Response to the
UK Smart Data Roadmap
from Smart Data Council
non-government members

Date: 2024-05-09

Response to UK Government Smart Data Roadmap
from Smart Data Council non-government members

We welcome the publication of a Smart Data Roadmap by the UK Government. This is an important milestone in the UK’s progress towards building a smart data economy that works for everyone. This brings together work across government departments in one place for the first time. Initial workstreams are underway in finance, transport, energy & road fuels, telecommunications, retail, and home buying. These will join the pioneer of smart data, Open Banking.

To empower and drive UK innovation (including AI/ML), we must address how data can be effectively shared across our economy with the explicit consent of (or permission from) those it impacts.

Data moves markets: providing a clear direction to create market stability will drive investment, protect and empower businesses, consumers and citizens, and create a race to the top. We therefore welcome the direction to markets provided by the Smart Data roadmap.

We must also ensure we have a joined-up approach to smart data. The good news is that there is a growing list of potential initiatives, as outlined in the roadmap. The related risk is that fragmented approaches lead to confusion and we must address this head-on. Co-development and collaboration between parties involved in implementation are essential to achieving common approaches and harmonisation. It will also be crucial for the government to build sectoral schemes with close industry engagement, to ensure their effective implementation.

This can better enable:

1. lower costs
2. reduce risks of implementation
3. faster speed to market
4. customer adoption with strong, trusted foundations
We support the direction and outline set out by the Government and encourage both the Government and regulators to take all necessary steps to accelerate implementation, including to:

- set further timetables for moving from identification and consultation to design and implementation;
- nominate ‘interface bodies’/‘implementation entities’ to take forward the work across the common requirements to make the market easy and safe to accelerate value. For example, but not limited to, scheme design, infrastructure design and common user experience design;
- provide or enable sufficient resources for the development of standards and trust frameworks that are critical to the successful adoption of smart data - especially where benefits may accrue in ways that do not immediately align with commercial goals and include ways of supporting societal benefits that may deliver more cost-effective achievement of wider public policy aims;
- Support growth incentive models that encourage the use of standards within and across sectors and create growth-enabling services
- Support the development of international growth by embedding Smart Data into UK Trade policies and trade deals
- Focus on value for the consumer, businesses and related stakeholders, and the design of solutions that tackle the cross-sector personal data and business data
- Support use cases that create value for consumers and use cross-sector data
- support our work to promote interoperability between and across sectors and schemes and consistent governance, standards and trust frameworks that enable this;
- provide Ministerial coordination and backing to drive progress across a complex web of Government Departments and regulators - ensuring clear responsibility and accountability to the delivery of the roadmap;
- recognise and build into the roadmap other industry-led initiatives (e.g. Finance, Perseus, Open Energy, STREAM, Food, Property, Transport) which are in-flight, alongside the Smart Data Big Bang. Markets continue to move to exploit customer data;
- examine what government data needs to be brought into scope to unlock use cases alongside data held by other organisations;
- identify where public funding or regulatory directions support the development of new infrastructure (eg digital £ and clean energy) and ensure that APIs and smart data are built into the functionality; and
- ensure that wider Government work on AI/Machine learning, tokenisation, smart contracts and digital assets join up with smart data. Artificial intelligence is only as good as the data it is based on, and many smart data use cases will rely upon AI analysis.

**Vision**

Our **Vision** is to lead the development of and enable a trusted Smart Data economy that works to both protect and empower individuals, communities, businesses, government and society, both domestically and internationally.

We define Smart Data to include both business data and personal data, and we look forward to supporting the successful implementation and evolution of the roadmap, focusing our work on two missions.
Mission 1

In 2024Q2 we will produce a plan to support Smart Data roadmap implementation. This will look at what is needed to connect across and between sectors, ensuring we maximise the potential benefits of combining datasets from different sectors.

This will include a blueprint and plan for cohesive governance to address data controls, consent/permission, legal, technical, dispute and policy interoperability. We propose to build upon industry-led initiatives (mentioned above) alongside Government-led roadmap sectors.

Outcomes from Mission 1

1. Common understanding of, and alignment on:
   - The quantifiable economic, social and environmental impacts for at least four roadmap sectors (e.g. finance beyond banking, energy, transport). This includes assessing the impact of innovation and new services, cross-sector benefits, and increased competition.
   - High-level plan for implementation including both public and private sectors, assessing interdependencies and common elements.
   - Definitions of detailed targets that will be applied to track progress.
   - Definition of cohesive and clear language: making sure we use the same terms, and explore what language promotes better understanding amongst businesses and consumers.
   - An overview of how best to introduce ‘enabling’ horizontal services that support all types of smart data - including areas such as reusable digital identity, verification, and personal data stores/dashboards, that enable consumers to control their data consistently and coherently.
2. We aim to engage at least three Government departments and regulators (beyond banking) in co-development with the private sector.
3. We will work with Government departments and regulators in each of the roadmap sectors to help define at least one clearly defined, user-focused use case that illustrates what is possible, its impacts (financial, social, environmental) and a more detailed roadmap to implementation for each. At least one of these should demonstrate cross-sector data use.

Mission 2

In 2024Q3, we will develop a detailed governance plan and onward roadmap for Smart Data schemes, focusing on ensuring interoperability and building consistent and interoperable schemes. We aim to support at least two active national demonstrator programmes.

Endorsed by

Gavin Starks, SDC co-chair, and Icebreaker One (IB1)
Ezechi Britton, Centre for Finance Innovation and Technology (CFIT)
Colin Griffiths, Citizens Advice
Tom Fish, Coalition for Online Data Empowerment (CODE)
Liz Brandt, CEO Ctrl-Shift Ltd
Adam Jackson, Innovate Finance
Henk VanHulle, Open Banking Limited (OBL)
Resham Kotecha, Open Data Institute (ODI)
Charlie Mercer, StartUp Coalition
Audre Verseckaite, techUK