Office for Statistics Regulation

Systemic Review Programme

Joining Up Data for Better Statistics – October 2019 update

Office for Statistics Regulation

We provide independent regulation of all official statistics produced in the UK. Statistics are an essential public asset. We aim to enhance public confidence in the trustworthiness, quality and value of statistics produced by government.

We do this by setting the standards they must meet in the Code of Practice for Statistics. We ensure that producers of government statistics uphold these standards by conducting assessments against the Code. Those which meet the standards are given National Statistics status, indicating that they meet the highest standards of trustworthiness, quality and value. We also report publicly on system-wide issues and on the way statistics are being used, celebrating when the standards are upheld and challenging publicly when they are not.
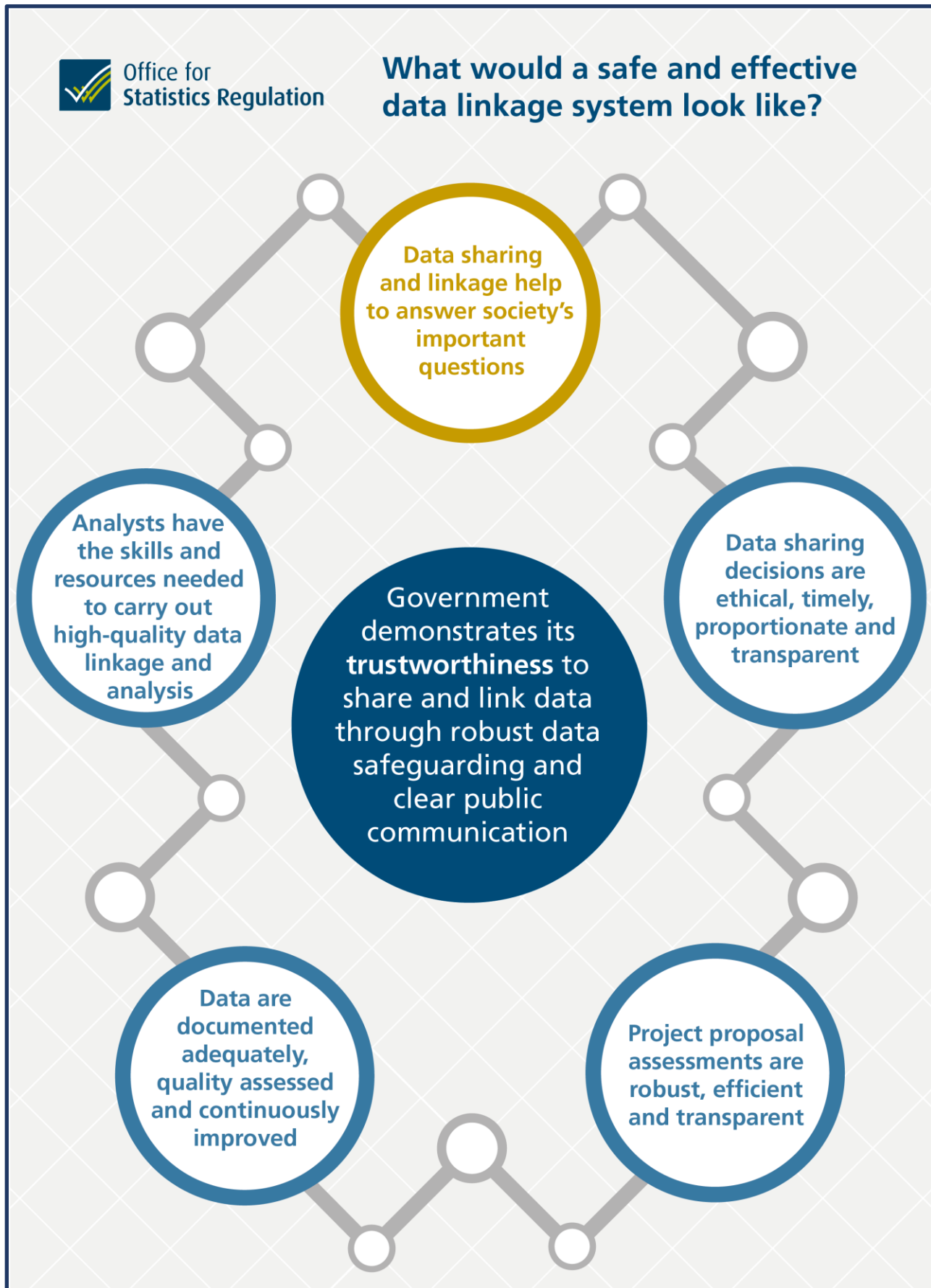
Contents

Our 2018 report **Joining Up Data for Better Statistics** outlined **six key outcomes** necessary to create a safe and effective data linkage system

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What would a safe and effective data linkage system look like?

