



Big data analytics : Your Role in Managing Privacy Risks

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(Almost) every minute of every day...



**...someone wants to know what TfL does
with their personal data...**



Big (or small!) Data – Big Responsibilities

We work with internal and external partners to analyse customer data to answer strategic planning and operational questions.

Partnerships with academics, industry experts and consultants help us innovate by using cutting edge analytical approaches

Many of the data sets contain personal data.

TfL has an obligation to ensure we – and our partners - comply with data protection legislation.





Big Responsibilities – Big Impact

Being **trusted** is key to delivering our *Every Journey Matters* promise

Customer

To put customers and users at the core of all of our decision making

Ensure all analysis is customer focused and privacy compliant maintains and enhances trust in TfL

Technology

To exploit technology to produce better and faster results

TfL's positive reputation is an enabler for innovative projects which push the envelope and make life in our city better

Our people

To invest in our people and lead them to be the best they can be every day

Demonstrating compliance ensures you can achieve your potential through privileged access to restricted TfL information, enhancing career progression opportunities

Finance

To cost less and generate more income

Avoiding data protection breaches ensures TfL does not incur fines nor reputational damage which could lead to cancelled projects and lost revenue / cost saving opportunities



Why everyone needs to 'Think Privacy'

TfL is the trusted custodian of the personal data of millions of customers

The security and privacy of customer data is a key responsibility

Personal data appears in both expected and unexpected places:



Customer Data



Free Text Fields
in Data Tables



Social Media
Wi Fi



Staff Data



CCTV / ANPR



The privacy landscape is changing...

GDPR will replace most of the Data Protection Act 1998

Comes fully into force on 25 May 2018 after 2 year transition – even with Brexit!

Key changes:

- Clarity!
- pseudonymised data
- profiling
- consent and transparency
- enhanced information rights for individuals



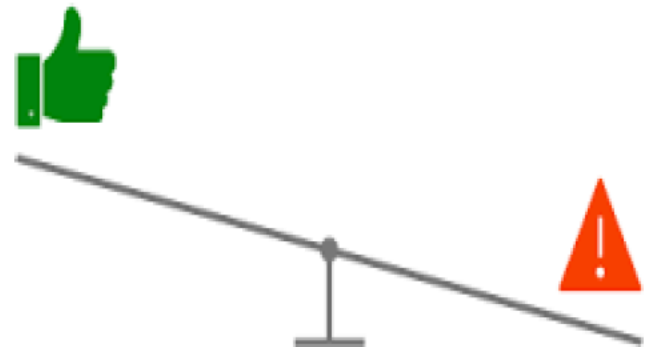
Balancing the benefits and risks

There will always be determined individuals looking for new ways to misuse personal data

A risk based approach: data protection should not be a barrier to research and innovation

Put yourself in our customers' shoes

Privacy impact assessments



Our Non Disclosure Agreement ensures consistency with all partners

All analysis projects where personal or TfL restricted / confidential data is shared with an **external partner** must have a **Non Disclosure Provision** or contract in place which covers:

- Sharing of TfL non Open Data and personal data
- Data protection and privacy considerations (including latest changes in European legislation)
- Publication of academic research papers (where appropriate)
- Studentship terms (where appropriate)

Legal, Privacy and Customer Experience have collaborated and developed a standard Non Disclosure Agreement (NDA) that complies with new legislation which will provide a consistent framework to use with all or our partners.



Our proposal process helps academics scope ideas and helps us to identify the best research model

The form helps capture of **business focused information** and presents our Non Disclosure Agreement terms upfront. Information requested includes:

- anticipated benefits aligned to the six key TfL priorities
- who the TfL sponsors / stakeholders are
- key milestones / when the project will deliver
- data sets requested from TfL



Project Name	
Lead Researcher Name	
Institution	
Contactable	
Project abstract (max 200 words)	
Summary of project objectives	
Objectives of project	
1. To understand the current state of the project	
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Putting it all together

Innovative ways of using – and misusing – personal data is ever increasing

Think about the bigger picture...

Protect your data...If you wouldn't release it under FOI, use a NDA to share with partners!

A range of resources and best practice:

- UKAN
- Information Commissioner's Office
- Management system pages – 'managing personal data'





Thank you!

tfl.gov.uk/privacy

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EVERY JOURNEY MATTERS