

ICO DLT Guidance August 2025

Overview

The Information Commissioner's Office (ICO) is consulting on draft guidance on Distributed Ledger Technologies, which can be found on our website here <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-sharing/distributed-ledger-technologies/>

<<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fico.org.uk%2Ffor-organisations%2Fuk-gdpr-guidance-and-resources%2Fdata-sharing%2Fdistributed-ledger-technologies%2F&data=05%7C02%7C1an.Deasha%40ico.org.uk%7Ccf89414a277a428e064908dde00fa7c5%7C501293238fab4000adc1c4cfefba21e6%7C0%7C0%7C638913>>

Why your views matter

Your responses will help us to provide any additional further clarity for the final guidance update.

We welcome your feedback to the questions set out in this survey. They're split into the following sections:

Introduction: Your name, and the context of your response.

Section 1: About your organisation (if applicable).

Section 2: How our guidance will affect your organisation (if applicable).

Section 3: Your views on our guidance.

Section 4: General comments about the guidance.

The survey will take approximately 15 minutes to complete and will remain open until **Friday 7 November 2025**.

For more information about what we do with personal data please see our [privacy notice](https://ico.org.uk/global/privacy-notice/) <<https://ico.org.uk/global/privacy-notice/>> , and the section on [responding to our consultations and surveys](https://ico.org.uk/global/privacy-notice/responding-to-our-consultation-requests-and-surveys/) <<https://ico.org.uk/global/privacy-notice/responding-to-our-consultation-requests-and-surveys/>> . As a public authority and controller we receive information requests under the freedom of Information Act and the UK GDPR. Requests are considered on a case by case basis and we will only disclose your information where we are legally required to do so.

Please note that we are using the platform Citizen Space to gather this information on our behalf. Citizen Space is provided by a UK supplier, Delib. You can read Delib's privacy policy [here](https://www.delib.net/legal/privacy_notice) <https://www.delib.net/legal/privacy_notice> .

Introduction

1 What is your name?

Name

2 Are you acting as an individual (please select)

(Required)

Please select only one item

- ☐ in a private capacity (eg someone providing their views as a member of the public?)
- ☐ on behalf of an organisation?
- ☐ as a legal representative of an organisation (ie not an employee)
- ☐ other

Section 1: About your organisation

The following questions will help us to understand better the organisations accessing our guidance and responding to this consultation.

3 What is the name of your organisation?

Organisation

4 Which category best describes your organisation?

Please select only one item

- ☐ Public sector
- ☐ Private sector
- ☐ Charity or non-profit
- ☐ Decentralised autonomous organisation (DAO)
- ☐ Other

If other please specify

5 What is the size is your organisation?

Please select only one item

- ☐ 0 employees or sole trader
- ☐ 1 to 9 members of staff
- ☐ 10 to 49 members of staff
- ☐ 50 to 249 members of staff
- ☐ 250 to 499 members of staff
- ☐ 500 or more members of staff

6 Which of the following best describes your organisation?

Please select only one item

- ☐ Headquartered in the UK
- ☐ A multinational organisation with a UK presence
- ☐ Solely based in the UK
- ☐ Unsure/ don't know
- ☐ Other

If other please specify

7 Approximately what percentage of your staff are based in the UK?

Please select only one item

- ☐ 81-100%
- ☐ 61-80%
- ☐ 41-60%
- ☐ 21-40%
- ☐ 0%-20%
- ☐ Unsure/don't know

8 In which region(s) or nations of the UK is your organisation based?
Please tick all that apply.

Please select all that apply

- ☐ East Midlands
- ☐ East of England
- ☐ London
- ☐ North East
- ☐ North West
- ☐ Northern Ireland
- ☐ Scotland
- ☐ South East
- ☐ South West
- ☐ Wales
- ☐ West Midlands
- ☐ Yorkshire and the Humber

9 Which of these best describes the main sector your organisation operates in?

Please select only one item

- ☐ Accommodation and food service activities
- ☐ Administrative and support service activities
- ☐ Agriculture, Forestry and Fishing
- ☐ Arts, entertainment and recreation
- ☐ Construction
- ☐ Education
- ☐ Electricity, gas, steam and air conditioning supply
- ☐ Financial and insurance activities
- ☐ Human health and social work activities
- ☐ Information and communication
- ☐ Manufacturing
- ☐ Mining and Quarrying
- ☐ Professional, scientific and technical activities
- ☐ Public administration and defence; compulsory social security
- ☐ Real estate activities
- ☐ Transportation and storage
- ☐ Water supply, sewerage, waste management and remediation activities
- ☐ Wholesale and retail trade; repair of motor vehicles and motorcycles
- ☐ Other service activities
- ☐ Don't know / unsure
- ☐ Other (please specify)

If other please specify

Section 2: How our guidance will affect your organisation

10 Do you think the guidance presents additional: (Please tick all that apply)

Please select all that apply

- ☐ Cost(s) or burden(s) to you/your organisation
- ☐ Benefit(s) to you/your organisation
- ☐ Both
- ☐ Neither
- ☐ Unsure / don't know
- ☐ Other (please specify) [open text box]