Data sharing and linkage help to answer society's important questions

Analysts have the skills and resources needed to carry out high-quality data linkage and analysis

Government demonstrates its **trustworthiness** to share and link data through robust data safeguarding and clear public communication

Data sharing decisions are ethical, timely, proportionate and transparent

Data are documented adequately, quality assessed and continuously improved

Project proposal assessments are robust, efficient and transparent

Is it getting easier to join-up data?

Executive summary

2019 progress update

1.1 This update provides an assessment of current progress towards meeting the six outcomes necessary to build a safe and effective data linkage system outlined in our September 2018 report Joining Up Data for Better Statistics.

1.2 Following its publication, the National Statistician wrote to us in January 2019 with details of:
- a work plan structured around the six outcomes
- case studies of current practice across government
- new Government Statistical Service (GSS) web pages on data linking with various resources
- plans for a cross-government data linkage conference to be held in 2019.

1.3 In response, we highlighted the need for the Office for National Statistics (ONS) to demonstrate stronger leadership, and noted that further action was required to address our recommendations about coherent public communication and engagement and resource challenges. In addition, we voiced our disappointment that the Department for Work and Pensions (DWP) and Her Majesty's Revenue and Customs (HMRC) had not by that point, March 2019, shared data with ONS under the Digital Economy Act's (DEA) provisions.

1.4 Nevertheless, since publication in September 2018, there has been **progress towards achieving the six key outcomes** in several areas. These include:

- the sharing powers of the DEA are increasingly being used to support new data linkages for statistics and research purposes
- new technical solutions have been developed to address data security issues associated with large-scale data shares
- cross-government work to improve data quality, led by the Department for Digital, Culture, Media and Sport (DCMS) and ONS, is underway
- the Economic and Social Research Council's new investment in administrative data use via Administrative Data Research UK (ADR UK) has been launched and is developing a suite of research-ready datasets to support projects designed to answer cross-government, policy-relevant questions
- the ONS Secure Research Service is increasing its visibility and reach following new investment from ADR UK that has enabled it to provide a more extensive cross-government secure data access resource
- the process for accrediting data processors under the DEA is underway, and the infrastructure is now in place for researchers to apply to access data under its provisions
- a new National Statistician's Quality Review (NSQR) of data linkage methodology has been announced and will feature at the October 2019 cross-government data linkage symposium.

1.5 However, there are still **notable gaps** and some **fundamental problems** that must be addressed:

- ONS has yet to receive the data it requires from HMRC and DWP to deliver major areas of its work programme, which also has consequences for devolved administrations who rely on ONS to acquire data from these departments on their behalf
- there is a lack of cross-departmental, clear and coherent information for the public as to how data are shared and used safely to deliver public benefit, and no apparent plans to develop this

- with a few exceptions, meaningful public engagement on data use is not yet a routine or core activity for statistics producers
- the potential to pursue significant cross-departmental infrastructure investment to improve data quality has been delayed following the cancellation of the 2019 Spending Review
- many of the positive developments noted above lack transparency and, in some cases, have progressed at a slower pace than is ideal.

Why do these fundamental problems remain?

1.6   We recognise that significant efforts have been made to enable the safe sharing of DWP and HMRC data with ONS, and we understand that the data we previously raised concerns about is now scheduled for delivery in autumn 2019. We also recognise the significant pressures departments are currently under relating to the UK's departure from the European Union.

1.7   It is important to highlight, however, that these disappointing data delays are a major hindrance to understanding what is happening to the UK's economy and population – at the point when there is heightened public and policy interest in these issues.

