Regulatory Sandbox Final Report: Greater London Authority

A summary of Greater London Authority's participation in the ICO's Regulatory Sandbox Beta

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Information Commissioner's Office

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1. Introduction

1.1   The ICO introduced the Sandbox service to support organisations who are developing products and/or services that use personal data in innovative and safe ways and where such products and/or services deliver a potential public benefit. In order to develop the Sandbox, the ICO launched the Sandbox as a beta phase, for an initial group of participant organisations during 2019 – 2020. The beta phase provided a free, professional, fully functioning service for ten organisations, of varying types and sizes, across a number of sectors.

1.2   Organisations who were selected for participation in the Sandbox beta phase have had the opportunity to engage with us; draw upon our expertise and receive our advice on mitigating risks and implementing 'data protection by design' into their product or service, whilst ensuring that appropriate protections and safeguards are in place. The Greater London Authority (GLA) applied to the ICO Sandbox and was one of the candidates who was selected for participation in the Sandbox beta phase.

1.3   GLA wished to use the ICO Sandbox process to support the development and enhancement of an already existing multi-agency data platform that they host (SafeStats). This would facilitate the use of a public health approach to violence reduction and align closely to the work of the London-based Violence Reduction Unit, helping to inform violence-related decision-making processes. The Violence Reduction Unit is a cross disciplinary department looking at the role of the public health approach to reducing violent crime.

1.4   The GLA wanted to utilise a significant proportion of their time within the ICO Sandbox to review both their processes and documentation in respect of Information Governance and Information Security pertaining to SafeStats. They were keen to ensure that all the relevant and necessary procedures and requirements were in place (and documented accordingly), so as to enable meaningful negotiations with other agencies, of more detailed/disclosive public health data. The GLA wanted to demonstrate to both current and potential data providers that they were fully aware of, and compliant with, all relevant

legislation and governance and had sound procedures in place to mitigate any identified potential risks with the proposed data sharing.

1.5   On 18 July 2019 the ICO attended GLA's offices in London and met with the lead of the project, the GLA's Data Protection Officer and the technical implementation lead. GLA acknowledged that the body of work required by this project would likely take longer than one year and a programme of actions was agreed for the Sandbox plan.

1.6   During the course of GLA's participation in the ICO Sandbox, the Covid-19 pandemic resulted in delays to the progress of the project and significant draws on the resources of other organisations also working to support broader public health aims in the capital. For this reason, some of the work which GLA hoped to complete before the end of the Sandbox participation has not yet been finalised. GLA have used this time to develop its policies and procedures and further improve its background understanding of the data protection issues resultant from tracking data points relating to violence as a public health issue.

2.   Executive summary

2.1   The programme of work GLA wished to complete within the ICO Sandbox was designed to improve on already embedded good practice and build a framework for further ongoing compliance. GLA's work was likely to far exceed the time available in the beta phase, therefore actions were designed to be repeatable and iterative. This was intended to help ensure a framework for compliance which can be effectively used going forward without additional support from the ICO.

2.2   The Sandbox plan objectives included a review of existing data protection measures, an iterative review of data protection documentation, a technical risk review and a data sharing review and support.

2.3   The GLA project does not attempt to identify or take action directly against individuals, however the data processed by the GLA for the purposes relating to SafeStats should be considered identifiable, as with the reasonable effort and resources of those within GLA who have access to the data, the data subject may be identified. This in turn raises further questions about

the ways in which GLA can support the data protection rights of individuals, including those at risk of being victims of or committing violent crimes.

2.4   The SafeStats project and associated deliverables, challenge the way that violent crime and its associated factors are routinely looked at; proposing to align health and crime data for the purposes of analysis. GLA's public health approach to reducing violence may:

- help facilitate collaborative working;
- reduce duplication;
- improve continuity between services;
- provide an insight in to why those who have been identified as high risk at an early age by public services still go through the system without appropriate action being taken;
- identify where the confounding issues may lie such as reductions in funding for non-statutory interventive work and extensive waiting lists for mental health support; and
- provide a more comprehensive and integrated understanding of violence.

