

Smarter use of your data – summary and analysis of consultation responses
Cabinet Office, Isle of Man Government
10 November 2017

Introduction and overview of the consultation

Public consultation launched on 25 August 2017 and closed on 6 October 2017. The consultation requested responses on the principles for the project, the expected outcomes, and the potential uses.

The consultation attracted 91 responses. Of these, 18 gave permission for their response to be published in full, 48 gave permission to publish anonymously and 25 did not give permission. Only one respondent stated that they were not an island resident. All respondents who gave their age were over 25.

Five responses were made on behalf of organisations:

- Braddan Parish Commissioners
- MICTA
- ICT Committee – Chamber of Commerce
- PDMS
- Douglas Borough Council

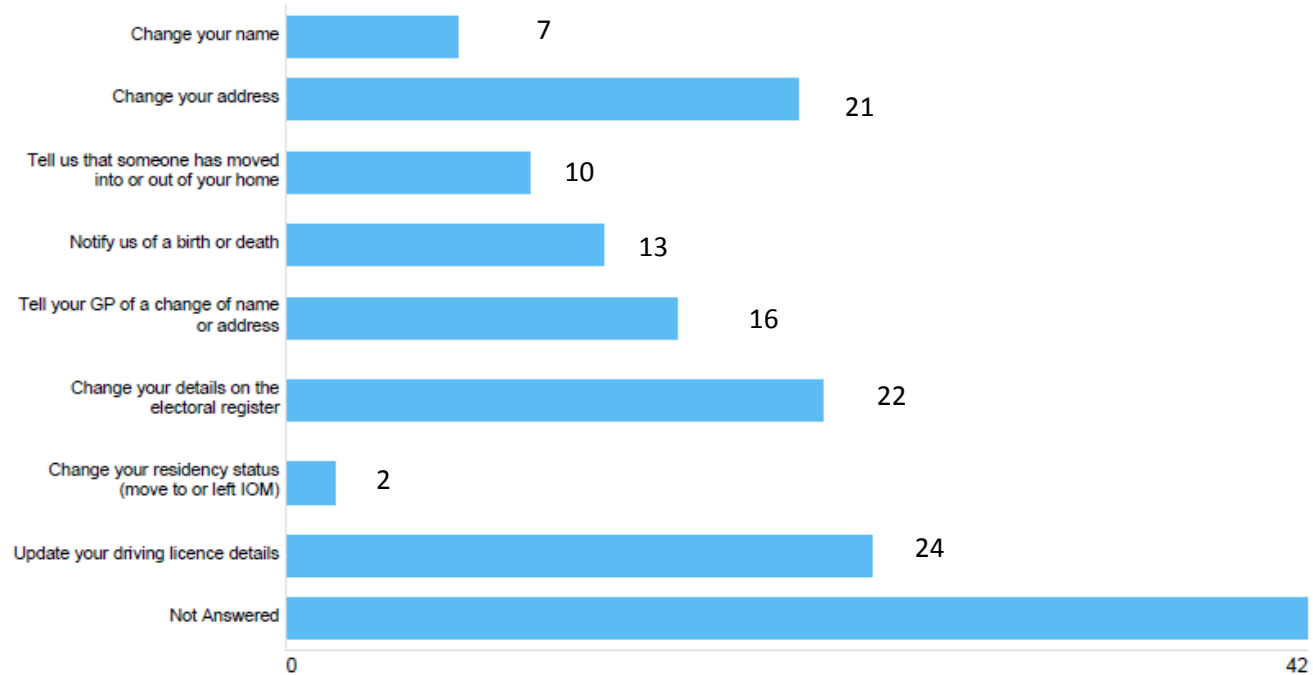
Those who broadly agreed with the proposals said that they agreed for reasons of efficiency and improved customer service. Several had assumed that Government already joined up some 'housekeeping' basic information such as name, address and date of birth. This broad agreement was not without some concerns and questions were raised around whether the benefits would be worth the time and cost, and ability of Government to deliver.

Those who broadly disagreed with the proposals said that security was a key concern, particularly around the future use of the system. A number of respondents were against any changes to data use, and articulated their perception that the proposal was about storing all data together and therefore more susceptible to security risks. These respondents highlighted data protection issues, future GDPR requirements, training and experience of Government staff, and the potential for misuse.

Q1. Have you had to do any of the following within the last two years?