1.8   Our concerns do not exist in isolation. Multiple recent parliamentary inquiries and independent reports have highlighted the need for government to do more to facilitate data sharing between departments for operational, statistical and research purposes, and to address public trust issues. These include:
- the House of Commons Public Administration and Constitutional Affairs Committee (PACAC) governance of statistics inquiry
- the Science and Technology Committee's digital government inquiry
- the Public Accounts Committee's challenges in using data across Government inquiry which was launched in response to the National Audit Office's June 2019 report that highlighted a lack of strategic leadership on data in government, and the need for this to be resolved via the new government data strategy being developed by DCMS.

1.9   In a blog to accompany our September 2018 report, Jeni Tennison, CEO of the Open Data Institute, drew an analogy between data and roads: "A single road only takes us to places between two locations; their real value comes from being part of a network. Data works in the same way: it is not just having more data that unlocks its value, but linking it together." The combination of positive developments and ongoing challenges we have highlighted here bring to mind a car whose bodywork has been patched, tyres replaced, and engine tuned, with a full petrol tank and a satnav primed to go. It has the capacity to go far, but it's currently only driving on A roads when it needs access to the full road network and its motorways to get to its chosen destination.

Our next steps

1.10   We welcome and share the new National Statistician Sir Ian Diamond's stated ambitions to improve people's lives by delivering better insights from statistics and research via data sharing and linkage. We will work with him to identify areas where we can add our support to his efforts to address the current challenges. PACAC has recommended OSR produce annual reports for parliamentary select committees; these will be a helpful avenue for highlighting concerns about data sharing. We also look forward to working with the new Chief Digital Information Officer currently being recruited to the Cabinet Office to lead the Government's digital, data and technology transformation.

1.11   We will continue to work with DCMS as they develop the new data strategy to ensure that the statistical system's needs are recognised and aligned with the strategy's broader vision to provide coherence and impetus to the range of data-led work in government.

1.12   We will also identify opportunities to promote our ambitions for data sharing and linkage by:
- publishing our new **Vision** in autumn 2019 (based on the draft shared in June 2019)
- holding an inaugural **OSR conference** in November 2019, where we will continue to reinforce our organisational interest in data sharing and linkage

- continuing to promote this aspect of our work through **public events**, as we did with the Institute for Government's Data Bites series
- ensuring that we continue to use our voice to record our ambitions for data sharing and linkage in our **core regulatory work** through assessments, compliance checks and other interventions. Our submission in July 2019 to the Scottish Government's consultation on the creation of its new national public health body, for example, highlighted the importance of appropriate information governance structures to support data sharing and linkage across the health and social care system
- building on our support of the cross-government data linkage symposium in October 2019, we will continue to work with ONS as the NSQR work develops. Our **new regulatory guidance** on documenting quality and methodology for official statistics based on linked data will now be aligned with the NSQR work, and we expect to publish in early 2020
- continuing to **support ADR UK** with the development of their strategic direction for investment in administrative data via the Director General's membership of the ADR UK Programme Delivery Board.

1.13 By the end of 2019 we will **publish new guidance** for official statistics producers that also provide data access services**.** The Code of Practice for Statistics places a clear expectation on statistics producers to fulfil the potential of the data they hold and enabling users to access data is a key component for unlocking this potential. The guidance will set out our expectations around transparent practices, data quality feedback, user engagement, and ensuring that access processes are timely, efficient and proportionate

1.14 Our September 2018 report, Joining Up Data for Better Statistics, committed to scope the terms of a review of NHS Digital's data sharing and access processes. This was prompted by data users in universities, independent research institutes and government departments reporting difficulties accessing health data in England held by NHS Digital. An interim report was published in May 2019 and a follow-up report**,** which will set out our plans for the next phase of the work, will be published in October. Planned work to progress two specific areas, improving data quality and access to population health surveys, will include workshops with users and NHS Digital in the latter part of 2019.

Is it getting easier to join-up data?

Detailed 2019 progress update

Why we undertook the original review

2.1　As the independent regulator of the UK statistics system, OSR has a major interest in the sharing and linking of data to add value to government statistical production and help answer society's important questions. In 2017, we launched an investigation of the UK statistics system's ability to provide greater insight to users via data linkage. Our timing was in part prompted by a desire to take stock of the landscape before the new data sharing provisions for statistics and research, introduced by the Digital Economy Act (2017) (DEA), were implemented.

