



UK Government

Smart Data

Call for Evidence

CP 1608



Government of the United Kingdom

Department for Business and Trade

Smart Data

Call for Evidence

Presented to Parliament
by the Secretary of State for Business and Trade
by Command of His Majesty

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Executive summary

As set out in both the Industrial Strategy and the Smart Data Strategy, Smart Data is a key component of this government's ambition to drive economic growth, competition and innovation by putting people and businesses in greater control of their data. Smart Data schemes in just 4 sectors could generate £71.2 billion in net social value from 2028 to 2043, with annual gross domestic product (GDP) contributions from 4 Smart Data schemes estimated to reach £9.6 billion by 2043 (0.34% of 2024 GDP).¹²

Earlier this year, building on the successes of Open Banking, the Smart Data Strategy made a long-term commitment to enabling secure, consent-based data sharing across the economy, by extending benefits to a wider range of sectors.³ We are now moving from strategy into design and delivery, and are seeking evidence on how we should do so.

In the Smart Data Strategy, we set out plans to progress towards Smart Data in banking, finance, energy, property, transport, digital markets, telecoms, retail, and agrifood supply chains, and to explore how Smart Data can support digitalisation of trade. Alongside, and since publication of the strategy, the FCA has published an Open Finance roadmap, HMT will soon be consulting on Open Banking regulations, DESNZ plans to consult on Smart Data in energy in Autumn and DSIT has published its response to a prior call for evidence on Smart Data in digital markets.

This document calls for evidence in relation to opportunities for Smart Data in property, retail, agrifood, transport and trade, as well as elements of the approach to join-up across the economy. It is organised around the themes of governance, international join-up, and sector-specific progress.

A strong and coherent approach to governance is essential to the success of Smart Data. This includes decisions about the roles of regulators, government, industry bodies and other institutions in scheme design, oversight and evolution. The government is seeking evidence on how governance models can promote join-up across the economy and balance goals such as flexibility and innovation, accountability, consumer protection and long-term sustainability.

The government is also seeking evidence on how Smart Data governance should align with developments in areas such as artificial intelligence, digital verification services and data protection, including where greater join-up could support trusted, secure and interoperable data sharing. We will use this evidence to also join up with work on the National Data Library,

¹Calculated using 2024 UK GDP data (GDP = £2,848 billion): [Gross domestic product \(GDP\): Economic indicators.](#)

²DBT (March 2026): [Potential Economic Impact of Future Smart Data Use Cases](#)

³ DBT (March 2026): [Smart Data Strategy - GOV.UK](#)

as part of the wider digital infrastructure landscape and alongside other reforms intended to improve how data is accessed, trusted and reused.

Smart Data presents significant opportunities for international join-up, for example through alignment and coordination of design to reduce costs for firms, improve user experiences and position the UK as a global leader in Smart Data enabled services. We are, therefore, seeking views on where international alignment would deliver benefits, where there are barriers to cross border data use, and how UK Smart Data frameworks could support export opportunities for UK firms and influence global best practice.

For each area of the Call for Evidence, stakeholders are encouraged to consider where Smart Data could deliver the greatest benefits, the readiness of markets and data infrastructure, and the sector-specific risks and challenges that would need to be addressed to ensure schemes are safe and inclusive.

Responses to this Call for Evidence will help shape the next phase of the government's Smart Data programme. This is likely to include consultations on the design of sector-specific Smart Data schemes, and the wider institutional and regulatory framework that supports them. We are grateful for your engagement and support as we work towards a Smart Data economy that drives UK economic growth.

1. Introduction

Smart Data enables the secure, consent-based sharing of data in ways that empower customers, stimulate competition and support innovation. In this context, Smart Data refers to the secure sharing of customer data, at the customer's request, with authorised third parties (ATPs), who use this data to provide innovative products and services that benefit the customer.

A Smart Data scheme is the policy, regulatory (or contractual), technical and governance framework that enables secure, standardised data sharing. This includes a trust framework that defines the rules, standards and requirements for participation. Schemes may be mandated through regulation or delivered through voluntary, contractual arrangements and may span single or multiple sectors. While Smart Data is not primarily focused on data held by the public sector, these bodies may participate in Smart Data schemes, and some use cases may be enabled or enhanced by public data.

Under the Data (Use and Access) Act 2025 (DUAA), the government now has powers to require firms to participate in Smart Data schemes. These schemes enable the secure sharing of business data⁴ – such as a firm's standard product and pricing details – and, at a customer's request, customer data, such as information about the goods and services provided to the customer by the firm. The customer may be a consumer or a business, and the data must be held by a trader. The scope of these powers applies only where data arises from a trader–customer relationship.

The government is supporting progress towards possible schemes across multiple sectors, including Banking, Finance, Energy, Property, Retail, Digital Markets, Transport, Telecoms and Agri-food. Together, these schemes are building a wider Smart Data ecosystem that drives best practice, enables interoperability and supports new services that fuel innovation, competition, and growth.

Following the publication of the Smart Data Strategy,⁵ government is now considering how Smart Data schemes should be prioritised, designed and delivered in practice. This call for evidence seeks stakeholder views to inform decisions on sector readiness, key use cases, how schemes should be designed, and how to ensure cross-economy alignment as the Smart Data programme moves from strategy into implementation. Use cases identified through this call for evidence will be subject to targeted feasibility analysis and design, including assessment of data availability, governance models, and legal applicability under the DUAA. They will also be subject to formal consultation prior to any regulatory change.

⁴ Business data in this context refers only to data relating to a business in its capacity as a customer, and not to wider datasets generated by or about a business more generally

⁵ DBT (March 2026) [Smart Data Strategy - GOV.UK](#)

1.1 About this call for evidence

The Smart Data Strategy set out the government's long-term commitments and ambitious targets to establish 5 or more active Smart Data schemes by 2030 and at least 20 interoperable schemes in the UK by 2035. As committed to in the Strategy, consultations for Smart Data schemes in **Banking** and **Energy** will be published in the coming months. Government has also recently committed to consult on the design of a **Digital Markets** scheme and, building from the FCA Roadmap, HMT will set out the government's next steps for **Open Finance**.⁶⁷

With a clear vision for UK Smart Data in place, and the powers provided by the Data (Use and Access) Act 2025, this call for evidence is the next step in that ambition as we move from strategy into scheme design. The government is now inviting views from stakeholders to help shape the future of possible Smart Data schemes across **Retail, Transport, Trade, Agrifood and Property**. This includes views on the cross-sector **governance** arrangements that will support schemes and **international** learnings to inform design.

Responses will help ensure that Smart Data schemes improve services and deliver meaningful benefits across multiple sectors throughout the UK.

1.2 Who should respond to this call for evidence

The government would like to hear views from respondents across the UK, who have an interest in all sectors or areas in scope of this call for evidence across Retail, Transport, Trade, Agrifood and Property. We also welcome perspectives on the Governance of schemes and International best practice.

We invite responses from a range of stakeholders with an interest in this call for evidence, including consumer groups, third-party providers, trade bodies, public sector bodies, industry groups, regulators, professional standards bodies, business representative organisations and academia.

We encourage respondents to engage with all questions where they have views but, given the breadth of issues and range of sectors covered, we do not expect full responses to every question.

