

Better Use of Data

GLA Consultation Response

April 2016

This document provides the response of the Greater London Authority (GLA) to the consultation on better use of data¹.

Overarching comments

The GLA strongly believes that Government needs to do more to unlock the power of data, helping organisations to make better decisions and operate more efficiently. Greater sharing of information between public authorities will allow them to improve the lives of citizens and help the economy flourish. To this end, in March 2016, the GLA launched the London City Data Strategy. The aim of this strategy is to give London the most dynamic and productive city data market in the world by reducing friction in the sharing and value-driven exploitation of city data to a minimum. The GLA seeks to recognise city data as part of the capital's infrastructure, using it to save money, incubate innovation, and drive economic growth, helping London to achieve global renown for data impact. Within this Strategy, we have committed to – as a priority action – pushing for broad access to data across government departments e.g. HMRC and DWP) for London, to overcome issues which currently prevent further data sharing opportunities outside departmental silos and which stand in the way of value creation. Our full strategy is available here: <http://data.london.gov.uk/dataset/data-for-london-a-city-data-strategy> and addresses many of the other points raised in this consultation.

The GLA therefore welcomes this consultation on the better use of data, and appreciates the opportunity to respond.

This said, the GLA is disappointed by the limited scope of this review. The opportunity to make legislation to support the sharing of primary data is a rare opportunity and should not be wasted. A possibility exists to deliver wide ranging and practical benefits to public bodies and that this review largely rules out the use of data sharing for analysis as a legitimate way to 'improve public service delivery' is both disappointing and representative of a wasted opportunity. The GLA would urge the Government to reconsider the scope of the review so that the following changes to legislation are fully reflective of the changes that we need.

The ODI's response to this consultation also expresses scepticism towards the government's 'piecemeal' approach, fearing that this will not improve data sharing within government in ways that maximise value inside and outside the public sector. The ODI also points out that it is unclear how these proposals fit within a wider government data strategy and makes a number of recommendations, and comprehensively address 'what's missing' from the consultation. The GLA would urge the government to strongly consider the recommendations put forward by the ODI and wishes to echo the sentiments expressed in their response:

<https://docs.google.com/document/d/1xj5fZHkxwGwpGNjeyoYviZhbYYNbBwO8QqyZyQfzJI/edit?pref=2&pli=1#>.

Of particular importance to the GLA is our access to administrative data sources in general, but at the moment, particularly the Inter-Departmental Business Register (IDBR). The IDBR provides a comprehensive list of UK business and is used by government for statistical purposes. At present, this data is available to both central government and local authorities, but no access has been granted to the GLA. This appears to be as a result of a legal oversight whereby as we are neither a 'government department' nor 'local authority', we are not permitted to use this data,

¹https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/503905/29-02-16_Data_Legislation_Proposals_-_Con_Doc_-_final_3_.pdf

despite having many overlapping roles with both. Access to this data, and other administrative data sources, would be hugely beneficial to the GLA in allowing us to better support London's economy and its businesses and is something the GLA feels should have been addressed in this legislation. In drawing up legislation on data sharing, it is important that this issue is addressed to correct for access by strategic bodies, such as the GLA and others, who may be affected in the future by the same issues e.g. Greater Manchester. The GLA would like to see this review address the issue of data access more generally in terms of our own access to all central government (DWP/HMRC/etc.) data sources, our status as a governing body, and the protocols by which we can apply for these data.

In addition, the GLA would like to see this consultation address the security measures that are needed to access and handle data. The GLA believes it is important that recipient organisations should be provided with details of a set of common sense security measures that have to be complied with in order to gain access to the data. At present, every time the GLA requires a set of data from a Government department, we are obliged to fill in a bespoke set of forms specific to that department. Having a more joined up approach to this, for example a single set of forms to fill in annually for all data sets we require, would be sensible.

The GLA our, ourselves, currently in the process of building out own system to better facilitate secure data sharing. This will work similarly to our public data store (<http://data.london.gov.uk/>) in so far as it collates and catalogues available data to make it searchable and accessible from a single point, while also providing the full metadata. The interface will be open source and cloud based, accessible through a web interface to address the needs of secure access by multiple users and periodic peaks in processing needs. This will allow us to share data non-public data securely between ourselves, the boroughs, London & Partners, and other city data market partners and is expected to go live in June 2016.

Question One: Are there any objectives that you believe should be included in this power that would not meet these criteria?

The Greater London Authority (GLA) is of the belief that access to data, including increased data sharing, is hugely important for statistical and research purposes in allowing public bodies to design better policy. A more accurate and timely evidence base would allow policy makers to make better informed decisions and would reduce the burden on public bodies to collect their own data.

A greater understanding of economic and social trends would allow the public sector to respond more appropriately to the pressures facing society, and as such, enhancing this understanding should be one of the objectives included in this power.

The current scope of objectives (fuel poverty and Troubled Families) is very restrictive and we believe represents a wasted opportunity to really help the UK's public bodies by enabling them to produce better statistics from the existing data.

Also of concern to the GLA that while these arrangements for data sharing can be made, there is no legal requirement or departments to share data which could limit the impact of legislation in this area.

As part of our commitment to increasing data access, the GLA publishes London specific data on the GLA data store: <http://data.london.gov.uk/>. While the GLA is listed as a public body who may benefit from these legislative changes, with no mention of the IDBR, and such a limited scope generally, it is not clear that the GLA will directly benefit from these proposals in their current form.

Question Two: Are there any public authorities that you consider would not be fit under this definition?

The GLA believes that any increase in data sharing between public authorities is beneficial and would only serve to increase their understanding of trends, allowing them to respond more effectively. Any public authority who can sign up to the necessary measures to protect data should be able to benefit from these data sharing measures.

