

MRC/CSO Social and Public Health Sciences Unit Consultation Response

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| **Title of consultation** |
| ESRC Data Infrastructure Strategy engagement exercise |
| **Name of the consulting body** |
| Economic and Social Research Council (ESRC) |
| **Link to consultation** |
| [https://esrc.ukri.org/news-events-and-publications/publications/corporate-](https://esrc.ukri.org/news-events-and-publications/publications/corporate-publications/data-infrastructure-strategy-engagement-exercise/) [publications/data-infrastructure-strategy-engagement-exercise/](https://esrc.ukri.org/news-events-and-publications/publications/corporate-publications/data-infrastructure-strategy-engagement-exercise/) |
| **Why did the MRC/CSO Social and Public Health Sciences Unit contribute to this consultation?** |
| Our comments are based on many years’ experience, both good and bad, of using and attempting to use linked administrative data for research, and on a project we are currently working on, funded by the [National Institute of Health Research Unlocking data](https://fundingawards.nihr.ac.uk/award/NIHR133585) initiative. |
| **Our consultation response** |
| 1. **What do you think about the vision for the Data Infrastructure Strategy? For the vision, see section 4.3.**

It is difficult to disagree with anything in the vision, but it is a statement about ends, rather than means, and does not commit the ESRC to any practical steps, any clear direction of travel, or any particular focus for investment of effort or other resources. In these respects, it reflects wider weaknesses in the Strategy document – in particular, a tendency to emphasise what the ESRC already does well (such as support for the curation of social surveys) and to ignore widely acknowledged structural problems that have blocked progress in areas such as the wider use of administrative data. It is reasonable to identify (page 12) the remarkable achievements made using administrative data for research during the COVID-19 pandemic, but these should not be allowed to obscure longstanding problems that make cross sectoral data linkage time-consuming, burdensome and uncertain. We urge that the vision should be revised to include a commitment by the ESRC and its UKRI partners to work towards the optimal harnessing of administrative data for research by facilitating linkage and controlled access.1. **What do you think about the activities identified to support delivery of the strategy and do you think any others should be considered? For the activities, see section 4.5.**

Again, these are unobjectionable, but unspecific – they could feature in any research strategy – and refer to goals, rather than to ways of realising them. To take sustainability as an example, it is a tautology to say that investment must be fit for purpose to maximise long term value. It is vitally important that the full strategy is much more explicit about what kinds of investment are envisaged. The most useful proposal in section 4.5 is the‘Future Data Services’ programme. The proposed consultation should systematically gather information on the experiences of researchers who have used the existing data infrastructure to identify what works well and what is not fit for purpose. Issues the consultation might cover include: researcher accreditation and information governance procedures – are they transparent, efficient and proportionate to risk? How useful have researchers have found the ADR infrastructure – what do they see as its strengths and weaknesses? What are the barriers to cross-sectoral data linkage – how can funders help researchers to overcome them, etc.? It would also be valuable to survey researchers and data infrastructure providers in other countries to identify models of good practice and potential solutions to the problems UK researchers identify. In section 4.1 leadership is defined to include making connections and co-ordinating stakeholders, but no activities that might deliver these goals appear in the list in section 4.5.1. **Do you have any comments on the draft theory of change (Figure 1), focusing on evidence of need and targeted impacts?**

The non-financial leadership activities should include the championing of data sharing by Government departments – currently one of the weakest links in the whole chain. The long term outcomes listed in the theory of change include an expansion in the numbers of researchers using large data infrastructures, but it may be hard to sustain such growth if the acquisition of administrative data for research continues to be as laborious and uncertain as it is at present. As things stand it would be unwise to recommend PhD students, or other researchers with relatively short term funding, to undertake projects that rely on being able to obtain linked administrative datasets. For such research to be an attractive proposition, the ESRC needs to drive forward the development of a series of core linked datasets, comprising administrative data on policy exposures, such as benefit receipt, education, experiences of custody, etc., with social, health and other outcomes, and to integrate the provision of data with funding calls for studentships and project grants.1. **What do you think about the draft goals and objectives in Figure 2?**

Again, more specificity would be welcome. What exactly does the ESRC see as its leadership role? Does it include advocacy for better data sharing by Government departments, in normal times as well as in times of crisis such as the 2020-21 pandemic?1. **In your view, and after reviewing this document, what impact will the strategy make?**

In its current form, very little. If the vision and long term aims are supplemented by a clearer analysis of the strengths and weaknesses of the UK’s existing data infrastucture and a set of concrete proposals for building on those strengths and addessing the problems, then it could potentially be highly impactful. The Future Data Services proposal is key to this, and should be allowed the time and resources to undertake a thorough investigation of what the existing infrastructure is delivering and researchers’ experiences of using it. We recommend that this becomes a UKRI-wide undertaking, rather than a review of ESRC investments, to maximise the scope for learning from current practice.1. **Is there anything else that you would like to comment on?**

We are an interdisciplinary group of social scientists, epidemiologists, public health physicians and others who conduct research to understand the social determinants of health, and to develop and test interventions that will improve population health and reduce inequalities. We use a wide range of data in our research, including population surveys, administrative and vital events data, from the UK and other countries, which we access in a variety of ways, including virtual and physical safe havens, end-user licence agreements and standard open source data channels. Further information about the work we do is available from our [website](https://www.gla.ac.uk/researchinstitutes/healthwellbeing/research/mrccsosocialandpublichealthsciencesunit/). Our comments are based on many years’ experience, both good and bad, of using and attempting to use linked administrative data for research, and on a project we are currently working on, funded by the [National](https://fundingawards.nihr.ac.uk/award/NIHR133585) [Institute of Health Research Unlocking data](https://fundingawards.nihr.ac.uk/award/NIHR133585) initiative.1. **Would you be happy to be contacted to discuss your comments and would you like to be involved in any additional engagement activities?**

Yes, we would be happy to provide further detail of the experiences that have motivated these comments and would be keen to participate in further engagement activities. |

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| **When was the response submitted?** |
| 13th September 2021 |
| **Find out more about our research in this area** |
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