

# Declaration for responsible and intelligent data practice

## Statement of intent (version 1.02 final draft for review)

Few could have imagined at the start of the 19th century the advances and disruptions of steam power and the industrial revolution to come. Equally unpredictable were the innovations at the beginning of the 20th century; the advent of powered flight, mass production and telecommunications. The first twenty years of the 21st century are revealing yet another revolution; one powered by data and the systems and software that underpin it.

This revolution in our ability to create, collect, transmit, analyse and store data about the world in which we live and our everyday interactions has opened up new opportunities for job and business creation and the development of better public services, and offers potential solutions to many of the complex problems that we face. However, many of these opportunities also come with challenges and risks that need to be understood and addressed.

We create data in our everyday routine, through the digital devices we use and the services we interact with. Additionally, our interactions and behaviours are captured on our daily commute, a shopping trip or walking around our towns and cities. Data about us is stored, processed and analysed by ever more advanced and complex techniques: by government, business and academia alike. This creates an environment for automated decision-making that can be beneficial through better, more effective services, but also harmful through bad design and embedded biases and assumptions.

Data in itself is an abstraction of the real world. With technologies such as machine learning and artificial intelligence advancing the ways this data can be processed, these ever more complex techniques become more removed from people, leading to a sense of powerlessness in the face of technology and its application. The erosion of agency and by association trust, through imposed and opaque systems, and the decisions that are made from them is detrimental to the needs of society, where major social, environmental and economic challenges need to be addressed through individual and collective action, and behaviour change.

It's vital that we collectively acknowledge our current data environment and work together to understand and counter the risks to individual rights and society as a whole, whilst also grasping future opportunities and the wider social, economic and environmental benefits that responsible and intelligent data practice can bring.

Greater Manchester was a crucible for new ideas and endeavour at the turn of the 19th century and now at the beginning of the 21st the opportunity has arisen to lead the way again in progressive, ethical and trustworthy data practice benefiting all in a fair, equitable and more sustainable future.

We the people and organisations of Greater Manchester agree to work together towards a world in 2025 in which:

### Common principles

- 1) We understand that data and digital systems are tools and not a replacement for humanity and consider what these tools can and can't do, and how they can enhance the everyday lives of those that live here.
- 2) We uphold that everyone has the right to respect for private and family life, their home and their correspondence as stated in the Human Rights Act 1998, and that this is a foundational principle for the design of any system of data collection, sharing and processing.
- 3) The public sector, businesses, academia, voluntary and civil society organisations who operate within Greater Manchester collect, use, share and store data in ways that is deserving of the trust of the people of Greater Manchester, as well as each other.
- 4) The region as a whole embraces the opportunities that data and digital brings whilst actively trying to prevent the risks and harms that may emerge, by building an ethical digital and data ecosystem that supports the aspirations of the people of Greater Manchester and prioritises that value is given back to the region.

### Collecting and using data

- 5) We recognise that as organisations that collect and process personal data we are custodians of that data and have a legal, moral and ethical duty of care in its handling, so that;
  - i) when personal data is collected, the lawful basis for the collection and processing of that data is accessible and open to review. We recognise that in some circumstances there are other lawful bases that are more appropriate than consent. If consent is the basis for collection and processing, the person giving consent is informed as to the purpose of that consent and does so freely, and that consent can be withdrawn at anytime with the corresponding data repatriated to the individual and deleted from those systems;
  - ii) when services and systems are developed and used by Greater Manchester organisations they have the principle of collecting only the minimum data needed (data minimisation) to perform a predefined task;
  - iii) systems that collect and process data will have strong privacy protection, adopting a privacy by design approach with security being foundational to system design. This also extends to the ongoing operation, maintenance and decommissioning of the system; and
  - iv) personal data derived from third party sources should be given the same consideration as data collected and processed by signatory organisations themselves with proper assessment of such data undertaken prior to its use.

## Governance

- 6) Good governance is essential for building and maintaining trust. Therefore, appropriate systems of governance should be developed that have meaningful representation from people and communities involved in and affected by those programmes. Where necessary, support should be offered to those that may need help to represent their views.

