

## The Brent Council Data Ethics Approach

### Origins

The London Borough of Brent published its first Digital Strategy in 2017. It set out Brent's intention to become a digital council and a digital place, describing how Brent would modernise its infrastructure, lay full fibre broadband access across the borough and improve residents' experience.

In addition to these ambitions, Brent also wanted to make better use of its data to inform decision making. To do this, it began to explore the concept of developing a data lake, a way to bring disparate data sources into one place and gain more insight to inform solutions that would improve the lives of its residents.

Brent commissioned its Digital Technology Partner, Infosys, to develop a Microsoft Azure based data lake, where extracts of data from Brent's own ICT systems could be transferred, curated and then used by council officers. A programme manager was allocated to oversee the project to create the data lake and manage the development of use cases to see how it could work (see below). The data lake infrastructure was tested with dummy data throughout January 2021.

With the technical capability of pooling data in one place, the data lake had the potential to help Brent to provide evidence that policies are having the necessary impact on residents and help them to focus on the right policies. Brent officers looked for use cases to test it out.

The first use case focused on providing a single view of a child on the edge of the care system. Brent wanted to see if a new view on the existing data would provide insights about how to improve early interventions that would put these young people on to a different pathway.

Brent officers knew there were ethical issues with this approach to using data. Elected Members were mindful that data should be used for the purpose for which it is collected, so officers sought out ways to consider ethics in a robust and systematic way. At the end of 2019, Brent officers approached LOTI, seeking advice on how to understand the concept of data ethics and how to apply it operationally.

Brent, with guidance from LOTI, arranged an away day to bring like-minded people together from different London boroughs as well as industry experts. There are a few ethical frameworks (listed below), but the officers were unsure how to apply them to a use case.



- [ODI's Data Ethics Canvas](#)
- [Government Data Ethics Framework](#)
- [UK Statistics Authority Ethics Self Assessment Tool](#)

Helped by attendees from the Open Data Institute (ODI), the Alan Turing Institute and the Department of Computer Science at UCL, officers from three different boroughs worked with a use case and applied one of the different ethical frameworks. Unfortunately, the work did not progress further as it was interrupted by Covid in the early part of 2020.

This did not deter Brent, as officers decided to continue with the work within the borough and elected to use the ODI's Data Ethics Canvas ('the Canvas') as they felt it was the easiest to use.

### Checklist 1

- Identify which senior leader and elected member(s) will champion data ethics
- Who is the champion at a working level who can drive through change?
- Identify how decisions will be made about committing resource to introducing data ethics into your organisation
- Review LOTI materials that discuss data ethics and think about how they might work in your organisation
- Take a look at data ethics frameworks and consider attending a training course
- Look for opportunities within existing governance structures in your organisation to start the discussion about data ethics
- Think about where your organisation is currently using data and how it might benefit from being reviewed through an ethical lens (perhaps as a pilot use case) and test out one of the ethical frameworks before making a decision

### Purpose

Brent's Strategic Director for Customer and Digital Services wanted to bring together a group of independent people to help think through the ethical implications of using data in the borough and specifically the use of the new data lake. He asked officers to set up a Data Ethics Board ('the Board').

The purpose of the Board is to support the council in identifying and proactively supporting residents and marginalised groups through the ethical use of data, as well as addressing areas where residents could be adversely impacted by data projects.

The Board is advisory and does not make decisions about data projects.

### **Checklist 2**

- Ask why you need a Data Ethics Board and what benefits it will bring to your organisation
- Think about how a Data Ethics Board could fit with your existing governance structures
- Set out a clear purpose that is understandable by lay people to help with buy-in
- Look to see if your organisation already has similar groups that involve a mixture of internal and external members and draw on that experience to develop a proposal for a Data Ethics Board

### **Structure**

There was some discussion at the LOTI led workshops about who would be a member of a data ethics board and this helped Brent officers to think about who to invite to join the Board from outside the borough. Officers knew that the use of ethics was well established in both the academic and medical world, and as a result, officers were keen to find a representative from each and sought to use their own networks to locate two suitable candidates.

In addition, officers were keen to have data and information governance expertise, finding both with Brent links - one a recently retired officer, and another a Brent resident who has a senior data role in the GLA. A further member with legal expertise joined the board. She is also a Fellow of the ODI and working on issues relating to AI governance and local authority planning.

The Strategic Director for Customer and Digital Services chairs the Board and is supported by Brent officers who provide input and secretariat functions. The Board has agreed a Terms of Reference and has asked Board members to sign a Non-Disclosure Agreement and Conflict of Interest declarations to ensure propriety. Brent officers arranged for the Board to receive virtual training from the ODI on using the Canvas.

