Data and Transparency for Combined Authorities: Briefing Paper
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DATA AND TRANSPARENCY FOR COMBINED AUTHORITIES: BRIEFING PAPER

LOCAL POLICY INNOVATION PARTNERSHIP HUB

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Contents

Introduction

This briefing has been written based on the experience of the author whilst on secondment with the West Midlands Combined Authority and collaborating across the mayoral networks on data access and transparency of data.

The work identified some key data devolution asks which Combined Authorities would benefit from. The paper also explores the wider context and challenges faced by mayoral combined authorities as regards data and how they are set up and their legal status is crucial to the future collaboration and data sharing across partners and the mayoral network.

Summary

This paper highlights seven key devolution asks of government:

1) Better engagement with the Mayoral Combined Authorities (MCAs) on identifying and acting on barriers to better sharing and use of data between government and the MCA/partners, especially the statutory role of the MCA in data sharing, processing, and holding.
2) Clear cross-government accountability, governance, and funding for data to support place-based analysis which is accessible to the MCAs.
3) Development of cross-government rules, standards, and common ways to collect, store, record and manage data at a place level, which aligns with the new institutional geographies of local delivery.
4) Collaboration on identification of datasets that are critical to government functions, business case development and evaluation, including looking at how to share them easily and examine how they can be enhanced by process improvement and automation.
5) Investment in staff and capacity by national government for the local level, recognising the effort and resources required to fully utilize data and develop evidence-based decision making on levelling up. Recognise the need for analysts and researchers to be on a par with central government and have access to the same data, training and investment seen in central government departments.
6) Greater MCA Collaboration with government on the cost of licensing data products or development of new data products, which could be shared across departments and with the teams delivering at a local level on 'Levelling-up' objectives.
7) Central government facilitation of working across other providers of research and public data, such as universities and UKRI funded programmes. To introduce new R&D focus and opportunities in the public sector data infrastructure.

Fig 1: 7 asks for data devolution.
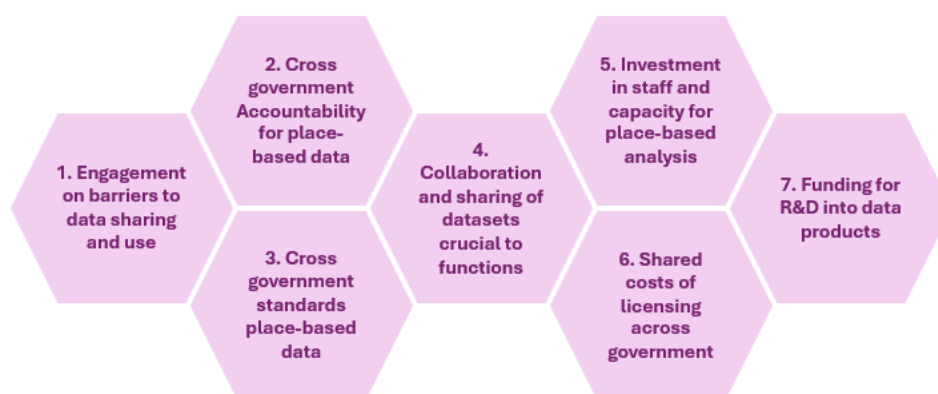
Context of data issues at a local level

The [National Audit Office](#)[1] (NAO) has reported time and again on the importance of well-informed decisions in government programmes and services.

The NAO highlights three substantive issues:

- Data is not always seen as a priority. Planning and spending across government highlighted the challenges for government in making long-term cross-government investments, and the quality and sharing of data is a clear example of a neglected and poorly planned activity. If government is serious about data being one of its most important assets, it is long overdue a balance sheet review.
- The quality of data is not well understood. Government has pursued the benefits of better use of data, but new initiatives often expose the poor quality of the data itself. Good data is not a 'free good' and government needs a structured approach to investing in improving and using data.
- There is a culture of tolerating and working around poor-quality data. Evidence-based decision-making is a necessary condition for achieving value for money in public spending. Government needs to develop the capability, leadership, and culture to support sustained improvement in the quality of information available.