## Respect for all

- 7) In designing digital and data services and systems for Greater Manchester, we take into account the diversity of people who live and work here, and engage them at appropriate points in the design process. We recognise that by doing so, we make better services, products and decisions.
- 8) All organisations collecting and using data understand that biases and assumptions exist within data and digital systems, and these must be actively acknowledged and assessed so that unintended consequences can be mitigated against.
- 9) By default, organisations should make it clear and visible when and where they are collecting data about individuals at the point of collection wherever possible. Organisations should explain and allow scrutiny of how data is captured, processed, shared and stored. This should be easily accessible and written in simple, jargon-free language.
- 10) When we design and procure new data and digital systems, we are aware of the human impact associated with the extraction of the raw materials these systems are built from and the treatment of those that build them.

## System design

- 11) Innovation and experimentation are central to improved ways of working and the development of new services and products. Greater Manchester as a vibrant, creative and innovative region should harness this energy, as well as understand that the design of these endeavours should be driven by user need.
- 12) When designing systems, steps should be taken to assess and mitigate against unexpected, undesirable and harmful outcomes, and if necessary, delay such endeavours until these outcomes are resolved. However we also understand that reticence is a risk and thought should be given to how we account for opportunities not taken.
- 13) Where complex analytical processes are used, such as artificial intelligence and machine learning, we commit to assessing these processes so that the outcomes from them are fair and accurate, and the code and processes are made available for scrutiny where necessary. If these processes and outcomes derived from them cannot be explained, they shouldn't be used.

## Procurement

- 14) The public sector within Greater Manchester should be a leader in ensuring ethical, effective, efficient and transparent uses of data. The sector must use the powers it has in procurement and decision-making to ensure that businesses operate appropriately and to the same standards when bidding for work, partnering together or implementing systems of data collection and processing.
- 15) The risks of vendor lock-in, proprietary data standards, closed source computer code, and external data ownership are understood. Accordingly procurement regimes should favour solutions that provide Greater Manchester residents and democratic bodies with as much control over the data as possible, offer an open and interoperable data standards approach, reconfigurable open source code and an accommodation for transitioning from one vendor solution to another at the end of, or cessation of contract.

## Sharing knowledge

- 16) We need to demystify how data is collected and processed within Greater Manchester and create training and support for organisations, communities and individuals to learn more about the opportunities and challenges of data use, as well as an appreciation of legal, moral and ethical rights, and how they can be asserted.
- 17) We believe that access to knowledge and skills regarding data should be available to all, with thought given to accessibility and the barriers that may exist for participation from under-represented groups.
- 18) We are a collaborative region and we should at all points aim to be more than the sum of our parts. Challenges should be shared and the knowledge, skills and wisdom of the people and organisations that are based here should be embraced and used to drive and develop new ideas, services and thinking.
- 19) Those involved with the collection, transmission, analysis, storage and deletion of data and those making decisions based upon that data should be supported to become knowledgeable and confident practitioners. Best practice should be shared widely and celebrated enabling others to adopt and build on that practice.
- 20) In a connected world, knowledge and new ideas regarding data practice can develop anywhere. Greater Manchester's aspirations as an outward looking global region should embrace this interconnectedness, drawing on knowledge and practice wherever it may take place and sharing back its successes and learnings in a spirit of openness and unanimity.

## Open data

21) Organisations understand the value of publishing good quality open data and commit to publishing it where practical. This means using appropriate licenses, open data standards where available, and ensuring data is released in a timely, accurate and comprehensive fashion. Additionally data that underpins government decision-making or supports democratic processes should be made available as open data by default, enabling the public and civil society to engage with democratic processes in a fully informed fashion.

## Environmental impact

22) In a time of climate emergency, we understand the environmental impacts of digital and data technology – from initial construction and the raw materials used, through ongoing maintenance and energy consumption to end of life disposal. Impacts should be measured and mitigated against where possible and obsolete systems and infrastructure be redeployed, re-purposed or recycled where practical.

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