Q1	Does the updated code adequately explain and advise on the new aspects of data protection legislation which are relevant to data sharing?		
	Yes		
	X No		
Q2	If not, please specify where improvements could be made. The section on law enforcement processing p62-68 offers very little help to police forces seeking to understand how to meet the legislation when sharing data (collected under part 3) with non-competent authorities for GDPR purposes.		
Q3	Does the draft code cover the right issues about data sharing?		
	Yes		
	X No		
Q4	If no, what other issues would you like to be covered in it? The examples are dominated by those relating to the NHS. Please could more examples from other public bodies be included.		
Q5 Q6	Does the draft code contain the right level of detail?		
	Yes		
	X No		
	 More explanation on the Human Rights Act in respect of Article 8(2) to explain why, when necessary, there are exceptions to the right to respect private and family life. It would be helpful for the ICO to suggest (or give an example) how to coherently set out the legal basis of an ISA which has multiple partners that are a mixture of competent authorities, public authorities and third parties/charities. 		
Q7	Has the draft code sufficiently addressed new areas or developments in data protection that are having an impact on your organisation's data sharing practices?		
	Yes		
	X No		
Q8	If no, please specify what areas are not being addressed, or not being addressed in enough detail. More detail would be helpful regarding the sharing by a competent authority processing under Part 3 with organisations who are processing under Part 2.		
Q9	Does the draft code provide enough clarity on good practice in data sharing?		
	Yes		
	X No		
Q10	If no, please indicate the section(s) of the draft code which could be improved, and what car be done to make the section(s) clearer. The old code had a small example after almost every paragraph. This provided context and was helpful when dealing with complex disclosure requests.		

Q11	Does the draft code strike the right balance between recognising the benefits of sharing data and the need to protect it?			
	Х	Yes		
		No		
Q12	If no, in what way does the draft code fail to strike this balance?			
Q13	Does the draft code cover case studies or data sharing scenarios relevant to your organisation?			
		Yes		
	X	No – The police sharing scenarios are largely focussed on other organisations sharing their data with police, not the other way round. The draft code of practice did not cover less standard sharing such as requests from solicitors or providing personal data to private organisations such as Business Crime Reduction Partnerships, Insurance companies etc. Also some of the examples point out what went wrong but do not provide direction as to what the correct response should have been.		
Q14	Please provide any further comments or suggestions you may have about the draft code. There is a heavy reliance on hyperlinks to external resources, is it realistic that all those links will remain valid and working throughout the CoP life?			
Q15	To what extent do you agree that the draft code is clear and easy to understand?			
		Strongly agree		
	X	Agree		
		Neither agree nor disagree		
		Disagree		
		Strongly disagree		