2.5   Ordinarily, analyses of violence are undertaken on the relevant data separately, in isolation from other relevant records. GLA's SafeStats project hosts emergency services data and public health data on a combined platform, to enable a more comprehensive and integrated understanding of the intelligence picture. This shifts from an enforcement-led analysis of individual datasets to a more proactive and collaborative approach, which simultaneously analyses the data to inform intervention and diversionary activity. Ultimately this is done in a way to be within the public interest as it should reduce the number of violent incidents within London. The bringing together of data is still required to be done in a way which supports the rights of the data subjects and the security of the data. During GLA's Sandbox participation, support was provided by the ICO in the development of risk assessments, document review and consideration of internal policies to help GLA effectively consider these issues.

2.6   The use of predictive analytics and decision support technologies to assist in deciding when and where to apply services and early violence interventions, as well as who to apply them to, enables the GLA and other involved parties to move away from

what is otherwise a very time-consuming, resource-intensive manual process. This form of innovation is likely to result in a much more efficient and effective process. It is however still important that such activities take place with public support and scale up in a way which demonstrates efficacy and proportionality with the outlined aims. The work in the Sandbox has included externally commissioned research and stakeholder engagement, and research-based decision making to help support this.

3. Product description

3.1   Whilst in the ICO Sandbox, GLA proposed to explore its data collection and data analysis, relating to the impacts of violent crime. This data is stored within a platform known as SafeStats and over the course of the Sandbox participation, GLA wished to look at both expanding the currently held data sets within SafeStats and also to look at building a basis on which to further its projects analysing this data around specific themes.

3.2   This work has taken place within the context of the Mayor of London setting up a Violence Reduction Unit (VRU) which is taking a public health approach to tackling violence. As part of this work, the VRU is required to better understand how public health and social services can be managed to prevent and reduce crime; with the focus being on early intervention. There is increasing interest from the VRU, the Mayor's Office of Policing and Crime (MOPAC) and the Greater London Authority (GLA), for health, social care and crime data to be looked at in an integrated and collaborative way.

3.3   The Sandbox project aimed to build on the existing SafeStats service run by the GLA, which brings together multi-agency emergency service data on crime and disorder within the capital and makes this available to authorised analysts in support of strategic planning, policy making and operations. These analysts are involved in crime and disorder reduction work and are primarily located in organisations external to the GLA; including the Community Safety Partnerships across London and the Metropolitan Police Service.

3.4   The aims of the GLA Safestats project are as follows:

3.5 **Reduced violence** – The project aimed to support the VRU in tackling the causes of violence, and reducing its associated harms in London. The consequences, impacts and ramifications of violence are often widespread, manifesting in issues, such as increased social costs, physical injury, social isolation, and an increased fear of crime amongst vulnerable groups of people. The resultant benefits to individuals, their families and their communities of reducing the prevalence of violence and the associated risks are thus fairly explicit and extensive.

3.6 **Better public health** – Violent crime has a complex relationship with health; known to negatively affect both people's physical and mental health. Through creating an established and strong evidence-base for the predictors of violence, these risks can be mitigated, and the impacts minimised. Health inequality is a pertinent issue for public health and for crime reduction. The victims and perpetrators of violence are consistently reported to have higher health needs, and worse health outcomes across a range of measures compared to the rest of society. Through a better understanding of these health needs, the right health provisions can be provided at the right time to those that need them most; reducing health inequality and increasing the overall health and wellbeing of society.

3.7 **Better public services** – The project will assist in the intelligence and evidence-led allocation of funding and resources to both the geographical locations most in need, and to the most vulnerable and needing groups within society. The optimisation of scarce resource deployment therefore results in a more efficient use of public funds, better service user experiences, and more effective and successful public services.