In instances where the public body might lack appropriate systems security, it is important that there is a mechanism through which they might be able to access it at a more aggregate level. The cost of de-identifying the data would necessarily have to be borne by the public authority making the request.

We also believe it is important that any increase in access to data does not hinder the current level of access provided to the GLA.

Question Three: Should non-public sector bodies (such as private companies and charities) that fulfil a public service function to a public authority be included in the scope of the public service delivery power?

Any data sharing that allows service providers to better tailor and target their service will be good for efficiency and effectiveness and will ultimately benefit the individual using the service. Any non-public sector body who can sign up to the necessary measures to protect data should be able to benefit from greater sharing of data.

It is, of course, hugely important that appropriate safeguards are put in place to ensure that the data is only used for the approved research purpose, and that any non-public sector bodies are clear on the circumstances and purposes for which such data may be shared. It is important to make sure that data sharing for the purpose of benefitting individuals is not used in other services provided by the same body to build databases or cause harm (e.g. by affecting their credit rating). Data must also be sufficiently de-identified/aggregated such that it is suitable for the body making the data request.

Again, any increase in powers in this area must not restrict the current level of access awarded to the GLA and others.

Question Four: Are these the correct principles that should be set out in the Code of Practice for this power?

N/A

Question Five: Should the Government share information with non-public sector organisations as proposed for the sole purpose of providing assistance to citizens living in fuel poverty or for any other reason?

The Government should share relevant information with any non-public sector organisations that provide a service to citizens, including but in no way limited to those living in fuel poverty.

Again, appropriate safeguards will need to be put in place to protect individual data.

Question Six: Would the provision of energy bill rebates, alongside information about energy efficiency support, be appropriate forms of assistance to citizens living in fuel poverty?

N/A

Question Seven: Are there any other forms of fuel poverty assistance for citizens that should be considered in the proposed power?

N/A

Question Eight: Should a government department be able to access birth details electronically for the purpose of providing a public service, e.g. an application for child benefit?

Yes. However, the GLA believes that a government department, or public authority, should also be able to access birth details for the purpose of statistical analysis. Data such as this could help local authorities adapt quicker to population changes e.g. provision of right number of school places.

Question Nine: Do you think that bulk registration, such as details of all deaths, should be shared between civil registration officials and specified public authorities to ensure records are kept up to date (e.g. to prevent correspondence being sent to families of a deceased person)?

Bulk registration should be shared so that public authorities' records are kept up to date but also for the purpose of statistical analysis.

Question Ten: Are there other measures which could be set out in the Code of Practice covering the proposed new power to combat fraud to strengthen the safeguards around access to data by specified public authorities?

N/A

Question eleven: It is proposed that the power to improve access to information by public authorities to combat fraud will be reviewed by the Minister after a defined period of time. This time will allow for pilots to be established and outcomes and benefits evaluated. How long should the Fraud gateway be operational for before it is reviewed?

N/A

Question twelve: Which organisations should Government work with to ensure fairness is paramount when making decisions about affordability for vulnerable debtors who owe multiple debts?

N/A

Question Thirteen: How can Government ensure that proposals for pilot data projects and the evaluation of projects under the debt power and effectively scrutinised against objectives?

N/A

Question Fourteen: It is proposed that the power to improve access to information by public authorities for the purpose of managing debt owed to government will be reviewed by the Minister after a defined period of time. This time will allow for pilots to be established and outcomes and benefits evaluated. How long would the debt power be operational before it is reviewed?

N/A

Question Fifteen: Should fees be charged by public authorities for providing data for research purposes, and if so should there be a maximum fee permitted which is monitored by the UK Stats Authority?

The GLA believes that the provision of data at no cost is not only in keeping with international precedents but of vital importance in ensuring that authorities are able to undertake necessary research to better inform policy decisions. Any additional burden to public authorities, be it administrative or financial, is unwelcome.

However, we recognise that making data available for sharing is not cost free and in order to encourage public authorities to increase the amount of data they are prepared to share, it is appropriate to charge others on a cost recovery basis. Models such as the Office for National Statistics commissioned Census tables provide a good example of affordable cost recovery for data provision.

Questions Sixteen: To ensure a consistent approach towards departments accepting or declining requests for disclosing information for research projects, should the UK Statistics Authority as the accreditation body publish details of rejected applications and the reasons for their rejection?

In the interest of information sharing, the GLA would support the publication of details of rejected applications and the reasons for their rejection. In addition, such information could help to inform other potential applicants and increase the quality of subsequent applications, saving both the UK Stats Authority and the applicant, time and money.

Question seventeen: What principles or criteria do you think should be used to identify research that has the potential for public benefit, or research that will not be in the public benefit?

If personal and sometimes sensitive data are being shared without individual consent it should be the responsibility of the receiving body to provide a case to demonstrate the public benefit. A good example of this is the Department for Education's National Pupil Database which has shared data with the GLA to develop a number of education-related outputs for the benefit of London, such as the London Schools Atlas.

Question eighteen: Is two years a reasonable maximum period of time for the duration of a notice for the supply of data to the UK Statistics Authority for the purpose of producing National and official statistics and statistical research?

N/A

Question nineteen: If your business has provided a survey return to the ONS in the past we would welcome your views on:

- a. the administration burden experienced and the costs incurred in completing the survey, and
- b. ways in which the UK Statistics Authority should seek to use the new powers to further reduce the administrative burdens on businesses who provide data to ONS for the purposes of producing National and other official statistics.

N/A

Question twenty: What principles and factors should be considered in preparing the Code of Practice?

N/A