



Isle of Man
Government

Woitjer-Flann-Yeoune



Smarter use of your data to improve Government services Consultation

Cabinet Office

Issue Date: 25 August 2017

Closing Date: 29 September 2017

Consultation Paper

The purpose of this Consultation

The consultation is about developing Isle of Man Government policy on how we use data better than we do at the moment to improve the way services are provided and to help us to become more efficient.

We're looking for views from members of the public on:

- Principles for government use of data
- Customer service benefits from improved use of data
- Reducing Government requests for the same data

We want to make sure that people do not have to give us the same information more than once (tell us once), to reduce the burden of duplicating data and prepare for future developments in digital identification.

We want to do that in the simplest way we can, but always guarding your privacy and security.

This proposal will help us:

- Focus our services around citizens' needs
- Maximise the benefits of digital transformation
- Increase transparency

This consultation will help the Cabinet Office understand views from members of the public, to inform proposals for a feasibility study to be presented to Tynwald by the end of 2017.

All respondents should be aware that the Isle of Man Government is subject to the provisions of the Freedom of Information Act 2015, and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise

The deadline by which you must respond is **Friday 29th September 2017**.

Responses must be in writing and sent preferably by e-mail (but not scanned documents) to:

Mike Haywood
Cabinet Office
Third Floor, Government Office
Bucks Road
Douglas
IM1 3PN

E-mail: change@gov.im

Telephone: +44 (0)1624 687007

Paper copies of this consultation document are available, if required, via the above contact details or at the Tynwald Library, the Welcome Centre at the Sea Terminal and your Local Authority offices. Electronic copies of this document are also available at: <https://consult.gov.im/>

When submitting a response please bear in mind the following:

1. Any abusive or offensive responses will be discounted.
2. Please let us know the name of the organisation that you are responding on behalf of, if applicable.
3. We would welcome your response at the earliest opportunity ahead of the closing date.

Publishing responses

During the consultation the Cabinet Office may publish the responses received and will publish a summary of the responses after the consultation has closed. Therefore information you provide to us, including personal information may be published or disclosed. Where this is the case, it will be done so in accordance with the Data Protection Act 2002 and/or the Freedom of Information Act 2015.

In respect of written responses (e.g. by letter or email) you may want your response and/or personal information included with the response to remain confidential. If this is the case please mark your response clearly. An automatic confidentiality disclaimer generated by your IT system will not, in itself, be regarded as binding.

In respect of responses made via the Isle of Man Government's consultation hub at <https://consult.gov.im/>, you will be able to indicate your preference regarding the publication, or otherwise, of your response prior to commencing the consultation.

Queries

If you have any query that relates to how this consultation has been carried out please contact Lisa Kelly on +44 1624 686244 or by e-mail at lisa.kelly3@gov.im

Code of Practice on Consultation

This consultation is being carried out in accordance with the Government's Code of Practice on Consultation, June 2008 ("Code").

The Code sets out six criteria for consultations, being:

1. Consult widely throughout the process, allowing a minimum of 6 weeks for a minimum of one written consultation at least once during the development of the legislation or the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process has influenced the policy.
5. Monitor your Department's effectiveness at consultation.
6. Ensure your consultation follows best practice, including carrying out an Impact Assessment if appropriate.

A list of the bodies this consultation has been sent to is attached in Appendix A.

However, if you know of any other body, not listed in Appendix A that might be interested in this consultation, please feel free to share this document with them or let us know.

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Introduction

Almost every area of Government collects, stores and processes personal data to help deliver services. This can be data to enable a service to be provided such as tax or health details, or identifying data such as name, address, date of birth and national insurance number. The growth of systems to store this data has been disparate and inconsistent. Many different parts of Government handle similar data in different ways – often within the same department.

Government departments can duplicate effort through maintaining separate versions of the same data, which can sometimes be inconsistent in their format, or out of date. This can mean that Government does not always have access to accurate and up to date information limiting our ability to monitor trends and develop policy based on evidence (eg determining future health demands and infrastructure requirements).

Our organisational and legal structure (Departments and Statutory Boards are individual, separate legal entities) means that when someone notifies a Government service of a change in their circumstances, it is not automatically passed on to other services as there is a legal requirement to keep the information separate. This will often result in customers dealing with multiple service areas, which can be inconvenient and time consuming.

Often, departments will request information from other parts of Government to confirm eligibility for a service or to check a person is who they say they are. This is frequently done manually which is inefficient, time consuming and can increase the risk of error.

We know this can be done more efficiently, and a number of respondents to the **SAVE programme ideas challenge** <<https://www.gov.im/about-the-government/government/the-council-of-ministers/save-programme/>> also gave us their ideas for Government using data to become more efficient.

Programme for Government

Outcome

We have public services which are fit for purpose, modern and provided in the right place.