If unsure/other please specify

11 What, in your view, are the benefits of using our guidance on DLTs? Please tick all that apply

Please select all that apply

- ☐ Increased confidence that we're providing a compliant service/ product
- ☐ Saves us time and/ or money
- ☐ Reduced legal or advisory costs
- ☐ Better able to advise my customers
- ☐ Improved reputation
- ☐ Increased confidence when doing my job
- ☐ Opportunity for training and upskilling
- ☐ None of these
- ☐ Other (please specify) [open text box]

If other please specify

12 What, in your view, are the costs of using our guidance of DLTs?
Please tick all that apply

Please select all that apply

- ☐ Time taken to read and understand the resource
- ☐ Staff time to attend additional training
- ☐ Hiring extra staff to ensure compliance
- ☐ Increased time to meet regulatory requirements
- ☐ Loss of customers
- ☐ Less efficient business processes
- ☐ Losing business to competitors who don't conform with "DLT guidance"
- ☐ None of these
- ☐ Other (please specify) [open text box]

If other please specify

13 Please provide an estimate of the costs and benefits your organisation is likely to incur and briefly how you calculated them?

Please provide as much detail as possible below

14 Do you agree that the draft impact assessment adequately outlines the likely main impacts of this guidance?

Please select only one item

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Unsure/don't know

If disagree/strongly disagree/not sure please explain

Section 3: Your views on our guidance

15 To what extent do you agree that the first part of the guidance (What are DLTs and Blockchains?) clearly explains the key features of these technologies?

Please select only one item

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Unsure/ don't know

If disagree/strongly disagree/not sure please explain

16 Do you agree that using the more familiar term 'blockchain' interchangeably with DLT helps make the guidance easier to follow?

Please select only one item

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Unsure/ don't know

If disagree/strongly disagree/not sure please explain

17 To what extent to you agree that this guidance clearly explains the roles of participants, validators and other actors?

Please select only one item

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Unsure/ don't know

If disagree/strongly disagree/not sure please explain

18 Does this guidance clearly explain what on-chain information can include?

Please select only one item

- ☐ Yes
- ☐ No

If 'no' please explain what was missing

19 To what extent do you agree this guidance clearly explains the features and differences between permissioned and permissionless blockchain?

Please select only one item

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Unsure/ don't know

If disagree/strongly disagree/not sure please explain

20 To what extent do you agree that this guidance explains when on-chain information could meet the definition of personal information?

Please select only one item

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Unsure/ don't know

If disagree/strongly disagree/not sure please explain

21 To what extent do you agree the following sections of the guidance were clear and easy to understand?

	Strongly agree	Agree	Disagree	Strongly disagree	Unsure/ don't know
Smart contracts <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Automated decision making <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Application of the contract exemption <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If unsure/don't know please explain what was missing

22 To what extent do you agree this guidance provides practical and actionable suggestions to ensure compliance (eg off-chain storage, putting data beyond use, pruning or purging?)

	Strongly agree	Agree	Disagree	Strongly disagree	Unsure/ don't know
Off-chain storage <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Putting data beyond use <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Purging or pruning approaches <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If disagree/strongly disagree/not sure please explain

23 To what extent do you agree that our description of blockchain and the rights to rectification and erasure clearly explains the technical challenges to compliance?

Please select only one item

- ☐ Strongly agree
☐ Agree
☐ Disagree
☐ Strongly disagree
☐ Unsure/ don't know

If disagree/strongly disagree/not sure please explain

24 To what extent do you agree this guidance clearly outlines the choices organisations have when considering data protection by design and default?

Please select only one item

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Unsure/ don't know

If disagree/strongly disagree/not sure please explain

25 Is there anything else you think this guidance should cover, or any way it can be improved further?

Please provide as much detail as possible below

Section 4: General comments about the guidance

26 Do you currently use blockchain?

(Required)

Please select only one item

- ☐ Yes
- ☐ No

If you are, which type of blockchain are you currently using (please tick all that apply)

Please select all that apply

- ☐ Private permissioned
- ☐ Public permissioned
- ☐ Public permissionless

27 Are you currently planning to use blockchain?*(Required)**Please select only one item*

- ☐ Yes
- ☐ No

If yes, which type of blockchain are you planning to use? (Please tick all that apply)

Please select all that apply

- ☐ Private permissioned
- ☐ Public permissioned
- ☐ Public permissionless

28 Having read this draft guidance how helpful did you find it to understanding blockchain and data protection obligations?*(Required)**Please select only one item*

- ☐ Extremely helpful
- ☐ Very helpful
- ☐ Moderately helpful
- ☐ Unhelpful

29 Does this guidance use language and examples that are clear and easy to understand?*Please select only one item*

- ☐ Yes
- ☐ No

30 Having read this guidance, how confident do you feel that you understand how data protection law applies to information on blockchain?*Please select only one item*

- ☐ Much more confident
- ☐ More confident
- ☐ Less confident
- ☐ Much less confident
- ☐ No change in my confidence

If less/much less confident or no change please explain what this guidance could cover to improve your confidence

31 Do you have any further comments or suggestions that would improve this guidance?

Please select only one item

- ☐ Yes, I have some comments or suggestions
- ☐ No

If yes please provide as much detail as possible below

If you would be happy to be contacted to discuss your suggestion further please provide your email address below