Question 1: Have you had to do any of the following within the last two years?

checkbox services accessed

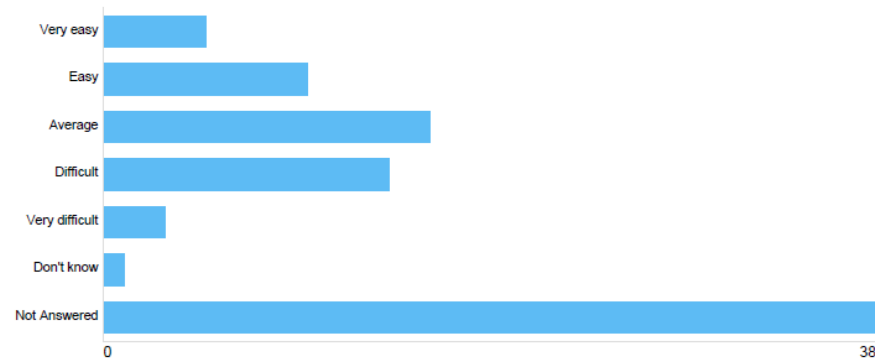


Of 90 respondents to the questionnaire, 48 said they had used at least one of the government services listed. 42 respondents did not answer this question.

Q2. Ease of the transaction?

Question 2: If yes, how would you rate the overall ease of the transaction?

transaction - ease radio button



Questions 1 and 2 introduced customer service and customer satisfaction concepts. The comments in response to this question gave us more background about respondents' recent interactions with government.

- 6% thought these transactions were very easy, 11% thought that they were easy
- 16% rated transactions difficult, with 3% saying they found them very difficult
- 18% thought transactions with IOM Government were 'average'

Some respondents highlighted customer service and the information that should be made available to Government customers:

- *'Firstly knowing who needed to be informed and then going round the different offices, sometimes more than once'*
- *'I have no interest in the underlying departmental structure. Please work together in the interests of the taxpayer...I would like to access all the services through one authentication'*
- *'Across all these items systems are very paper based, repetitive and require unnecessary burdens of proof that should be provided against one another. But there is no system that would be classified as easy'*
- *'I have not found it unduly onerous or difficult'*

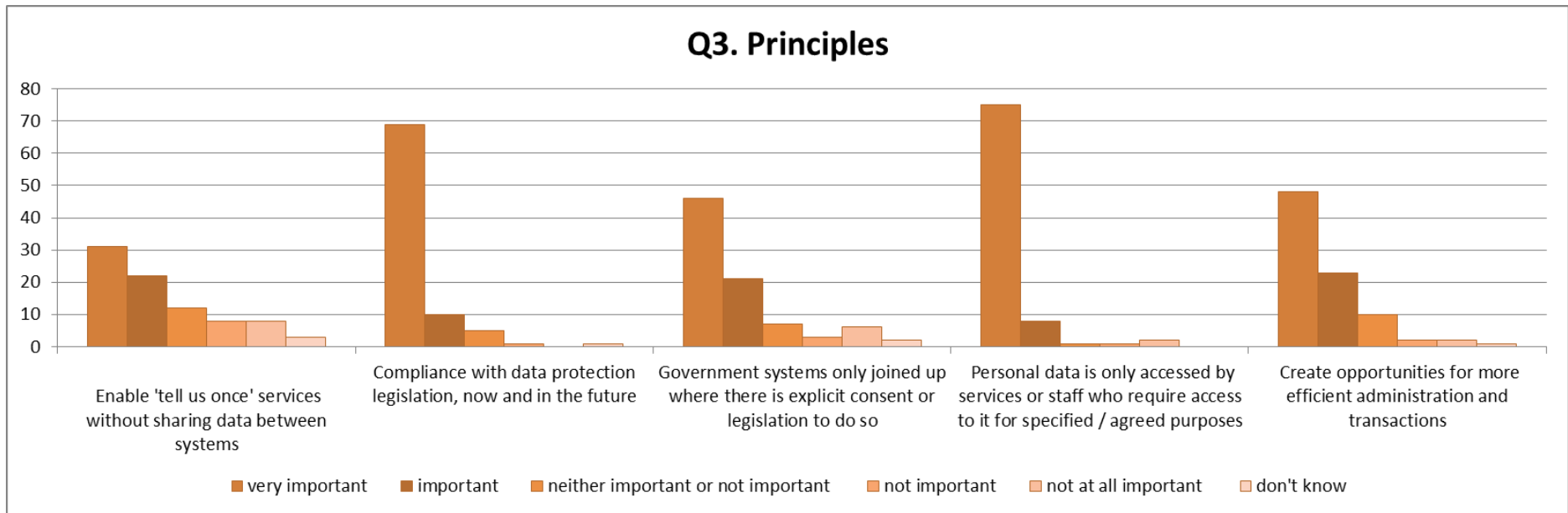
Others recognised that current processes could be improved and made more efficient, but questioned how 'feasible' it might be and how much it might cost to remove paper methods and cut out duplication.

