

Data Sharing Review

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Consultation paper on the use and sharing of personal information in the public and private sector

List of questions for response

We would welcome responses to the following questions set out in this consultation paper. Please follow the question order as set out in the consultation paper, leaving a blank response box for any questions not answered.

Please email your completed form to contact@datasharingreview.gsi.gov.uk

Alternatively you can send a hard copy response to:

Data Sharing Review Secretariat
5.26 Steel House
11 Tothill Street
London
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Thank you.

Section 1: Background

Question 1.

Comments: GE Money Home Lending does not have an active interest in data sharing.

We collect and hold customer data, elements of which are shared with credit reference agencies and fraud databases such as Hunter and CIFAS and our regulator (FSA).

The customer information is gathered through the application process, information is both hard copy and stored on our computer systems. Information is shared through various means, for credit reference agencies through a monthly file detailing account performance which is couriered (due to move transmission to online). Information shared with Hunter and CIFAS is through a web-based system. The mode of data transmission with the regulators varies.

Section 2: Scope of personal information sharing, including benefits, barriers and risks of data sharing and data protection

Question 2.

Comments: A and b) reduced risk of fraud which is ultimately a cost to society which is

passed onto individuals and tax payers

Question 3.

Comments: A and b) data loss occurring during the transmission of data process being carried out to share information, leading to potential reputation damage and / or fraud / identity theft

Question 4.

Comments: Poor controls over data transmission have recently been highlighted as posing risks both to security of personal data and institutions reputations

Question 5.

Comments:

Question 6.

Comments:

Question 7.

Comments:

Question 8.

Comments:

Section 3: The legal framework

Question 9.

Comments: Structure works well – the principles are accessible, common sense and can be understood by all as statements of good practice.

Weaknesses – not enough guidance/detail around some of the rules – open to data controller interpretation i.e. some of the conditions for processing “interests of the data controller” – would be helpful to have guidance on aspects like this.

Notification – onerous for both data controller and ICO.

Fair Processing Notices – not convinced that the average consumer reads the disclaimers before giving consent – there has been a lot of work on simplification – not aware of enforcement or warnings being given to those using lengthy and legalistic notices.

Suggestions – remove the annual renewal for notification – replace with a longer term notification.

Data Subject Access Requests - £10 is not considered to meet the costs of admin and paperwork and often doesn't give the data subject the information they are seeking following the re-defining of relevant filing system.

ICO – though steps are already in place to strengthen the law behind protecting personal data - more power and resource required. As with the FSA, adopt a risk based system for monitoring data controllers and processors.

Question 10.

Comments:

Question 11.

Comments:

Question 12.

Comments:

Question 13.

Comments:

Question 14.

Comments:

Question 15.

Comments:

Section 4: Consent and transparency

Question 16.

Comments:

Question 17.

Comments:

Question 18.

Comments:

Question 19.

Comments:

Section 5: Technology

Question 20.

Comments:

Question 21.

Comments: Guidance on examples of what equals best practice and good practice would be helpful in relation to areas such as data storage and data transmission
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Question 22.

Comments:

Section 6: International comparisons

Question 23.

Comments:

Question 24.

Comments:

Question 25.

Comments:

Question 26.

Comments:

Section 7: Additional questions

Question 27.

Comments:

Question 28.

Comments:
