

How we work with DCMS (Department for Digital, Culture, Media and Sport)

May 2020

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1 Summary and scope

This position statement provides an overview of the policy dialogue currently underway between the UK data centre sector and Government. While the sector engages with different departments on specific areas of policy, data centres have not, to date, enjoyed the attentions of a sponsoring department. The COVID-19 pandemic catalysed a closer level of cooperation and the sector's relationship with Government is now being reappraised. From mid-March, activity focused on addressing urgent priorities: ensuring that operators were included in the key workers list, establishing a dedicated team within DCMS to ensure the sector was factored into policy, and informing Government decisions on issues like lockdown exemptions, testing and quarantine.

Now the dialogue is moving to longer term issues. At the end of 12 months DCMS will make recommendations within Government regarding the suitability of existing structures to support the sector's role in providing business resilience, and potential policy measures to protect the sector's competitiveness and its ability to support the UK's digital economy moving forward.

2 The story so far

As soon as formal restrictions on movement looked likely in the UK, techUK approached Government to ensure that the critical role of data centres was understood, and to request that staff working within the sector would be allowed to travel and access sites in the event of a lockdown. That request was made to DCMS, the Department for Digital, Culture, Media and Sport. There was an immediate response and as a direct result, "data infrastructure" was included [in the list of key workers](#) published by Cabinet Office on the 19th March 2020. While at this stage the designation was for the purpose of childcare provision, the key workers list largely identifies those who will be permitted to travel in the event of tighter restrictions on movement or a full lockdown.

At the same time, during the week commencing 16th March, DCMS established a dedicated team, the Data Infrastructure Resilience Team, to work with the sector and build a knowledge base within Government about data centres. This team then shared information in cross-Government discussions to ensure that data centres are taken into account in relevant policy decisions.

As the Department responsible for other forms of digital infrastructure, DCMS leads this activity from the Government side. With almost all the UK's commercial providers in membership, plus many enterprise operators from telecoms, finance and IT services sectors, techUK is well placed to provide a collective voice for the sector and is therefore the two-way point of contact between Government and UK operators. For good measure, all outputs (position statements, policy updates,

bulletins, insights and meeting notes) are placed in the public domain to ensure open access to the decision making process for all stakeholders. DCMS also established a [dedicated mailbox](#) for the sector to which operators, suppliers, customers and other sector stakeholders are invited to submit questions or observations.

The DCMS team is funded for 12 months and tasked with immediate actions and some longer term objectives. At the end of the period the team will make recommendations on how Government can best support this little little-known part of the UK's digital infrastructure and whether current policy structures are set up in the right way to do so.

3 Immediate priorities (mid-March to late May)

In March, the immediate priorities for DCMS were to ensure that data infrastructure was getting the support needed to ensure business continuity and that the sector was contributing to fast-moving COVID-19 related policy decisions. Information requests came thick and fast: some could be answered with existing material, others required a more bespoke response. techUK immediately:

- Set up regular engagement with DCMS to ensure rapid resolution of emerging issues
- Organised weekly open calls between the sector and DCMS
- Mobilised the sector to provide data and collated information on:
 - Construction projects, critical worker definitions, footfall and means of transport to site
 - Precautions to reduce infection taken by operators, (restricted access PPE, hygiene etc)
 - Approaches to CNI (critical national infrastructure) designation by country
 - Sector service delivery landscape
 - Risk timelines for COVID-19 and data centres and inter-sectoral interdependencies
- Shared updates and clarifications from DCMS with operators on key worker movement, construction site guidance, testing, PPE and many other policy developments
- Developed a library of COVID-19 resources for data centres and other stakeholders

This period has been characterised by urgent requests from Government followed by rapid response – often the same day – from operators. All non-sensitive material has been shared publicly because operators have found it helpful to compare notes, but it is important to bear in mind that these are short-order snapshots, not final industry positions.

4 Looking ahead (late May onwards)

COVID-19 has made it clear that everyone's lives are extremely data dependent and that the data centre sector is critical to economic activity. Whilst operators have been delivering resilience for years – business continuity is, after all, what they are there for - policy makers want to understand more about the sector and how this is achieved in practice.

Although data centres interact with individual parts of Government on specific topics (for instance with BEIS on energy and carbon and with DEFRA on air quality), until March this year the sector had no official sponsoring department and no dedicated team working with operators on policy matters.

