UK STATISTICS AUTHORITY

RESEARCH ACCREDITATION PANEL

Minute

Friday 30 September 2022

Present

Committee Members
Paul Boyle (Chair)
Mark Brewin (HM Revenue & Customs)
Chris Dibben (Independent member)
Tricia Dodd (Independent member)
Andrew Garrett (Independent Member)
Emma Gordon (Independent Member)
Roger Halliday (Independent Member)
Stephanie Howarth (Welsh Government)
Alistair McAlpine (Scottish Government)
Alexander Singleton (Independent Member)

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

In Attendance
Hans-Erik G. Aronson (DARE UK) for Item 2
Fergus McDonald (DARE UK) for Item 2
Alison Pritchard (ONS) for Item 3
Bill South (ONS) for Item 3

UK Statistics Authority
Sophie Gwillym
Natasha Kong

Apologies
Ann Berrington (Independent)
Siobhan Carey (NISRA)
Michael Chapman (NHS Digital)
Sarah Henry (ONS)
Paul Lodge (DWP)

1. Introductions

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

1.2 Members approved the minutes of the meeting held on 27 June 2022.

1.3 Anne Berrington, Siobhan Carey, Michael Chapman, Sarah Henry, and Paul Lodge gave their apologies.

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

2. DARE-UK (Data and Analytics Research Environments UK): Report Presentation

2.1 Hans-Erik Aronson (Director, DARE-UK) and Fergus McDonald (Senior Programme Manager, DARE-UK) presented the findings of DARE-UK's recent report. DARE-UK (Data and Analytics Research Environments UK) is a programme funded by UK Research and Innovation (UKRI) to design and deliver a more coordinated national data research infrastructure for the UK. The meeting heard that the DARE-UK report, '*Paving the way for a coordinated national infrastructure for sensitive data research*', was the result of a UK-wide public dialogue to collect public views on a national data infrastructure and included recommendations for a coordinated national infrastructure for sensitive data research.

2.2 The presentation introduced the work DARE-UK has undertaken to produce the report and set out recommendations which are most pertinent to the Digital Economy Act (DEA 2017) and the role and work of the RAP. These were as follows:

   i. More work should be undertaken by the research community to demonstrate trustworthiness to the public about public good research and the national data research infrastructure that enables it, such as standardising, centralising and unifying processes enabling access to public data. DARE-UK notes that the DEA's public register that is publicly available is a great example of proactive transparency that builds public trust.
   ii. More public engagement should be undertaken, such as embedding the public in the decision-making process and obtaining public consensus on the definition of public good.
   iii. Researcher accreditation should be standardised and streamlined to enable trustworthy researchers to access sensitive data for research in the public benefit in a timelier way.
   iv. The DARE-UK report recognised that the DEA Research strand is a strong foundation for a nationally recognised trusted research environment (TRE) standard, accreditation and audit framework, and recommends the DEA Research strand framework is recognised across the research community as a baseline standard for TRE accreditation, including TREs that make data available outside the DEA.

2.3 DARE-UK confirmed that they have obtained further funding for their programme and will begin to coordinate actions to take forward some of the more immediate recommendations outlined in their report.

2.4 Members of the Panel thanked DARE UK for their presentation noting their report was thorough and well researched. The Panel raised the following points in the discussion that followed:

  i. The Panel were supportive of the recommendations in the report as this would help develop a coordinated national infrastructure for sensitive data research.

  ii. Welcomed the recognition in the report of the DEA research strand as a trustworthy, flexible and robust accreditation standard which would provide a strong foundation for a nationally recognised TRE standard, accreditation and audit framework.

  iii. Welcomed the recognition of the UKSA's work around the DEA public register and the importance of the register in bolstering public confidence.

  iv. Agreed that more should be done with engaging the public on key questions on public good research, such as defining what the public good means.

  v. Recognised that DARE-UK had taken great strides in embedding public dialogue in their report.

  vi. Noted that these recommendations also mirror previous conclusions of a similar nature from earlier reports on the UK data landscape; and,

  vii. Requested to be kept updated with DARE's progress on taking these recommendations forward so the RAP can further understand how it can best support DARE's work.