All these issues are replicated in the relationship with local areas. City-REDI work[2,3,4] in the West Midlands Combined Authority area, has identified several similar issues especially in relation to central government data sharing and capacity building:

1. Much like the NAO report at the national level, data is a long-term investment and a strategic approach to data sharing across partners and with central government is needed. There is a broad landscape of rich data and resources locally, but because of the need for comparability and performance analysis the MCA and partners always focus on analysis of data which is available nationally and also at a local level, and therefore favour national datasets. However, these are not readily available to MCA staff, as MCA's is not seen as an arm of government or has the data access privileges the central government analysts have.
2. There are also significant gaps in data availability and quality at a place level, either due to data not being collected or not being shared. As the NAO points out, government needs to invest in improving the quality of data, especially with the demands of carrying out place-based analysis. Although there is a desire to use better data and evidence and a more consistent use of regional measures/data, this is difficult for multiple reasons and local policy makers continue to make decisions on impartial evidence, where central government has access to better data.
3. As a result, in order to carry out place-based or place-based analysis Local Authorities (LAs) and Combined Authorities have had to work on the data available, despite quality issues such as sample sizes and variability, geography and granularity. Local analyst services have also suffered from a lack of capacity and capability to utilise data across all policy areas, partly due to lack of technical or core funding for posts but also because of workforce availability and lack of analyst progression routes at the local level. Evidence-based decision-making is a necessary condition for achieving value for money in public spending,

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[1] https://www.nao.org.uk/wp-content/uploads/2019/06/Challenges-in-using-data-across-government.pdf
[2] ODA Support for information sharing PA Consulting 2019
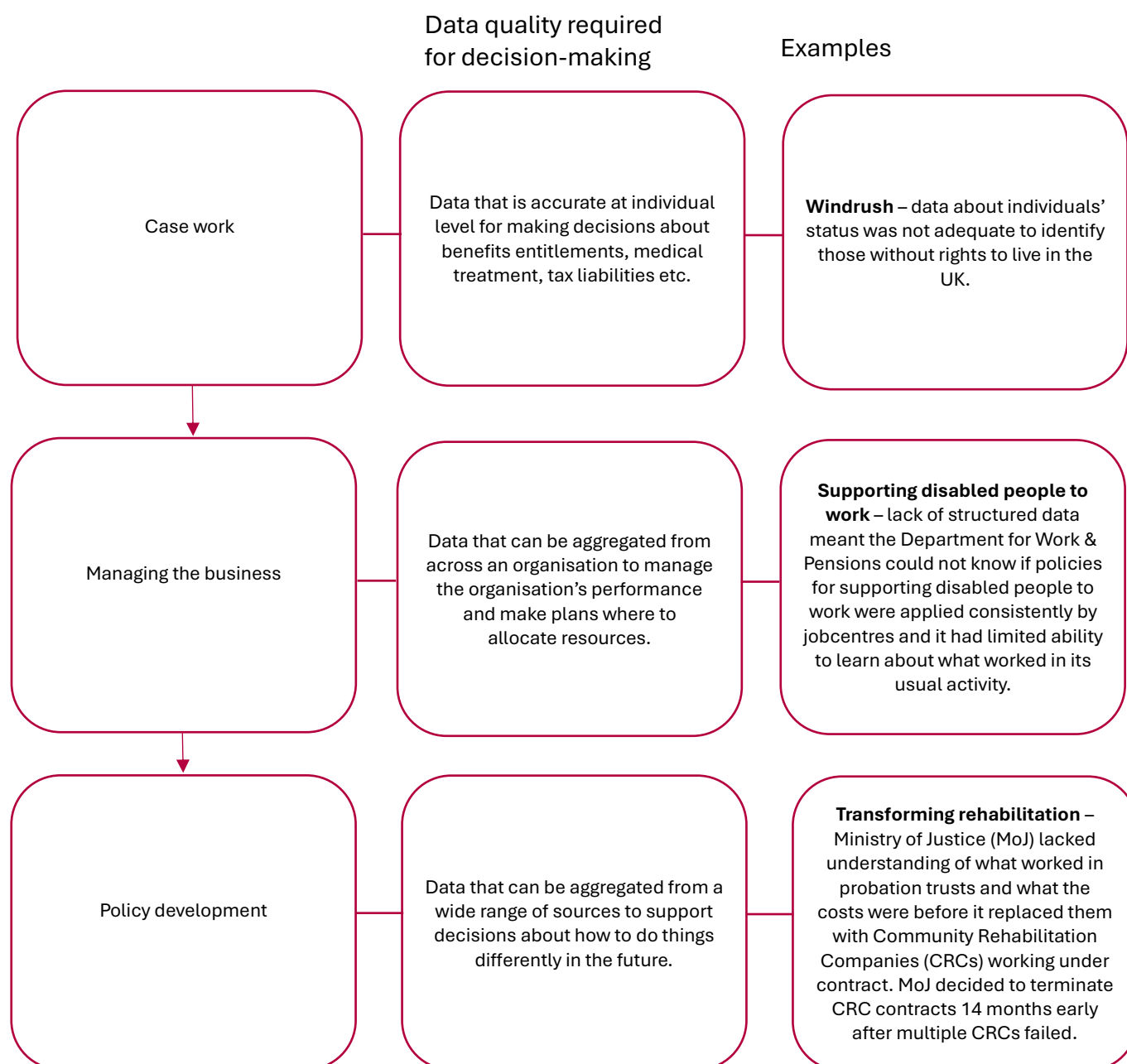[3] WM DataStore CA Oct 2021
[4] Regional performance monitoring and State of the Region reporting 2015 to 2022