Question 3. Principles

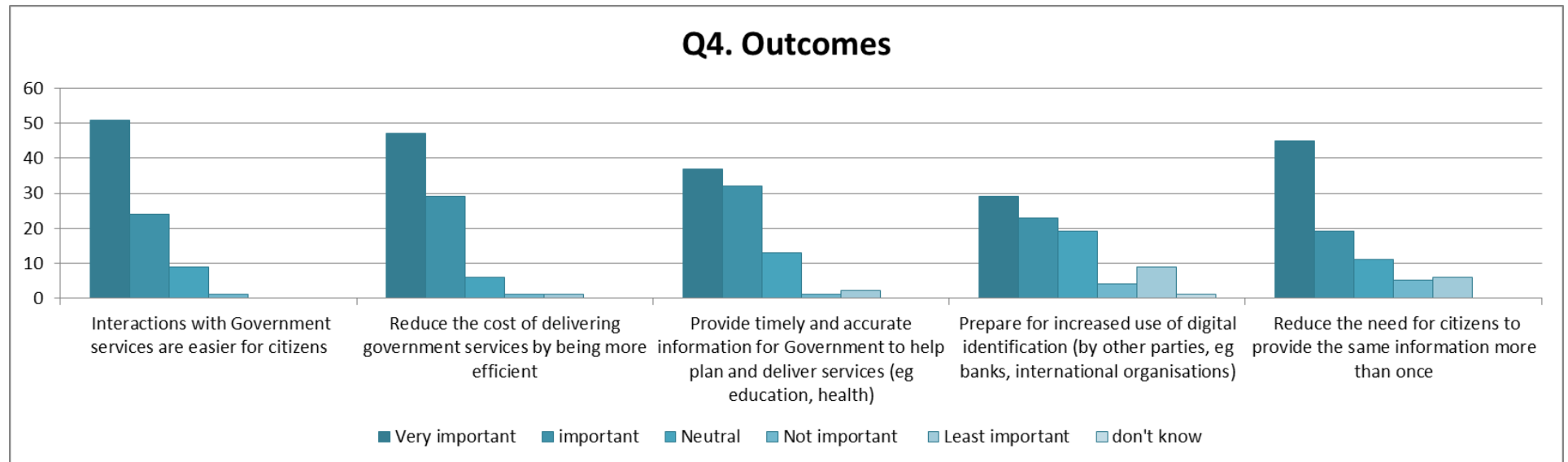
Confidentiality and safeguards were the most common themes in answer to this question, with 17 respondents referring to their concerns about confidentiality and privacy, and 10 respondents asking about what safeguards will be in place.

Access to personal data and compliance with data protection legislation now and in the future were ranked as important or very important by over 79% of respondents.

'Tell us once' was ranked as very important by 53% of respondents saying this was important or very important.



Question 4. Outcomes



85% of respondents said it was important or very important that interactions with Government services are easier for citizens.

83% of respondents said it was important or very important for government to reduce costs and become more efficient.