ACTION: DARE UK to update the Panel on DARE UK's future work taking forward the recommendations and on any of their work that will impact the DEA research strand and the work of the RAP.

3. Integrated Data Service (IDS) Update

3.1 Alison Pritchard (Deputy National Statistician and Director General for Data Capability, ONS) presented the work the ONS has undertaken to deliver the Integrated Data Service (IDS). The IDS is a cross-government service which securely enables co-ordinated access to a range of high-quality data to inform policy decisions and improve public services. Alison described the main aim of the IDS as significantly uplifting the ONS Secure Research Service (SRS) into a cloud native environment to support external research, and uplifting government use of data to meet a broader range of user needs.

3.2 Alison Pritchard confirmed the IDS is on track to submit a DEA Research strand processor accreditation application by April 2023. The DEA research strand will be the primary legal gateway that enables access to data in the environment and the gateway will provide the guiding framework (including the Research Code of Practice and Accreditation Criteria, approved by Parliament in 2018) for data access within the environment. The RAP were also informed that there will be times where the DEA cannot be used and other legal gateways will be used to access data within the IDS.

3.3 A number of potential new processes and procedures to reduce friction in the data access process within IDS and improve the service for analysts seeking access to data were reported to the RAP. These included the following:

    i. Whether it is possible to move existing project accreditation practices to a principles-based approach which is linked to the data asset being accessed.

    ii. Providing an enhanced level of user access that gives users particular privileges.

    iii. The extent to which accredited projects can be broader in scope and still fulfil a public good research purpose.

3.4 The Panel was supportive of the approach to remove suspected bottlenecks from the process, however the Panel noted that any significant changes to the way in which existing data access processes operate should be consistent with the DEA Research Code of Practice and Accreditation Criteria as this is supported by the public. The Panel recommended looking at the ADR's recent work in this area for recent insight into public attitudes towards public good research.

ACTION: Emma Gordon to share the recent ADR Report '*A UK-wide public dialogue exploring what the public perceive as 'public good' use of data for research and statistics*'.

3.5 The Panel supported making improvements to the service provided to researchers accessing data under the DEA research strand but requested further assurance from the IDS team that the proposed changes are, and will remain, aligned to the requirements in the DEA Research Code of Practice and Accreditation Criteria.

3.6 The Chair suggested it would be useful to receive a detailed paper from Alison Pritchard and the IDS team, setting out the data access proposals that the IDS is working on to reduce friction in the IDS data access process and provides evidence of how they are compliant with the DEA Research Code of Practice and Accreditation Criteria.

ACTION: Alison Pritchard and the IDS team to provide a paper to the RAP at the December RAP meeting setting out the proposals the IDS is working on to reduce friction in the data access process and evidences the extent to which they are compliant with the DEA Research Code of Practice and Accreditation Criteria.

3.7 The Panel also noted that should the IDS become a DEA accredited processor in the future this could potentially increase the number of projects using the DEA Research Strand. The Panel asked Alison to keep them informed of the expected number of projects in the IDS that would be using the DEA Research Strand in the future.

ACTION: Alison Pritchard and IDS team to keep the RAP informed of the expected use of the DEA Research Strand in the future.

4. Processor Accreditation: Capability Review

4.1 Simon Whitworth presented the Panel with proposed changes to the framework used to assess data capability for the accreditation of processing environments. This excludes the relevant frameworks used for the security accreditation of data processing environments. At the March 2022 RAP meeting, the Panel requested to review the set of controls used for assessing the data capability of data processors as part of their accreditation under the DEA.

4.2 The proposed framework was designed in consultation with subject matter experts and existing accredited data processors. The following is an overview of the changes proposed:
  i. a revision of the previous control framework making existing controls more specific and introducing new controls where gaps where identified,
  ii. a set of criteria to assess controls and data processors consistently,
  iii. a three-tier accreditation status (capable, maturing and mature) to capture the progress of data processors in their journey towards maturity,
  iv. incentivising maturing and mature data processors by decreasing the frequency of regular accreditation reviews for data capability to every two and three years respectively,
  v. introducing a set of minimum information and metrics on the performance of the data processor, and
  vi. a mechanism for provisional accreditation.

