

Gloucestershire County Council's Commitment to Ethical Data Stewardship

The purpose of this document is to demonstrate the council's organisational-wide commitment to a set of clear principles which govern the use of data and associated technologies and outline the processes which need to be followed for ethical risk assessment and decision-making.

The right kind of access to data is vital in tackling the big challenges we face in society; from earlier detection and treatment of disease to reducing pollution in urban spaces. However, data and related technologies can also cause harm, including automated decisions that require a human element or inadvertently contribute and embed existing biases and/or inequalities.

Gloucestershire County Council's commitment to ethical data stewardship is a responsible, rights-preserving, and participatory concept which aims to unlock the economic and societal value of data and simultaneously uphold the rights of individuals and communities to participate in decisions relating to the collection, management, and use of their data.

Principles	Commitments	Considerations
1. The human being at the centre	An individual's interests will always be prioritised over the council's interests.	<p>Individuals are at the centre of all our processing activities, including highly vulnerable people facing some of the most difficult moments in their lives. We recognise that we have a duty to keep each person at the centre of our data practices and not expose them to additional risk or harm when managing their data.</p> <p>We will ensure the individual has the primary benefit of data processing and will consider the context around when/how data is collected, stored, and used, as well as the impact this will have on individuals, including any power imbalances that may be created.</p> <p>Every individual is unique, capable of empathy, self-determination, unpredictability, intuition, and creativity. They are not comparable to computer processes, programmes, or software and will not be treated as such. There will always be a human element in our decision-making. Decisions will not be made using algorithms alone.</p>
2. Agency	Individuals are in control and will feel empowered by their data.	Where possible, an individual's self-determination will always be prioritised in council processes, giving them data sovereignty.

		<p>We will ensure that individuals feel empowered and have the ability to enforce their rights over the use of their data, the context in how it is processed, and how it is activated.</p> <p>Where consent is used, individuals will always have the choice and control over how their data is used and the power to reverse their decision at any given time. These choices will be incorporated and embedded into all systems and databases which process personal data.</p>
3. Good Practice	We have consistent, efficient, and actionable ethics review practices.	<p>Robust processes for all new products, services, and research programmes which process personal data already exist across the council. This includes the creation and review of data protection impact assessments (DPIAs), information sharing agreements, and advice from the Data Protection Officer, as well as our Caldicott Guardians who play a leading role in safeguarding the personal and sensitive data we hold about our most vulnerable individuals.</p> <p>Caldicott Guardians act as the council's 'conscience,' and oversee all arrangements, protocols, and procedures where confidential service user information may be shared with external bodies.</p> <p>Individual project boards and corporate-wide information governance structures can direct work relating to information security and privacy and consider the consequences of their decisions, thus aligning them to integrity and ethical standards.</p> <p>We will utilise expert advice to ensure all ethical, privacy, and security dimensions are covered, and seek to promote a social licence for data processing activity, particularly in relation to citizen data, as well as adhering to legalities.</p>
4. Transparency	Our data processing activities and automated decisions make sense for the individual.	No data processing services will be commissioned without maximum transparency from developers (internal or external suppliers) about the design of data services, including any algorithms.

		<p>The logic, methodology, and metadata used for a data service will be easily explainable to elected members and the public on demand, as well as proactively published in high profile and/or potentially contentious situations.</p> <p>A dynamic relationship will be fostered between the council and key stakeholders, allowing their voice to be heard and demonstrating how they have contributed to decisions.</p>
5. Accountability	Accountable processing is embedded throughout the organisation.	<p>Data protection legislation already places great emphasis on accountability both in identifying the legal entities that are responsible for personal data and demonstrating compliance with the regulations.</p> <p>Responsible and accountable data stewardship will include anticipatory, reflective, reflexive, inclusive, deliberative, and responsive actions to foster a consistent approach in our principles and ensure ethical accountability in the short, medium, and long term.</p> <p>This further extends to all sub-processors, contractors, and partner organisations working with the council or using council data and will ensure we are always held accountable for our processing activities.</p>
6. Privacy	We will always consider our privacy obligations under data protection legislation and our policies.	<p>All privacy information will be made truly transparent and explainable, thereby ensuring the purpose and interests of the processing is clearly understood by the individual, as well as any associated social, ethical, or societal risks.</p> <p>Privacy information will be communicated and written in simple language, explaining how the council will use the data it has collected, who it will be shared with, and how long it will be stored for.</p>
7. Fairness	Attention is given to how data is compiled, linked, and analysed	Whilst everyone should have access to the social and economic benefits of data, not everyone is equally impacted by the processes of data

	<p>to remove actual or perceived bias.</p>	<p>collection, correlation, and predication. This means data can be a tool of both inclusion and exclusion.</p> <p>By considering how ideology around data ethics and responsible stewardship differs based on an individual's socio-cultural values, and adhering to our principles of agency, scrutiny, transparency, and accountability, we will ensure that we respect human diversity in all its forms and will not reinforce problematic biases.</p>
8. Intention	<p>We will always consider why data is needed, what will be gained from collecting it, and what changes are possible after analysis.</p>	<p>Our considerations will account for, and avoid, any unintentional consequences as well as explore how the data can be used to tackle some of our biggest challenges.</p> <p>We will strive to collect the minimum viable amount of data necessary for our purposes and will consider the possibility that less data may result in better analysis and less risk.</p>
9. Benefit	<p>Advanced data services should provide clear benefits to the people of Gloucestershire and, as far as possible, cause zero harm to society and the environment.</p>	<p>Whilst some data analytic services have obvious benefits if deployed by the council, and data protection law and its principles aim to reduce any potential harms, there are potentially much wider societal harms which may occur even with legal data processing.</p> <p>We will create space to understand the impacts and implications of data processing and how this may differ in different contexts, for different people, and at different times.</p> <p>We will endeavour to understand the ecosystems and environments in which our processing operates and, where possible and/or critical, will collaborate with other key stakeholders to ensure benefits and risks are fully explored and shared.</p> <p>All benefits should be considered including the provision of intrinsic benefits to society, improved public services, improved outcomes for communities and enabling research opportunities. Such benefits will be weighed up using council governance structures.</p>

10. Governance	<p>We will always adhere to our agreed governance structure, including escalations to Caldicott Guardians where necessary.</p>	<p>The council recognises that data ethics poses organisational challenges that cannot be resolved by compliance regimes alone. Some laws have largely failed to keep up with the pace of digital innovation and change, which means existing regulations are often mis-calculated to current risks.</p> <p>To excel in data ethics, the council has defined its own compliance frameworks to outperform legislated requirements and has embedded collaborative routine and transparent practices for ethical governance across the organisation.</p>
11. Sustainability	<p>We will reduce the impact of our data processing activities on the environment</p>	<p>The negative impacts of data and related technologies on the environment are becoming better understood. There is a growing awareness that some components of the infrastructure of the internet are not environmentally sustainable.</p> <p>As such, we will consider ways to reduce environmental harm through alternative data processing and storage solutions.</p>