3.8 The utilisation of the Project is dependent on GLA's ability to source relevant data in a compliant way, to hold that data in a secure manner and further share the information whilst limiting the risk of exposing special category personal information to unauthorised individuals. GLA is currently working on encouraging further strategic data sharing with their current, and new, partners. Fundamental to the ongoing effectiveness of GLA's work is trust and confidence both from its data sharing partners and the public. Increasing and expanding the data sets is likely to increase the risk profile of the data processing activity and GLA are currently working to mitigate these issues prior to increasing the functionality of the service.

3.9 GLA defined three different stages of data collection and collation for their ongoing project. The first stage refers to taking the aggregate data to which it already has access and the provision of the data at a lower geographical level than currently

held, specifically what is known as Lower Super Output Area (LSOA). This stage concentrates on dialogue and data sharing with agencies and organisations that the GLA already has authorised data sharing agreements with, or those agencies and organisations that have the required data sets to be publicly available, albeit at an insufficient geographical level of aggregation. The next stages are specific projects which will look at thematic understanding of violence including Youth Violence and Domestic Abuse.

3.10 Core to this service is SafeStats, the host site for the emergency services data, which is accessed directly by the permitted users such as Community Safety Partnership Analysts and Police Analysts external to the GLA, to query the data that they need. This site is hosted and maintained by GLA; with all included data based upon approval by the originating bodies such as Transport for London (TfL) and the British Transport Police (BTP). SafeStats is currently undergoing a significant redevelopment to improve functionality, usability, performance, aesthetics, and user experience. The scope of the Sandbox project was to look at a new service which is currently unnamed but is essentially a "SafeStats +". The GLA project proposes to have an increased data set with more disclosable data at a lower geographical level, possibly at LSOA, and failing that at ward level. Whilst the current implementation does not aim specifically to identify individuals based on the data provided through the project, there a realistic possibility that the data could be combined with other data sources to uniquely identify the data subjects included and is therefore the reason the project is considered to involve the processing of personal data to be under the scope of the data protection legislation.

4. Key data protection considerations

Lawful basis for processing

4.1 The GLA aimed to consider whether the GDPR or the requirements set out under part 3 of the DPA 2018, that relate to law enforcement processing, would be applicable to its work, processing data relating to violent crime. At the initial stages of working with the GLA, the ICO requested that the lawful basis for processing be considered; it was then confirmed by the GLA DPO the GLA is not thought to be a competent authority for the reasons of law enforcement, as it is not listed in

schedule 7 of the DPA 2018, nor does it seek to enforce law enforcement or prosecute infractions of the law. Therefore, the GLA determined that any criminal enforcement data is to be processed in line with the GDPR (and part 2 of the DPA 2018) with the appropriate requirements. The ICO took the view that, for the purposes of GLA's sandbox participation, it was a matter for the GLA to determine, based upon their own knowledge of the legislation, to which part of the DPA 2018 they are subject.

4.2 The GLA determined that its lawful basis for processing under the GDPR was Article 6(1)(e) Public Task, which is defined in the legislation as "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller".

4.3 This is because the processing relates to its duties set out in Section 30 of the Greater London Authority Act 1999 (as amended) that provides the Mayor with a general power to act on behalf of the GLA to do anything which he considers will further the promotion of social development in Greater London and to promote improvements in the health of persons in Greater London.

4.4 As part of the Police and Social Responsibility Act, in 2011, the Mayor of London was given a direct mandate for policing in London, with the Mayor being directly responsible for policing performance, setting strategic direction and allocating resources through the Police and Crime Plan. The priorities identified for London all align to tackling violence and its associated issues; including violence against women and girls, keeping children and young people safe, and hate crime and intolerance.

