UK STATISTICS AUTHORITY

RESEARCH ACCREDITATION PANEL

Minute

Monday 27 June 2022

Present

Committee Members
Paul Boyle (Chair)
Ann Berrington (Independent)
Mark Brewin (HM Revenue & Customs)
Michael Chapman (NHS Digital)
Chris Dibben (Independent member)
Tricia Dodd (Independent member)
Andrew Garrett (Independent Member) Roger Halliday (Independent Member)
Sarah Henry (ONS)
Stephanie Howarth (Welsh Government)
Alistair McAlpine (Scottish Government)

Advisors
Jason Riches (Legal Advisor, ONS)
Ross Young (Data Protection Officer, UK Statistics Authority)
Simon Whitworth (Data Ethics Advisor, UK Statistics Authority)

In Attendance
Andrew Austin (Security and Information Management ONS) for Item 4
James Evans (Chief Data Architect, ONS) for Item 4
Fiona James (Director of Data Capability, ONS) for Item 4
Felix Ritchie (UWE Bristol) for Item 4

UK Statistics Authority
Sophie Gwillym
Natasha Kong
Lily O'Flynn

Apologies
Siobhan Carey (NISRA)
Emma Gordon (Independent Member)
Alexander Singleton (Independent Member)

1. Introductions

1.1. The Chair welcomed the members to the twenty-fifth meeting of the Research Accreditation Panel (RAP).

1.2. Members approved the minutes of the meeting held on 8 March 2022.

1.3. Alex Singleton, Emma Gordon and Siobhan Carey gave their apologies.

1.4. The Panel welcomed Alistair McAlpine to his first RAP meeting as Interim Chief Statistician for Scotland.

1.5.   Sophie Gwillym updated the meeting with progress on actions from previous meetings. All actions were complete or otherwise in progress.

2. Maximising the Utility of the DEA Research Function

2.1.   Lily O'Flynn and Simon Whitworth presented the Panel with proposals to expand the UK Statistics Authority's work to date in maximising the utility of the DEA Research powers. This includes:

   i.   A programme of work to improve the oversight that the RAP has of the wider data access process to enable the RAP to provide informed advice to the UKSA on how we might better implement the DEA Research powers to enable efficient access to data for researchers while upholding robust governance safeguards; and

   ii.   A programme of engagement to understand the reasons why there has been limited uptake of the DEA research powers by some data providing government departments and using this information to reflect on whether any improvements can be made to DEA operations to support increased uptake of cross-government data sharing via the DEA.

2.2.   The Panel was supportive of broadening the strategic remit of the RAP to supporting and advising the UKSA on maximising the utility of the DEA Research powers and getting a broader understanding of the data access journey.

ACTIONS: The Secretariat to look into the Terms of Reference to ensure that it is reflective of this change of remit and will circulate the revised Terms of Reference via correspondence with the RAP meeting minutes.

2.3.   The Panel was strongly supportive of these programmes of work and welcomed this initiative by the UKSA. The Panel requested metrics from the UKSA and DEA accredited processors that illustrate the steps involved and service provision of the data access journey. This will be helpful in identifying bottlenecks within the broader process where the UKSA may be able to support in making improvements and establishing timelines for accessing data and subsequently increasing the visibility of timeframes to researchers.

2.4.   The Panel noted that it would be important to establish clear definitions of the start and end of each stage of the data access journey when establishing the full picture of the end-to-end data access process. It is also important to consider alternative starting points of the data access journey, such as when researchers are accessing the data remotely, to measure whether different start points affect the data access journey and the service provided to researchers.

ACTIONS: The Secretariat to engage with DEA accredited processing environments to establish a full picture of the end-to-end data access journey by determining a clear start and end of each stage in this process and agreeing on a regular flow of metrics to publish.

ACTIONS: The Secretariat to collect and regularly present key information that illustrates the operation of the data access journey, and the functioning of the DEA Research powers in enabling efficient and robust access to data.

2.5.   The Panel identified the importance of a publicly available data catalogue for research ready datasets for researchers and government departments which makes it clear what datasets are available under the DEA.

ACTIONS: The Secretariat to invite a member of Administrative Data Research UK (ADR UK) to present on work undertaken to bring together research-ready datasets within accredited processing environments, and how this work is publicised through effective metadata catalogues.

2.6.   The Panel provided the following advice to the UKSA when undertaking engagement work to further understand why there has been limited uptake in the use of the DEA powers by some data providers and how DEA operations might be improved to support improved update:

   i.   The UKSA should be mindful of the different models that data owning government departments use to make decisions about data access during the engagement process.
   ii.   It is understandable that government departments will need to prioritise data sharing activities and that there needs to be benefits to government departments to make administrative data available.
   iii. The Integrated Data Service (IDS) presents an opportunity for government data providers to consider and potentially increase data sharing activities for public good research. Therefore, the Research powers within the DEA will be a key enabler for the IDS and has the potential to streamline governance for access to linked datasets from multiple data providers. The RAP agreed that continued engagement with the IDS programme would be helpful in enabling the RAP to advise on research accreditation and governance during the design of the platform and service, and support the RAP in better defining its role in supporting research within the IDS.

ACTIONS: The Integrated Data Service (IDS) to continue to regularly engage with the RAP and UKSA regarding research accreditation for the IDS, with a presentation from the IDS programme coming to the September RAP meeting.

