

Data Asset Register and Data Asset Registrar White Paper Consultation

Overview

The Department for Enterprise is seeking views on the proposed Data Asset Register and Data Asset Registrar under the Data Asset Foundations framework.

The White Paper sets out the proposed architecture, governance model, registration process, classification framework, access model, and operational approach for the Register and Registrar. The consultation is intended to gather feedback on the proposed regulatory and operational framework before secondary legislation and supporting guidance are finalised.

The consultation does not create legal obligations. Its purpose is to test whether the proposed model is clear, proportionate, workable, and complete.

Why your views matter

We are consulting to refine the proposed operational and regulatory framework for the Data Asset Register and Data Asset Registrar before secondary legislation is completed.

We are particularly seeking views on whether the proposals are clear, practical, proportionate, and whether any important risks, gaps, or implementation issues need to be addressed.

Responses will be reviewed and used to inform the development of regulations and operational guidance required to implement the Register and Registrar.

Reasonable adjustments and alternative formats

The department is committed to equal opportunities and our aim is to make our documents easy to use and accessible to all.

We will take steps to accommodate any reasonable adjustments and provide such assistance as you may reasonably require to enable you to access or reply to this consultation.

If you would like to receive this document in another format or need assistance with accessing or replying to this consultation, please email Kasia.Heggs@gov.im or telephone +44 1624 639766.

Responding to this consultation

You can respond to this consultation online by clicking on the 'Online survey' link below.

Alternatively you can download a paper version of this consultation in the 'Related' section below and email it to Kasia.Heggs@gov.im or post it to:

Digital Isle Of Man (Kasia Heggs)

St Georges Court,
Upper Church Street,
Douglas,
IM1 1EX.

What happens next

Once the consultation closes, responses will be reviewed and analysed by the Department. A summary of consultation feedback and the Government response will be prepared and published on the Consultation Hub.

The responses will be used to inform the finalisation of the proposed regulations and operational guidance for the Data Asset Register and Data Asset Registrar.

Publication of consultation feedback is expected within 12 weeks of the consultation closing, in line with Consultation Hub guidance.

About you

You do not need to provide personal details to respond to this consultation. If you choose to provide them, they may be used to help us understand your response and contact you if clarification is needed.

1 What is your name?

Name

2 Are you responding on behalf of an organisation?

Please select only one item

- Yes, I am
- No, I am responding as an individual

Organisation

3 What is your email address?

Email

4 May we contact you if we need to clarify any part of your response?

Please select only one item

- Yes, you may contact me
- No, you may not contact me

5 May we publish your response?

Please read our [Privacy Policy](#) </privacy_policy/> for more details and your rights.

More information

- Publish in full – your name, organisation name, along with full answers **may** be published on the hub (your email will **not** be published)
- Publish anonymously – only your responses **may** be published on the hub (your name, organisation and email will **not** be published)
- Do not publish – **nothing will** be published publicly on the hub (your response will only be part of a larger summary response document)

(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

Introduction

This consultation seeks views on the proposed Data Asset Register and Data Asset Registrar (DAR) set out in the White Paper.

We are particularly interested in whether the proposed framework is clear, proportionate, workable, and whether any important risks, gaps, or implementation issues need to be addressed.

Each question will contain the relevant pages of the DAR white paper, as well as the summary of the pages for responders to read and understand the context behind each question.

[The DAR white paper can be downloaded separately \(opens in a new tab\).](#)

Overall framework

Relevant pages

The relevant pages in the DAR white paper for this section are the following:

Pages 7 to 8, which explain the overall purpose of the regime and what the Register would and would not do

Pages 12 to 13, which explain the policy objectives and how the framework is intended to sit across legislation, regulations, guidance, and technical standards
These pages explain the overall framework, what the Register would and would not do, the policy objectives, and how the legal and operational structure is intended to work.

Summary

The proposed framework sets out a Data Asset Register and a Data Asset Registrar as part of the Data Asset Foundations regime. The Register would record structured information about registered data assets and, on full registration, would give legal effect to the personal property right under the proposed regime. The framework is intended to support legal certainty, trust, transparency, market enablement, responsible innovation, and jurisdictional differentiation.

These pages also explain how the regime is intended to work across primary legislation, regulations, guidance, and technical standards, which should help respondents consider whether the overall model is clear, proportionate, and workable.