4.5 Similarly, where the processing of any identifiable personal data concerning the health of an individual constitutes 'special category' personal data under Article 9 of the GDPR, such processing must also meet the condition in paragraph 6, Part 2 of Schedule 1 of the 2018 Act (in accordance with the requirement in Article 9(2)(g) of the GDPR): "processing is necessary for the exercise of a function conferred on a person by an enactment or rule of law and is necessary for reasons of substantial public interest." Paragraph 6 of Part 2 of Schedule 1 of the DPA 2018 (Statutory etc and government purposes) provides that: "This condition is met if the processing (a) is necessary for a purpose listed in sub-paragraph (2), and (b) is necessary for reasons of substantial public interest.

(2) Those purposes are (a) the exercise of a function conferred on a person by an enactment or rule of law; (b) the exercise of a function of the Crown, a Minister of the Crown or a government department."

Where any data is considered to be criminal conviction data and could require a condition to process data under article 10 of the GDPR GLA could rely upon the same condition as per paragraph 36 of part 2 of Schedule 1 of the DPA 2018.

4.6   Further powers to process and share data relating to violent crime have been outlined in the Government's Serious Violence Bill 2019, but have yet to become law.

Commissioned research on public views to data sharing

4.7   As part of the Sandbox work, GLA commissioned external research to better understand the public's view on the sharing of personal data in respect of its public health approach to reducing incidents of violence. This consultation was completed in April 2020. The research particularly focused on those who were most likely to be impacted by violent crime as either victims

or perpetrators. Conducting this research has also helped GLA to comply with Article 35 (9) of the GDPR[1], relating to seeking the views of data subjects where possible, as part of a data protection impact assessment. Where the GLA has not identified the data subjects specifically affected by the processing it has still sought those views from the most relevant sections of the public.

4.8   The view articulated by the public in this research included a positive view of data sharing for the purposes of violence reduction, as well as a concern that data shared in such a fashion should only be used in ways which benefit the data subject. The subjects engaged in the research expressed views about specific data sets the public believed could be shared, such as data relating to health and schooling, and other data which they would not support the processing of, such as biometric or geolocation data. The research also highlighted the importance of ongoing communication of how these data sets are being used and the importance of piloting the data sharing to ensure that it is effective before rolling out more widely.

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[1] Where appropriate, the controller shall seek the views of data subjects or their representatives on the intended processing, without prejudice to the protection of commercial or public interests or the security of processing operations.

4.9 The ICO recognises that GLA have taken an important step by ensuring that the public views are considered, through the GLA's initial research process. With respect to proportionality and necessity of processing, the ICO has worked with GLA in ensuring that the outputs of the research can be read across into the data protection work carried out by GLA within the ICO Sandbox.

4.10 Significantly, this allowed the GLA to not only articulate which areas of data protection the public had the most concerns about given the specific areas of focus of the project; but also the general support for the activity in respect of the balancing of the rights of the data subjects against the wider public benefit of the data processing. The consultation has acted as an important step in ensuring the GLA is demonstrating the appropriate care and respect for the rights of the data subjects, whose data it seeks to collect and process.

Consultation with stakeholders and data sharing practices

4.11 At the beginning of its Sandbox participation, GLA aimed to clarify and standardise its existing data sharing documentation in respect of the SafeStats platform. On 11 September 2019, drafts were provided to the ICO for comment. This included a revised data sharing template, a data sharing pathway document and clarification as to the data controllership as a result of the transfer and further use of data. The final data sharing agreement template framework was comprehensive and lended itself to compliant data sharing activities. The templates and processes represented an encouraging starting point for the formation of ongoing Data Sharing Agreement's (DSA's) assuming that appropriate considerations are made regarding the legal basis and the necessity of the data sharing activity.

4.12 After conducting the wider research into the public's views around data sharing for the purposes of crime reduction, the GLA went on to conduct a consultation with the London Local Authorities to ensure that their proposed processing and data sharing would be effective for the purposes outlined, would be feasible to conduct and would not involve the collection of data above and beyond that which could be effectively used and required for the reasons of violence prevention. This has been productive in ensuring principles of data minimisation across the board and helped define what is possible as part of the Sandbox project.