The new DCMS team therefore wants to answer two important questions. Firstly, does this lack of an aggregated view within Government mean that key vulnerabilities, or key opportunities for the sector are being missed? Secondly, is Government set up in the right way to help manage the risks and opportunities for the sector? Is there a case for a different type of Government-industry relationship? Consequently, they will focus on three main areas:

- Security and resilience: building an understanding of how resilience is achieved and how the sector manages risks

- Economic growth and recovery: understanding what role Government can play in supporting the sector and enabling growth
- International competitiveness: establishing whether the UK business environment for data centres is sustainable and how Government can support sector competitiveness

This work should enable the team to:

- Establish whether any transformative changes are needed to Government support for the sector in terms of resilience, and what form they might take
- Identify actions that Government should be taking to support the competitiveness and economic viability of the sector and also enable it to continue to underpin the UK economy

techUK will provide a collective voice for the sector over the coming year, and this dialogue with DCMS will become a core part of our data centre programme. We anticipate a slightly more measured pace of work, but activity is already underway on the following:

- Setting up operator-supplier dialogues on COVID-19 supply issues
- Mapping existing industry relationships with Government
- Working closely with Government on a reappraisal of the role of data centres
- Identifying support measures needed for future competitiveness of the sector
- Reviewing incident data and exploring risk scenarios in the light of COVID-19

The team will present its recommendations to Government at the end of the 12 month period. Data centres do not operate in isolation so this work will form part of the Government's longer-term data strategy and innovation programme.

5 Implications for the sector (what does this really mean for operators?)

This new relationship with Government has significant implications for the sector. It signals a seismic change in terms of policy dialogue. While the DCMS team has only a 12 month tenure, no decision has been made as to whether it will become a permanent fixture, but this is certainly possible. The sector can also anticipate a higher degree of scrutiny as awareness grows of the criticality of data centres to the delivery of digital services. A successful digital economy, and by default our collective economic futures, depend on the existence of state-of-the-art digital infrastructure, or in other words, on the UK's data centre providers. Now that this is understood, we can expect Government to take a keen interest in the sector looking forward.

Keen interest does not mean that UK data centres will suddenly be designated CNI by default. CNI designation in the UK tends to be more bespoke. To date the sector has demonstrated an impressive degree of resilience with no significant outages attributable to COVID-19 despite only a tiny proportion of facilities being categorised as CNI. Government, however, will want to improve its understanding of how this resilience is achieved and ensure that the right support measures are in place to ensure the future security and resilience of the UK's data infrastructure.

Again, techUK, with almost all commercial operators and a good proportion of large enterprise (some of whose facilities were already designated CNI) is well positioned to provide a collective voice. This will be an iterative piece of work as it is a very complex topic with significant implications for individual businesses and the sector at large.

We look forward to working with the DCMS Data Infrastructure Resilience Team on this project once the immediate issues relating to COVID-19 are resolved.

6 Other information and useful links

Always check our data centre COVID-19 page: <https://www.techuk.org/covid-19-information-hub/data-centres> for the latest updates – many documents are revised in line with emerging policy developments and the latest versions are posted to our information hub. Broader tech sector updates relating to COVID-19 are available from the techUK COVID-19 info hub: <https://www.techuk.org/covid-19-information-hub>

DCMS has also established a dedicated mailbox: COVID-data-resilience@culture.gov.uk for queries from data centre operators, customers and suppliers.

Relevant links at point of writing are reproduced below.

- Data centres and COVID-19: [What has techUK been doing?](#)
- Mental health (21st May): [operator actions to protect mental health](#)
- Recovery planning (14th May): [Data centre recovery planning overview](#)
- Quarantine (14th May): [Notes on challenges presented by quarantine for data centres:](#)
- Testing (14 May): [Key worker testing update](#)
- Precautionary measures (27 April): [Actions taken by operators to limit routes for infection](#)
- CNI status (14 April): [international comparisons on data centres](#)
- Risk timeline (14th April): [Indicative risk timeline for data centre operators under COVID-19](#)
- Footfall and transport (8th April): [Indicative footfall and transport modes](#)
- Key workers (3rd April): [Childcare and key worker absences](#)
- Data Centre COVID-19 Q&A (30 March): [Frequently asked questions from operators](#)
- First COVID-19 position statement (19 March): [Data Centre Sector Position Statement](#)

Other external links

- Coronavirus: official guidance and support: <https://www.gov.uk/coronavirus>
- Key workers list (updated 4 May): [Critical workers who can access school provision](#)
- Returning to work: [Official guidance on getting back to work](#)
- TFL guidance: <https://tfl.gov.uk/campaign/coronavirus-covid->
- Testing information: <https://www.gov.uk/guidance/coronavirus-covid-19-getting-tested>
- Operator statements: on our [COVID-19 data centre information hub](#) (scroll down to the bottom)

Contacts

- For more on our data centre programme see: techUK data centre programme: <https://www.techuk.org/focus/programmes/data-centres>
- Data centre programme overviews, [2019 overview](#) and [2020 Q1 overview](#)
- techUK's data centre programme: [What's the Point of Us?](#)



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About techUK

techUK is the UK's leading technology membership organisation, with more than 850 members spread across the UK. We are a network that enables our members to learn from each other and grow in a way which contributes to the country both socially and economically. www.techuk.org