⁶ Gov.uk (May 2026) [Smart Data opportunities in digital markets: government response - GOV.UK](#)

⁷ FCA (April 2026) [Open finance roadmap: our vision for a smart data future | FCA](#)

1.3 Key terms used in this Call for Evidence

A subset of the key definitions from the ‘Smart Data Strategy – Draft Glossary of Terms’ has been provided to support responses to this Call for Evidence.⁸ The Smart Data Guidebook, currently in development, will provide the authoritative glossary for Smart Data terms.

Authorised Third-Party Provider (ATP)

A trusted organisation that has been accredited to access and use data, with the permission of the customer. ATPs can only participate in a scheme if they are accredited according to the scheme accreditation rules. In Open Banking, these providers are known as Account Information Service Providers (AISPs) and Payment Initiation Service Providers (PISPs). ATPs are also examples of data intermediaries — entities that help transfer data securely between consumers and service providers to enable better, more personalised services. In the UK Digital Verification Services Trust Framework, ATPs are broadly analogous to Orchestration Service Providers (OSPs), which facilitate trusted data exchange between parties, and may also share features with Holder Service Providers (HSPs) when enabling user-controlled data sharing.

Data holder

A trader or organisation that holds and processes data in the course of business and may be required to share it under Smart Data regulations. Data holders are typically the original custodians of consumer or business data. For example, in Open Banking, the account-holding banks are the data holders. They share customer data with ATPs when consumers give consent. ATPs can also technically act as data holders if regulations allow. Data holders play a critical role in enabling secure and regulated data exchange within Smart Data schemes.

Data (Use and Access) Act 2025

Part 1 of the DUAA provides government with a set of powers to introduce legal requirements for the creation and governance of data sharing schemes in any sector. These powers support a wide spectrum of initiatives – from fully fledged Smart Data schemes (e.g. Open Banking) to bespoke open data programmes (e.g. Fuel Finder). The Act builds on existing rights and principles under the UK General Data Protection Regulation (GDPR), particularly around portability, consent, and interoperability.

Interoperability

The ability for different systems, platforms or services to understand, exchange and use data, enabled by common standards. Interoperability can facilitate both intra-sector and cross-sector

⁸ DBT (March 2026) [Smart Data Strategy - GOV.UK](#)

data sharing. For example, if an ATP provides a service that combines data from different sectors, the system should make it as simple as possible, subject to other constraints (such as those required for security).

Open Data

Data that is freely available to anyone to access, use, and share without restrictions, typically published in machine-readable formats under open licences. Open data schemes do not require consumer consent and focus on transparency, open innovation, and public benefit. In Smart Data policy, open data initiatives – such as Fuel Finder – use Smart Data powers to mandate the publication of business data (e.g. fuel prices) to improve market efficiency and consumer decision making. Smart Data powers could allow for varying levels of openness, with regulations placing a degree of restriction on how contextual business data is shared. Data sharing enabled by open data initiatives could support the development of Smart Data use cases.

Smart Data

The secure sharing of customer data - at the customer's request - with ATPs, who use this data to provide innovative products and services that benefit the customer. While Smart Data schemes typically involve the sharing of data about the customer, complementary open data initiatives (e.g. the Fuel Finder scheme) illustrate how Smart Data powers in the Data (Use and Access) Act can also support broader market transparency and efficiency. These initiatives share the common goal of using data to drive better decision-making and consumer outcomes and may inform future Smart Data applications. Smart Data is not primarily focused on public sector data, but certain use cases could be enabled or enhanced by it.

Smart Data Scheme

The policy, regulatory (or contractual), technical and governance framework that enables the secure, standardised sharing of data. This includes a trust framework to define rules and standards. All of these elements must be present for a data sharing initiative to be defined as a scheme. For example, Open Banking is a single scheme which operates within the wider financial services sector. Schemes typically apply to a particular sector of the economy but may also span multiple sectors or include several schemes within one sector. A Smart Data Scheme can be mandated through regulation or delivered through voluntary contractual arrangements.

Use case

A clearly defined purpose for accessing data to deliver a specific product or service that benefits the end user (e.g. customer), or meets a system requirement, through addressing a user need or solving a problem. Use cases play a critical role in informing the design of Smart

Data schemes, including governance, technical standards, and interoperability requirements. For example, Project Perseus is a voluntary industry-led Smart Data initiative that enables the use case of leveraging SMEs' smart meter data to inform lending decisions by banks.

2. Transport

Transport plays a key role in supporting economic growth, connectivity and access to opportunity, while contributing to the government's wider environmental and decarbonisation objectives. The transport sector generates large volumes of data across journeys, networks, vehicles and infrastructure. As outlined by the Department for Transport's (DfT) Data Action Plan, if used effectively, this data has the potential to improve information for users, support more efficient network management, enable innovation and deliver better outcomes for consumers and businesses.⁹

Government published research in June 2026 that explores the potential for Smart Data schemes to support innovation, investment and growth within the transport sector. The research identified areas of the sector where improved data-sharing could be a solution to existing challenges. Research participants identified twelve use cases where Smart Data has the potential to add value across the modes of freight, rail and road.¹⁰ We are seeking views primarily on the opportunities, benefits, barriers and risks to introducing Smart Data in these areas and identified use cases, though government's interest is not limited to these modes, or the identified use cases, only.

Research participants also highlighted common barriers to data sharing across the sector, including fragmented data ecosystems, inconsistent standards, commercial sensitivities, unclear governance, weak incentives, and concerns around trust, security and liability.

The use cases reflect views expressed by research participants and should be interpreted as exploratory, early-stage evidence. Respondents may note that, while this call for evidence draws on use cases identified in government research, the descriptions have been adapted to fit the current policy context and therefore may not reflect the original wording precisely. Any future policy decisions will be taken in line with DfT's strategic and wider government priorities. We are also aware that there is a significant amount of progress in data sharing initiatives happening in industry. We will explore how the use cases complement existing initiatives in this area.

2.1 Smart Data in freight and logistics

The freight and logistics sector faces fragmented and inconsistent access to data across organisations and modes. Data is often collected and managed differently across organisations and regions, with few common standards.¹¹ The sector includes a wide range of

⁹ Gov.uk (2026) [Transport Data Action Plan](#)

¹⁰ Gov.uk (2026) [Exploring Smart Data opportunities in the transport sector](#)

¹¹ Catapult Connected Places (2021) [Logistics-End-to-End_Case-Studies_final.pdf](#)

organisations with different sizes, roles and technical capability, with data flowing across multiple actors in the supply chain. Around 90% of road freight operators are SMEs,¹² many of which have limited capacity to invest in modern digital systems. Concerns about commercial sensitivity can discourage data sharing.¹³ This can limit consistency and comparability across datasets, reduce visibility of data flows and contribute to higher administrative burdens.