4.13 The consultation allowed for an assessment of current provision of localised data sets and utility of such data to help understand what the current data recording is and how it can be improved. The Local Authorities were also able to clarify particular areas of concern and interest in respect of violent crime such as youth violence and domestic abuse with the hope that improved accessibility to demographic data was proposed to have several positive impacts across a broad range of aspects of violence work. This included, providing insight into the intelligence picture for violence, reducing reoffending, helping inform early intervention work, reducing repeat victimisation, helping to facilitate collaborative working, and helping with service provision/allocation.

4.14 GLA has consistently sought out the best ways to understand its data processing in a holistic fashion, seeking to ensure the greatest level of utility of personal data as well as public benefit, whilst limiting the risk to the data subjects. The methodical approach to these consultations has seen the application of a rigorous practice of data protection principles to ensure that the legitimate aims are correctly specified in a specific and tangible fashion, that the processing is feasible and aims to tackle complex and emotive issues in the least invasive way possible. The work done by GLA demonstrates that data sharing in the public good can be achievable and conducted in a way which maintains a high level of data protection throughout.

Using research to understand the implications of big data processing

4.15 Due to the nature of data analytics and platforms which could be described as involving "big data" it is becoming increasingly important for organisations to fully consider to what extent they should be taking advantage of opportunities to collect new data or link existing datasets, ensuring that any data processing remains both proportionate and necessary to achieving a legitimate aim.

4.16 During the course of the Sandbox participation, GLA took opportunities to further define the scope of what it hoped to achieve and base the work within the Sandbox around overall themes. Working with the ICO, the GLA has placed significant value on looking at the proposed issues prior to the processing of data, to ensure it has a relevant basis for the inclusion of the data within the data set. As part of this work, GLA has benefited from taking specific steps to understand the relevance

of the data prior to the processing activity taking place. These steps which GLA formed in the context of the Sandbox, are as follows:

- **Clearly state the aims of the big data processing** – GLA clearly articulated the aim of the processing and why it was currently needed, including for the purposes of understanding the strategic requirements of the violence reduction unit and its own current intelligence provision. From this analysis, several priority areas were articulated for further expansion of the data set.

- **Make an assessment as to if/why currently available mechanisms are not effective** – GLA has made an attempt to understand and quantify why its existing datasets would not be sufficient for addressing the priority areas. Including consultation with stakeholders and evaluation of the current utility of the data with respect to specific core thematic areas for further research.

- **Use a rational basis for the inclusion of data in the big data set with the input of technical and subject matter experts** – GLA has consistently sought the views of stakeholders to ensure it is looking at relevant data sets and has undertaken literature reviews to indicate the areas which may be most valuable for expansion. This has led to targeted and specific areas in which to focus their data analysis, to better serve the public without conduct of broad exercises in data analysis without thought as to the relevance of the data processing. Significantly GLA have reduced the risks of processing data unnecessarily that would be resultant from processing the data based upon an assumption that that creating larger datasets would automatically lead to better insights.

- **Conduct a limited scope exercise** – in the early stages, to ensure roll out will be effective, each additional piece of work carried out by GLA will be limited in geographic scope and will be time limited. Each of the new initiatives proposed by GLA have been described as pilots with limited scope tied to a thematic aim. This is to allow GLA to scale up as efficacy is proved whilst also reducing any of the risk associated to the data subjects.

- **Reduction of readily identifiable information** – all of this work has been conducted in such a fashion that data subjects are not readily identifiable and no action is taken against specific individuals on the basis of the work done for

the purposes of the data analytics work.

Provision of transparency information when the data subject is not identified

4.17   During its Sandbox participation GLA was required to determine the level of anonymity of the personal data being processed in order to explore its obligations under the GDPR. It was agreed that while GLA may be limited in its ability to identify individuals in the data set, individuals may still be identified by further processing of the data. This could happen if the data were to be triangulated, or "jigsawed" with other data allowing the deidentified data to be matched with a living individual. The ICO supported GLA to clarify the nature of the data and the importance of rights facilitation under the requirements of the GDPR.