as is emphasised in the revised Green Book which also now has a focus on place-based development, and the need to focus on improving the quality of data at the local level is key.

The NAO[5] highlights where the problems arise below:

Figure 1 – Decision making and data quality

Problems arise when data is not adequate

	Data quality required for decision-making	Examples
Case work	Data that is accurate at individual level for making decisions about benefits entitlements, medical treatment, tax liabilities etc.	**Windrush** – data about individuals' status was not adequate to identify those without rights to live in the UK.
Managing the business	Data that can be aggregated from across an organisation to manage the organisation's performance and make plans where to allocate resources.	**Supporting disabled people to work** – lack of structured data meant the Department for Work & Pensions could not know if policies for supporting disabled people to work were applied consistently by jobcentres and it had limited ability to learn about what worked in its usual activity.
Policy development	Data that can be aggregated from a wide range of sources to support decisions about how to do things differently in the future.	**Transforming rehabilitation** – Ministry of Justice (MoJ) lacked understanding of what worked in probation trusts and what the costs were before it replaced them with Community Rehabilitation Companies (CRCs) working under contract. MoJ decided to terminate CRC contracts 14 months early after multiple CRCs failed.

Source: Comptroller and Auditor General, Handling of the Windrush situation, Session 2017–2019, HC 1622, National Audit Office, December 2018. Comptroller and Auditor General, Supporting disabled people to work, Session 2017–2019, HC 1991, National Audit Office, March

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[5] https://www.nao.org.uk/wp-content/uploads/2019/06/Challenges-in-using-data-across-government.pdf

2019. Comptroller and Auditor General, Transforming Rehabilitation, Session 2015-16, HC 951, National Audit Offi ce, April 2016

At the MCA level partners cannot access or share the data as highlighted above, this is especially true of the aggregation role (of bringing data together across multiple geographies) required at the Combined Authority level to develop policies, interventions and actions across partners and place.

The NAO highlights principles for successful use of data see below diagram, which would need to be implemented between central government and MCAs and local partners.

Figure 2 – Principles for government and its service providers for successful use of data

1. **Understand the current landscape:**

Part One: Introduction

| Benefits of using data well | Current responsibilities | Previous initiatives |

2. **Have a clear understanding of what it is trying to achieve:**

Part Two: Strategy and leadership

| A clear strategy in place | Leadership and accountability | Funding to make it possible |

3. **Have the infrastructure in place to make it work**

Part Three: Data, systems and processes

| High-quality data | Data standards to improve consistency | Systems and tools which talk to each other |

4. **4 Have the conditions in place to make it work**

Part Four: Conditions

| Safeguarding data and securing public trust | Legislation to enable change | Skills and appetite for change |

Source: National Audit Office

Government departments tend not to treat data as a strategic asset. The Department for Digital, Culture, Media & Sport (DCMS) is the only department that refers to data as a strategic asset in its 2018 single departmental plan. Other departments have varying strategies but there is very little which looks at place-based approach or how departments will tackle understanding place-based or impacts of interventions on place[6].

