

# Trust and Transparency – Session Two of Data Voices Panel

## Session Two Summary Report – May 28<sup>th</sup> 2026

### Who was there

The second session of the Data Voices public engagement panel was held online on 28th May 2026, 18:30–20:30 as part of Smart Data Foundry’s ongoing public engagement programme.

The session brought together members of the Data Voices panel, who are representative of the population of Great Britain (GB) and bring a diverse range of lived experiences and perspectives. The session was attended by 17 of our 20 panel members.

The session was facilitated by Kimberley Mitchell (Impact & Engagement Manager, Smart Data Foundry), with presentations and input from Patricia Ruddy (Head of Information Governance), Charlotte Binstead (Head of Communications), and Oliver Berry (Research Engagement).

This panel has been funded by SDR UK through the Financial Data Service (FINDS) programme.

### Purpose of this session - Agenda

The purpose of this session was to:

- Build understanding of how Smart Data Foundry approaches trust, transparency and safeguards in the use of financial data
- Explore how decisions are made about research access and governance
- Discuss the legal and ethical frameworks surrounding the use of sensitive data
- Use gambling as a real-world case study to explore ethical tensions, privacy concerns and public benefit
- Gather public perspectives on what conditions need to be in place for data use to feel responsible and trustworthy

### Key topics discussed

- Trust, transparency and safeguards in data use
- The GUARDS framework and Five Safes model
- Data protection, anonymisation and ethical review processes
- How research access decisions are made through the Data Access Committee (DAC) process
- The distinction between legal, ethical and acceptable uses of data
- Gambling as an example of sensitive financial data use
- Public good, unintended consequences and commercial risks

### Building trust: safeguards and framework

Patricia Ruddy introduced the session by explaining the frameworks and processes Smart Data Foundry uses to build trust and accountability in the use of financial data. This included discussion of the GUARDS framework and the Five Safes model, which underpin how data is accessed, managed and protected. The panel heard about the principles of safe people, safe projects, safe settings, safe data, and safe outputs, alongside the wider GUARDS principles, which are designed to ensure data use is ethical, transparent, and equitable.

Patricia also explained the practical safeguards used within Smart Data Foundry, including:

- Data Protection Impact Assessments (DPIAs)
- Effective anonymisation assessments
- “Motivated intruder” testing to assess re-identification risk
- Consequence scanning to consider intended and unintended harms
- Secure access through the Trusted Research Environment (TRE)

The panel discussed how these processes are designed not only to comply with legal requirements but also to maintain public confidence and accountability.

One panel member asked whether studies are monitored throughout the duration of a project. Patricia explained that projects are monitored continuously through audit logs and regular researcher check-ins:

*“We have an audit log of when researchers have accessed the Trusted Research Environment, and we have check-ins with them throughout the project to see how they are progressing.”*

The discussion highlighted that many panel members viewed transparency and oversight as equally important as technical safeguards.

### How decisions are made: research access (DAC process)

The session explored how research proposals are assessed through Smart Data Foundry’s Data Access Committee (DAC) process.

Patricia explained that research proposals are reviewed across three key areas: practicality, suitability, assurance. These assessments consider whether a project is likely to provide public benefit, whether the proposed methods are appropriate, and whether ethical, legal and governance standards are met.

The panel also heard about Smart Data Foundry’s guiding ethical principles, including public benefit, transparency and accountability, and fairness. Discussion focused heavily on how “public benefit” is defined in practice and whether it can mean different things to different people..

The session explored the difference between what is legal, what is ethical, and what society considers acceptable. Patricia provided examples showing that some activities may be legal yet morally uncomfortable or ethically challenging. This led to a broader discussion about the meaning of “public good” and who decides what it means.

Eleven participants shared reflections on what “public good” meant to them. Responses included:

- *“Public good as information that improves services, understanding and social cohesion”*
- *“The importance of reducing harm and improving outcomes for vulnerable groups”*

- *“Concerns that “public good” can become vague, subjective or open to misuse”*
- *“Recognition that benefits for the majority can still create harm for minorities”*
- *“The view that ends do not always justify means”*

One panel member reflected:

*“Public good - this has been touched upon but it’s hugely complex. Ends don’t always justify means e.g. animal testing, and utilitarian arguments i.e. benefits for the greatest number of people can result in adverse outcomes for others. I’d consider measures that aim to improve the lot of the most vulnerable in society to be the greatest public good.”*

Another panel member commented that:

*“Public good is a very nefarious concept and therefore needs handled with extreme caution.”*

The discussion reflected broad agreement that public benefit needs to be clearly evidenced, carefully governed and continually open to challenge.