4.18   Given that the data is held in a format that could be identifiable it should be considered to be identifiable personal data and as such under the scope of the GDPR and therefore subject to the proper provision of individual data protection rights.

However, GLA is not required to re-identify data subjects in the data set as per GDPR Article 11[2], to help facilitate the rights of the data subject.

4.19   GLA have gone on to create a documented assessment as to whether providing fair processing information to data subjects could be considered impossible or of disproportional effort under GDPR article 14 (5) b[3]. As this would not likely be possible in most cases, would represent a higher level of risk to the data subject and is not required to meet the aim of the

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[2] If the purposes for which a controller processes personal data do not or do no longer require the identification of a data subject by the controller, the controller shall not be obliged to maintain, acquire or process additional information in order to identify the data subject for the sole purpose of complying with this Regulation.
1Where, in cases referred to in paragraph 1 of this Article, the controller is able to demonstrate that it is not in a position to identify the data subject, the controller shall inform the data subject accordingly, if possible. 2In such cases, Articles 15 to 20 shall not apply except where the data subject, for the purpose of exercising his or her rights under those articles, provides additional information enabling his or her identification

[3] the provision of such information proves impossible or would involve a disproportionate effort, in particular for processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the conditions and safeguards referred to in Article 89(1) or in so far as the obligation referred to in paragraph 1 of this Article is likely to render impossible or seriously impair the achievement of the objectives of that processing. In such cases the controller shall take appropriate measures to protect the data subject's rights and freedoms and legitimate interests, including making the information publicly available;

processing, GLA have considered that it would not be proportionate to re-identify and notify the data subjects directly of the processing.

4.20   It was agreed that GLA should still ensure privacy notices are made readily available online as per ICO guidance on transparency, and a consideration to the risk to the implementation of the data subjects rights should be documented in a data protection impact assessment (DPIA).

4.21   The GLA should consider all rights requests made in relation to the processing of personal data which are not manifestly unfounded or excessive. However rights requests should only be facilitated where information is provided to enable the re-identification of the data subject. GLA should consider the methods available to them ahead of processing in order to implement an appropriate process to ensure that rights requests are adequately responded to. These methods may included working with data sharing partners, and should not place an unfair onus on the data subject to provide information to facilitate their rights.

Technical security considerations and conduct of DPIAs

4.22   It is a requirement of UK data protection law that any processing likely to result in a high risk to the data subjects should be subject to a DPIA process. As the processing proposed by GLA was on a large scale and may contain information considered to be of a sensitive or a highly personal nature, both the ICO and GLA determined a DPIA would be relevant to the processing. An initial version of the SafeStats DPIA was drafted by GLA in August 2019. Iterations of the DPIA were reviewed by the ICO Sandbox during the course of GLA's participation. An additional DPIA was also drafted and reviewed for the specific thematic projects that GLA proposed to undertake. While a single DPIA may have been sufficient for multiple processing operations of a similar nature as per GDPR article 35(1)[4], the GLA considered the thematic projects to be different enough in nature to be supported by a separate DPIA, to enable a better understanding of the risks involved. This was supported by the ICO, with any information relevant to both DPIAs contained in each DPIA separately.

4.23   In general, a DPIA process should include an assessment of any risk to the rights and freedoms of the data subject resultant from the data processing. This may include a data subject not being able to action their relevant data protection rights such

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[4] Where a type of processing in particular using new technologies, and taking into account the nature, scope, context and purposes of the processing, is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall, prior to the processing, carry out an assessment of the impact of the envisaged processing operations on the protection of personal data. A single assessment may address a set of similar processing operations that present similar high risk

as the right of access as defined by data protection legislation, or their broader rights to privacy and equality. During the course of the risk assessment, particular attention should be paid to the security implementation of the data processing activity, including measures to improve the confidentiality, integrity or availability of the personal data involved in the processing.

