

# Recording and sharing personal data: **some practical issues**



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Whereas data-processing systems are designed to serve man; whereas they must, whatever the nationality or residence of natural persons, respect their fundamental rights and freedoms, notably the right to privacy, and contribute to economic and social progress, trade expansion and the well-being of individuals

Data Protection Directive, 2<sup>nd</sup> Recital

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“Organisations that don’t understand what can and cannot be done legally are as likely to disadvantage their clients through excessive caution as they are by carelessness”

Christopher Graham, Information Commissioner  
Data sharing code of practice

# Data protection principles

- Fair and lawful
- Condition for processing
- Specified purpose(s)

# Data protection principles

- Adequate, relevant & not excessive
- Accurate & up to date
- Kept no longer than necessary

# Data protection principles

- Individuals' rights
- Security
- Transfers outside EEA

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# Fairness and transparency

- Privacy notices
- Telling people about data collection and sharing
- Communicate actively?



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# 14.9%

In England 14.9% of adults aged 16-65 lack functional literacy skills. This equates to 5.1 million people.

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“Legalese persists for a lot of bad reasons - habit, inertia, fear of change, the overwhelming influence of poorly written opinions and forms, false notions of prestige, and any number of myths about plain language... There are enormous social costs of poor legal and official writing.”

Data protection

# Privacy notices code of practice

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# Data sharing



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# Weighing up data sharing

But, citizens' and consumers' rights must be respected

Data sharing can play a crucial role in providing better, more efficient services



# Key questions - data sharing

- What is it meant to achieve?
- What needs to be shared?
- Who requires access?

# Key questions - data sharing

- When should it be shared?
- How should it be shared?
- Is sharing achieving objectives?

# Key questions - data sharing

- What risks?
- Need to share? Anonymised?
- Update notification?
- Transfer outside EEA?

# Governance

- Responsibilities
- Data sharing agreements
- Data standards
- Reviewing arrangements





Misleading  
people



Excessive or  
irrelevant  
information



Sharing personal  
data when there  
is no need to do  
so



Sharing inaccurate  
and out of date  
data



Incompatible  
systems



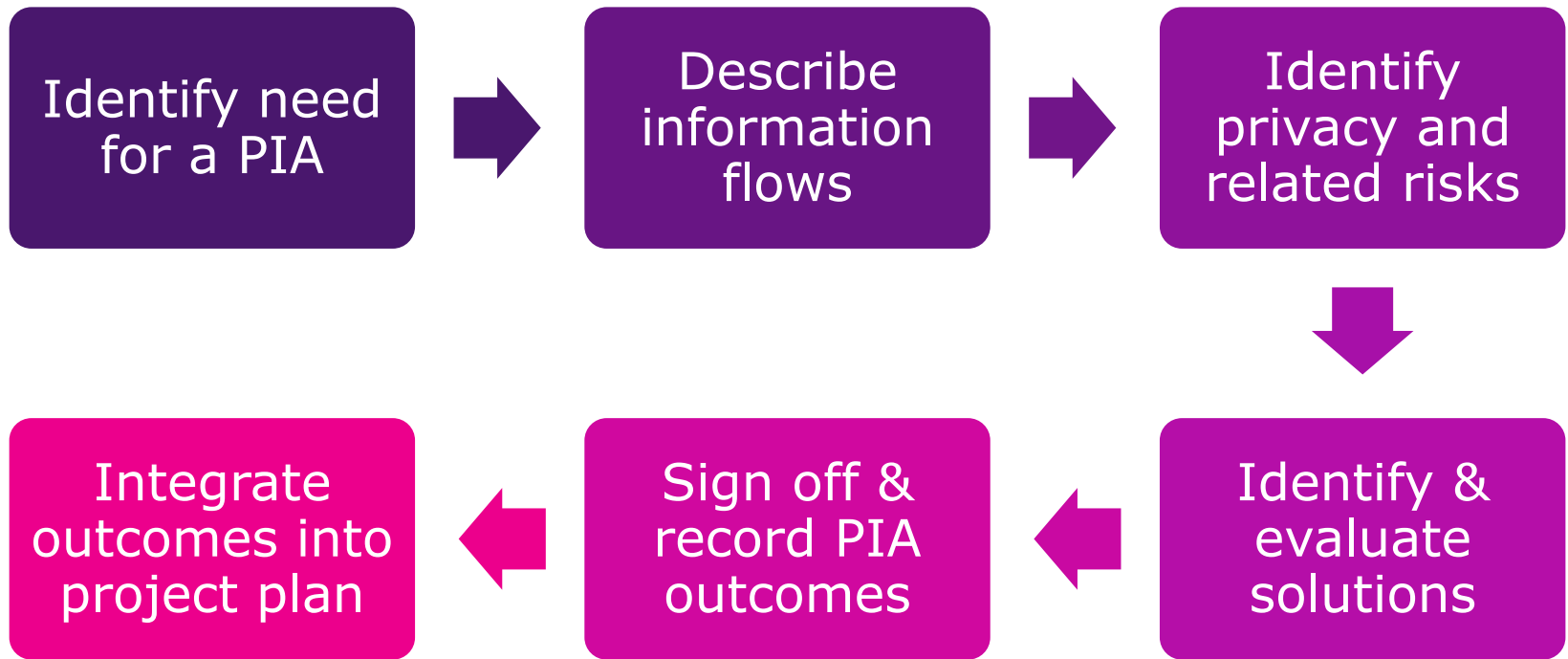
Inadequate  
security

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Conducting  
privacy impact  
assessments

# Privacy impact assessment process



Consult with internal and external stakeholders as needed throughout the process