### Case study: gambling and financial data

The second half of the session focused on gambling as a case study for exploring the ethical tensions surrounding sensitive financial data use. Oliver Berry introduced gambling as an example because it sits at the intersection of public benefit, financial vulnerability, privacy and potential harm.

The panel discussed:

- Gambling as a legal but sensitive activity
- Links between gambling, debt and financial vulnerability
- Potential uses of financial data to identify wider societal trends
- Concerns about surveillance, intrusion and misuse of data
- Risks of commercial exploitation and unintended consequences

One panel member expressed discomfort: *“It makes me feel uncomfortable that people do not know that their bank is being monitored to see their gambling habits without their knowledge.”* Another reflected on empowerment: *“Empowerment is the critical word that Patricia used and that’s the discomfort that I feel about banks using personal data about an individual’s (or group’s) gambling.”* Several members voiced concerns about data being potentially misused by commercial organisations. One commented: *“Public benefit is quite vague; although I understand the intention, I fear research could have intended and unintended consequences. You could make a valuable finding on how mental health or something could be improved, which a bookmaker could then potentially use to counter.”* Another added: *“I would feel more comfortable with gambling data being used for public benefit if it’s not exploited by gambling companies to better target and leverage information against people at-risk of developing or maintaining gambling addictions.”* Charlotte clarified that the work aims to understand broader trends, not identify individuals. The discussion also examined whether consent should play a larger role. One panel member asked: *“If banks are concerned and want to understand the impact or benefit or provide support to customers who are gambling, wouldn’t it be more appropriate to offer customers the option to initially consent to the use of their data for this trend and then offer counselling or support?”*

There was a strong theme throughout the discussion around maintaining boundaries between public-interest research and commercial use.

### Ethical tensions and trade-offs

The panel explored the wider ethical tensions involved in using sensitive financial data for research.

Discussion focused on balancing:

- Public benefit
- Privacy
- Transparency
- Harm prevention
- Accountability
- Commercial risk

There was broad recognition that even where research aims are positive, there can still be discomfort around the use of sensitive behavioural data. Two panel members commented that they would feel more comfortable if findings were not made publicly available and instead only shared with organisations focused on harm reduction, with strict safeguards preventing access by the gambling industry.

The discussion highlighted that safeguards alone are not always enough to create trust. Panel members repeatedly returned to themes of transparency, accountability, control and clarity around who benefits from the research.

### Public benefit – “choose two” poll results

We conducted a poll through the chat in the meeting, where thirteen participants responded to the question:

**“What would matter most in deciding whether gambling data should be used for public benefit?”**

Participants were allowed to select up to two priorities.

The discussion revealed that privacy remains the foundation of public trust, with 35% of the panel identifying strong privacy protections as one of their top priorities. Four other considerations were each selected by 18% of participants: ensuring the research delivers a clear public benefit, ensuring data use has no impact on individuals’ access to credit, services or treatment, providing a clear explanation of who is using the data and why, and placing limits on commercial use. A further 12% highlighted the importance of giving the public the opportunity to question or challenge how data is being used. Together, these responses suggest that support for using gambling data is closely tied to confidence that it is being used transparently, responsibly and with meaningful safeguards.

Additional themes raised by panel members included:

- Accessibility
- Transparency around who data is shared with
- Clarity about how data is being used
- Risks of commercial misuse and unintended consequences

One panel member highlighted concern that:

*“The same data that highlights demographics vulnerable to problem gambling could also be used to target advertising to them.”*

### Panel reflections

Panel members engaged deeply with the ethical complexities of the use of sensitive financial data and reflected thoughtfully on the balance between public benefit and personal privacy.

There was broad support for research that could genuinely improve understanding, reduce harm and support vulnerable people. However, panel members consistently emphasised that this support depended on strong safeguards, clear transparency and meaningful accountability.

Key themes emerging from the session included:

- Concern about unintended consequences and commercial misuse
- Desire for greater transparency around how data is used
- The importance of public involvement and challenge
- Recognition that public good is complex and subjective
- Support for research that demonstrably improves people's lives

The discussion reinforced that trust is not created through technology or governance alone, but through openness, accountability and ongoing public dialogue.

### What comes next

Reflections from Smart Data Foundry:

*“Hearing the panel discuss where the boundaries should sit around the use of sensitive financial data has been extremely valuable. The conversation highlighted that safeguards and legal compliance alone are not enough; trust, transparency, accountability, and clarity of purpose matter deeply to people. These insights will continue to shape how we approach responsible data use and public engagement.”*

The panel will continue with further sessions over the next two years exploring:

- Research applications and case studies
- Risks and unintended consequences
- Public expectations around data use
- Practical ways research can improve economic wellbeing

The next session will take place on 3rd September 2026 and will look at research projects using Smart Data Foundry datasets.,