3.   Research Accreditation: Effectively Assessing Analytical Merit

3.1. Sophie Gwillym presented the Panel with alternative ways of assessing research methodology within the DEA project accreditation application form. At the March 2022 RAP meeting, the Panel agreed that the detail requested on methodology within the DEA project accreditation application should be reconsidered to enable efficient research accreditation, while maintaining robust governance of projects to ensure compliance with the Research Code of Practice and Accreditation Criteria.

3.2. The Panel supported reassessing the way that methodology is assessed and agreed that assessment of research methods should relate to whether the method is valid and can achieve the public good of the research, as opposed to the previous emphasis on assessing the feasibility of the method proposed.

3.3. The Panel agreed that where concerns around the validity of a method and its potential to realise research benefits are identified as part of the revised project application, the UKSA should refer the project to the RAP for an accreditation decision, so that the research team is able to benefit from any methodological advice provided by the RAP.

3.4. Given that this change impacts the focus of the methods checks that accredited processors, the UKSA and, where required, the RAP undertake on DEA project accreditation applications, the Panel requested the Secretariat to engage with data providers that currently make data available via the DEA Research powers to ensure that there is contentment among data providers on the changed focus of methodological checks, and whether this change will impact data owner checks undertaken ahead of accreditation.

ACTION: The Secretariat to undertake engagement with DEA data providers and consider the extent to which this impacts any checks undertaken by data owners ahead of accreditation.

3.5. The Panel noted it would be useful for the Secretariat to update published best practice example guidance of the revised methodology questions within the DEA application guidance to ensure researchers know what is expected from them when beginning a research project application.

ACTION: Dependent on feedback from data providers, the Secretariat to amend the DEA application form to reflect this change, socialise the change across the DEA accredited processing environments and publish on the UK Statistics Authority website.

ACTION: The Secretariat to include best practice methodology examples within the DEA application form guidance.

4. Processor Accreditation: ONS Accreditation

4.1. Andrew Austin (ONS Security) and Felix Ritchie presented the Panel with an overview of the evidence report of the ONS' second DEA accredited processor annual review. The review relates to the ONS's internal processing environment which prepares data before it is transferred to the ONS Secure Research Service for hosting to accredited researchers for accredited research projects.

   i. For security, ONS are operating 13 controls at a Mature level, and 4 at a Good level. Overall, this represents a 'Good' opinion for security.

   ii. For capability, ONS are operating 1 control at Mature level, and 4 controls at a Good level. Overall, this represents a 'Good' opinion for capability.

4.2. The assessors recommended the RAP continues ONS's accreditation under the DEA, while noting that the ONS will have to significantly improve its reporting on the capability controls. The areas for improvement relating to capability are:

   i. Better structuring evidence collection for accreditation reviews;

   ii. Development of improved training in some areas for colleagues supporting data preparation activities; and,

   iii. More broadly identifying an owner for DEA accreditation activities within ONS that is responsible for the implementation of recommended actions and service improvement for the interim period between reviews.

4.3. The Panel noted the importance of the DEA accreditation processor review process in assessing and promoting organisational maturity, and stressed the importance of ONS carefully considering the areas for improvement to provide evidence that such recommendations are implemented with clear timeframes.

4.4. Fiona James (Director of Data Capability, ONS) and James Evans (Chief Data Architect, ONS) presented on current work that the ONS is undertaking to

improve maturity in those areas identified within the report as requiring improvement.

4.5. As part of this work, the ONS is undertaking a review to improve training, evidence collection, evidence management, attitudes towards DEA accreditation, and the ownership of DEA accreditation within ONS.ONS committed to increasing the visibility of DEA accreditation across the organisation and confirmed that the areas for improvement will also be reported to the ONS's Data Governance Committee for internal senior level oversight.

4.6. The Panel thanked ONS colleagues for their detailed report on actions to be taken following the review. The Panel agreed to confirm the accreditation of the ONS under Chapter 5 of Part 5 of the DEA and requested that an interim accreditation review should be undertaken with the ONS in November 2022 to understand progress against the agreed actions that the ONS has committed to take following the review.

ACTION: The Secretariat to write to ONS to confirm the continuation of accreditation under the Digital Economy Act, following the completion of this annual review.

ACTION: The ONS to undertake agreed actions following consideration of the accreditation report, which will be reviewed by UKSA accreditation assessors by November 2022. The outcome of this review is to be presented at the December 2022 RAP meeting.

5. Any Other Business

5.1. Sophie Gwillym informed the Panel that the first projects approved through ONS's legacy legal powers prior to Digital Economy Act (DEA) 2017 implementation will start the process to become accredited under the DEA, as their original approval under the legacy legal powers is expiring. The UKSA is currently working with the ONS SRS team to ensure that each project approved under this route is compliant with DEA accreditation standards.

5.2. The Chair noted the 'for information' reports provided. These included:

   i.   A paper updating the Panel on the progress of establishing the Processor Accreditation Sub-Committee which was approved at the March 2022 RAP meeting.

   ii. The usual reports of accreditation processes undertaken by the UKSA and overseen by the Panel in the interim period between meetings.

   iii. The Panel noted it would be useful to know why researchers are requesting project extensions to determine if there are any actions the Panel can take to reduce the number of requests. The Secretariat agreed to review the compilation of such reports to ensure that these are providing the Panel with the required information.

ACTION: The Secretariat to review the reports on accreditation activities provided to the RAP for information purposes to ensure that these reports are providing the RAP with the required information to enable the RAP to understand and advise on DEA accreditation operations.

5.3. The next RAP meeting is on 6 September 2022.