

Chair of the Public Administration and Constitutional Affairs Committee
House of Commons
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SW1A 0AA

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By email to: pacac@parliament.uk

12 December 2023

Dear Chair,

**Follow-up from Public Administration and Constitutional Affairs
Committee meeting on 04 December 2023**

Thank you for inviting me to give evidence as part of the committee's inquiry into transforming the UK's evidence base. I hope the committee found my evidence useful.

I committed to write to the committee with some further information about our work with the Office for National Statistics (ONS) in developing its Integrated Data Service (IDS). The ONS are currently operating the IDS in beta mode ahead of a full launch of a live service next year. It will be accessible by accredited analysts – largely within central government, but also including the devolved administrations and some external users – who can access data to support research and decision-making.

It is important to note that the design of the IDS is iterative, so although the beta version of the IDS has been published, there is very little personal data involved in this version and related risks are low. Aspects of future versions of the IDS are still being fully defined. Future instances of the IDS are intended to process data in relation to a larger number and variety of research projects and users and we will be involved with these new iterations as and when needed. The IDS has also recently received accreditation from the Research Accreditation Panel under the Digital Economy Act 2017.

At an early stage in development, ONS has engaged with my office with drafts of its Data Protection Impact Assessment (DPIA). This should

hopefully provide the first and overarching reassurance to the committee that the ONS has taken its data protection obligations seriously when it comes to developing the IDS.

A DPIA is a key tool for organisations to surface, and then mitigate, the privacy risks of a potential use of personal information. We have already provided our feedback on a previous version of ONS' DPIA, who have gone away and reviewed our feedback, and have now provided us with a revised version which my team is currently reviewing. The DPIA is a living tool that will be revisited and updated where necessary.

My office is currently engaged with the ONS on its DPIA, but I can set out some of the areas where my office has provided advice to the ONS. We have asked ONS to further clarify details within their DPIA to enable a fuller assessment of the associated privacy risk on what we think are crucial areas to consider. These include:

- The data flows which take place within the IDS as they relate to anonymised and pseudonymised data.
- Where and how different forms of data for the IDS will be sourced.
- The de-identification process.
- Retention policies for the variety of data the IDS will use.
- The data linkage process.
- The privacy policies and data sharing agreements of organisations providing data to the IDS.
- Verifying the process around de-identified data.
- Measures for disposal of data.
- Processes for rectification and future mitigation should re-identification occur.

- Location of processing operations.

We also suggested that the ONS map out the journey for complying with the individual rights, which is a useful tool for organisations to consider the privacy risks of a complex/multi-stage processing operation. ONS has taken these comments on board and made a number of revisions to their DPIA which is now under review. My team expect to provide its latest round of comments to the ONS by the end of January.

The committee may wish to contact ONS directly once it has made further progress on the IDS to understand how it has mitigated and handled privacy risks in more detail. I expect that the ONS will publish further details in the future about how it is using the information within the service, as part of its transparency obligations under data protection law.

I also said I would provide you with a link to our review into data sharing under the Digital Economy Act 2017. Our DEA review findings¹ can be found on our website along with our publication schemes report² also referenced in the Committee.

I hope the above information, as well as my evidence to the committee has proved useful.

Yours sincerely



John Edwards
UK Information Commissioner

¹ [ico-review-dea-20230314.pdf](#)

² [publication-schemes-snapshot-202302.pdf \(ico.org.uk\)](#)