The National Data Strategy also highlights a number of interconnected issues currently preventing the best use of data in the UK:

1) **Data foundations**: The true value of data can only be fully realised when it is fit for purpose, recorded in standardised formats on modern, future-proof systems and held in a condition that means it is findable, accessible, interoperable, and reusable. By improving the quality of the data, we can use it more effectively, and drive better insights and outcomes from its use.
2) **Data skills**: To make the best use of data, we must have a wealth of data skills to draw on. That means delivering the right skills through our education system, but also ensuring that people can continue to develop the data skills they need throughout their lives.
3) **Data availability**: For data to have the most effective impact, it needs to be appropriately accessible, mobile, and re-usable. That means encouraging better coordination, access to and sharing of data of appropriate quality between organisations in the public, private and third sectors, and ensuring appropriate protections for the flow of data internationally.
4) **Responsible data**: As we drive increased use of data, we must ensure that it is used responsibly, in a way that is lawful, secure, fair, ethical, sustainable, and accountable, while also supporting innovation and research.

Data devolution asks:

There has been a lack of leadership across government in working with places on sharing strategic data needed to enhance collaborative policy making, this could be addressed through a number of asks (which align with the governments National Data Strategy recommendations):

1) **Engagement with the MCAs on identifying and acting on barriers to better sharing and use of data between government and the MCA/local authorities/partners. A clear and coordinated plan of work to overcome these barriers to ensure better use of data is needed.** This should also cover an assessment of central expertise and support for fundamental data issues, including safeguarding data and public trust between the centre and local places. The key solution would be to enable better access to raw data by MCA and partners to enable analysis to be carried out, and working in partnership with government to unlock other data which could be nationally developed or negotiated and released at the appropriate geographical levels for place-based analysis. The major barrier is the ability for the MCA to support the Local Authorities with data analysis, insight, and consultation without the requirement of data powers to run concurrently for the data use. Currently MCAs need to run powers concurrently with the LAs in relation to work that involves data but the MCA itself does not have the relevant powers set out in statute. This would support more effective, confident, and efficient data sharing for the purposes of city region policy development and local area insight. This would not remove the need to work with districts to agree work and priorities but more to allow data to flow more effectively via a simplified legal framework.
   Examples:

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[6] The Green Book now requires departments to carry out and share place-based assessments.

Barrier – the legal and statutory function of the MCA – the set-up of the MCAs can be a barrier and we would recommend that combined authorities are seen as on a par with Local Authorities and Greater Manchester and Greater London Authority in terms of access to data, data processing and data sharing. There is a need to establish the MCAs as a data controller with associated data powers for the MCA, and to be recognised as a Local Authority for the purposes of processing data linked to key policy areas. In addition, it is necessary to address the lack of powers in data use and digital space. There are also operational barriers such as government systems needing a gov.uk email address to access (this includes data, policy, and training access). There is a need to establish and include appropriate statutory instruments and legal gateways for data sharing between Local Authorities and the MCAs. For example, extending the Digital Economy Act (2017) to add in specific data such as health and social care data, to identify and work with at an earlier opportunity those families and individuals that require support that cut across many local authority and health services (see Annex 1 for further details).

Barrier – governance and oversight – this would need to be reviewed in terms of data access but the establishment of a Public Accounts Committee[7] could be created to help secure better value for money, reduce the dangers of democratic deficit and overcome current barriers to proper scrutiny. The use of data could be part of this process and oversight.