Numerous initiatives and innovations across government and industry are enabling improved data sharing across all levels of the freight and logistics system. This reflects the increasing recognition of the value of data as economic assets and the associated motivation to unlock and harness its benefits for the sector and nation. The Transport Data Action Plan sets out DfT's own commitments to drive such change, with numerous transport-wide and freight-specific data and insights initiatives in development. These build on the successes of existing initiatives, such as the Freight Innovation Fund, which has helped SME innovators pilot, prove and scale new and improved data-sharing solutions for freight and logistics.¹⁴ One of 2025's winning SMEs, '1Timetable', has developed a data-sharing platform with improved timetable visualisation and validation, helping freight operators and Network Rail to operate a more efficient railway.¹⁵

Potential use cases

Government's June 2026 research identified four potential use cases for Smart Data in freight, which would aim to address existing challenges the sector faces.¹⁶ We invite respondents' feedback on these use cases, but note that they reflect views expressed by research participants and should be interpreted as exploratory evidence.

Freight Use case 1: Supporting more consistent carbon reporting across transport supply chains

Challenge: Businesses using logistics services struggle to produce consistent, credible transport emissions reporting because logistics providers use different data sources, methodologies and formats for calculating CO₂.

Potential use case/solution: Requiring logistic providers to share operational data could enable consistent, comparable CO₂ reporting across transport supply chains. Logistics customers could retrieve emissions data from multiple transport operators, reducing manual reconciliation, uncertainty, and potentially lowering administrative burden for businesses. For

¹² Gov.uk (2026) [Consultation on a New Heavy Goods Vehicle CO₂ Emissions Regulatory Framework for the United Kingdom](#)

¹³ Catapult Connected Places (2021) [Logistics-End-to-End Case-Studies_final.pdf](#)

¹⁴ Gov.uk (2025) [Government boost for businesses to drive freight innovation - GOV.UK](#)

¹⁵ Gov.uk (2025) [Freight Innovation Fund fourth round winning projects - GOV.UK](#)

¹⁶ Gov.uk (2026) [Exploring Smart Data opportunities in the transport sector](#)

example, a sustainability lead compiling a corporate report could pull like-for-like emissions figures directly from all logistics partners.

Freight Use case 2: Supporting visibility and coordination across the freight network

Challenge: Decision makers plan freight movements with limited visibility beyond their own operations, contributing to empty running and underutilised domestic capacity across road, rail and waterborne networks. Limited visibility of shipments across the wider logistics system can also constrain coordination within supply chains and influence modal choices.

Potential use case/solution: This use case would aim to improve coordination across freight networks. Businesses could securely share standardised data on their available road, rail, waterborne and terminal capacity with other operators and relevant third parties. Freight movements could then be better matched to existing capacity, reducing empty runs and underused services. For example, a logistics planner could better identify spare space on a rail or road service already operating on a route, rather than commissioning a separate vehicle for each shipment. Improved access to shared data could also support greater visibility of shipments across the logistics system for parties involved in the movement of goods, helping to coordinate operations and make more informed decisions about how freight is routed across different modes.

Freight Use case 3: Support coordinated and efficient urban logistics, particularly around last-mile efficiency

Challenge: Last-mile deliveries in cities can be inefficient, with multiple operators serving the same customers and areas independently. This leads to duplicated trips, congestion and higher costs that may not align with customer priorities.

Potential use case/solution: This use case would aim to support more coordinated and efficient first- and last-mile deliveries in urban areas. Improved access to data on delivery volumes, routes and kerbside availability across the network could enable more coordinated planning and delivery activity between parties involved in urban logistics. This could support consolidation of deliveries across multiple operators, reducing duplicated journeys and congestion.

This could also involve the consensual sharing of data on delivery demand and preferences between relevant parties, e.g. business or individual customers sharing delivery data with freight providers. This could support decision making on how deliveries are scheduled, grouped or routed, helping to better reflect user priorities such as lower cost, improved efficiency or decarbonisation.

Freight Use case 4: Support coordination of freight electrification infrastructure

Challenge: Limited joined-up understanding of freight movements, electricity network capacity and planned charging infrastructure can make it challenging for public and private sector decision-makers to identify and prioritise where high-capacity charging is needed.

Potential use case/solution: This use case would aim to support more coordinated planning of freight electrification infrastructure. Logistics operators could share freight movement and demand data with energy network operators and charging providers. These organisations could then identify where demand for charging is likely to arise and align investment decisions accordingly. For example, a logistics operator and network operator could use shared data to anticipate demand along key freight corridors and prioritise the development of charging hubs where both vehicle usage and grid capacity support deployment.

Freight Questions

Please provide concrete examples, existing workarounds, pilots or evidence where possible, especially when describing benefits, barriers and risks.

1. What opportunities and benefits would each use case bring to the freight sector? For whom, and why? If there are specific benefits for SMEs participating and/or for reducing business admin burden, what are these?
2. What types of existing customer data held by traders could inform/enable these use cases?
3. What barriers to implementation and possible risks are there to each freight use case? If there are specific barriers for SMEs participating, what are these?
4. How could a Smart Data scheme complement existing data-sharing initiatives in the freight sector? What additional value could it provide, and are there any risks that it could duplicate or hinder existing initiatives?

2.2 Smart Data in rail

Despite recent progress in government and industry, the rail sector continues to face data-related issues. The sector is shaped by a complex, legacy-based system where data is held across multiple organisations and data sharing can be constrained by commercial sensitivities.

Government and industry are seeking to improve how data is used in rail to improve services and efficiency for both businesses and consumers. Rail Delivery Group's Rail Data Marketplace (RDM), operational since 2023, is now a central platform for finding and sharing

rail data.¹⁷ RDM makes it easier for almost 4,000 registered organisations and individuals to access over 270 data products, many for the first time, enabling innovation and improving access to information for passengers.¹⁸

Potential use cases

Government's June 2026 research identified two potential use cases for Smart Data in rail, which would each aim to address existing challenges the sector faces.¹⁹ We invite respondents' feedback on these use cases, but note that they reflect views expressed by research participants and should be interpreted as exploratory evidence. Further use cases involving the rail sector will be explored in section 3.2, which outlines potential use cases in multi-modal transport.

Rail Use case 1: Supporting improved journey planning information across the rail system

Challenge: In the rail sector, journey planning information is fragmented across organisations and is therefore difficult to access and use consistently. This includes data on service conditions, facilities and train loading, which is often collected but held in different formats and systems. While a growing number of datasets are available through platforms such as the RDM, some data relevant to journey planning (such as train loading information²⁰) remains inconsistently structured or difficult to use across systems. As a result, passengers may lack confidence in planning rail journeys due to incomplete or inconsistent information.

Potential use case/solution: This use case would aim to improve the availability and consistency of journey planning data by improving sharing across train operators, infrastructure managers and journey-planning services. This could include data on train loading or crowding, station and onboard facilities, or accessibility information. Improving the availability and consistency of this data could help passengers plan and book travel with greater confidence, including by making it easier to assess whether services meet their needs, including where accessibility requirements need to be considered in advance.

Rail Use case 2: Supporting more proactive management of rail infrastructure

Challenge: Rail infrastructure managers can have limited visibility across the wider network because relevant data is held in separate systems by different organisations. In some cases, different teams may inspect the same assets separately, leading to closures, repeated disruptions and additional compensation costs.

¹⁷ Rail Delivery Group (2025) [Rail Data Marketplace](#)

¹⁸ Gov.uk (2026) [Transport Data Action Plan](#)

¹⁹ Gov.uk (2026) [Exploring Smart Data opportunities in the transport sector](#)

²⁰ Train loading information details for passengers how busy specific train services are.

