

Science and Technology Committee - Evidence Check Web Forum: Digital Government

January 2016

Key Points

- **The Government should follow a strategy of privacy by design.**
- **Reassurances must be given about the security of personal information.**
- **Proper evidence must be presented to show that any new digital service will provide real benefits.**

Response

The document, although very clear about the potential benefits that a more digital government can bring, lacks any focus on the privacy of citizens. Only the need *“to retain citizen trust with a clear approach to what should and should not be done with these powerful tools”* is mentioned in the section on safeguards.

No information has been provided on the impact *“Digital Government”* will have on the privacy of citizens. In the modern world personal information is being stored in an increasing number of places. The potential for misuse; both accidental and malicious is therefore greatly increased.

In 2015 there were a number of high profile hacks, some resulting in massive data theft, others just highlighting the need to keep personal information properly secured. Ashley Madison, the US Office of Personnel Management and TalkTalk all suffered serious hacks and as a result the security of information has shifted in the public’s mind.

The plans to make government more digital will almost certainly require the collection and storage of more data . It is therefore important that information is provided on how this personal data will be kept secure.

The starting point for any government project involving use of personal information should be to adopt a *“Privacy by Design”* approach.

Privacy should be seen as a central plank of any project involving the retention and use of personal data. The Information Commissioner’s Office (ICO) has warned that too often the issue is *“bolted on as an afterthought or ignored altogether”*.¹

The benefits of prioritising privacy early on are clear. Any potential problems can be identified either before roll-out or at an early stage meaning that they are far less costly to rectify. Our reports on data protection have consistently shown a large proportion of data breaches occur through mistakes or employees not fully understanding their responsibilities. A clear demonstration that privacy is a core focus will increase public confidence in any project, increasing its potential effectiveness.

¹Information Commissioner’s Office , *Privacy by design*: <https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-by-design/>

A key part of this approach is the completion of a thorough Privacy Impact Assessment (PIA) before a project commences. Whilst it is expected that this process will be completed anyway it would be beneficial for any PIA to be made public, this will increase both public understanding of what is being attempted and what it may mean for their data. There is also value in using the PIA as a retrospective tool to ensure that privacy considerations were met throughout, this will assist with any audit of projects and encourage best practice going forward.

Whilst the evidence presented mentions the intended results of the increased digitisation of government there needs to be a concerted effort to prove that this will yield beneficial results. All too often ideas that sound new and innovative are rushed into place without proper groundwork being done to show that they will actually have a positive impact. It should be the case that before any plan is rolled out the government publishes the business case and any other supporting documents to show why the move is necessary as well as the intended impact it will have, consultation with a broad range of stakeholders including the general public should always be considered.

This, alongside the publication of a full PIA will help citizens judge for themselves the benefits of the scheme and will increase transparency and clarity of any initiative. As we all become digital citizens and are encouraged to be digital by default it is critical that engagement and explanation of a scheme is conducted with people and that no one is unclear on what the scheme may entail. It is also important that any project focuses on providing a service for the citizen not on asking the citizen to provide the service to the State.

As noted the evidence presented outlines clearly why the Government wants this increased digitisation, it does however lack detail on what they think needs to be done to protect the privacy of the citizens they are trying to help.