be placed on virtual or physical data infrastructure service providers to provide data security, continuity and resilience of service supply?**

Greater Manchester is working with the National Cyber Security Centre as they develop their Connected Places Cyber Security Principles. We are supportive of that work and the way in which it responds to questions 14- 16.

**Q14a. How do clients assess the robustness of security protocols when choosing data infrastructure services? How do they ensure that providers are keeping up with those protocols during their contract?**

**Q15. Demand for external data storage and processing services is growing. In order to maintain high standards of security and resilience for the infrastructure on which data use relies, what should be the respective roles of government, data service providers, their supply chain and their clients?**

**Q16. What are the most important risk factors in managing the security and resilience of the infrastructure on which data use relies? For example, the physical security of sites, the geographic location where data is stored, the diversity and actors in the market and supply chains, or other factors.**

**Q17. Do you agree that the government should play a greater role in ensuring that data does not negatively contribute to carbon usage? Please explain your answer. If applicable, please indicate how the government can effectively ensure that data does not negatively contribute to carbon usage.**

* **Strongly disagree**
* **Somewhat disagree**
* **Neither agree nor disagree**
* **Somewhat agree**
* **Strongly agree**

The IT industry uses 3.6% of the world’s electricity, and it produces 1.4% of the overall greenhouse gas emissions. This is likely to grow, even with efficiency savings, as our use of smart technologies increases.

Although some data services claim that some of their data centres are carbon neutral or “100% renewable”, there is little clarity about how this is achieved. Also, these figures probably just focus on the energy used by data centres and not the full emissions for the staff, materials and transport included to deliver the data management activities.

Government could mandate, either through regulation (private sector) or public procurement criteria (public sector), that all UK data centres **must** have a plan and pathway for net zero carbon by 2050 (at the latest), with quantifiable milestones linked to the UK’s carbon budget, **and** be able to demonstrate that they are on target to achieve these. This would encourage data centre providers to procure or develop renewable energy generation, develop policies to reduce scope 2 and scope 3 emissions and ensure that any surplus heat generated is appropriately utilised.

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## Mission five: Championing the international flow of data

In our hyper-connected world, the ability to exchange data securely across borders is essential.

As the UK leaves the EU, we have the opportunity to develop a new UK capability that delivers new and innovative mechanisms for international data transfers.

Using our reputation as a world leader in digital, a champion of free trade and the rules-based international system, and an engaged, rule-abiding member of the global community, we will build trust in data’s use, creating the regimes, approaches and tools to ensure personal data is appropriately safeguarded as it moves across borders. We will also facilitate cross-border data flows by removing unnecessary barriers to international data transfers that promote growth and innovation. And we will seek to promote data standards, data interoperability, and UK values internationally.

**Q18. How can the UK improve on current international transfer mechanisms, while ensuring that the personal data of UK citizens is appropriately safeguarded?**

*We will seek EU ‘data adequacy’ to maintain the free flow of personal data from the EEA and we will pursue UK ‘data adequacy’ with global partners to promote the free flow of data to and from the UK and ensure it will be properly protected.*

**Q19. What are your views on future UK data adequacy arrangements (e.g. which countries are priorities) and how can the UK work with stakeholders to ensure the best possible outcome for the UK?**

Greater Manchester is an international hub of business, academic and cultural links. It is right that we build on these links to support our international trade and the development of new markets for our products and services. To support this, it is vital that we focus on the implementation of international standards, and work with international partners to develop trusted data transfer mechanisms.