2.2　We also recognise the value that external researchers' analyses bring by revealing new insights and helping to develop and improve Official Statistics. Support for academics and independent researchers to access government data, for example via the Economic and Social Research Council's (ESRC) new investment, Administrative Data Research UK (ADR UK), was another important focus for our work.

2.3　Our desired outcome is **for data linkage to be widely used to answer society's important questions in a timely manner**.

What the original review found

2.4　Our September 2018 report Joining Up Data for Better Statistics identified **six key outcomes** the statistics system needs to deliver to enable sharing and linking data to become a core activity for government analysts:

1. Government demonstrates its trustworthiness to share and link data through robust data safeguarding and clear public communication
2. Data sharing and linkage help to answer society's important questions
3. Data sharing decisions are ethical, timely, proportionate and transparent
4. Project proposal assessments are robust, efficient and transparent
5. Data are documented adequately, quality assessed and continuously improved
6. Analysts have the skills and resources needed to carry out high-quality data linkage and analysis

Assessment of progress towards the six outcomes (October 2019)

Introduction

2.5　This assessment of progress in the past year was informed by our ongoing monitoring activity and conversations with statistics users and producers. Through these, we have documented the achievements and challenges we have noted since the September 2018 report was published and have structured these around the six key outcomes.

Demonstrating trustworthiness

2.6   In January 2019, ONS published new web pages to explain how it looks after and uses data for public benefit. These pages cover various aspects of data security and include the register of external data supplied to ONS for its statutory statistical production functions. Collectively these are a welcome development, however they would benefit from a more user-friendly roadmap to help guide non-expert members of the public through them, and an even stronger emphasis on the public benefits being delivered.

> Government demonstrates its **trustworthiness** to share and link data through robust data safeguarding and clear public communication

2.7   The Digital Economy Act has strong guiding principles around transparency. The UK Statistics Authority's Better Use of Data for Statistics web pages outlining the DEA's statistics provisions signpost to ONS's register of external data acquisitions. However, the ONS register needs to be amended so that data obtained via the DEA can actually be identified.

2.8   OSR's regulatory guidance on data governance, published in October 2018, includes a recommendation about using ONS's Five Safes framework to help guide public communication about data safeguarding. The Five Safes are not mentioned in ONS's data use materials. In contrast, DfE now presents its information about how it safeguards the data it collects and shares using the Five Safes.

2.9   We held a round table in February 2019 with statistics producers to explore how departments approach public engagement around data use. Most of the public engagement around data happening in the UK at the moment is being led by non-Government organisations, for example this new study on data ownership by the Royal Society, Open Data Institute, and Luminate, and the citizens' juries on health data sharing currently being run by the Wellcome Trust and Ada Lovelace Institute with NHS England. Health Data Research UK's (HDRUK) major investment in data and research to improve health is being supported by a programme of public engagement, with a Public Advisory Board in place to guide their work.

2.10 ADR UK also has plans to engage with the public, building on the work conducted by the centres in Scotland, Wales and Northern Ireland in the previous phase of the ESRC's administrative data investment. In Scotland, for example, new resources are in place to support public engagement work around the Scottish Government's plans for Research Data Scotland (described below) and other plans for further data use.

2.11 The statistics system has good stories to tell: there are robust structures in place to safeguard data, a strong ethical framework via the National Statistician's Data Ethics Advisory Committee and its new self-assessment tool for analysts, and compelling examples of work that serves the public interest. But many statistics producers appear to lack the confidence to tell these stories. Our original recommendations in this area are therefore unchanged: proactive public engagement about how government uses statistical data for public benefit is needed. Statistics producers also need to work together to develop coherent and consistent public information about how data are safeguarded and used for public benefit. We will be issuing further guidance on this and will continue to work with others to raise the profile of the importance of public engagement.