Actions

- We will make access to our services more focussed around the needs of our customers.
- Continue to make more government information available and increase transparency in the way government delivers its services.
- Continue our drive to transform Government through the use of technology.

Programme for Government 2016-2021 <<http://www.gov.im/programmeforgovernment>>

Government services

Government provides a wide range of services, and needs to hold information about individuals to deliver these services.

Most of this data needs to be kept separate as it can be sensitive and highly confidential, such as health, benefits and tax information.

This means that departments are often not allowed or able to share updates to an individuals' details, such as their new address, because of legislation, which can be inconvenient for customers.

This question is about government services such as tax, benefits, etc.

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

Please select all that apply

- Change your name Change your address
- Tell us that someone has moved into or out of your home
- Notify us of a birth or death Tell your GP of a change of name or address
- Change your details on the electoral register
- Change your residency status (move to or left IOM)
- Update your driving licence details

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

Please select only one item

- Very easy Easy Average Difficult Very difficult Don't know

Do you have any other comments on transactions with Government?

Principles

Principles for the better use of Government data

As Government we require certain personal information from individuals to enable us to deliver our services to you. This information is often confidential and sensitive, and therefore requires careful handling.

This includes the **collection** and **storage of data** and how it is **used** and **retained**.

We are considering whether we could develop a system which allows certain changes which are made in one system to be communicated to other systems across Government, meaning people would only have to tell us once. This would only be done where we have been given explicit consent to do so, or there is legislation in place which gives us the power to do so.

In deciding on how to develop a solution we have established the following principles. These principles are about privacy, data protection, good customer service, access to information by Government staff, and being as efficient as we can be.

Privacy by design

What sort of data are we talking about?

Personal identifying information such as names, addresses, dates of birth. Sometimes, where these are updated manually in several different systems, there is a potential for human error.

A citizen's data privacy will be at the centre of any solution, incorporating both data protection legislation and the introduction of the EU General Data Protection Regulation

<https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-by-design/>

<<https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-by-design/>>

Is there anything else you'd like to say about these principles? Is anything missing?

Outcomes

As part of the Programme for Government, we're committed to improving customer service, delivering our Digital Strategy, and ensuring we meet our statutory obligations.

We're exploring how to use our data better to:

- make interactions easier for our citizens
- plan, create and deliver efficient, targeted services
- efficiently collect the data which is required for statutory purposes (eg compiling the jury list and electoral register)
- provide timely and accurate information to enable evidence-based policymaking
- make sure we are prepared for future developments in digital identification

Digital identification and policymaking

Digital identification

Secure digital identification is an important enabler of data protection and the prevention of online fraud.

Digital identification can **enable** the identification of a person and make it possible to get the service delivered to the person who is **entitled** to it.

Evidence-based policymaking

This means policies and proposals are developed based on evidence, such as demographic information about the population (age, income, employment status etc) and statistics on current numbers accessing particular services or benefits.

Data protection and customer service

The term 'personal data' refers to any item of information that identifies a **living** individual – their name, date of birth, address etc. This data is required by Government in order to deliver services, and is stored on the systems that are used to support the provision of those services.

Protecting personal data is important to all organisations - particularly so in Government. There are some instances, where sharing data could help to improve the way we deliver our services by reducing the number of times people tell us the same information or providing more accurate statistical information to help plan our services better.

Data protection in the Isle of Man

It is important that we protect citizen identity and data to comply with data protection legislation now and in the future, and we know this is important to our customers.

Data protection means we have to:

- collect data securely
- keep data safe
- make sure it's accurate and up to date
- not process it more than we need to
- only keep it as long as we need to

Government currently has multiple complex systems containing personal data, which can mean it is difficult and inefficient to update these systems when information changes. This is important because using inaccurate data can create serious risks.

Data Protection Act 2002 <<https://www.courts.im/courtinformation/dataprotection.xml>>

Information Commissioner - Isle of Man <<https://www.inforights.im/>>

5 To what extent do you agree with the following statements?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
I trust Government to securely store my information <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I trust Government to effectively control access to my information <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I should only have to provide Government with the same information once (eg tell a central point my address has changed to let all departments know) <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Where it has explicit consent or legislation in place to do so, I believe Government should join up information to improve services <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have any other comments about data privacy?

Awareness of legal requirements

Government is required by law to hold certain items of data about people who live and/or work in the Isle of Man. This requirement may not always be clear to residents, and this proposal could help reduce the obligations on people to update their information with us.

6 Are you aware that you are legally obliged to keep certain items of your personal data up to date with the following services/functions?

Yes – I am aware
and always do this

Yes – I am aware but
haven't done this /
don't always do this

No – I am not aware

Electoral register –
details of all
individuals eligible to
vote living in the
household updated
annually

*Please select only one
item*

Jury list – name and
address updated
when details change

*Please select only one
item*

Driving Licence –
address updated
when move house

*Please select only one
item*

Vehicle registration
updated when details
change

*Please select only one
item*

Income Tax updated
when details change

*Please select only one
item*

Is there anything you'd like to add?