4.3 The Panel was strongly supportive of the proposed changes to the data capability framework and asked the UK Statistics Authority to implement the revised data capability framework with immediate effect.

ACTION: The UK Statistics Authority to commence the operationalisation of the new data capability framework in which annual accreditation reviews of data processing environments will start from October 2022.

4.4 The Panel noted that it would be important to establish clear and consistent definitions on the performance metrics collected from DEA-accredited data processors.

ACTION: The UK Statistics Authority to work with DEA accredited data processors to establish a clear and consistent definition on performance metrics that will be collected from DEA-accredited data processors.

5. Project Accreditation: Transparency Requirements

5.1 Sophie Gwillym presented the Panel with the Digital Economy Act's Research Code of Practice and Accreditation Criteria transparency requirements and how these are met through existing publication options set out in the DEA application form. The Secretariat previously circulated a paper via correspondence seeking the RAP's view on whether projects that produce solely internal reports meet the

transparency requirements which the RAP requested was discussed at this meeting.

5.2 The transparency requirements for publication are set out under s.34.1 of the DEA Research Code of Practice and Accreditation Criteria:

    i. *When the project is complete, all results or outcomes of the research must be made openly and accessibly available in a way that could reasonably be expected to be permanent. The public authority which is the source of the data should be acknowledged to allow others to verify the research. The applicant must also set out a clear commitment to engage with core stakeholders on any useful findings from the research in order to maximise the public benefit.*

5.3 The Secretariat identified two areas where the Panel could consider strengthening compliance with the Digital Economy Act research strand's transparency requirements and set out potential solutions for these.

    i. Internal reports or government departmental reports do not currently meet the DEA Research Code of Practice transparency criteria for being openly and accessibly available.

    ii. Across a number of publication options provided to researchers, the requirement for researchers to engage with core stakeholders on any useful findings from the research is either missing or difficult to measure.

5.4 The Panel decided that internal reports should only be selected in conjunction with a publication option that makes findings openly and accessibly available. The Panel also decided a question should also be included within the DEA application form that asks researchers about their plans to engage with key stakeholders.

ACTION: The Secretariat to amend the DEA application form to include the option for internal reports to be selected in conjunction with other transparent publication options, and a separate question to be included asking researchers about their plans to engage with key stakeholders.

5.5 The Panel noted the importance of upholding all transparency requirements when operationalising the Digital Economy Act's Research Powers and acknowledged with the increase of government projects expected with the potential accreditation of the IDS, there will likely be more projects requesting exemptions from publication. The Panel asked the Secretariat to develop a publication exemptions policy for the RAP to consider at the next meeting.

ACTION: The Secretariat to develop a policy on exemptions from publication and provide a paper to RAP at the December meeting for approval.

6. Updated Terms of Reference
6.1 Sophie Gwillym presented the Panel with an updated RAP Terms of Reference to:

      i. Clarify the RAP is an independent oversight body that provides advice to the UK Statistics Authority Board through the National Statistician on the areas that the RAP has oversight of.

     ii. Clarify the roles and responsibilities of the RAP have been separated into two areas: firstly, providing independent oversight of accreditation operations, and secondly, providing independent strategic advice to the National Statistician on how the UK Statistics Authority might better maximise the utility of the Research powers within the DEA.

6.2 The Panel were supportive of the changes made, especially providing independent strategic advice to the National Statistician and UK Statistics Authority Board and instructed the Secretariat to publish the minutes on the UKSA website.

ACTION: The Secretariat to publish the updated Terms of Reference on the UK Statistics Authority website.

7. Any Other Business

7.1 Sophie Gwillym informed the Panel that in the interim period between the RAP meetings, the RAP approved the new iteration of the Project Accreditation Tool (PAT) following the new methodology section within the application form. Following approval, the new PAT has been socialised across all DEA processing environments and the new iteration of the PAT is now operational.

7.2 The Panel noted the usual report of accreditation processes undertaken by the UK Statistics Authority and overseen by the Panel in the interim period between the RAP meetings. The Secretariat noted the information provided within these reports will be reviewed to ensure the RAP is receiving the evidence it requires in the most streamlined way.

7.3 The RAP will meet next on 6 December 2022.