Potential use case/solution: This use case would aim to support management of rail infrastructure by enabling more consistent and secure sharing of data across organisations. For example, sharing data on inspection and maintenance records of rail assets could support a clearer, more joined-up view of the network. This could support with the identification of emerging issues, allowing for early intervention to reduce disruption and improve overall network performance.

Rail Questions

Please provide concrete examples, existing workarounds, pilots or evidence where possible, especially when describing benefits, barriers and risks.

5. What opportunities and benefits would each use case bring to the rail sector? For whom, and why?
6. What types of existing customer data held by traders could inform/enable these use cases?
7. What barriers to implementation and possible risks are there to each rail use case?
8. How could a Smart Data scheme complement existing data-sharing initiatives in the rail sector? What additional value could it provide, and are there any risks that it could duplicate or hinder existing initiatives?

2.3 Smart Data in multi-modal transport

Multi-modal journeys, which involve using more than one mode of transport in a single trip, remain relatively uncommon – only 7% of trips.²¹ This may reflect practical barriers: journeys are often more complex to plan and less convenient than single-mode travel, particularly where information is difficult to compare. A key challenge is that data is not consistently shared or easily combined across different operators and modes,²² constraining the capacity of existing journey planning tools and service providers. Newer forms of transport, such as electric vehicles, or e-scooters and e-bikes, are generating large amounts of data, which could be better harnessed to support multi-modal travel.

There are initiatives in both government and industry that have promoted data sharing, therefore improving the quality of multi-modal journey planning. DfT's Better Connected strategy highlights the importance of integrated, interoperable data to enable more seamless journeys - supporting improved real-time information, journey planning and payments across modes.²³ A number of open data initiatives are operating at regional levels, improving the

²¹ Gov.uk (2025) [multi-modal public transport and operational changes: Qualitative research findings report](#)

²² Gov.uk (2026) [Transport Data Action Plan](#)

²³ Gov.uk (2026) [Better Connected: a strategy for integrated transport - GOV.UK](#)

quality of journey planning. For example, Transport for London's open data feeds share data from different modes in one format, which supports over 600 travel apps used by 42% of Londoners.²⁴ Data-sharing has also progressed for road transport, with DfT's Bus Open Data Service (BODS), launched in 2020. This contains up-to-date data on bus locations, timetables and fares, improving consumers' trust in bus services.²⁵

Potential use cases

Government's June 2026 research identified four potential use cases for Smart Data in multi-modal transport, which would each aim to address existing challenges the sector faces.²⁶ We invite respondents' feedback on these use cases, but note that they reflect views expressed by research participants and should be interpreted as exploratory evidence.

Use case 1: Supporting door-to-door journey planning across modes

Respondents may wish to read and respond to this use case alongside Rail Use Case 1, which refers to how Smart Data could apply to improved journey planning information in Rail.

Challenge: Passengers may need to plan journeys across multiple modes and operators. However, relevant journey planning data is often held across different organisations and is therefore not always easy to access. Although journey planning tools exist, not all data or modes of transport are integrated into these services, meaning some door-to-door journey options are not readily available to consumers.

Potential use case/solution: This use case would aim to support multimodal, end-to-end journey planning by enabling more consistent sharing of journey-planning data across modes and operators. This could allow services to combine information across a wider range of modes and providers and/or present integrated door-to-door journey options in a single place. For example, a passenger could plan a journey involving rail, bus and onward travel, with coordinated routes, timings and connections. Individuals could also consent to provide their data to reflect their preferences and needs in journey planning. This could also include the use of real-time information, enabling services to reflect disruption or changing conditions and support users in adapting their journeys accordingly. Additionally, improved integration of this data may also support passengers with accessibility requirements with more effective journey planning across modes.

Use case 2: Supporting more evidence-based local transport planning

²⁴ Gov.uk (2023): [Transport Data Strategy](#)

²⁵ Gov.uk (2020) [Find and use bus open data - GOV.UK](#)

²⁶ Gov.uk (2026) [Exploring Smart Data opportunities in the transport sector](#)

Challenge: Local transport authorities can lack a clear, joined-up picture of how people travel in practice, particularly for short, everyday journeys. Existing data is fragmented across modes and sources, making it difficult to understand unmet demand, emerging travel behaviours, or why people continue to rely on cars for trips that could be made by public or active transport.

Potential use case/solution: This use case would aim to support more evidence-based transport planning by enabling secure access to mobility data from service providers, including public transport operators, connected vehicle services and shared mobility platforms. These organisations could share data on how their customers use transport services with local authorities, which could reduce the need for manual collation of data across multiple sources. By analysing these datasets together, authorities could better understand local travel patterns and identify where services do not align with people's needs. For example, a local authority could identify mismatches between school start times and bus timetable data, informing targeted changes to services, safer cycling routes and pedestrian infrastructure.

Use case 3: Enabling integrated ticketing

Challenge: Passengers can face fragmented, complicated ticketing and payment systems across different transport modes and operators, making journeys harder to plan and fares difficult to compare. Where integration exists, it can be limited to specific operators with different restrictions or that only include certain locations. This can limit access to the best priced fare or lead some passengers to default to driving instead of using public transport.

Potential use case/solution: This use case would aim to support integrated ticketing by enabling transport operators to share standardised ticketing and pricing data. This could allow journey planning services to build end-to-end travel options and calculate the best-value fare across multiple modes and operators. For example, a passenger could plan a combined bus and rail journey and pay seamlessly through a single tap-in process, with fares correctly allocated across operators behind the scenes.

Use case 4: Supporting reliability and availability of Electric Vehicle (EV) charging

Challenge: Currently, EV drivers can lack tailored journey planning information, which could help to minimise the time and cost of their journeys. While real-time open data on the availability of public charge points is already shared by charge point operators, this can lack more granular pricing information and does not include data on current wait-times. Additionally, journey planning tools are not always tailored to the specific needs and circumstances of the driver, such as their vehicle type, current battery charge level and accessibility needs, which would enable the provision of more bespoke planning information for each user on the time and cost of their journey.

Potential use case/solution: This use case would aim to improve the end-to-end charging experience by enabling the combination of existing but fragmented or hard-to-access data

sets. This could include the inclusion of open data on public charge point availability with more granular pricing data and vehicle/battery data into more integrated services. Journey planning systems could then identify suitable charging stops across networks and provide clearer cost and wait-time estimates. For example, an EV driver planning a long family trip could be

Multi-modal Transport Questions

Please provide concrete examples, existing workarounds, pilots or evidence where possible, especially when describing benefits, barriers and risks.

9. What opportunities and benefits would each use case bring to the relevant sector(s)? For whom, and why?
10. What types of existing customer data held by traders could inform/enable these use cases?
11. What barriers to implementation and possible risks are there to each multi-modal use case?
12. How could a Smart Data scheme complement existing data-sharing initiatives in multi-modal transport? What additional value could it provide, and are there any risks that it could duplicate or hinder existing initiatives?

Governance questions

Respondents may wish to consider these questions alongside the broader governance questions set out in Section 7.