6 Do you consider the proposed Data Asset Register framework to be clear, proportionate and workable?

Please select only one item

- Yes, I do
- I mostly do
- No, I don't
- I am unsure

If you have any comments to make about this question or answer, please enter it below.

Information recorded on the Register

Relevant pages

The relevant pages in the DAR white paper for this section are the following:

Page 8, which gives a high-level overview of what the Register would record

Pages 21 to 23, which set out the five field groups and the categories of information in more detail

These pages set out the categories of information that would be included in the Register and how that information would be structured.

Summary

The Register would record structured metadata and governance information rather than the underlying data itself. It is organised into five field groups covering foundation and governance details, core asset information, rights and encumbrances, provenance and composition, and assurance and compliance.

These include matters such as asset identity, classification profile, purpose, restrictions, licences, security interests, provenance history, accreditation status, data protection registration, and version history. Each asset would also be assigned a unique Data Asset Identifier to act as its persistent legal reference.

These pages should help respondents consider whether the proposed content of the Register is appropriate and whether any important categories of information are missing or disproportionate.

7 Are the proposed categories of information for inclusion in the Register appropriate, including governance details, rights declarations, classification and provenance?

Please select only one item

- Yes, I do
- I mostly do
- No, I don't

If you have any comments to make about this question or answer, please enter it below.

Data asset classification

Relevant pages

The relevant pages in the DAR white paper for this section are the following:

Pages 24 to 27

These pages contain the full classification model, including the matrix and overlay attributes needed to assess whether the approach is clear and workable.

Summary

Each registered data asset would be assigned a classification profile that would help determine assurance requirements, residency expectations, disclosure defaults, and renewal cadence. The model uses two core axes: distribution scope and data sensitivity. It also includes four overlay attributes covering commercial intent, AI use tier, regulated sector, and residency tier. Together, these would form the full classification profile used across the regime.

These pages should help respondents consider whether the model is easy to understand, whether the categories are practical to apply, and whether any parts may need more guidance or simplification.

8 What do you consider the proposed classification model to be?

Please select only one item

- Clear and practical
- Generally workable but may require guidance
- Too complex
- Unsure

If you have any comments to make about this question or answer, please enter it below.

Data protection, access and confidentiality

Relevant pages

The relevant pages in the DAR white paper for this section are the following:

Pages 50 to 55

These pages directly explain the proposed access model, safe publication principles, and the intended interaction with data protection obligations.

Summary

The proposed model seeks to balance transparency with confidentiality and data protection through a tiered access approach. Some information would be publicly accessible, while more sensitive information would be restricted to approved professional users, the DAF council, the Registrar, and regulators. Public fields would contain metadata only, not underlying datasets.

The paper also makes clear that registration would not provide a lawful basis for processing personal data and recommends pre registration checks for assets containing personal data, including lawful basis declarations, DPIA evidence for higher risk assets, and safeguards to ensure data subject rights continue to take priority.

These pages should help respondents consider whether the right information would be public, whether the restrictions are strong enough, and whether the proposed safeguards are sufficient to protect confidentiality and data protection rights.

9 Do you consider the proposed safeguards and access model to provide an appropriate balance between transparency, confidentiality and data protection requirements?

Please select only one item

- Yes, I do
- I mostly do
- No, I don't

If you have any comments to make about this question or answer, please enter it below.

Provisional registration period

Relevant pages

The relevant pages in the DAR white paper for this section are the following:

Page 13, which explains that regulations would set the period for completing provisional registration

Pages 28 to 30, which explain the two stage registration process and what happens if the completion period is not met

These pages explain the two stage model, confirm that the completion period would be set through regulations, and show how provisional and full registration are intended to work.

Summary

The regime uses a two stage registration model. At stage 1, a provisional registration would be accepted and recorded on the Register, but no personal property right would arise at that point. At stage 2, the applicant would need to complete registration within a period to be prescribed by regulations by obtaining accreditation and meeting any outstanding requirements.

If this is not done within the prescribed period, the provisional registration would be removed and become void. The paper also discusses a proposed Micro Asset Tier for certain low risk assets to support accessibility for startups and SMEs.

These pages should help respondents consider how much time organisations are likely to need to obtain accreditation and complete the process in practice.

10 What period should be prescribed for completion of registration from provisional registration (i.e. the period within which accreditation must be obtained and submitted)?

