## Draft Communications Data Bill Lacking Evidence Base and Detail

While it is clear that the UK Home Office is seeking to protect the public by ensuring that the communications data necessary to achieve this aim are available to public authorities, the evidence base for the draft Communications Data Bill is very weak.

In the evidence I submitted to the Joint Committee on the Draft Communications Data Bill I adress two major omissions in the current draft a) the absence of evidence of consideration of the costs and risks associated with mandating companies to invest in a 'big data' infrastructure for the purposes of the draft Bill without adequate transparency; and b) insufficient detail as to the means of achieving transparency and adequate scrutiny of the technical means to be employed.

No step should be taken toward mandating investment in this new data infrastructure until there is better evidence about the risks of hazard or harm. There is a need for agreed target benchmarks against which errors can be judged, and authorisation of data requests must be given by judicial authority to ensure that citizen rights are protected.

The deadline for anyone else wishing to submit evidence to the committee is Thursday 23 August.

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