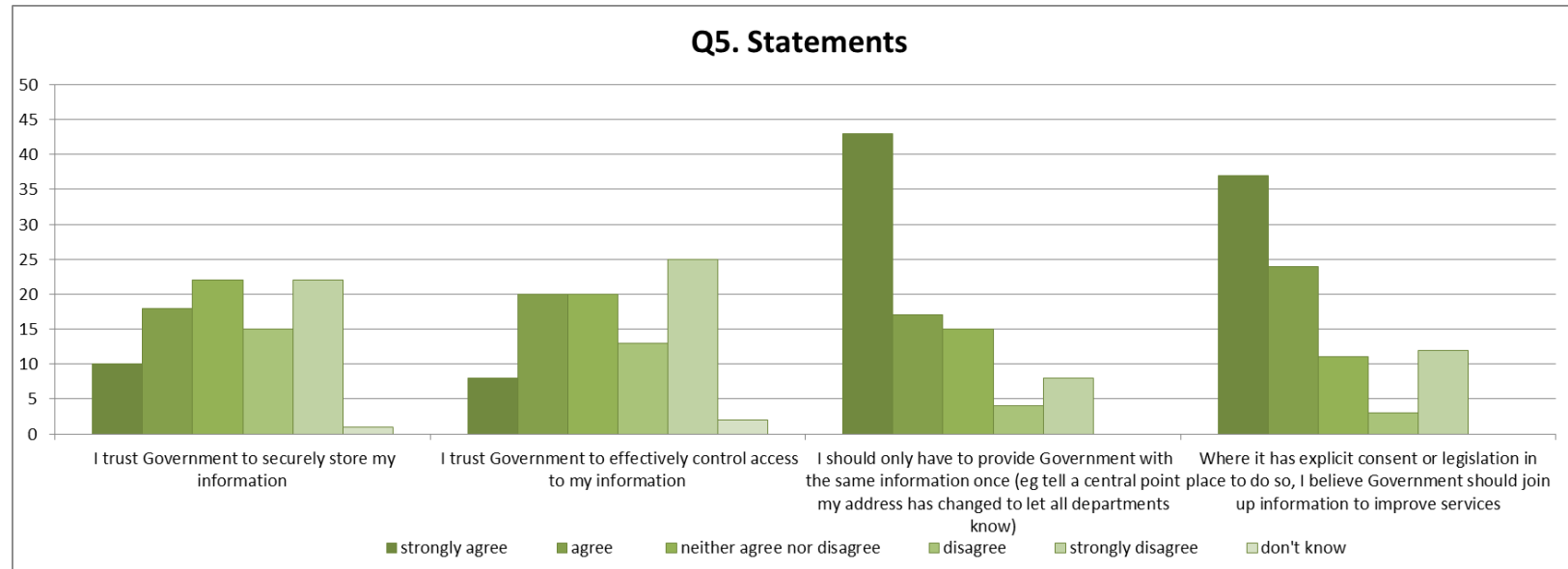
78% said that it was important or very important to provide timely and accurate information for Government to help plan and deliver services (e.g. education, health).

74% said it was important or very important to reduce the need for citizens to provide the same information more than once.

Preparing for digital identification was the least popular outcome though it still received a rating of important or very important from 58% of respondents.

Question 5. Statements

- 31% said they trust government to securely store their information and effectively control access to it
- 67% said they wanted to only give government information once
- 68% said they thought Government should join up information to improve services where explicit consent or legislation is in place