Electoral register, jury and demographic information

Recent Tynwald Select Committee reports into the operation of the Jury system, and the organisation and operation of the General Election, led to the Tynwald resolution to investigate the feasibility of improving the way in which lists of Jurors and the electoral register are maintained and updated.

In particular the committees requested that we investigate the possibility of connecting the data that Government already holds, in order to:

- Modernise the way in which the jury list and electoral register were maintained and updated.
- Identify other areas within Government that could benefit from the improved use of Government data.

To make these changes it is likely that Government will need to amend legislation and create new systems. There will also be a specific consultation on any proposed changes.

The following questions address these three Government functions:

- 1) Electoral register
- 2) Jury
- 3) Demographic information

Electoral Register

The data held on the electoral register is currently verified by carrying out an annual canvass of each household.

Notifications are sent to all households who must complete a form with details about the people in the household who are eligible to vote.

In addition to the annual canvass, IOM residents are required to update their details on the electoral register with any changes. The electoral register is published once a quarter, which means records may lag by up to three months. The electoral register is used by credit agencies to support applications for loans, mortgages etc.

Keeping the electoral register up to date is a labour-intensive process, which incurs postage and administrative costs.

Government already holds much of the information needed to complete the electoral register. It is possible that, supported by a change to legislation, we could enable the electoral register to be maintained and kept up to date without the need for today's process of manual intervention.

Electoral registration

More information about the **electoral registration process** <<https://www.gov.im/categories/home-and-neighbourhood/elections-and-voting/register-to-vote/>> in the Isle of Man.

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

Please select only one item

Yes No

Please tell us more about your answer

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

Please select only one item

Yes No

Why or why not?

Jury selection

The current system for the selection of jurors starts with information that is collected as part of the annual canvass for the electoral register. Electoral Registration forms are issued to households and as part of the process of completing the form, there is the opportunity to indicate that you are in a category that would exempt you from jury service.

When the completed forms are returned to Government, the completed list of names collected as part of the electoral canvass (minus anyone who qualifies for exemption) is then passed to the coroner for the relevant sheading, and jurors are summoned from these lists.

Keeping the list of jurors up to date is a labour-intensive process, which incurs postage and administrative costs.

A possible application of the improved use of government data could enable the jury list, supported by a change to the legislation, to be maintained and kept up to date without the need for today's process of manual intervention.

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

Please select only one item

- Strongly agree Agree Neither agree nor disagree Disagree
 Strongly disagree Don't know

Any additional comments about the jury list?

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

Please select only one item

Yes No

Why or why not?

Demographic information

Demographic information is data which tells us the gender, age, ethnicity, place of birth, education level, and employment status of our overall population. It helps us to plan services such as education, health, infrastructure and housing based on the needs of the population.

The **Census** <<https://www.gov.im/census/>> is currently carried out every 10 years, with an interim Census every five years to provide Government with population information to inform policymaking and service planning.

This can mean that Government planning and strategy may be based on historical data. The current method of conducting the Census is a labour-intensive process, and is costly to conduct. The Census also places the burden of responsibility for responding onto the citizen.

This proposal could allow selected demographic information to be compiled on a more regular or ad hoc basis .

This would not remove the requirement for a Census, as some demographic information that is useful to Government is only requested in the Census.

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

Please select only one item

- Strongly agree Agree Neither agree nor disagree Disagree
 Strongly disagree Don't know

Do you have any additional comments on demographic information?

Anything else?

12 Is there anything else you would like to ask us or tell us?

About you

13 What is your name?

Name

14 What is your email address?

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.

Email

15 Are you responding on behalf of an organisation?

Please select only one item

- Yes No

Organisation

16 May we publish your response?

(Required)

Please select only one item

- Yes, you can publish my response in full
 Yes, you may publish my response anonymously
 No, please do not publish my response

17 How old are you?

Please select only one item

- Under 16 16-25 26-34 35-49 50-65 Over 65

18 Are you ordinarily resident in the Isle of Man?

Please select only one item

- Yes No

Please add the first three characters of your postcode

19 Please tell us if you are:

Please select only one item

- Employed Self-employed Unemployed Retired Student
 Other

20 We may hold some small discussion groups as part of this consultation.
Please let us know if you are happy for us to contact you about taking part.

Please select only one item

Yes No

Next Steps

Following the closure of this consultation on Friday 29th September 2017, the Cabinet Office will publish a summary of the responses that it has received on the Government's Consultation Website, which can be found at <https://consult.gov.im/>.

Appendix A

List of Bodies to which this Consultation Paper has been sent

Local Authorities

- The 22 local authorities of the Isle of Man

Chief Officers

- The Chief Executive Officers of the Government Departments (excluding the Cabinet Office)

Other

- Tynwald Members
- The Law Society