Answering society's important questions

2.12   There are good examples of data sharing and linkage being used to help develop official statistics to answer important questions, these include:

- NHS Digital's Increasing Access to Psychological Therapies data, provided to ONS via the DEA's statistics provisions, is being used to examine whether the social and economic characteristics of people who experience common mental health disorders differ from the general population, and to look at the social and economic outcomes of people who have had psychological therapies

- ONS's plans for transforming migration statistics and its ongoing work exploring the potential for administrative data to provide population estimates via an Administrative Data Census

- The ongoing evaluation of the Ministry of Housing, Communities and Local Government in England's Troubled Families Programme

- The latest statement of data needs from the Scottish Fiscal Commission (whose forecasts inform the Scottish Government's budget) reports many improvements in the past year to the range of data shared with it by HMRC and DWP, resulting in new or improved official statistics outputs

2.13   New data resources are being developed by ONS in its new role within ADR UK to acquire, link and curate datasets to support policy-relevant analyses. For example, a new dataset linking Census 2011 data with a bespoke extract from the National Pupil Database will be used to increase understanding of the factors shaping children's school achievement and will be supporting work led by the Children's Commissioner for England. Other linked data resources will support themes such as ageing, the world of work and homelessness. These will be available to access via the ONS Secure Research Service and other accredited secure research services, by approved researchers for projects accredited by the Research Accreditation Panel. The DEA also enables ONS to share its own data with devolved administrations for statistics production, we would encourage them to support devolved administrations to make use of this provision.

2.14   The devolved administrations have their own programmes of work, carrying on the successful work of the Administrative Data Research Centres (ADRC) that preceded ADR UK. Some of their original work has been extended, such as the Scottish Government's health and homelessness and vulnerable children's dental health projects that featured in the 2018 report, in addition to new projects that are now being developed. ADR Scotland has also invested in a new post to build links with policy makers in government aimed at ensuring the programme's work remains policy-relevant. This new model for ADR UK, with a strategic hub at the centre and strong partnership between all countries and ONS, has the potential to deliver huge benefits, particularly as a mechanism to identify cross-cutting issues beyond individual departmental boundaries.

2.15   However, as will be clear from the next section, impediments to data access are having implications across the UK, for ADR UK's work, ONS's statutory statistical production functions, and devolved administrations, resulting in important questions still not being answered. Whitehall departments hold some of the key outcome measures, such as employment, that are fundamental to evaluations of the impact of social and economic initiatives delivered by departments and devolved administrations. Similarly, work to understand income dynamics and poverty across the UK is dependent on data held in Whitehall.

Data sharing and linkage help to answer society's important questions

Making ethical, timely, proportionate and transparent decisions about data sharing

2.16   The DEA has helped ONS to access a wide range of new data (e.g. council tax, self-assessment, VAT, commercial scanner). However, the DEA has not yet been used successfully to deliver all the population-wide data that ONS has requested to produce new statistics and enhance existing ones. We also know of established linked data resources that researchers are keen to use, such as the Longitudinal Educational Outcomes data, that are not yet available for secondary analysis via the DEA's research provisions, despite the safeguards around people, projects and data access that have been put in place to support such work.

Data sharing decisions are ethical, timely, proportionate and transparent

2.17   When the DEA came into force there was some misunderstanding about how it was aligned with other legislation, such as the Data Protection Act 2018. Time was then spent establishing its place in the wider legislative landscape, with support from the Information Commissioner's Office, to establish that its provisions did not contravene important data protection principles. Next, work was required to assure departments that the security systems for sharing large volumes of data were suitably robust. A bespoke method for encrypting the data was also developed to provide further assurance that the process for transferring data was secure. We understand that ONS is expecting delivery of new data from DWP and HMRC in autumn 2019.

2.18   The PACAC governance of statistics inquiry raised concerns about the slow progress of the DEA's statistics powers. Their report encouraged the UK Statistics Authority to be bolder about highlighting instances to parliament where public bodies are not sharing data. In addition to the steps we are already taking to promote the value of data sharing and linkage (outlined in the Executive Summary), we will support the new National Statistician to implement this recommendation. For example, by identifying statistics users whose needs are not being served by data sharing barriers, and by highlighting concerns in OSR's new annual reports to parliamentary committees.

Assessing projects and people robustly and efficiently

2.19   This section covers data access application processes, secure settings where data can be accessed are discussed in the final section about resources for analysts.

Project proposal assessments are robust, efficient and transparent

2.20   The new infrastructure for accrediting researchers, projects and data processors under the DEA's research provisions is now in place. Transparency has been built into this: details of the Research Accreditation Panel members, meeting minutes and project accreditation criteria are all available. A proportionate approach to researcher accreditation has been proposed so people accredited under the Statistics and Registration Service Act 2007 would not need to be reaccredited under the DEA because it uses an identical accreditation process. The Research Accreditation Panel is currently considering this proposal.

