



ODI Policy Manifesto

March 2024

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Introduction

2024 is a big year for democracy, with billions of people voting in elections across the globe. A general election will be triggered before the end of the year here in the UK and will probably be held in 2024, given that the Prime Minister's '[working assumption](#) is we'll have a general election in the second half of this year'.¹

Issues around data, digital and technology will be more prominent in this election campaign than in previous years. The rapid development and wide availability of artificial intelligence (AI) systems – for which [data is the feedstock](#) – has generated an explosion of interest in AI and its potential political consequences. The Post Office Horizon scandal has come to the forefront of public consciousness – and joins other global outrages, such as [Robodebt](#) (Australia) the [child care benefits affair](#) (the Netherlands) and the UK's own [exam algorithm fiasco](#), in reminding us what can go wrong with blind faith in data-driven decisions and technology. [Slovakia's elections](#) are among those showing the dangers of deepfakes. The controversial [Data Protection and Digital Information Bill](#) continues its parliamentary passage, and the government's [response to its AI white paper consultation](#) set out some further steps towards AI regulation but neglects thinking about data issues or data infrastructure.

This manifesto outlines policies that the Open Data Institute wants to see in parties' own manifesto commitments – and as part of the political discussion – for the next election.

The ODI was founded on a belief in trust and openness – essential features for a world where data works for everyone. [Our five-year strategy](#), published in 2023, outlines six guiding principles in response to global trends, including those surrounding AI and other technological advancements. We have organised our policy ideas underneath those principles below.

Ahead of the general election, we would like to see all political parties engaging with these themes and recognising their importance as foundational for building a thriving data ecosystem - and, with it, a thriving AI-ecosystem that benefits people, the environment and the economy.

¹ An election has to be held by 28 January 2025; parliament will be dissolved on 17 December 2024 if an election has not already been called; the Prime Minister can ask the King to dissolve parliament and call an election at any time before then; many commentators expect [an election in November](#), with some speculation about an earlier date, e.g. May.

The ODI's Guiding Principles

Principle 1: Strong data infrastructure

The ODI believes that a **strong data infrastructure** is the foundation for building an open, trustworthy data ecosystem on a global scale and that this can help address the world's most pressing challenges.

As part of this, we would like to see:

- **A legislative and regulatory regime that is fit for the future, and has people and society as well as the economy at its heart**
 - We believe the Data Protection and Digital Information Bill (DPDIB) is a missed opportunity to strengthen the data ecosystem. Instead of supporting and extending our rights in order to build public trust in new data-driven technologies, it weakens them, threatening the innovation the bill purports to champion. We believe DPDIB should:
 - retain requirements around data protection impact assessments - indeed, it could extend them (requiring them to be published or shared with the regulator could help better identify challenges and opportunities) - and data protection officers
 - give legislative backing to mandatory transparency reporting for public sector algorithms - and ensure mechanisms for redress and accountability
 - protect and expand information rights - not weakening Subject Access Requests, and instead enabling people to request data about themselves on an ongoing basis, and introducing collective rights (e.g. implementing article 80(2) of GDPR to allow organisations to lodge complaints)
 - better protect the independence of the ICO - including making it responsible to parliament, not the government
 - do more to support new data institutions, such as those facilitating better access to data - through a better evidence base, fostering public trust through participation by civil society and the general public, and funding data and digital infrastructure.
 - While [we broadly support the approach to AI regulation](#) in the government's white paper - empowering sectoral regulators to regulate in context - there needs to be a statutory underpinning to their powers (including enforcing their remit and gathering information). The government should add a sixth principle, centred on data and encapsulating the importance of well-functioning, high-quality, open data ecosystem, to underpin the five it has put forward, especially transparency, fairness and accountability.