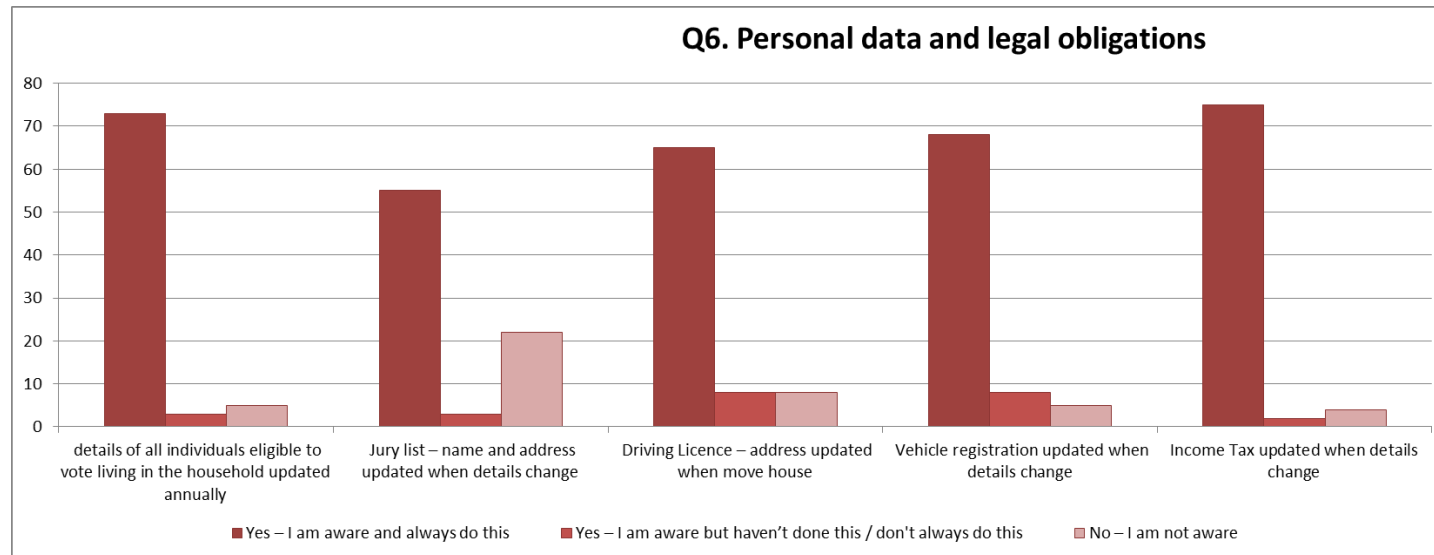


The statement that respondents most strongly agreed with was that they should only have to provide the same information to Government once. Additional information provided in answer to this question highlighted the reasons that respondents agreed or disagreed with these statements.

- *'Citizens must be allowed to view online what information government is holding about them'*
- *'Only basic data should be shared between all departments eg name address'*
- *'The larger the database, the greater the risks to privacy. Although these risks can be minimised, they cannot be eliminated entirely. Information is leaked inadvertently (by mistake), or maliciously (by disgruntled individuals or remote hackers) or through technological failures. It is highly optimistic to expect that the IOM Government would never experience problems with data leaks'*
- *'The government seems incapable of safely storing or using my personal details'*

Question 6. Legal obligations

The majority of respondents said that they were aware of the requirement to update their details for electoral roll, jury, driving licence, vehicle licensing and income tax. By asking about individuals' awareness of their legal responsibilities to keep their information up to date, we hoped to understand more about how they found these interactions with Government.



Respondents said:

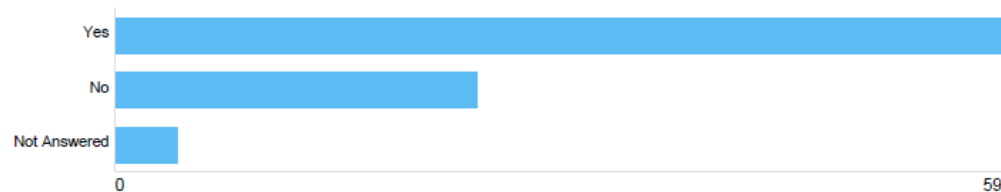
- *'Individuals should be given access to a secure area to self-administer all their personal information outside of the central government network'*
- *'Of the above examples three cannot be undertaken electronically which is disappointing and frustrating especially when I have a very secure login to Government services'*
- *'New residents to the island often have no clue who they need to register with'*
- *'I have not [sic] problem complying with any of the present arrangements for the above services and functions'*
- *'The prompt around all of these when moving house is useful on the government portal but could be better'*
- *'Joining up this data on a publish and subscribe basis is uncontentious'*
- *'Why are you (the interfering Government) forever trying to restrict my freedom and steal my personal property (you call it taxation) with your ever growing mountain of rules and regulations?'*

Questions 7 and 8. Electoral roll

- 66% of respondents agreed that the electoral register should be compiled and kept up to date automatically, with 66% also agreeing a change in legislation in principle for this purpose
- 28 did not support the concept, with 29% disagreeing in principle with a change in legislation for this purpose

Question 7: Do you agree that the electoral register should be compiled and kept up-to-date with other data Government currently holds?

radio button yes / no



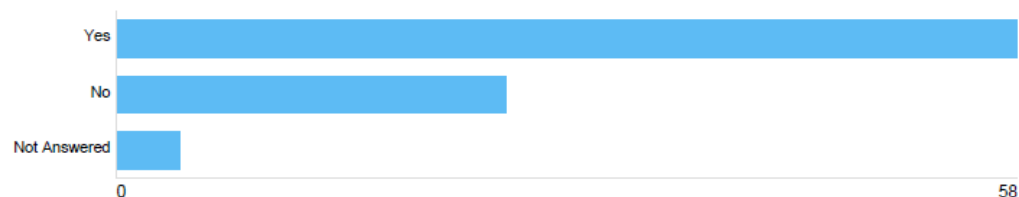
Themes raised included concerns about privacy and GDPR, citizen responsibilities and the opportunities for self-management of personal data. There were some misconceptions about the electoral register and the publicly available edited register. More information about this is available on the [Government website](#).