13. What governance related barriers or enablers (e.g. incentives, commercial considerations, trust arrangements) are most significant in practice for enabling data sharing in the transport sector?
14. How should liability and accountability be managed where transport data is shared between multiple providers and users, and responsibilities are shared across different actors?

Further questions

15. How could Smart Data support or enable use cases in other modes of transport not referenced in this Call for Evidence? What are the key areas of opportunities and barriers to implementation in these modes?

directed to an available, competitively priced charger with shorter wait times along their route, making EV travel more predictable and practical for everyday and longer-distance journeys.

3. Trade

International trade depends on a complex network of businesses, logistics providers, financial institutions and public authorities. These authorities oversee customs, safety and security and regulatory compliance. When goods cross borders, data is exchanged repeatedly across supply chains. This includes customs declarations, regulatory certificates and commercial documentation. This complexity can result in repetitive and duplicative data submissions and increased administrative burdens for businesses, limiting the efficient sharing of data across the supply chain journey.

Cross border data flows are critical to modern trade. Government requirements cover only a part of the data flows necessary for international trade. We intend to explore specific data flows and how business data sharing works across borders. Smooth data flows improve resilience, security, and predictive risk management in global supply chains. They support better enforcement of trade rules, including customs, sanctions and sanitary and phytosanitary (SPS) measures. They also enable fraud detection, risk-based inspections and secure and trusted cross-border transactions. Smooth data flows within supply chains can unlock efficiencies, make commercial processes quicker and reduce admin burden whilst facilitating more trade. Together, these functions help maintain a secure and trusted trade system and support economic growth.

The government and all supply chain actors need access to accurate and timely information about goods movements to facilitate trade. Government and businesses have taken steps to address this complexity, but we know there is more to be done. The UK approach emphasises the need for accurate, structured trade data.

The UK Trade Strategy recognises the Electronic Trade Documents Act (ETDA) 2023 as a foundational legal reform that places electronic trade documents on an equal footing with paper equivalents. The Act enables their use but does not mandate adoption of electronic trade documents, nor does it prescribe specific technical standards or systems for implementation. The UK is encouraging momentum in digital trade with DBT Digital Trade Corridor initiatives, increased electronic Bill of Lading (eBL) adoption and rising digitalisation in trade finance. However, uptake of electronic trade paperwork across UK businesses remains slower than desired.

Evidence from government and industry-led pilots demonstrates that digitalisation of trade documentation and data flows can materially reduce processing times, administrative costs and error rates for businesses.

In addition, a Call for Evidence on Customs Modernisation led by HMRC and HMT Treasury was published in June 2026, seeking industry views on the future of international trade in the

context of digitalisation and impacts on the UK customs regime.²⁷ We will ensure that the next steps on Smart Data in Trade align and are complementary to this ongoing work.

Smart Data has the potential to complement and build on existing digitalisation initiatives, unlocking growth, competition and innovation across the economy. In trade, it can do this by using DUAA powers to enable data sharing and connected standards for trader data. Integration and interoperability with the wider data ecosystem are central to maximising the benefits of Smart Data. This includes learning from and aligning with established frameworks such as open banking and finance, on key areas such as governance, standards and developments from sectors linked to trade such as retail, agrifood or transport.

Initial scoping work suggests that, alongside our work related to the transport of goods, potential Smart Data use cases in trade may emerge in areas such as border freight and logistics optimisation, improved access to port and border status information, supply-chain traceability and provenance required at the border, trade finance processes, and the streamlining and sharing of regulatory and customs documentation. Examples could include enabling better reuse of data already provided to government, improving access to real-time operational information for traders, or supporting interoperability between digital trade systems used by businesses and public authorities.

However, there are important questions around governance, coordination and incentives. Multiple departments and arm's-length bodies have responsibilities within the trade ecosystem, each with different statutory roles and data requirements. Stakeholders have highlighted the importance of clarity on accountability, data standards, and long-term interoperability to avoid further fragmentation. There are also considerations around how costs and benefits are distributed across the system, particularly where upfront investment may be required from exporters while longer-term efficiencies accrue more broadly.

Through this Call for Evidence, the government is inviting views from businesses, trade bodies, technology providers and other stakeholders on where Smart Data could most effectively support trade digitalisation; what barriers would need to be addressed; and how Smart Data schemes could be designed to support growth, efficiency and trust in UK trade. When answering the questions, please take into consideration that Smart Data is primarily about unlocking and enabling use of private sector data and not government bodies reusing their own data.

²⁷ Gov.uk (2026) [Customs Modernisation - GOV.UK](#)

Trade Questions

16. Are existing frameworks sufficient to support the sharing of trade-related data held by private sector actors, particularly where such data relates to the trader itself or its customers? Please provide details and evidence of areas where this is not working so well.
17. How might Smart Data approaches build on current digitalisation initiatives (for example where there are current gaps), rather than duplicating systems or platforms already in use and support existing trade digitalisation activity?
18. What trade requirements that rely on tracking throughout the supply chain to ensure smooth movement across borders could benefit from a Smart Data framework to ensure smooth data capture and sharing?
19. What risks or challenges could arise from using Smart Data in trade, and how might these be mitigated in practice? (For example, risks relating to data accuracy, unequal access for different types of businesses, cybersecurity, unintended impacts on competition, or the readiness of existing trade systems and processes).
20. What international data standards, data models or frameworks do you currently use in relation to trade data? In your view, to what extent do these enable or constrain interoperability, data sharing and the effective use of Smart Data? Please provide evidence or examples where possible.

4. Retail

Retail supply chains span manufacturers, wholesalers, logistics providers and delivery networks, generating large volumes of data on products, prices, sustainability, nutrition and customer activity. However, this data is often fragmented, held in incompatible formats and difficult to access or share across supply chain partners—challenges that are common across the other sectors. In retail, as elsewhere, this limits operational efficiency, increases compliance burdens, and restricts the development of data-driven services.

Smart Data has the potential to address these systemic challenges by requiring the secure sharing of key data with ATPs under common standards, supporting greater interoperability across sectors. As with the other Sectors, this will enable ATPs to address data silos, reduce inefficiencies and drive growth.

For the retail sector, Smart Data could improve product traceability by requiring that supply chain actors share key data (e.g. origin, production and logistics data) with ATPs in standardised, interoperable formats. This could enable ATPs to aggregate and link data across systems, enabling end-to-end tracking, strengthening consumer confidence and supporting growth through more efficient, transparent supply chains.

Smart Data could also require consented retail transaction data to be shared with ATPs, enabling them to provide personalised budgeting support, savings and healthier shopping recommendations to consumers. This could boost consumer spending power and support wider Government priorities such as the NHS 10 Year Health Plan. Smart Data could additionally support Government's High Street Strategy by requiring retail actors to share real-time shelf pricing, stock availability and local offer data with ATPs. This could be combined with transport and location data to direct consumers to nearby stores in the most cost-effective way, increasing footfall and supporting high street growth.