Barrier – access to data at the right level and granularity – in most cases the data exists but MCA staff cannot access, or it is not released at the right scale. This is often administrative data which is not supplied for the geography concerned. The solution is either to give access to the more granular data or supply it in the appropriate way for local level analysis. Examples include: Data on employment – DWP regional and local data and links to long term health conditions (disabilities included); Labour Force Survey to lower levels (where sample sizes also come into play here); Health inequalities indicators the NHS Midlands which Public Health England have access to but MCAs do not have access to; Access to Local Authority level data which can be built up to the MCA level, such as social care, housing and fuel poverty, and granular benefits data.

Barrier – delayed releases – This is a general issue; the Covid-19 pandemic has shown that much of the data released for monitoring and research purposes is very out of date and this creates issues with understanding and planning for response. This has led to the use of other real time indicators which are not as robust, or the use of anecdotal data. It would be more efficient and robust if common data sets could be accelerated for release when required; there are good examples of this through the pandemic and lessons could be applied across the board.

Barrier - missing data – data gaps are an issue, as there is a lack understanding of what is happening in the local economy. Some of these can be filled by a national approach to gathering or negotiating access and release of data already collected. For example mortgage rates as a standard (the average mortgage rates, what the general products people are taking out in an area, and maybe a projection of future trends and demographics); Standard Assessment Procedure (SAP) ratings / EPC (Energy Performance Certificate) – zero carbon home and future home standard – more local breakdown; Average cost for affordable housing; How many more Electric Vehicles are there (access to registration vehicles in an area) – Driver and Vehicle Licensing Agency/Driver and Vehicle

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[7] Local Public Accounts Committees

Standards Agency; local grant uptake and decisions data for programmes such as, business loans, training, heritage or arts, solar panels or retrofit take up, digital inclusion; data on wellness such as sick days; data on small and micro businesses, sole traders and single person limited companies; social value and other agreed approaches to impacts; household and business surveys capturing information across a wide range of policy areas including the current gaps in missing indicators i.e. pride in place and local leadership; local air quality, climate change and business/household net zero data.

Barrier - Access to data developed by public funded bodies – many organisations are publicly funded and should release data in an accessible way. This includes Non-departmental Public Bodies, Special Purpose Vehicles and Universities in receipt of funding to collect and analyze data. There are also organisations which receive funding as part of a programme and information and data should be shared with the CAs and local authority partners to understand the wider impact locally. This should be made accessible and available as part of the funding criteria. This should include evaluations and businesses case evidence which can be applied at the local level.

Barrier – integration of data – as we deal with complex place-based issues across organizations we need to be empowered to enable integrated data at the local level; however this needs leadership from government to enable this to happen. For example, integrated health and social care, shared data integration systems – making sure data is linked with LA social care data and possibly DWP, because currently there are many barriers to sharing data which government could help to remove, including clarifying the legal role and function of the CAs in this activity and their ability to access data across organisations.

Barrier – regional data platform –there is a lack of clarity over accessing and sharing data which has led to a lack of traction on developing regional trusted data platforms. This is essential under for a smart city region and if powers are devolved across multiple policy areas. Although technology and partnerships exist, clarity over what partners can share holds the development of a shared platform back. Guidance and leadership from government on what they will share and expect local partners to share is essential. Investment in a regional platform to integrate data is also essential.

2) **Clear cross-government accountability, governance, and funding for data to support place-based which is accessible to the MCAs.** Units such as the Spatial Data Unit, department analytical teams and the Office for National Statistics should have a responsibility and remit to joint working with the MCAs. Cross-government groups need to have clearly assigned responsibilities to work with the MCAs on analyzing policy requirements. These responsibilities need to be aligned with the levers available including funding, controls, and operational resources.

3) **Development of cross-government rules, standards, and common ways to collect, store, record and manage data at a place level, which aligns with the new institutional geographies of place-based delivery.** The MCAs and partners should also be involved in developing an understanding of the implications for future decision making and costs in relation to local data, any process put in place should also include a regular review of how departments are ensuring they develop and share data for policy with places directly. Leading to a "local by default" approach to data creation and sharing at the national level

which leads to better business cases and evaluations in relation to place-based issues. Business cases for new data should be explicit on how they are addressing place-based concerns, particularly focusing on how they address geographically low levels of data across key areas of policy.

