# Making the most of HMCTS data

## HMCTS' full response and update to Dr Byrom's recommendations

**Justice matters**

# HM Courts & Tribunals Service

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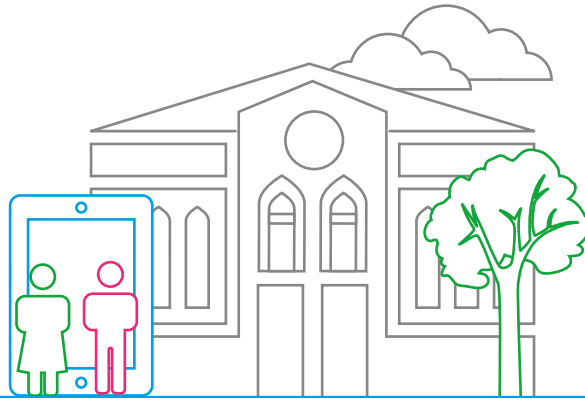## HMCTS' full response and update to Dr Byrom's recommendations

1. **We thank Dr Natalie Byrom for her report on open data and academic engagement**, her contribution whilst on secondment, her commitment to open engagement and gathering broad input to bring rigour and consensus, and for her support over the last year in implementing some of the report's recommendations. We also thank the Legal Education Foundation (LEF) for agreeing to the secondment, and echo Dr Byrom's thanks to all those who attended seminars, responded to the consultation and otherwise helped to shape the analysis and recommendations and to those who have already contributed to the early implementation.

2. HMCTS welcomes Dr Byrom's recommendations on data collection to support the evaluation of Reform and on developing our approach to open and shared data. Since publication of the report HMCTS has begun to implement the recommendations, but there are some areas which will need to be considered by the Senior Data Governance Panel (SDGP) (see below) prior to implementation. This paper sets out how we have put them into practice over the past year and our plans into the next year – we have made specific commitments about the timeframes for collecting data on protected characteristics, and on other commitments the timeframe will in part depend on the impact of the COVID-19 pandemic, which has disrupted projects across government. Some of Dr Byrom's recommendations are addressed to the Ministry of Justice (MoJ), who responded last year.[1]

### Our goals for open and shared data

3. The Reform programme will enable HMCTS to become an increasingly data-driven organisation. From daily operational decisions about deploying staff and prioritising worklists, to providing insights for service improvements and evidence for strategic planning; increased amounts of better-quality data will be more easily available. Data is a strategic asset which plays an increasingly important part in the delivery of our roles: supporting the rule of law and access to justice, improving performance and efficiency, driving fairness and promoting transparency. The COVID-19 pandemic has highlighted this in our need for data to support delivery, to monitor and evaluate our response to date and to inform plans for the future.

4. We recognise the potential interest from a wide range of users, including: academics, researchers, news organisations and civil society, organisations that provide legal support or advice to individuals and businesses and – inevitably –the innovations we cannot foresee. The Ministry of Justice is committed to supporting the use of technology in the legal sector and the LawTech Panel[2] supports properly governed access to data to catalyse growth and innovation.

5. Dr Byrom's report advances the case for change and highlights the potential benefits of widening data access. A clear articulation of the associated complexity and challenges sits alongside the recommendations. We take seriously concerns about risks to privacy for victims, witnesses, complainants and defendants. It is also important to recognise the potential risks to judicial independence. There is no proposal to share data on live and current cases. Over the past 6+ months, we have engaged extensively with MoJ and the judiciary to develop and agree data governance proposals. This work has included:

   a. Articulating the status quo, including the production of a report describing: what data is already available on an open and shared basis, what data could be made available on request (including via FOI, PQ and/or the data access panel), and the applicable limits and protections (including via GDPR and court orders for anonymity).

   b. Developing clear governance mechanisms to make data available on an open or shared basis including appropriate new controls. We will continue to commit to engaging with: people and organisations who want to use the data, privacy and data protection experts and organisations who are recognised as leaders in information sharing. We are delighted that Dr Byrom has continued to work with us on researching the potential options. We have already begun to re-launch the reformed and expanded Data Access Panel (DAP). We continue to refine proposals and procedures for a Senior Data Governance Panel (SDGP). Membership of the SDGP will be composed of representatives from judiciary, MoJ, HMCTS and civil society. From this autumn, the SDGP (operating initially in