The economic potential of Smart Data in the retail sector is reflected in Government-commissioned analysis, which estimated that applying Smart Data in online groceries alone could deliver £7.2 billion in Net Present Value (NPV) between 2028 and 2043, with average annual benefits of £479 million. When expanded to wider retail, the UK could see up to £24.6 billion in net social value generated over the same period.²⁸

Designing a Smart Data scheme in the retail sector will require careful consideration of data availability, quality and incentives. Evidence on the nature, standardisation and completeness of retail data remains limited. Stakeholders have also queried incentives and the justification to share or enable access to data, particularly when such data underpins existing commercial models or has required significant investment to collect.

²⁸ [Understanding the costs and benefits of smart data use cases: research report](#)

Through this Call for Evidence, the Government is inviting views from retailers, suppliers, industry bodies, technology providers, logistics and distribution partners, and other retail stakeholders on what data is currently used within the sector; how accessible this data is; what the quality is of this data; where Smart Data could deliver the greatest benefit across the retail sector and what barriers would need to be addressed; and how Smart Data schemes could be designed to support growth, efficiency and trust across the UK retail sector.

To date, the Government's work on retail Smart Data use cases has focused on grocery retail with the goal of addressing cost of living challenges. However, stakeholders from across the wider retail sector are encouraged to respond to this Call for Evidence, particularly where use cases could help address cost of living challenges or support economic growth.

Retail

21. What data sets do you use as part of your role (e.g. pricing, sales, stock management, logistics, customer or compliance data)? What barriers, if any, do you face when accessing, using or sharing this data?
22. Which parts of the retail sector should be prioritised for Smart Data intervention, and why? For example, online retail, independent retail, marketplaces.
23. What specific data access challenges exist in the retail sector, and what action could be taken to address this? How might these challenges impact the development of a Smart Data scheme? For example, challenges accessing item-level data, product metadata, customer data.
24. What specific data quality, accuracy or completeness issues exist in the retail sector today? How might these impact the development of a Smart Data scheme? For example, where the data is held or shared in an unstandardised or non-digital format.
25. What use cases could a Smart Data scheme enable in the retail sector, and what outcomes could these deliver? Please detail the barriers that would need to be addressed, and necessary governance structures required for these to be successful.
26. To what extent, if any, do existing commercial arrangements, including contractual obligations, constrain your ability to share data with supply chain partners or third parties? What considerations should a Smart Data scheme include to address these constraints?
27. How could a Smart Data scheme complement existing data-sharing and digitalisation initiatives in the retail sector? What additional value could it provide, and are there any risks that it could duplicate or hinder existing initiatives?

5. Agrifood Supply Chains

The agrifood sector operates within complex, interconnected supply chains spanning farmers, processors, distributors, retailers and public authorities. These supply chains generate large volumes of data on food production, logistics and storage, pricing, and compliance. However, this data is often fragmented and held in silos, limiting effective data sharing. In addition, businesses frequently report duplication of regulatory reporting obligations and a lack of standardised data formats, increasing administrative burden and reducing supply chain visibility.

Smart Data has the potential to address these system challenges by requiring the secure sharing of key datasets with ATPs under common standards, enabling greater interoperability across sectors. As with the other sectors, this will enable ATPs to address data silos, reduce inefficiencies and drive growth.

In practice, Smart Data in the agrifood sector could enable ATPs to create services that automatically transfer regulatory environmental data from producers to compliance, assurance and commercial actors. Smart Data could do this by requiring key datasets to be shared with ATPs in a standardised format and requiring interoperability across downstream systems. This could reduce administrative burdens by reducing duplicative entries, improve data quality and support new digital tools that drive productivity and growth across the agrifood supply chain.

Smart Data in this sector could also complement existing digitalisation initiatives, such as the Food Data Transparency Partnership and its projects, including the Food Data Infrastructure & Governance Project (FIG). FIG will recommend an architecture for data sharing infrastructure and an overarching governance model to enable effective, efficient and scalable environmental data sharing across agri-food supply chains. Smart Data powers could build on this by enabling data within this system, with consent, to be shared and reused beyond its original reporting purposes. This could help to reduce duplication, unlock greater value from existing investments and support more innovative and scalable uses of data across the sector.

Designing a Smart Data scheme in the agrifood sector requires careful consideration of data availability and standards, incentives and scope. Data within the agrifood sector is often fragmented, with limited interoperability between systems, and incentives to share data can be weak. Given the breadth of the sector, it will also be important to focus on areas where Smart Data can add the greatest value, recognising that different parts of the agrifood sector have distinct challenges to and opportunities for data sharing and innovation.

Through this Call for Evidence, the government is inviting views from farmers, producers, manufacturers, industry bodies, technology providers, distributors, supply chain managers, logistics managers and other stakeholders on which parts of the agrifood supply chain would benefit most from Smart Data; where interventions could add the greatest value; what barriers

would need to be addressed; and how Smart Data schemes could be designed to support growth, efficiency and trust across the UK agrifood system.

Agrifood supply chains

28. What data sets do you use as part of your role (e.g. production, pricing, logistics, compliance)? What barriers, if any, do you face when accessing, using or sharing this data?
29. Which parts of the agrifood sector should be prioritised for Smart Data intervention, and why? For example, primary production, processing, logistics, waste management or areas such as green finance.
30. What specific data access challenges exist in the agrifood sector and what action could be taken to address this? How might these challenges impact the development of a Smart Data scheme? For example, there are difficulties accessing particular types of data such as pricing, traceability, sustainability or compliance data.
31. What specific data quality, accuracy or completeness issues exist in the agrifood sector today? How might these impact the development of a Smart Data scheme? For example, the data is held or shared in an unstandardised or non-digital format.
32. What use cases could a Smart Data scheme enable in the agrifood sector, and what outcomes could these deliver? Please detail the barriers that would need to be addressed, and necessary governance structures required for these to be successful.
33. To what extent do existing commercial arrangements, including contractual obligations, constrain your ability to share data with supply chain partners or third parties? What considerations should a Smart Data scheme include to address these constraints?
34. How could a Smart Data scheme complement existing data-sharing and digitalisation initiatives in the agrifood sector? What additional value could it provide, and are there any risks that it could duplicate or hinder existing initiatives?

6. Property

The Property sector contributes over £100bn per year to the UK economy and employs 1.2 million people.²⁹ Yet, the sector is still held back by significant inefficiencies. Market transactions remain lengthy, complex, and prone to failure – and this is felt most acutely in the residential property sector.