Please select only one item

- A single period should apply to all assets
- Different periods should apply depending on asset type or class
- Unsure

If you have any comments to make about this question or answer, please enter it below.

Protection for third parties affected by Registrar errors

Relevant pages

The relevant pages in the DAR white paper for this section are the following:

Pages 73 to 80 (in particular page 79)

These pages provide the liability context needed to understand why protection for third parties is being considered and how Registrar error is treated within the wider liability model. They are relevant because they explain the policy issue behind the question without locking respondents into one specific mechanism.

Summary

The paper recognises that third parties may rely on information in the Register and could suffer loss if the Registrar makes certain types of error. It sets out a wider liability framework that distinguishes between responsibility falling on the foundation, assurance providers, and the Registrar depending on the nature of the failure.

Within that broader framework, it raises the question of whether some form of protection should be available where a third party suffers loss because of a Registrar error. It refers to an indemnity style model as one possible approach, while leaving open how any such protection might be structured or funded.

These pages should help respondents consider whether this type of protection is necessary, proportionate, and useful in practice.

11 The White Paper acknowledges that errors may occur in the Register, which could result in losses for third parties who rely on its information. Do you think some form of protection, such as an indemnity fund, should be available where a third party suffers loss due to an error by the Registrar?

Please select only one item

- Yes, I agree
- No, I disagree
- Unsure

Fee structure and accessibility

Relevant pages

The relevant pages in the DAR white paper for this section are the following:

Pages 28 to 29, which explain the proposed Micro Asset Tier and accessibility considerations

Page 32, which explains the proposed fee structure and fee categories

These pages contain the fee principles, the main fee categories, and the accessibility rationale most relevant to this question.

Summary

The paper proposes that the Registrar may charge prescribed fees and that the overall fee structure should be cost reflective, scalable, and competitive. It identifies fee categories such as initial registration, annual maintenance, certification and extracts, transfer, security interest notation, version amendments, and provenance certificate issuance. It also discusses a possible Micro Asset Tier intended to support accessibility for startups and SMEs.

These pages should help respondents consider whether the proposed fee approach is fair, whether any groups may struggle with cost, and how the model should balance sustainability with accessibility.

12 Do you have any views on how the fee structure should balance full cost recovery with making the Register accessible to startups, SMEs and the voluntary sector?

The White Paper proposes that the Registrar would recommend fee levels and that the Department would set fees by order. These could include fees for registration, annual maintenance, search services, certified extracts, provenance certificates, Asset Passport services and the verification agent. Reduced fees are also proposed for Micro Asset Tier registrations.

Please select only one item

- It should prioritise full cost recovery
- It should prioritise accessibility and lower barriers to entry
- It should aim to balance both
- Unsure

If you have any comments to make about this question or answer, please enter it below.

Practical implementation

Relevant pages

The relevant pages in the DAR white paper for this section are the following:

Pages 21 to 32, which explain what information would be required, how registration would work, and the role of the Registrar

Pages 42 to 49, which explain lifecycle management, version control, ongoing compliance, and automated verification

Pages 70 to 72, which explain the technical architecture and delivery requirements needed to support the regime

These pages contain the operational detail most relevant to identifying where organisations may face practical difficulties in using the proposed framework.

Summary

These pages describe how the proposed Register would operate in practice, what information would need to be submitted, how assets would be classified, how provisional and full registration would work, and what role the Registrar would play in oversight and decision making.

They also explain lifecycle management for dynamic assets, including version control, growth parameters, amendments, remediation, dormancy, and deregistration. In addition, they set out the proposed approach to automated verification, confidential computing, and the technical architecture needed to support the regime.

These pages should help respondents consider practical issues such as the amount of information that may need to be provided, the effort needed to maintain compliance over time, the technical capability that may be required, where guidance may be needed, and what costs or burdens the framework may create in practice.

13 Are there any practical challenges, costs or guidance gaps that organisations may face when registering a data asset under this framework?



Final comments

This final question is open ended and allows respondents to comment on any aspect of the proposed operation of the Data Asset Register, the Data Asset Registrar, or the regulations and guidance that may support the regime.

Respondents may wish to comment on matters such as the overall framework, classification model, registration process, Registrar functions, access model, data protection interface, technical architecture, fees, liability allocation, or implementation practicality.

14 Do you have any other comments or recommendations regarding the proposed operation of the Data Asset Register or the regulations that may support it?