Statements included:

- *'It is the individual's responsibility to comply with the legislation. If they fail to comply they lose the right to vote and expose themselves to the legal consequences of failing to act. Better enforcement of the law would ensure the register is kept up to date in a timely fashion. I see no need for the proposed changes or any benefit to them for me'*
- *'[A]lthough this may lead to details being available to others. there must still be an option to keep your details off the publicly available register for safeguarding reasons'*
- *'If electronic it could be left live even up to the day of an election. The present system can cause confusion'*

Question 8: In principle, would you support this change in the compilation of electoral registration in legislation?

support electoral reg legislation radio



- *'[I] feel that any decisions require public consultation prior to any change in legislation'*
- *'Gov should determine the key personal information required for all key services and simplify the legislation such that the key information is legally accessible on demand to allow individuals to access to all key services, e.g. benefits, healthcare etc.'*

Questions 9 and 10. Jury

- 67% agreed or strongly agreed with the automatic compilation of the jury list and enabling legislation to support this
- 18% disagreed or strongly disagreed with the automatic compilation of the jury list
- 10% neither agreed nor disagreed
- 28% would not support a change in legislation (in principle)

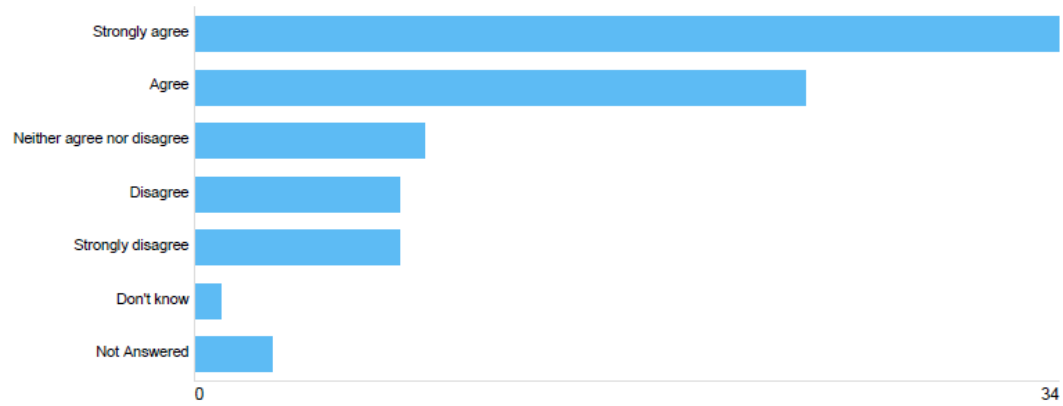
Statements made include:

- *'[P]ersonal information should be requested/presented digitally as and when required not held locally in Government central servers'*
- *'The jury data can and should be managed as part of the statutory information that all citizens are obliged to share with government and this can and should be done online and securely in real time'*
- *'It is supplied and maintained annually. There is no need for a constant live update'*

A number of people also made comments about the reasons exemptions from jury service should be permitted. The jury list is currently based on the electoral register but Isle of Man residents have to update annually whether they are eligible. [Read more about jury service.](#)

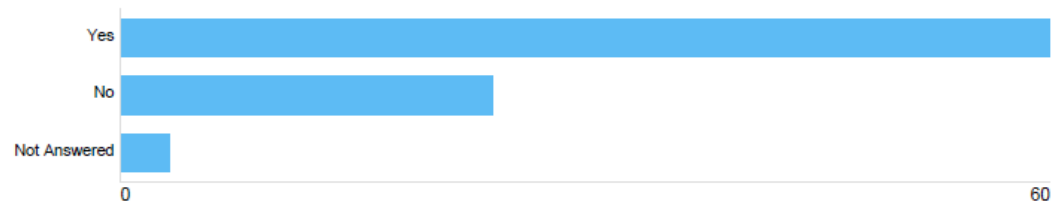
Question 9: Do you agree that the jury list should be compiled and kept up-to-date with other data Government currently holds?

agree - radio button



Question 10: In principle, would you support this change in the compilation of jury lists in legislation?