2.21   The ADR UK investment in the ONS Secure Research Service (SRS) is enabling ONS to develop a new access platform to meet the new demands that will arise from researchers using the DEA. It will have greater capacity and scalability to handle additional datasets and increasing numbers of projects. In addition, an online facility for researchers to submit and track their applications and service requests is being built. This has been released to some users for testing and development work is ongoing.

2.22   However, at time of writing, no projects have been accredited. In part this is due to the time it has taken for data processors to be accredited (see the final section below). Some users we have spoken to are disappointed about the pace at which things are progressing. We will continue to monitor this, following our commitment in the 2018 Joining Up Data report, and have further recommendations on this in the resources section below.

2.23 A new infrastructure for research data access is being developed in Scotland – Research Data Scotland. It will provide a single portal for researchers to apply for public sector data, a secure data environment to process, de-identify and access data, and a robust information governance and ethics framework to scrutinise data access requests independently. The Scottish Government's 2019/20 Programme for Government has confirmed this investment as part of its wider ambitions to make better use of data across the public sector. To support this, a model for research-ready linkable data is being developed, with a streamlined information governance system to avoid duplication of processes, both of which should deliver more efficient access to data. The 2018 Joining Up Data report urged more sharing of expertise and learning between data providers so it is very encouraging that Scotland is drawing on the expertise at the SAIL Databank in Swansea to develop Research Data Scotland.

2.24 Users have raised concerns about the current processes for accessing health and social care data in Scotland, overseen by the Public Benefit and Privacy Panel. We are actively monitoring this, and we encourage the Scottish Government to address these concerns as part of its wider work to provide robust, proportionate and efficient access to research data.

2.25 In the past year we have been working with NHS Digital to improve data access processes for health data users in England. An update on this work will be published in October. Recent developments worth highlighting include more automation of their application process and an increasing use of precedents to guide their project approvals, with full review by the Independent Group Advising on the Release of Data reserved for more novel or complex applications.

2.26 Our work with NHS Digital, the ONS SRS and other official statistics producers who also provide data access services has increased following the 2018 publication of Joining Up Data. Building on this work, we are developing guidance outlining how the Code of Practice for Statistics relates to the provision of data to researchers. This will be published before the end of 2019.

Documenting, assessing and improving data

2.27 The increasing interest in data use across government is presenting new opportunities for statisticians to work with other data specialists to improve data quality. The Data Leaders Network (a body tasked with enabling cross-departmental collaboration on the management and use of data) is sponsoring a programme of data quality improvement work co-led by DCMS and ONS. This work could potentially address many of the concerns highlighted in the 2018 Joining Up Data report about data quality. A cross-departmental working group has been formed to progress this work which should help it to identify solutions that work in multiple settings, rather than a one-size-fits all approach.

Data are documented adequately, quality assessed and continuously improved

2.28 We understand that engagement in this work has been strong in most departments, as has been the case with the GSS Quality Champions network. It is important to ensure that data quality is seen as a priority across government, with senior-level support. We will continue to use our voice to highlight the importance of data quality (one of the three core pillars in the Code of Practice for Statistics) and look forward to monitoring the progress of this work. We would welcome greater transparency about the planned initiatives to help raise the work's profile. We also encourage DCMS and ONS to involve the devolved administrations in this work to ensure that good practice and learning is maximised across the whole UK, and cross-system data standards are developed to support the high demand for cross-border data sharing.

2.29 The Connected Open Government Statistics (COGS) work underway by the Government Statistical Service (GSS) can also help to improve data quality. Its chief aim is to increase the impact and reach of government statistics by streamlining how information can be collated and presented online, making it easier for users to discover and use statistics. To achieve this, the project has developed mechanisms to take existing data sources and create open data from them. Data quality is improved by using web standards and harmonisation techniques to ensure that information is always recorded the same way in each dataset, ideally by addressing this at the data source. However, a long-term funding model for this work is not currently in place but the team is working to secure this.

