### Data Centre Sector Position Statement 26 July 2021

## techUK

#### Government rules on self-isolation threaten digital infrastructure and business continuity

Current rules on self isolation for critical sectors are impractical and threaten to undermine data infrastructure resilience. The current approach places UK operators in a Catch-22 situation: raising the level of risk on the one hand whilst disabling their ability to manage it on the other. If not addressed immediately these conditions could compromise our digital infrastructure and, in turn, business continuity across the economy.

Operators do not want COVID-positive workers on site and have strict testing protocols to prevent this from happening. However, the sector cannot accommodate further staff shortages due to COVID-negative staff being forced to isolate and urgently needs a workable concession, beyond existing provisions, for COVID negative staff to return to work.

UK government has relaxed COVID-19 restrictions at a time when we are seeing escalating infection rates across the UK. This presents significant challenges for data centres where staffing levels are reduced because workers are obliged to self-isolate following contact through the NHS Test and Trace App.

Data centres<sup>i</sup> receive, process, manage, store and transmit digital data and, with communications networks, form our core digital infrastructure<sup>ii</sup>. Besides underpinning all online activity, data centres enable retailers and banks to process financial payments, supermarkets to resupply, delivery companies to manage logistics and public authorities to deliver services and messaging.

Data centres rely on a pool of around 5,000 technical staff to ensure business continuity. Operators must maintain an environment in which the IT equipment functions reliably and securely. Constant security is required to avoid data breaches, cooling must be adequate or servers will overheat and fail, power supply must be continuous and stable. A cooling unit engineer will not need to be on site every day but when a chiller fails in the middle of the night he or she needs immediate access to the facility.

Government has identified critical sectors eligible for limited exemption from the obligation to self-isolate, which enables organisations so designated to allow fully vaccinated staff back into the workplace following a negative test. However, a very high bar has been set for both the eligibility criteria and the process. While digital infrastructure (thanks to strong support from DCMS), is among those eligible, this listing does not confer pre-exemption. Concessions are granted on a case-by-case basis, with formal government approval required for every single individual before return to work. The rules also exclude younger staff who will not meet the vaccination requirements. We believe this approach is unworkable and counter-productive.

<u>Complexity and interdependency:</u> The current approach implies that Government is ignorant of the way that critical sectors and functions operate, the existing constraints they are under, the complexity of activity and the highly interdependent nature of industry sectors across the wider economy. Exposing critical sectors like digital infrastructure to increased risk whilst eroding the ability of UK operators to manage it is irrational and presents an immediate and profound threat to every sector in our economy. Any step that could compromise the functionality of our world-class data centre estate, which underpins everything we do and provides business continuity and resilience to every type of organisation must be avoided. Supermarkets provide a good example: they may be struggling to find staff to stack shelves, but every aspect of their operation: supply chains, logistics and financial transactions, are dependent on data centres: if their logistics

systems are compromised, then products won't even leave the warehouses, if transactions are compromised, the tills won't work. It is impossible to overstate how heavily we rely on our digital infrastructure. Failing to recognise this is perverse, particularly now, when we are more reliant on digital services than ever before.

<u>Risk management:</u> Policy makers also appear to be disregarding the ability of critical sectors like our own to manage risk appropriately. Since March 2020, the UK data centre sector has successfully handled the twin challenges of a significant upsurge in demand for services as activity moved online across the economy, and the need for strict infection control measures to protect staff. Assisted by key worker status, which allows the right people access to site when needed, operational characteristics like sophisticated security, movement and access tracking, highly automated operations, a very strong focus on business continuity and risk management and low levels of human traffic have, so far, ensured business continuity. The sector successfully limited the spread of infection from asymptomatic staff both before, and since, testing was widely available. As a result, to date in the UK, we have seen no data centre outages attributable to COVID-19 despite operational constraints and higher workloads. Failing to recognise this demonstrates either ignorance of, or contempt for, the sector's resilience.

The current approach also contradicts government policy priorities around digital infrastructure and our ability to supply digital services around the world: by threatening sector resilience we undermine our position as a global leader in digital exports.

UK data centre operators urgently need a workable test and release route, at sector level, so our pool of critical workers can access site when needed. While only a small proportion of staff may need to implement this measure, data centres are already operating under significant staffing constraints due to existing levels of infection in the wider population and upsurge in demand from customers. The data centre sector must be allowed to manage its own risk.

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Further information in our data centre programme Directory: https://www.techuk.org/data-centres-programme/data-centres-resource-index.html

NB: See the COVID-19 section of this Directory for current rules, guidance and template form

#### What is a data centre?

A data centre is a building (or self-contained unit) used to house computing equipment such as servers along with associated components such as telecommunications, network and storage systems. A data centre is equipped with a guaranteed power supply and high bandwidth connectivity. Resilience is critical so redundancy (duplication) of networks, power and other infrastructure is common to ensure continuity. Building management controls such as air conditioning maintain the environmental conditions for the equipment within a specified envelope of temperature and humidity, and security systems ensure that the facility and its data remain secure.<sup>1</sup>

We estimate that there are around 500 data centres in the UK, depending on definitions. 200 or so of these are colocation (commercial) facilities, operated by specialist data centre service providers. These include our very largest facilities. The rest are known as enterprise, which loosely means "in house" although they may be remote from other business operations. These underpin corporate IT functions for all sorts of organisations like universities, banks and supermarkets. Sizes vary but on average these facilities are smaller. Many organisations use a mixture of outsourced and in-house provision to minimise costs and risk.

Data centres underpin an internet economy that contributes over 16% of domestic output, 10% of employment and 24% of total UK exports and is growing faster than any other in the G-20. Our sector provides the technical infrastructure for financial services, aerospace, transport, healthcare, retail and utilities. Each new data centre contributes between £397 M and £436 M GVA per year to the UK economy while that of each existing data centre is estimated to lie between £291 M and £320 M per annum.

#### " What is digital infrastructure?

Our core digital infrastructure is not a single system but multiple systems and networks that interoperate. The three main constituents are fixed line telecommunications (made up of the high capacity and highly resilient core network plus the access network that runs from the exchanges to tens of millions of individual customer premises), mobile telecommunications (that interact with the core network but provide customer coverage through a cellular network) and data centres (that manage, transmit, process and store data for government, businesses, individuals and academia).