- Regulators should be encouraged to see **open data** as part of their toolkit. Regulation could be improved by regulated organisations opening up more data, and regulators using this data to scrutinise and support their sectors more effectively. For example, [the ODI](#) has been working with the [water industry regulator](#), [Ofwat](#), to transform access to data that can provide better insights, help improve how the water system is operating, and support future planning and innovation. As discussed above, the ICO could use data protection impact assessments to identify challenges and best practices – if DPDIB doesn't weaken them.
- **Improved data infrastructure for solving key societal and governmental challenges**
 - [A recent ODI report](#) looked at the open data available on the cost of living crisis and found that data was missing, of poor quality or excluded different societal groups. Better data could contribute to solving policy problems and alleviating hardship.
 - There should be a clear commitment to ensuring the whole public sector tackles existing gaps and limitations in data infrastructure and that key data is available and accessible to tackle significant challenges.
 - Several recent controversies - including the Post Office Horizon scandal and Covid contracts - have involved the performance of government suppliers and contractors. Labour and several other parties have previously pledged to extend the Freedom of Information Act to companies in their provision of public services. Better proactive publication of data may also be necessary to ensure they are performing (the new Procurement Act may bring a renewed focus on such key performance indicators).
 - We are calling for **better data infrastructure for AI and making data AI-ready**, including government creating and regulating for high-quality datasets, ensuring that this data is not only accessible, assured, and usable, but also published to high, and agreed, standards. We are also calling for effective infrastructure to enable AI systems to make responsible use of data, including assurance and quality assessment infrastructure.
- **Rolling out Smart Data schemes to benefit consumers**
 - Smart Data – the ability of consumers to securely share their data with third parties – could lead to better outcomes through consumer choice and more competition. Open Banking has shown what can be achieved; the government has recently consulted on open communications and announced seven sectors for growth; the Spring Budget provided funding for transport and energy schemes; but we could and should move further and faster. The government after the election should publish an ambitious strategy and a realistic timetable for how smart data will be rolled out across different sectors.
- **Better data infrastructure that works for public services and public servants, backed by minimum standards and funding, for local as well as central government**

- It is easy to get carried away with all the excitement about AI and tech innovation. But to enable this, the government has to get the basics right, as do other sectors. This includes data infrastructure. This includes data assets (like datasets, identifiers and registers), the standards and technologies that allow those assets to be used, guidance and policies, and organisations governing and communities contributing to or impacted by that infrastructure. –
- Minimum standards, appropriate funding and ‘fixing the plumbing’ when it comes to data infrastructure, would lay strong foundations for [a tech-ready public sector that is fit for the future](#). This includes ensuring public sector workers have access to the right technology and training (see data knowledge and skills, below) that allows them to access data and the opportunities it provides. It should also include a focus on standards for data assurance.
- Getting the basics right should include thinking about the right tech and training for ensuring data security. The recent [hack of the British Library](#) is a timely reminder of the devastating impact that cyberattacks can have on operations and public confidence.

Principle 2: Open data as foundational

Strong data infrastructure includes data [across the spectrum](#), from open to shared to closed.

The best possible foundation is open data, supported and sustained as data infrastructure.

Only with this foundation will people, businesses and governments be able to realise the potential of data infrastructure across society and the economy.

As part of this, we would like to see:

- **A clear government strategy around open data or data availability, making data findable, accessible, interoperable and usable**
 - The government promised [a refresh of the government’s open data policy](#) in December 2022; this has not been forthcoming. A strategy around data availability should build on mission 1 of the [National Data Strategy](#), and focus on the government’s role in making data usable and generating impact from data, including supporting communities to use data themselves. Public data should be open by default - with organisations publishing reasons for not opening up datasets.
 - The government could go back and learn lessons from previous initiatives, such as [the National Information Infrastructure](#), or focus on developing the top 50 foundational datasets, opening with a purpose to drive specific outcomes ([TfL’s work](#) with developers, innovators and stakeholders remains a good example of this).
 - An obvious dataset to open up is the Postcode Address File, which the ODI has been calling for for over a decade. This was sold off, with the Royal Mail, in

2013, a decision described by parliament's Public Administration Select Committee as 'a mistake. Public access to public sector data must never be sold or given away again'. Address data has significant economic value – a 2012 report on the PAF estimated its value to the UK economy to be [between £992 million and £1.32 billion](#) each year. Campaigners to 'free the PAF' have suggested [practical steps for how it could be done](#).

Principle 3: Trust

For data to work for everyone, it needs to work across borders – geographic, organisational, economic, cultural and political. **For this to happen ethically and sustainably, there needs to be trust** – trust in data and trust in those who access and share it.

As part of this, we want to see:

- **A more participatory data future**
 - We need to move beyond transparency and accountability to a world [where people can meaningfully participate](#) in how data is used by the government and others, empowering people and communities to help shape how data is used for society, the environment, the economy and the public good.
- **Reforms to DPDIB for a more trustworthy legislative regime**
 - As discussed above, requiring (open) publishing of impact assessments in higher-risk situations would be one measure that could help build trust that data is being used ethically. Dropping some of the more controversial elements of the Bill – such as sweeping powers for DWP to access benefit claimants' bank accounts (a move the Information Commissioner [has concerns about](#)) and 'democratic engagement' clauses (that would allow the government to 'switch off' direct marketing rules around the use of voters' personal data in the run-up to an election) – would also help.
- **Investing in assuring data practices across the economy**
 - Data is now fundamental to all organisations but to unlock the true value of data organisations must be confident in their [data practices](#). At the ODI, we believe we need to go beyond the current legal requirements to build trust in data and unlock the significant economic benefits of data sharing, through [data assurance](#).
 - Assuring the data practices of organisations will enable them to understand how they can be better with data and will enable those sharing data with organisations to understand the trustworthiness of those organisations.
 - We believe the government should invest in developing world leading data assurance services and estimate this market will grow to \$5.6bn within 5 years.