2.30 ADR UK's new strategic investment fund is a welcome development that is being used to develop new data linkage resources such as the children's dataset mentioned above. Part of the investment will go

towards data quality improvements which can often be a barrier to linkage. For example, they are funding methodological work at the Ministry of Justice in England and Wales to enable data from the civil and criminal justice systems to be linked for the first time, making it possible to track people as they move around the justice system. The Welsh Government will benefit from this work as data improvements will mean new analyses of users of the justice system in Wales will be possible. There is clear user demand for these developments, as identified in our 2018 review of justice statistics.

2.31   Our ongoing work with NHS Digital is identifying new user engagement channels to help data users provide feedback about health system data that could in turn lead to improvements to data quality and documentation. The October update on that work will include more details, and our new guidance for data providers will include recommendations about gathering user feedback to improve data quality.

2.32   The progress outlined here is considerable. But there is a very long way to go before government data quality meets the standard needed for it to deliver its true potential. Many of the changes required need large sums of cross-departmental investment in data infrastructure of the kind that individual departmental budgets do not support. Data also needs to be recognised and invested in as a collective national asset. In Whitehall this will require new funding models. The cancellation of the 2019 multi-year Spending Review is therefore an unfortunate missed opportunity to provide long-term, strategic investment in data quality.

Ensuring analysts have sufficient resources and skills

2.33   The new data linking pages in the GSS policy and guidance hub were created in response to the 2018 Joining Up Data report. These will help to address some of the concerns we raised, as more resources become available, as will the NSQR on data linkage methodology that is now underway. The data linkage symposium in October 2019, announced in response to the 2018 report, is another welcome development to support progress in this area (details on the GSS data linking site). Its aims are:

Analysts have the skills and resources needed to carry out high-quality data linkage and analysis

- To facilitate sharing of cross-government data linkage methods and experiences through a series of presentations from GSS colleagues
- To open up a discussion about how to work together to facilitate data linkage work
- To signpost people towards resources and training to build GSS capability in data linkage
- To update delegates on the progress of the National Statistician's Quality Review on data linkage and learn from academic experts on leading linkage methods

2.34   The symposium should act as a catalyst for raising the profile of these ambitions across the GSS and help to build a community for sharing and developing expertise in data linkage. We will promote these activities via our work with departments, but we also encourage the ONS team driving this to make more information available about the NSQR and to promote the wider programme of work more proactively.

2.35   As already noted, the new investment in the ONS SRS – an important resource for analysts – is delivering benefits and efficiencies across government by avoiding the need for departments to establish their own secure research services. DfE has opted to use the SRS as its primary mechanism for analysts to access data, other departments are following.

2.36   To address the issue of users not being able to access the SRS's physical secure locations in Titchfield, Newport or London, a new scheme – Assured Organisational Connectivity (AOC) – is now in place for organisations to access the SRS securely from their own premises. AOC operates by providing a mark of assurance to the SRS, information asset owners, and other stakeholders. It places greater responsibility on organisations to protect data and confidentiality and includes annual certification where evidence provided by the organisation is assessed. Over half the datasets held in the SRS are available through AOC and work is ongoing with data owners to make more available via this route.

2.37 The UK Statistics Authority is responsible for accrediting data processors under the DEA, and this is being carried out by ONS technical experts. The progress of the accreditations has been as follows:

- The Northern Ireland Statistics and Research Agency was the first processor to gain accreditation, in May 2019.

- ONS was accredited in August. The accreditation of the ONS SRS as a data processor required additional external input, which ONS sought from academic experts, HMRC and DWP, to ensure there was independent oversight and scrutiny of the process. This additional scrutiny of the SRS's accreditation was proportionate and necessary to ensure confidence in the process and mitigate the risk of perceived conflicts of interest. However, it took longer than users we spoke to had hoped, which has also contributed to perceptions that the overall progress of the DEA's research provisions has been slower than expected.

- Other data processors, such as those in Scotland and Wales, have not yet been accredited. One consequence of this is that ONS's own data has not yet flowed to the rest of the ADR UK centres for research purposes, although positive commitments have been made that this will happen once all centres have finalised their applications and have been accredited (and following the necessary approvals).

2.38 The experience gained as each new processor is accredited can hopefully be used to help make the process more efficient as it develops. The Statistics Authority's Better Use of Data for Research webpages provide a range of information for researchers and processors. We believe that greater openness about how the research provisions, including accreditations, are progressing would be welcomed by users, for example a blog or more informal articles to sit alongside the more formal information available about the process.