



GPA Global Privacy and Data Protection Awards 2021

Entry Form

To submit an entry to the GPA Global Privacy and Data Protection Awards please complete and email this form to secretariat@globalprivacyassembly.org no later than **14 June 2021**.

Note: GPA member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline above.

Languages: The GPA documentation Rule 6.2¹ applies.

1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection
Authority:

The Information Commissioner's Office (ICO)

2. ELIGIBILITY

By submitting this entry, I confirm that (*please tick all boxes to confirm*):

- The Authority is a member of the Global Privacy Assembly
- The initiative described in this entry was undertaken since January 2020.
- I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the GPA Secretariat.

3. CATEGORIES

Please indicate which category you wish to enter.

*Please tick **one**; please use a separate form for each category you wish to enter:*

- Education and Public Awareness
- Accountability
- Dispute Resolution and Enforcement
- Innovation
- People's Choice

4. DESCRIPTION OF THE INITIATIVE

a. Please provide a brief summary of the initiative (no more than 75 words)

¹ [GPA Rules and Procedures](#), Rule 6.2 'Assembly documents':

Without prejudice to section 4.2, Assembly documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other Assembly documents such as the Assembly Rules and Procedures.

The ICO's Regulatory Sandbox is a service which provides support for organisations who are creating products and services which utilise personal data in innovative and publicly beneficial ways.

Participants have the opportunity to engage with our Sandbox team, to draw upon our wider ICO expertise and advice on mitigating risks and embedding 'data protection by design'.

The Sandbox provides a free, professional, fully functioning service for organisations, of varying sizes, across a number of sectors.

b. Please provide a full description of the initiative (no more than 350 words)

PLEASE NOTE: The vast majority of the work described below has taken place post January 2020 – the work undertaken between September 2019 and January 2020 was mainly administrative/planning work.

The Sandbox service provides free and professional support to organisations who are creating products and services which utilise personal data and can demonstrate that their product or service is:

- innovative in its use of personal data,
- of demonstrable public benefit, and
- operating in a genuinely challenging or 'grey area' of Data Protection law.

Following a successful test of the Sandbox from September 2019 to March 2021 (referred to as the Sandbox Beta Phase) the ICO pivoted its package of support to address the following high priority issues in data protection when the Sandbox re-opened to applications in September 2020:

- Compliant data sharing in Health, Central Government, Finance, Higher or Further Education or Law Enforcement considered to be crucial to the operation of modern economies.
- Operationalising the standards of the ICO's Age Appropriate Design Code (AADC) and working with innovators developing products or services that have a direct relevance to the rights and freedoms of children online.

Post Beta Phase the Sandbox Team has begun working with [seven new organisations](#) who are working on a wide range of products and services from Age Assurance in E-sports to data sharing to prevent instances of cybercrime.

By engaging with the Sandbox process our participants have gained:

- access to ICO expertise and support;
- increased confidence in the compliance of the participants finished product or service;
- a better understanding of the data protection frameworks and how these affect their businesses;
- a public perception that they are accountable and proactive in their approach to data protection, by customers, other organisations and the ICO, leading to increased consumer trust in their organisation;
- the opportunity to inform future ICO guidance; and
- the opportunity to contribute to the development of products and services that can be shown to be of value to the public.

By engaging with Sandbox participants the ICO has provided support to the UK Government in its ambition to be an innovative economy as well as valuable insights into the various sectors our participants inhabit and how organisations in these sectors struggle to interpret and operationalise data protection legislation and guidance. This has allowed us to effectively target areas of particular misunderstanding in subsequent guidance pieces we have published.

c. Please explain why you think the initiative deserves to be recognised by an award
(no more than 200 words)

ICO's Sandbox was the world's first data protection Sandbox which has worked effectively since its inception in collaboration with industry to help them create innovative products and services in the public interest in a way that is compliant with UK data protection legislation.

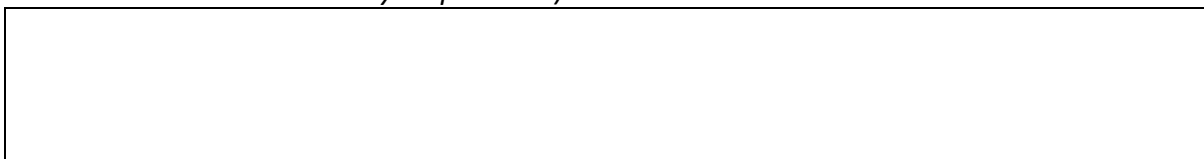
ICO's Sandbox takes an innovative approach to governance and management of risk providing 'regulatory comfort' from enforcement to participants, clear and transparent Exit Reports from which wider learnings are distilled.

ICO worked transparently and collaboratively with industry to design the Sandbox, inviting them to provide feedback through consultations and workshops. We continue to seek feedback about the Sandbox and have consistently recorded satisfaction levels of 90% from participants. Our willingness to manage the risks that come with working in challenging areas has allowed us to deliver great public interest outcomes and demonstrated the value of upstream compliance work to industry.

Since inception the ICO sandbox has assisted with key public interest projects such as the successful Covid-19 vaccine trial registry, supporting young people's mental health, combating violent crime, helping remove algorithmic bias, enhancing safety transport network, and the use of voice recognition in healthcare settings.

The Sandbox has gone [to help inspire](#) the adoption of Sandboxes to support innovation elsewhere (e.g. France and Norway) and acted as a model of good practice, demonstrating how regulators can work flexibly and proactively while navigating complexity and innovation.

d. Please include a photograph or image, if you wish *(This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided)*



e. Please provide the most relevant link on the authority's website to the initiative, if applicable (*The website content does not need to be in English*)

[The Guide to the Sandbox | ICO](#)

f. Please provide any other relevant links that help explain the initiative or its impact or success (*e.g. links to news reports or articles*):

In our beta phase (which commenced pre January 2020) we worked with the following organisations and produced the following reports as a result of work predominantly undertaken from January 2020 onwards:

- [NHS Digital](#)
- [Heathrow Airport](#)
- [The Greater London Authority](#)
- [The Ministry of Housing Communities and Local Government \(MHCLG\)](#)
- [JISC](#)
- [Onfido](#)
- [Tonic Analytics](#)
- [Novartis Pharmaceuticals UK Ltd](#)
- [FutureFlow](#)

Following the conclusion of our current work supporting organisations who are operationalising the ICO's Age Appropriate Design Code and developing compliant data sharing initiatives, we expect to publish similar reports to those listed above.

We have also discussed some of our beta phase work on the [Privacy Law & Business Podcast](#) (Episode 9 – FutureFlow and further lessons from the ICO Sandbox – 17 November 2020)

News about the ICO's Sandbox has also been reported extensively by various media outlets such as [Compliance Week](#). Articles such as these have led to ongoing ICO engagement with our counterparts in Europe and beyond, allowing us to share learnings and best practices for them to consider when designing their own Sandboxes.

The ICO Sandbox also featured heavily in the recent 'Business at OECD' report on regulatory sandboxes for privacy – with many of the operational learnings feeding into that report's wider recommendations for the development of sandboxes as a model of regulatory good practice.