Necessary data for property transactions is often inaccessible; or where it is available, its sources are sometimes unauthenticated. This undermines trust and compels manual and/or duplicated verification. Furthermore, data is often hard to share and therefore hard to reuse, causing delays and security risks. All this contributes to a situation where buying a home takes 60% longer than it did a decade ago;³⁰ and about a third of sales fall through, leaving consumers to pay the price. Every year buyers and sellers carry an estimated £400 million in wasted costs.³¹

Smart Data has the capacity to improve the homebuying and selling process by making it easier to securely share and reuse essential and trusted data across the system. This would reduce administrative burdens and delays for estate agents and conveyancers, benefiting consumers, property service providers, and financial services. Government recently published analysis that estimates that a Smart Data scheme in homebuying could generate £28.7 billion in net social value between 2028 and 2043 and £4.2 billion in GDP every year, depending on how it is implemented.³²

Government has committed to consulting on a Smart Data scheme as part of the recently published roadmap to reform homebuying and selling.³³ This is in response to stakeholders' considerable support for initiatives to improve residential property transactions by promoting secure data sharing, using transformative digital assets, and digitalizing key datasets. Any Smart Data scheme would build on the wider homebuying and selling reforms, the HM Land Registry digitalisation and API programme, and other government digital infrastructure policies like the National Data Library and the Digital Verification Services Framework.^{34, 35}

Industry leaders have shared initial perspectives on how Smart Data could progress in homebuying through the government-commissioned Open Property coalition, delivered by the Centre for Finance, Innovation and Technology (CFIT).³⁶ And we note the many industry-led

²⁹ MHCLG (October 2025): [Home buying and selling reform](#)

³⁰ MHCLG (October 2025): [Home buying and selling reform](#)

³¹ [DBT \(March 2026\): Potential Economic Impact of Future Smart Data Use Cases](#)

³² Calculated using 2024 UK GDP data (GDP = £2,848 billion): Gross domestic product (GDP): Economic indicators.

³³ MHCLG (June 2026): [Home buying and selling reform - GOV.UK](#)

³⁴ [Our plan for the National Data Library - National Data Library](#)

³⁵ [UK digital verification services trust framework - GOV.UK](#)

³⁶ CFIT (May 2026): [“Open Property: A Roadmap for Transforming Homebuying and Selling through Smart Data”](#)

initiatives to develop necessary aspects of a Smart Data scheme, such as the Digital Property Market Steering Group's Smart Property Data Trust Framework sandbox (led by OPDA, the Council for Licensed Conveyancers and Radium following a Regulators' Pioneer Fund award),^{37, 38} technology solutions and propositions (e.g., Moverly, the Smart Data Challenge Prize winner),³⁹ and data access platforms (e.g., Land Data's NLIS platform).⁴⁰

Designing a Smart Data scheme in homebuying requires careful consideration of data availability and quality, data standards, incentives, and scope. Property transactions rely on data held, or created, by several diverse organisations who all store and manage their data according to different standards. Unlike other Smart Data sectors, public data is a fundamental part of the picture. This, along with the different industries involved in the sector, will impact incentives for upgrading, maintaining, and sharing data.

Thus far, focus for Smart Data in the property sector has been on homebuying and selling to shorten the timescale and complexity of transactions. However, government is eager to hear from stakeholders about how the secure, consented sharing of trusted data could transform other areas of the property sector too, especially where there is a close relationship with homebuying. This could include the rental and commercial sectors, building lifecycle management, and possibly planning.

Through this Call for Evidence, the Government is inviting views from property services providers (including estate agents, letting agents, surveyors, conveyancers, and property managers), technology providers, relevant professional standards bodies and regulators, consumer groups, public and third sector bodies, financial services providers, utility companies, credit reference agencies, identity verification providers, and any other organisation with a relevant interest.

To complement what we have heard from stakeholders so far on homebuying and selling reform, the Government is seeking views from stakeholders with interest in a homebuying Smart Data scheme on how it would impact their business, including ways of working, operating models, revenue, and how they work with others in the conveyancing chain; what currently prevents them from sharing data; which organisations should hold governance responsibilities; how to ensure consumer trust and adoption; and what other areas of the property sector would benefit from a scheme. And for respondents with interest in other property sector use cases that could align with a homebuying scheme, we are seeking your views on where interventions could add the greatest value; what datasets are most relevant and could be unlocked; and what barriers would need to be addressed.

³⁷ [Smart Property Data Trust Framework - OPDA](#)

³⁸ [Digital Property Market Steering Group](#)

³⁹ [Smart Data Challenge Prize selects Moverly's digital property pack as winner - GOV.UK](#)

⁴⁰ [Next Gen NLIS | Land Data](#)

Property

35. What specific conditions need to exist to enable your organisation to participate in a homebuying Smart Data scheme (e.g., regulatory changes, data standards, technical infrastructure, commercial incentives, legal liability)? How should these conditions work?
36. To what extent do existing legal obligations, licensing issues, legislative requirements, or commercial arrangements constrain your ability to share data with third parties? What considerations should a homebuying Smart Data scheme include to address these constraints?
37. What impact would a homebuying Smart Data scheme have on your business or organisation? Please consider ways of working, operating models, revenue, your relationship with your suppliers or customers, etc.
38. In addition to costs, what might be the other challenges of digitising and/or converting your data to conform to interoperability standards? (Interoperability standards may include a standardised format that's machine readable, secure API specifications, etc.)
39. In a sector with many industries, who do you think should hold governance responsibilities for the Smart Data scheme, and what level? What role(s) should existing regulators and standard setters have in a homebuying Smart Data scheme?
40. What consumer protections should a homebuying Smart Data scheme have, and should they evolve as a scheme matures? How should a scheme ensure effective dispute resolution and redress, and what body (existing or created) could be responsible for handling this?
41. What value could datasets from other Smart Data sectors (like finance or energy) add to property sector datasets if made accessible? This does not need to be specific to the homebuying use case.
42. What issues need to be considered to successfully integrate Smart Data from sectors like finance or energy, into a homebuying Smart Data scheme? What would encourage/allow data sharing across sectors, and what would support cross-sector governance?
43. What aspects of a homebuying Smart Data scheme could benefit, or could be replicated in, other areas of the property sector (e.g., the rental sector, property management sector)? What outcomes could this deliver?
44. What barriers or challenges would need to be addressed to help a homebuying Smart Data scheme benefit other areas of the property sector?
45. For other parts of the property sector that could benefit from smart data, what are the essential data sets (e.g., planning data, local environmental records, smart meter data, etc.)? And what datasets could be made more accessible to unlock further opportunities? Please differentiate between private and public data sets in your response.
46. For other parts of the property sector that could benefit from smart data, what specific data access and sharing challenges exist and what action could be taken to address this? How might these challenges impact the development of a scheme?
47. For other parts of the property sector that could benefit from smart data, what specific current data quality, accuracy or completeness issues exist? How might these impact the development of a Smart Data scheme?

7. Governance and International

Effective governance is critical to the success of Smart Data schemes. A governance framework provides oversight of how a scheme operates in practice, including mechanisms to monitor compliance, enforce rules and manage risks. It includes consumer protections, security controls (such as authorisation and access), and performance assurance. In practice, this means setting the rules, standards and accountability mechanisms that enable participants to share and use data safely and consistently. This is supported by institutional arrangements that determine how schemes are designed, overseen and held accountable, including the roles of government, regulators and industry bodies; how participants are accredited and standards are set; how disputes are resolved; and how customers are protected.

As Smart Data develops into new sectors and use cases, coherent cross-economy governance will be important to ensure schemes work well together, support effective competition, and remain trusted and adaptable over time.

Government has previously commissioned and published a programme of research that builds evidence on Smart Data governance and scheme design.⁴¹ This research identified the governance functions Smart Data schemes may need to perform and explored options for how these functions could be organised or coordinated across sectors.⁴² The research concluded with two model recommendations for future Smart Data Governance. They are:

1. Medium Term Recommendation: Federated Governance

- Sector-specific implementation entities to lead delivery in each sector (appointed by competitive process).
- A Smart Data co-ordination entity to set common standards, accredit third parties and manage cross-sector services such as authentication.
- Existing regulators to enforce compliance with data sharing mandates and standards in their sector, working closely with the sector-specific implementation entities.