support jury list legislation radio

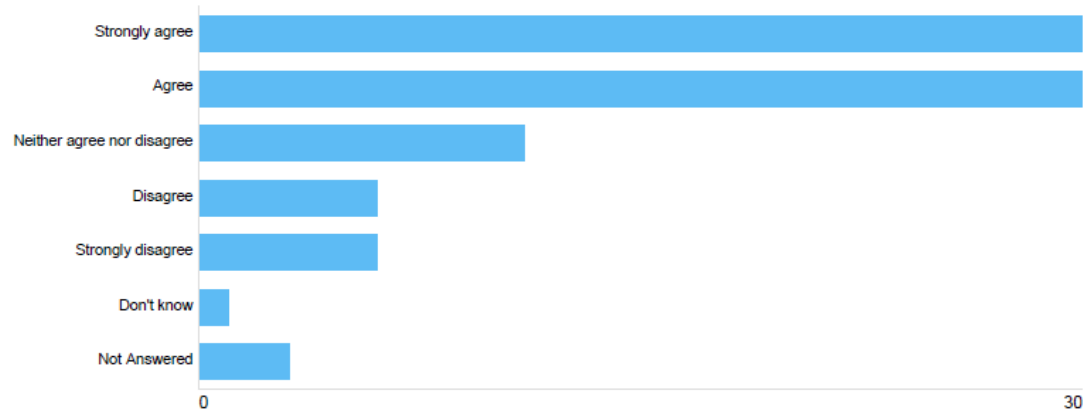


Question 11. Demographic data

- 67% agreed that de-personalised information should be used to compile demographic information in between censuses
- 13% neither agreed nor disagreed
- 13% disagreed or strongly disagreed

Question 11: Government should use 'de-personalised' information it already holds to automatically compile demographic information in between censuses?

radio buttons agree



Additional comments raised themes of privacy, and that respondents wished to see greater use of evidence in policy making and service design:

- *'The most recent census shows first hand why real time data is so critical as we do not want large amounts of development at a time when costs are high and population is falling. We have far greater needs elsewhere and accurate reporting of information in real time would allow this to be identified and acted upon'*
- *'It's not obvious why any census would be necessary...'*
- *'I have no idea what de-personalised information is and this indicates that there has been insufficient debate about what a lot of these terms really mean and their implications for the general public'*
- *'Provided all data is suitably anonymised [sic]'*

Question 12. Anything else?

There were 31 responses to this open question, which raised themes of:

- Human Rights and Privacy
- Confidentiality
- Government policy
- Penalties for misuse of data
- Core 'central data' versus sensitive personal records
- Customer satisfaction
- Citizen empowerment
- The security of a single 'consolidated' database and susceptibility to hacking

Statements made by respondents included:

- *'The sharing of data between department - and even between divisions within departments - is a sensitive issue, particularly on a small island, so should only be done on a 'need to know' basis, and with the permission of the subject'*
- *'The idea that a central register would allow some sort of 'new' big-brother snooping charter is probably still held by a significant % of the population. The key issue is what would be considered to be 'central data' and what would be seen personal data'*
- *'I believe very strongly in the potential for better use of personal and demographic data by government agencies and other organisations in the private and third sector. However this requires a fundamental shift in mind-set on the part of Government away from control and towards digital empowerment of the citizen and business'*
- *'Access to records should pro-actively be monitored and staff held accountable where misuse is identified'*
- *'What reassurances will there be about the quality and accuracy of existing personal information as Government are well know[n] for not having good control of records, both paper and electronic?'*
- *'...the benefits of a Single Resident Record would accrue mainly to Government. The adverse effects to the public would be loss of privacy and risk to personal data if, or more likely when, the data is hacked or otherwise compromised'*
- *'[O]rdinary individuals ought to know who is accessing the information, when and how, in order to form their own view on whether it is lawful ,and hold the government to account if necessary'*

Conclusions

Public debate has highlighted the need to better communicate the technical solution which is proposed as it would be designed to protect privacy and personal information. A small number of respondents believed that Government intended to create a single, large database in which all personal and sensitive information would be stored. Some of the responses reflect the perception that any officer in Government could interrogate this record and view all information associated with an individual. The proposed technical solution is not based on this approach and would not contain personal information.

Responses also show that further work is needed to ensure that stakeholders and the public understand the proposals and the expected costs and benefits.

The responses showed that respondents find the proposals broadly acceptable as long as Government ensures respect of privacy, absolute compliance with data protection and GDPR, and supports change with adequate levels of training and support for staff, plus adequate penalties for misuse. This consultation summary will accompany the feasibility study to be considered by Tynwald in late 2017.

**Cabinet Office
10 November 2017**