Principle 4: Trusted, independent organisations

There is a greater need than ever for **trusted, independent organisations** to help people across all sectors, economies and societies to benefit from better data infrastructure.

As part of this, we would like to see:

- **The establishment of strategic funds to support civil society organisations working to ensure we all benefit from the use of data, and scrutinise and challenge the use of data (including in AI)**
 - Credible, independent organisations play a crucial role in our data ecosystem, able to convene actors from across sectors, develop research and policy for beneficial uses of data (and data-centric AI) and scrutinise the use of data and AI by powerful organisations in government and other sectors. Increasingly, organisations focused on particular sectors – such as work, welfare and education – have a role to play in understanding and challenging uses of data and AI.
 - Credible, independent organisations exist - however, these organisations require support to survive and continue to provide this essential role, as well as a ‘seat at the table’ when it comes to policymaking. UK Government funding for independent civil society organisations has significantly reduced in recent years, and we are concerned that independent organisations like ours who care deeply about the equity of the data ecosystem are being defunded and are increasingly under resourced.
 - Global tech companies are increasingly stepping into the public sector data space and are influencing data and AI regulation. In our view, this risks the creation of a dangerous concentration of power and control in the hands of monopolistic private actors. Whilst we believe there is space for all in the ecosystem, organisations like ours must continue to provide necessary checks and balances against asymmetry in the market, and the potential political, economic and social impacts. The support of the government is essential to ensure the future health of the ecosystem
 - The major [announcements on AI made by the US Government](#) in November 2023 show what could be possible. These included ‘a bold new initiative with philanthropic organisations related to AI’, with more than \$200m given to ‘advance AI that is designed and used in the best interests of workers, consumers, communities, and historically marginalised people in the United States and across the globe’.
 - The UK government should consider something similar. Such funds could be used to support the use of data and AI for the public good, including funding interdisciplinary research that scrutinises the use of data (and AI), and civil society and campaigning organisations that support communities who experience harms or could be better equipped to benefit from data and AI. This

also requires a transparent approach from the government, for example in its use of algorithms, and ensuring that people and communities subject to automated decision making have appropriate complaint routes and redress mechanisms. In addition, the government should place a greater emphasis on 'explainability' and 'transparency', particularly for public sector use of AI and data.

- In particular, this should provide support to people and communities who are looking to exercise their data rights or seek redress for decisions based on the use of data, and to ensure workers' rights are protected where AI is used to make decisions in the workplace.
- **A clear commitment to including civil society in decision-making on the use of data and AI**
 - Recent government data initiatives have been rightly criticised for excluding civil society and public voice, including the Data Protection and Digital Information Bill ('[co-designed with industry](#)', for industry, in order to maximise the economic benefits) and AI Safety Summit (prompting [a global open letter](#) - the ODI was one of the signatories). We need a stronger and more diverse civil society voice, alongside business and academia, in the government's data and AI governance initiatives - for example, feeding into and scrutinising the work of the AI Safety Institute. Civil society organisations are able to successfully bridge the gap between government, public sector, private sector, and society as a whole - and can be invaluable in supporting the ecosystem as a whole.

Principle 5: A diverse, equitable and inclusive data ecosystem

For data to work for everyone, those collecting and using it need to be highly alert to inequalities, biases and power asymmetries. All organisations working in data must take proactive steps to ensure that they contribute fully and consciously to creating **a diverse, equitable and inclusive data ecosystem**.

As part of this, we would like to see:

- **Ensuring equitable access to data for growth and innovation purposes**
 - For the data ecosystem to work for everyone, we need as many sectors, communities and people as possible to be able to access the data, data infrastructure and data skills they need. This is particularly important for the development of AI systems and use cases with big societal implications, such as misinformation, climate and infectious diseases, [where fair and equitable access must be mandated](#). It is also critical for competition and economic growth that SMEs and start-ups are able to compete with big tech firms who will benefit from [data asymmetries and network effects](#) (where being able to link vast amounts of data leads to extraction of more value).
- **Greater researcher access to data from (eg) social media platforms**