2. Long Term Model Recommendation: Centrally-led Governance

- Central entity takes on more governance functions – for example, standards development, customer protection and engagement, regulatory compliance and implementation function.

Further research highlighted the importance of trust, consent, control, accessible support, and redress in enabling participation. This project recommended principles to mitigate barriers to inclusion that should be considered in the development of future Smart Data schemes.⁴³

⁴¹ DBT commissioned research is published at [Creating a Smart Data economy - GOV.UK](#)

⁴² DBT (January 2026): [Research into governance models for Smart Data](#)

⁴³ DBT (July 2023): [Design principles for inclusive smart data schemes research](#)

Research has also been conducted to build evidence on and set out principles for developing and maintaining data standards to support effective data sharing.⁴⁴

Earlier this year the Smart Data 2035 Strategy committed to consulting on long-term, cross-economy governance arrangements, with a focused consultation planned for early 2027. This Call for Evidence is a first step in that process. It builds on the published research and seeks evidence on the practical cross-sector questions that remain unresolved, including where there are gaps, uncertainties or limitations in the current evidence base that need to be addressed before consultation.

This section focuses on how schemes work together in practice where services, data flows or responsibilities span more than one sector including how data is shared between organisations, how responsibilities are coordinated across different actors, and how services are delivered and experienced by customers in cross-sector use cases. This includes interoperability between systems, platforms and services (the ability to understand, exchange and use data through common standards) to support effective data sharing within and across sectors.

Themes

Respondents are encouraged to consider the following themes when answering the questions in this section:

- **Essential governance functions:** what governance functions are required in practice, and how these may vary by sector or context. DBT has published research⁴⁵ on what these essential governance functions could be, and respondents are encouraged to discuss whether they agree with these recommendations and any additional functions they have identified.
- **Join up across schemes:** how governance and institutional arrangements enable schemes to operate effectively where services, data flows or responsibilities span multiple sectors, including how coordination between different actors should be managed. DBT has published research⁴⁶ that aims to identify the different arrangements and actors within the scheme. Respondents are encouraged to build on this evidence, identifying areas where they agree/disagree and other arrangements they have identified.
- **Participation, competition and proportionality:** what encourages and deters participation, and how governance design affects incentives, competition, and proportionality across different types of organisations.

⁴⁴ DBT (November 2025): [Research into data standards for Smart Data](#)

⁴⁵ DBT (January 2026): [Research into governance models for Smart Data](#) pages 20 to 30

⁴⁶ DBT (January 2026): [Research into governance models for Smart Data](#) pages 65 to 74

- **International and domestic learning:** what practical lessons from existing schemes or comparable systems might inform UK Smart Data governance.

Respondents are encouraged to provide examples, evidence or operational experience where possible, and to draw on relevant sector-specific experience where this helps illustrate how these issues arise in practice.

Governance Questions

48. What aspects of governance are most important for Smart Data schemes in practice, and why?

In your response, please consider:

- the roles, responsibilities or aspects of governance that matter most;
- whether this differs by sector or market maturity;
- which aspects should align across schemes, and where sector flexibility is needed.

49. How should Smart Data schemes be governed and coordinated in practice where services or data flows span more than one sector?

In your response, please consider:

- what coordination issues matter most where services or data flows span sectors;
- what challenges arise when schemes, regulators, or participants need to work together;
- what role should government, regulators or industry play in addressing these challenges.

50. How should customers be protected and able to seek redress where Smart Data services span more than one scheme or sector?

In your response, please consider:

- what the customer journey should look like in practice;
- how accountability should be allocated where issues arise across schemes or sectors;
- what effective, accessible redress should look like;
- how this should interact with existing routes such as the ICO and the Financial Ombudsman Service, and whether gaps exist.

51. What factors would encourage and deter your organisation from participating in a Smart Data scheme?

In your response, please consider:

- incentives, benefits and any practical barriers;

- how these factors affect different types of organisations, including SMEs and new entrants;
- any features of governance design that could affect competition or create disproportionate burdens;
- any sector specific factors that should be taken into consideration.

52. What lessons from existing UK data-sharing initiatives should shape Smart Data governance?

In your response, please consider:

- what has worked well, and what has created challenges;
- which lessons are most relevant for future Smart Data schemes;
- any relevant examples, including Smart Data schemes (such as Open Banking), network markets such as payment card schemes, or other UK data-sharing initiatives.

53. Are there international examples of data-sharing or Smart Data-style approaches, in the sectors covered by this Call for Evidence or in other sectors, where lessons may be transferable?

Next steps

This call for evidence will remain open until 1 October 2026. The government encourages all interested stakeholders to submit their views within this period.

Following closure, responses will be carefully reviewed to inform decisions on sector prioritisation, scheme design and delivery approaches. We will publish a high-level summary of findings in early 2027, providing an overview of key themes and stakeholder perspectives. More detailed analysis will be set out through sector-specific summaries and further publications throughout 2027, where appropriate, supporting the transition from strategy into implementation.

Wider Considerations

54. Are there any other risks, opportunities or benefits (such as environmental or societal) you would like to raise that relate to Smart Data?
55. Is there anything you haven't said already that you would like to add in response to the Call for Evidence?

Alongside this call for evidence, the government will continue to draw on existing research and engagement. This includes prior work exploring how Smart Data can be designed to support vulnerable consumers, such as the *Design principles for inclusive Smart Data schemes* research, which will inform ongoing policy development.⁴⁷

We would also encourage respondents to:

- highlight additional risks, opportunities or benefits (including environmental and societal impacts), and
- provide any further comments not otherwise covered.

⁴⁷ DBT (2023) <https://www.gov.uk/government/publications/design-principles-for-inclusive-smart-data-schemes>

Respondents are encouraged to use the Qualtrics [survey link](#) to submit their views. However, alternative submission formats (e.g. Word or PDF) will be accepted where responses are sent to the SmartDataCfEInbox@businessandtrade.gov.uk in advance of the Call for Evidence deadline.

These inputs will help ensure that the Smart Data framework reflects cross-cutting considerations and emerging issues that may not be fully captured elsewhere in the questionnaire.

The government will continue to engage with stakeholders across sectors to refine policy, build shared understanding, and support the development of a coherent, interoperable Smart Data ecosystem across the UK.

Confidentiality and Data Protection

Before responding to this Call for Evidence, please read the information below about how we will use and protect the information you provide, including any personal data. By submitting a response, you acknowledge that you have read and understood this information and the accompanying [Privacy Notice](#).

Confidentiality

Information you provide in response to this Call for Evidence, including personal information, may be disclosed in accordance with UK legislation, including the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004. If you would like information that you provide to be treated as confidential, please explain why when submitting your response or contact us at SmartDataCfEInbox@businessandtrade.gov.uk. While we will take your views into account, we cannot guarantee that information will be kept confidential in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as a confidentiality request.

How we use your information

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We may publish anonymised summaries of responses received and may refer to evidence submitted in subsequent reports or publications. Unless we have your permission, or are

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