4)

Examples:

Geographical boundaries – the need for single MCA data units. For example, ONS provides West Midlands Metropolitan data in most datasets, but then these have to be extracted and processed for the other authorities across multiple editions and datasets to view the numbers together or visualise them, which becomes time intensive. Having a readily available summary and breakdown of data for MCA regions and authorities would save time and effort. There are also inconsistencies in geography in national datasets.

Sample sizes – although it should be recognized sample size is a balance of cost versus need, there does need to be a review of core data requirements for local decision-making. Small survey samples mean that local analysis is difficult in terms of granularity or quality or lacks robustness. MCA (and Local Authorities) can help define and prioritise sample demand and requirements in partnership with government.

5) **Collaboration on identification of datasets that are critical to government functions, business case development and evaluation, looking at how to share them easily and examining how they can be enhanced by process improvement and automation.** This should include an analysis of the processes, systems, and data flows so their use is fully understood within place analysis. This would build on work developing MCA Devolution Assessment Frameworks and the gaps and issues that currently exist in data, working with government departments to fill gaps. This will enhance the development of programmes, projects, and strategies at the local level.

6)

Examples:

Aggregation of common data – for example a lot of data gathered by local authorities within MCAs leads to lack of consistency and comparability. In many cases it would be more cost efficient if this was developed nationally, i.e. house prices, first time buyers, which involves reviewing multiple providers' data and is likely replicated across other organisations.

Collaboration on new data methodologies and analytics – there are new emerging methodologies for real time data which the MCAs and partners would like to collaborate with government on, such as web scraping, and predictive analytics. There is also a need to collaborate on business case and evaluation methodologies and the data requirements at a local level to enhance and improve decision making at the national level (with local implications) and local level. This collaboration is crucial to achieving local growth, as departments tackle place based analysis and assessment across programmes, to ensure consistency and understanding between place and government.

7) **Investment in staff and capacity by national government for the local level, recognizing the effort and resource required to fully utilise data and develop evidence-based decision making on place-based.** This recognizes the need for analysts and researchers to be on a par with central government and have access to the same data, training and investment seen in central government departments including adoption of the professional structure around the Government Economics, Statistician and Social Research professions alongside support and engagement in processes for data ethics, quality and sharing[8][9][10][11]. Currently as MCAs are not seen as arms of government, they are missing from the structures and processes of central and local government.

8)

Examples:

Access to support for key professions – government research professions are limited to government departments, this should be extended to MCAs, where there is a function of business case development and evaluation. Staff in place institutions should have consistent access to the training, skills, networks, and data that central government analysts have.

Investment in core technical staff – government needs to ensure investment in the skills and expertise to provide technical assistance to projects, programmes, and strategy development at a local level.

9) **Collaboration with government on the cost of licensing data products which could be shared across departments and with the teams delivering at a local level on place-based objectives.** The former UK Office of Fair Trading[12] surveyed more than 400 UK Public-Sector Information Holders (PSIHs) and 300 UK businesses buying or licensing data from PSIHs. The study estimates that the direct impact of public sector information (PSI) (i.e. the producer surplus generated by the PSIHs) in the United Kingdom was around GBP 66 million per annum. The study shows that the high price of paid-for licenses is a major barrier to data access. This is an area we would like to review with central government to ensure best value for money.

10)

Examples:

Data licenses – examples include FAME, DataCity, Redflag business data, Burning Glass data on vacancies and skill, Idox grant data providing information on grants and funding.

11) **Central government facilitation of working across other providers of research and public data, such as universities and UKRI funded programmes. To introduce new R&D focus and opportunities in the public sector data infrastructure**. There are a range of funding structures through UKRI which could be harnessed for the benefit of place-based analysis, including helping mayoral combined authorities. This could be explored through

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[8] Data Authority new standards
[9] Meta data standards
[10] Data sharing across the public sector: the Digital Economy Act codes
[11] New approaches to trustworthy data sharing and improve data access across the economy CDEI
[12] https://www.oecd-ilibrary.org/sites/90ebc73d-en/index.html?itemId=/content/component/90ebc73d-en

commissioning new funding calls for development data products and analysis to address local challenges, which include specific engagement with local partners.