- We have [previously written](#) about the failure of the Online Safety Bill -now Online Safety Act - to mandate researcher access to data from social media platforms to help better understand online harms. Greater researcher access - perhaps even supported by an [independent evidence centre](#) - could help better understand harms affecting marginalised communities and people with particular characteristics. Article 40 of the EU's Digital Services Act offers a precedent for mandated researcher access, and it is important that we rapidly follow suit with our own legislation here in the UK.
- **Reforms to the Data Protection and Digital Information Bill which will help foster a diverse, equitable and inclusive data ecosystem**
 - Several of the measures already mentioned above (data protection officers, impact assessments, algorithmic transparency) could support this. DPIAs could be reformed to ensure greater consideration of diversity and equality issues, for example, proactively reviewing the potential impacts of using particular datasets before harms appear rather than only reactively after the fact

Principle 6: Data knowledge and skills

The world needs a new cohort of data leaders – individuals who **have data knowledge and skills and are equipped to understand the value, limitations and opportunities offered by data**, data practices and data sharing.

As part of this, we would like to see:

- **Greater data literacy among leaders, including in business and the public sector**
 - The Data Literacy Index found that 76% of key business decision-makers lack confidence in their data knowledge and skills. Gartner cites poor data literacy as the second-highest internal roadblock to the success of a CDO. Accenture found that the US economy alone loses over US\$100 billion each year through data-induced procrastination.
 - Data literacy and skills are also a challenge for the public sector. Although our report on [data literacy in the UK government](#) found several promising initiatives to improve data literacy – and there have been several since, including [‘One Big Thing’](#) focusing on data – we noted the need for more non-specialist data literacy support (i.e. for policymakers) within government and that many of government's internal resources could be shared more widely.
 - Dedicated schemes and strategies may be required to support existing and future leaders with data literacy, skills and knowledge, though ultimately better data literacy across the whole population will support future cohorts of leaders.
 - There are also pressing environmental reasons for improving global data knowledge and skills. Indeed, this has been cited as a critical success factor in

addressing the climate emergency, with countries urged to invest in their populations' data skills, thereby building a sustainable capacity for effective use and understanding of data to solve environmental challenges.

- **Greater data literacy among the public**

- **A focus on diversity in data and data literacy for all** In our report [mapping data literacy in the UK government](#), we highlighted the three-pronged approach taken by the (now-disbanded) AI Council in its approach to skills and diversity, which included prioritising inclusion and diversity alongside high-level AI skills building and general data literacy. Without such a focus, those making decisions with and about data and data-driven technologies will continue to come from the same privileged backgrounds, with marginalised groups being most likely to be harmed. Changing this must be at the centre of any strategy for data and AI literacy and skills, which we discuss below.
- There should be a commitment to upskilling people for a world in which every element of their lives will be impacted by data and AI including the jobs market and the way we work, supporting young people through their formal education, and supporting older people already in the workforce.
- As well as this all being important in its own right, only through society-wide data literacy and skills will we build a pipeline of future data leaders, fully equipped to help us all navigate an increasingly data-dominated world.

ONE PAGE VERSION OF MANIFESTO ASKS:

Principle 1 - Strong data infrastructure

- A robust and future-proofed legislative and regulatory regime that is cohesive and comprehensive and has people and society, as well as the economy, at its heart
- Improved data infrastructure that enables key societal and governmental challenges to be solved
- Rolling out Smart Data schemes to benefit consumers
- Better collection, maintenance, and use of data for better public services, backed by minimum standards and funding (including for local services, not just central government)

Principle 2 - The best possible foundation is open data

- A refreshed government strategy around open data or data availability, making data findable, accessible, interoperable and usable

Principle 3 - There needs to be trust

- A more participatory data future where the data ecosystem is diverse, inclusive, and people are empowered to play an active role in the data ecosystem
- Reforms to Data Protection and Digital Information Bill for a more trustworthy legislative regime
- Establishing strategic funds to help create positive applications of both data and AI and allow proper scrutiny of AI systems
- A greater focus on data assurance to enable trusted and trustworthy data practices

Principle 4 - Trusted, independent organisations:

- Strategic and long-term funds to support civil society and campaigning organisations working on data and AI
- Clear commitment to include diverse civil society voices in data and AI decision-making

Principle 5 - A diverse, equitable and inclusive data ecosystem:

- Ensuring equitable access to data for growth and innovation purposes
- Greater researcher access to data from (eg) social media platforms
- Reforms to the Data Protection and Digital Information Bill which will help foster a diverse, equitable and inclusive data ecosystem

Principle 6 - Data knowledge and skills:

- Greater data literacy among policymakers and leaders in business and the public sector
- Greater data literacy among the public