4.24 GLA has sought to document these considerations within the DPIA, including the proportionality and necessity of the data processing it is undertaking. This has included a thorough documentation as to how the new approach is materially more effective to achieving its aims than not processing personal data at all. It establishes the legal basis for processing and documents the relationships, legal and organisational measures in place between itself and its partner organisations to ensure that the rights of the data subject are upheld.

4.25 In early drafts of the DPIA it was agreed that the risk assessment element of the DPIA could be more specific and have clearer and more granular detail as to the risks and nature of the mitigations in place to reduce those risks. Whilst it was originally envisioned that a full scale, on-site, assessment of GLA's operational security be conducted as part of the Sandbox process, this was not possible due the impact of Covid-19. GLA have instead sought the ICOs view on risks that may be associated with the processing and documented these in its DPIAs.

4.26 Unlike a cyber security assessment, which considers the risk from an organisational perspective, the DPIAs were primarily concerned with any impact on the data subject and in particular any distress or harm they may suffer as a result. This should cover the risk of a single breach of personal data and how that may impact a particular individual and also the possible scale of interference to multiple individuals of a wide-ranging breach. Risks in this assessment included the risk of misuse of data by a user, the risk of re-identification of a data subject in the data set and risks relating to the secure transfer of data from stakeholders to GLA.

4.27 The GLA has iterated on the DPIAs during the course of the Sandbox participation, as changes have been made to projects and new information has been gained from consultation and strategic processes. In any event, iteration of DPIAs can be helpful and should be considered good practice as the security requirements of any system will be dependent on the context in which that system is used. The overall security of the organisation will also have a bearing on how secure the individual

system is and without that holistic assessment, there may still be significant security issues relating to the processing of the personal data within any given system. GLA have a wide range of established governance and security policies in place to support the mitigation of these risks which have been documented but not fully assessed within the scope of the Sandbox participation.

4.28   As SafeStats continues to be improved or new thematic areas are explored which require more data for GLA to conduct its activities, GLA should continue to revisit its risk assessments in particular in relation to the risk of re-identification.

5.   Ending statement

5.1   The SafeStats data portal brings together data from many sources and provides access to these data in a secure way to different types of authorised users. SafeStats has been around in different iterations for around 20 years. During this time there have been massive changes in the national understanding of and approaches to this data sharing which impacts on governance frameworks. Changes in policy relating to crime and violence require access to a wider range of datasets than those held in the past and these add to the complexity of the portal governance.

5.2   The Sandbox experience has afforded GLA with a neutral space to review in greater depth all the processes and documentation associated with the SafeStats system: to provide clarity on their compliance with all the relevant legislation and ensure all documentation was completed robustly. As a result, GLA have a much greater level of assurance and confidence around legislative compliance when making approaches to both new and existing data providers.

5.3   The Sandbox has provided GLA with the opportunity to engage in meaningful dialogue with the ICO and other key stakeholders regarding the differing roles and aligned obligations under the GDPR legislation, the implications on the rights of data subjects in de-personalised datasets, an exploration of the feasibility and benefits of the GLA appointing a Caldicott Guardian, and how to best utilise engagement and consultation to assist in our rigorous enforcement of data protection principles.

5.4   GLA's participation in the Sandbox proactively demonstrates to the public, stakeholders and data-providing organisations that they are cognisant of legal requirements in handling, processing and sharing of personal data; with the relevant and necessary procedures and requirements in place. GLA have demonstrated awareness of the full array of potential risks to the data processing activities, and have developed and continue to develop sound procedures in place to mitigate these risks and new potential risks. All these activities have helped GLA to understand how they can assure others, external to the GLA, that the handling of data is both legal and ethical, and that GLA can build effective procedures for the appropriate handling of a wider set of data.

5.5   The Sandbox has placed GLA in a strong position to iteratively develop both our data-sharing/SafeStats policies and procedures to address future developments.