

Consultation Response: Ofcom's proposed plan of work 2021/22 'Making communications work for everyone'

Open Data Institute response

About the ODI

The Open Data Institute (ODI) is an independent, non-partisan, not-for-profit organisation founded by Sir Nigel Shadbolt and Sir Tim Berners-Lee in 2012.

The ODI wants data to work for everyone: for people, organisations and communities to use data to make better decisions and be protected from any harmful impacts. We work with companies and governments to build an open, trustworthy data ecosystem. Our work includes:

- **pilots and practice:** working as a critical friend with organisations in the public, private and third sectors, building capacity, supporting innovation and providing advice
- **research and development:** identifying good practices, building the evidence base and creating tools, products and guidance to support change
- **policy and advocacy:** supporting policymakers to create an environment that supports an open, trustworthy data ecosystem

We believe that:

- Sectors and societies must invest in and protect the data infrastructure they rely on. Open data is the foundation of this emerging vital infrastructure.
- Everyone must have the opportunity to understand how data can be and is being used. We need data literacy for all, data science skills, and experience using data to help solve problems.
- Data must inspire and fuel innovation. It can enable businesses, startups, governments, individuals and communities to create products and services, fuelling economic growth and productivity.
- Everyone must benefit fairly from data. Access to data and information promotes fair competition and informed markets, and empowers people as consumers, creators and citizens.
- People and organisations must use data ethically. The choices made about what data is collected and how it is used should not be unjust, discriminatory or deceptive.
- Everyone must be able to take part in making data work for us all. Organisations and communities should collaborate on how data is used and accessed to help solve their problems.

We have a mixed funding model and have received funding from multiple commercial organisations, philanthropic organisations, governments and intergovernmental organisations to carry out our work since 2012.

Consultation response

This is the ODI's response to [Ofcom's proposed plan of work 2021/22 'Making communications work for everyone'](#). We focus on the review of the Royal Mail's Postcode Address File (PAF), open communications and online harms. In particular, we argue that:

- Ofcom should review the cost and governance of the Royal Mail's Postcode Address File (PAF)
- The ODI supports Ofcom's commitment to proceed with its proposals on Open Communications
- The ODI supports Ofcom in its plans to regulate online harms

Postcode Address File (PAF)

The ODI supports the view that Ofcom should review the cost and governance of the Royal Mail's Postcode Address File (PAF), as advocated by the Centre for Public Data¹.

We believe that data is critical national infrastructure². It is a public good that underpins business innovation, public services, and civil society. Address data is an example of a key foundational dataset. It has significant economic value, underpinning products and services across every sector of the UK. For example, as noted in the consultation document, letter volumes may be in decline but still numbered 10 billion in 2019/20 while parcel volumes have seen a dramatic increase, partially as a result of the coronavirus pandemic.

The value of address data, however, goes beyond simply the delivery of letters and parcels. It is a fundamental knowledge asset that is central to the delivery of public services and economic growth.

Data as infrastructure has some key components. As set out in the ODI's response to the government's recent National Data Strategy consultation³, this includes the data assets (such as PAF), the standards and technologies used to curate and provide access to the data assets, the management of the data infrastructure, the organisations that govern the data infrastructure, and the communities that contribute to or are impacted by the data infrastructure. The aim is to ensure critical data infrastructure, such as PAF, is accessible, reusable, up-to-date, accurate, findable, and interoperable.

Currently the business model underpinning PAF limits its quality and timeliness, causing particular problems for people living in new builds to access public and private services. It also restricts both its wider use and the reuse of data that includes substantial numbers of addresses, such as data about the locations of buildings, house prices, or building energy performance.

¹ Centre for Public Data (2021), '[Ofcom's opportunity to review UK address data](#)'

² ODI (2017), '[ODI welcomes UK National Infrastructure Commission recognition that data is infrastructure](#)'

³ ODI (2020), '[UK National Data Strategy: Open Data Institute response](#)'

Ofcom should review both the costs and governance of PAF given advances in technologies and data governance approaches since its last review, and the changing context and needs of the market resulting from the current and desired growth of the digital and data economy.

In 2014, the ODI led a project, Open Addresses⁴, that explored how an open address database for the UK could be created using an alternative governance model to PAF; one that meets all the requirements of data infrastructure. The project was funded by the Cabinet Office through the Release of Data Fund and through the course of its work was able to identify the key challenges associated with setting up such a database based on the principles of openness, transparency and collaboration.

The project demonstrated that national data infrastructure has to be maintained by an organisation that: can be trusted to exist in the long-term; has a reason for continuing to make data available to others; and can adapt to changing user needs and expectations. New organisations, such as the company created as part of the Open Addresses project, cannot meet the first of these criteria, especially given Royal Mail's central role in the original creation of addresses. This effectively means that Royal Mail holds a monopoly on address data, which, given its governance of PAF, removes competition and stifles innovation.

It is therefore vital that the principles which underpin Royal Mail's governance of PAF are reviewed, particularly the conditions it puts on access to and reuse of PAF data.

Open Communications

The ODI welcomes Ofcom's commitment to proceed with their proposals on Open Communications.

As detailed in our response to Ofcom's recent consultation on Open Communications⁵, we broadly agree with the view that Open Communications could provide additional benefits to consumers. These might include comparing, switching, aggregating and managing communications products based on their needs and lifestyle; bill splitting in shared households; unbundling services across multiple providers for the best deal; and understanding usage patterns in public services. There are, however, potential risks associated with increasing access to personal data that need to be taken into account, particularly around vulnerable consumers and shared accounts.

The ODI has considerable experience in data portability initiatives such as open banking, including our foundational work with Ofcom on Open Communications⁶. The ODI was also a member of the Open Banking Working Group that helped develop the standards and guidelines for open banking and we continue to monitor and promote this initiative today⁷. We have also

⁴ ODI (2015), '[Creating the UK's first free and open address list](#)'

⁵ ODI (2021), '[The ODI's response to Ofcom's consultation on Open Communications](#)'

⁶ ODI (2020), '[Open communications: an open trustworthy data ecosystem for the telecommunications sector](#)'

⁷ ODI (2019), '[How far Open Banking has come: our five takeaways – The ODI](#)'

been involved in sector initiatives with Ofgem⁸, including the Open Energy Advisory Groups⁹, and Ofwat. We are keen to share this experience and continue to support Ofcom as they continue to work on this important topic.

Online harms

The ODI supports Ofcom in its plans to regulate online harms.

The huge increase in the range of online services and platforms, coupled with the increasing time spent on and importance of these in many people's lives, means that Ofcom's role as the future regulator of online harms will be a challenging one.

The consultation document rightly highlights the importance of reaching a better understanding of online harms in terms of the consumers, business models and technologies, and that this will require new research and extensive collaboration. In particular, we would highlight the need for Ofcom to consider the appropriate data flows for the monitoring, evaluation and regulation of online harms, by Ofcom and by third parties such as researchers and consumer advocacy organisations, as well as the appropriate sharing of data to support new technologies to help detect and address those harms.

We are keen to help Ofcom explore how access to data can help it fulfil its role as regulator and support the complementary roles of other organisations with interests in this area.

⁸ ODI (2019), ['Using 'Open Standards for Data' in the energy sector'](#)

⁹ Icebreaker One (2020), ['Introducing Open Energy'](#)