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Data Sharing Code Consultation
Parliament & Government Affairs, Information Commissioner's Office
Wycliffe House
Water Lane
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By email

Dear sirs

This response is made on behalf of the Society of Local Council Clerks (SLCC), the professional body representing officers working for over 5,000 town, parish and community councils in England and Wales. The Society is committed to working to raise professional standards and to building skills and capacity among its members, strengthening the local council sector.

The SLCC recognises that this consultation is framed around specific questions and that the draft code applies across all sectors. The Society's comments are provided in the context of this, recognising that there is no separate Code relating to parish and town councils. The Society welcomes the guidance provided recently for parish and town councils, specifically the Six Steps fact sheet which supports our sector in managing data protection compliance while data sharing.

Q1 Does the updated code adequately explain and advise on the new aspects of data protection legislation which are relevant to data sharing?

Yes

No

Q2 If not, please specify where improvements could be made.

No further comment

Q3 Does the draft code cover the right issues about data sharing?

Yes

No

Q4 If no, what other issues would you like to be covered in it?

No further comment

Q5 Does the draft code contain the right level of detail?

Yes

No

Q6 If no, in what areas should there be more detail within the draft code?

No further comment

Q7 Has the draft code sufficiently addressed new areas or developments in data protection that are having an impact on your organisation's data sharing practices?

Yes

No

Q8 If no, please specify what areas are not being addressed, or not being addressed in enough detail

No further comment

Q9 Does the draft code provide enough clarity on good practice in data sharing?

Yes

No

Q10 If no, please indicate the section(s) of the draft code which could be improved, and what can be done to make the section(s) clearer.

No further comment

Q11 Does the draft code strike the right balance between recognising the benefits of sharing data and the need to protect it?

Yes

No

Q12 If no, in what way does the draft code fail to strike this balance?

No further comment

Q13 Does the draft code cover case studies or data sharing scenarios relevant to your organisation?

Yes

No

Q14 Please provide any further comments or suggestions you may have about the draft code.

This has however been covered very clearly in the separate Six Steps fact sheet

Q15 To what extent do you agree that the draft code is clear and easy to understand?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

The SLCC is grateful for the opportunity of commenting on this important issue and conscious of the overarching need to promote the best practice in data protection in the parish sector. The SLCC remains most happy to meet with officials to expand upon the above comments if that would be helpful.

Yours faithfully



Lis Moore
Head of Advisory & Support Services