A meeting of the Board is quorate where there are at least two external and one internal member as well as the Chair or Deputy Chair. Agendas and papers for the meetings are made available at least three working days in advance of the meeting. The agenda includes two standing items covering risks and issues as well as a review of outstanding actions.

### Checklist 3

- Review the membership of the Brent Data Ethics Board and map it against your own organisation and network contacts to see if it is a good fit
- Consider drafting role descriptions to help potential members understand what is required
- Consider who might fill each of the roles on your Data Ethics Board
- Identify any gaps and seek guidance from your network of contacts on how to fill the gaps
- Review the Brent Data Ethics Board Terms of Reference and adapt to your local circumstances

### Methods

All data projects that use the data lake must be assessed using the ODI's Data Ethics Canvas. Other data projects can also use the Canvas and projects that have links to data, such as surveys and engagement methods have also gone through this assessment and presented to the Board.

A member of the Business Intelligence team, trained in preparing the Canvas, works with the relevant service area to complete the Canvas. This is likely to include the head of service, the service manager, team leader and a member of staff. This has been done virtually so far because of the pandemic but would normally be done face to face.

The Canvas lists questions for the project, to get a sense of whether the response meets ethical standards. As the project team looks at each question in turn, they discuss their answer and consider if any further work needs to be done to provide a robust response. This might include questions about systems, policy, behaviours and so on.

The initial workshop on the Canvas can take up to 90 minutes, with follow up sessions required to get the Canvas to a stage where the product is fit for review. The assessment is not a one-off exercise and can be revisited throughout the life of the project.

The product of the assessment is a list of actions captured on a spreadsheet that show what follow up the project needs to do to ensure that it can be sure to have a robust response to each part of the Canvas. The service area is responsible for completing the actions generated from the assessment. It is the responsibility of the head of service to report back to the Customer and Digital Board or the Data Ethics Board on completion of any follow on actions.

Before a project is signed off at a strategic level, the project manager must confirm that a data ethics assessment has taken place.

The Transformation Department has used different methods to raise awareness of the work they are doing with data ethics. Using existing governance structures has proven useful to sharing information about data ethics. Officers set up virtual 'show and tell' sessions to share their work with anyone in the council and wrote internal communications using Yammer. They have found interest in the data analyst community but hope to spread this further over time. Moving forward, the Data Management Strategy will set out long term engagement methods, including how to utilise the proposed Brent Data Academy.

#### **Checklist 4**

- Choose the ethical framework for your organisation (see steps above)
- Identify a suitable use case for piloting the use of your data ethics framework
- Arrange for those involved in your use case (the project team or similar) to be trained in how to use the data ethics framework
- Test the use case using the new knowledge and understanding of the data ethics framework
- Review the outputs of the assessment and create an action list with owners and timescales
- Prepare to present to your Data Ethics Board in line with the requirements set down in the Terms of Reference
- Think about existing engagement methods that can be used to share your new approach to assessing data ethics so that staff are aware and integrate it into their own work

#### **Activity to date**

The Board first met in February 2021 and has convened four times since then. Meetings have been virtual due to the pandemic, but also because members are geographically dispersed. It is likely that the Board will take a hybrid approach to meetings, with a mixture of face to face and virtual gatherings in the future.

The Board has provided advice to projects that cover:

1. Digital exclusion
2. Children and young people
3. Community and resident engagement
4. Financial inclusion

To present to the Board, a data project must translate the actions from the Canvas into a plain English presentation that sets out the issue, the problem, the impacts and the advice being sought. It is important that the Board focuses on the main areas where their input will add significant value.

The service users involved in the project and are affected by the outcome of the project present the data project's assessment of ethics to the Board. The Business Intelligence Manager can assist but does not lead the process.

The Board encourages open discussion and debate and the actions are recorded in the minutes. Project teams make their own notes and take these away from the meeting and act up on them within the project's own structures.

One of the key learning points from these meetings is how much time is required to review, discuss and then advise projects. The Board Chair recommends allocating a minimum of 90 minutes per project.

The secretariat for the Board records the advice that it gives to projects on a register, capturing the name of the project, who presented it, when it was presented and what recommendations were offered.

The Board intends to review the register on a regular basis and seek feedback from projects using a standard survey to elicit information about how useful its advice has been to project delivery. Based on the learning from these surveys, the Board will make any necessary adjustments to improve its advice going forward.

#### **Checklist 5**

- Engage with secretariat for your Data Ethics Board to get a slot on the agenda
- Take the outputs from the ethics assessment and turn it into a presentation for the Board (following any guidelines they may provide)
- Seek peer review on the presentation prior to the meeting
- Be clear what you want to get out of the meeting
- Take notes during the meeting to capture main actions even though they will appear on the minutes at a later date
- Arrange a project meeting to discuss outcomes from the Board and how they will be acted upon going forward