Underpinning accountability frameworks

Greater devolution of data accessibility and sharing would help deliver better outcomes for residents through better evidence for action, monitoring, and evaluation. **It should also come with greater accountability** – with the agreement of clear and transparent deliverables that the Mayor's and Mayoral Combined Authorities will be held publicly and politically accountable for.

There needs to be greater alignment between national government analysis, skills, capacity and budgets and the MCAs.

This will enable greater alignment of the devolution accountability frameworks with national priorities through shared data and interpretation. This would reflect:

- A shared ambition for both government and the places across priorities through a consistent interpretation and access to data.
- A collaborative approach to the understanding of place and interpretation of data and analysis between the national and local level.
- Clear accountability – on the holding and use of any data shared.
- Investment in research, data, and evaluation at the local level.

Agreed outputs and outcomes of these asks would focus on a small number of priority issues of political and public importance and be subject to public scrutiny. This would include:

- Improved analysis and interpretation of what action is needed at the MCA level
- Improved understanding of the local economy, society, and environment
- Better business cases, monitoring, and evaluation on impact
- Greater collaboration with national government on understanding place
- Establishment of an MCA data governance board to oversee the work

How could this work?

Clear data accountability
- Agree a clear **basis on which to share data and commit to achieve the legal, governance and accountability standards required.**
- **Work towards democratisation of data** and allowing local partners access to research and data that enables clear understanding of the strategic reasons for investment – through the MCA devolution accountability frameworks.

Joint oversight of access to data
- We would **expect to agree clear data sets to measure progress against outcomes** and access to the underlying data, and wider data needed to understand how we affect progress against outcomes.
- There would be **regular reviews of progress between government and MCAs** on achieving the devolution asks. This would include a review what data access has been devolved, collaborative projects in place, capacity, skills, and professions in place.

- **Ensuring investment in appropriate capacity and capability at the local level** to deliver place-based analysis, and giving those people access to government data and training, monitored on an ongoing basis.

The 'consequences'

- If data access and sharing is delivered, we would expect a better shared understanding of the needs of the MCAs in terms of achieving government policy aims. We would expect that this would lead to better policy, intervention and strategy development between central government and national government.
- Not investing in this approach would lead to continued gaps in understanding on what the needs, assets and opportunities are for places, and a lack of understanding of the potential impacts of national policy on place.

Annex 1: Devolved powers over data and processing

Based on recommendations from the Centre of Data Ethics and Innovation to GMCA[13]:

Use the MCAs' convening powers to show what modern, ethical data governance looks like - The MCA has an opportunity to show how to govern data and technology in an ethical and trustworthy way, by using its convening influence. The powers devolved to the MCA do not appear to confer new 16 functions for the Combined Authority in governing data and new technology, but such governance is necessary for the fulfillment of the authority's role.

The Combined Authority is therefore in the position of needing to use the powers it has in transport, economic development, policing, and many other areas, to convene discussion and direction of local data collection and use into a system that governs often sensitive information for the benefit of local citizens.

Many MCA staff understand that the Combined Authority lacks formal power over local data and technology issues. Lack of statutory powers held by the Combined Authority to deliver on the policies and projects behind their data sharing ambitions, and on local public organisations that hold useful information.

National legislation makes no reference to data and technology use at the local level: the Cities and Local Government Devolution Act 2016 does not contain provisions directly related to data, data protection or information governance, and the word 'data' is not in the Act; and the Digital Economy Act contains few references to local authorities and these are limited to duties such as management of civil registrations and do not reference Combined Authorities. It is therefore not surprising that approaches tend to stress a capacity to convene and coordinate local parties involved.

Combined authorities are well placed to not only convene but be given powers in the data space to support economic growth and support several of the place-based missions. The MCA is limited to specified Combined Authority provisions, severely hampering its ability to efficiently play an effective role in enabling data sharing/ analysis, research, and policy development. Lack of clear powers in relation to data limits its role to a convening one across a city region addressing huge cross-cutting themes.

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[13] https://www.greatermanchester-ca.gov.uk/what-we-do/information-strategy/ethical-data-governance/

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