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1 http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/justice-committee/hmcts-court-and-tribunal-reforms/oral/103778.html

2 https://technation.io/lawtechuk

"Today is a pivotal moment for the government to fully embrace – and fully fund - a data strategy that will deliver digital justice for all. Over a year on from delivering my report to HMCTS, I welcome its acceptance of my recommendations and the work undertaken so far to implement them. I urge the government to now put words into action. There is no better moment than now to step up the implementation of those recommendations. Otherwise, we will waste the opportunity to make the UK a world leader in delivering digital justice for all, is not wasted."

**Dr Natalie Byrom**
**Director of Research and Learning at**
**The Legal Education Foundation**

'shadow' mode) will set precedent and advise the Lord Chancellor, Lord Chief Justice and Senior President of Tribunals on novel, sensitive or potentially contentious issues, guiding HMCTS decision making on data.

c.   Using real examples to examine the details of secure data sharing. For example, in support of MoJ in the ADR UK funded 'Data First' programme, court data was deposited on the Office for National Statistics Secure Research Service (ONS SRS). The established ONS '5 safes' framework will allow HMCTS to observe and benefit from a respected and established sharing system which also protects private information.[3] In June and August, we authorized the share of 10 years' worth of magistrates' court Data and 7 years' worth of Crown Court data with the ONS SRS. We expect other datasets to follow, including Family Court data to be available from March 2021. This is a key first step which will enable accredited researchers in government, universities and other institutions to securely access de-identified extracts of linked datasets. Data linkage will allow researchers to interrogate how people interact with courts over time, what characteristics influence patterns of frequent

use and build a better understanding of the efficacy of different policies and services.

Further to this, researchers will be able to explore justice system users' interactions with other government services. This will enable deeper understanding of how the economic, social and educational backgrounds of people who use the justice system influence the pathways they follow (for example, between the civil and criminal courts), their needs and the outcomes they experience. Understanding these pathways is crucial to delivering evidence-informed, targeted policies and services. This in turn will lead to higher quality, lower cost, public services for everyone in the UK. Data access will be facilitated by the ONS SRS; an accredited processor under the Digital Economy Act (2017). The ONS controlled access procedure is an internationally renowned practical example of the highest standards of data security and protection.

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3   https://www.ons.gov.uk/aboutus/whatwedo/statistics/requestingstatistics/approvedresearcherscheme#the-five-safes – the framework refers to safe people, safe projects, safe settings, safe outputs and safe data.

6. Working closely with the judiciary and MoJ, we have also begun work to establish a coherent approach for publication of judgments and case outcomes while ensuring appropriate protection for personal data. Over the next 12 months, we aim to develop an agreed approach to publication in order to further support transparency and Open Justice.

7. We recognise the need to define the datasets that HMCTS holds and controls. Our data is currently held in fragmented systems (some of which are paper based records) and is often difficult to access. HMCTS has partnered with MoJ, providing de-identified court data for the MoJ 'Data First' programme. HMCTS historic datasets hosted on the ONS SRS will be accompanied by user guides and data catalogues describing the nature and quality of the shared data. The guides will also provide information on ONS SRS tools, data linking processes, the procedure to apply for access, and potential limitations of the data. They are currently being developed in close collaboration with the academic community and will be publicly available on GOV.UK. The magistrates' and Crown Court datasets were each accompanied by a data catalogue providing dataset specific information, for example, the variables included and coverage of those variables.

## Data to support evaluation

8. The MoJ-led overarching evaluation of HMCTS Reform is underpinned by a theory of change that will inform project-level evaluations carried out by HMCTS to ensure consistency and agreement on data requirements. MoJ published an initial response last year and is planning to publish an evaluation framework in due course.

9. HMCTS carries out a wide range of evaluation and evaluative activity.[4] This includes: user research and iterative testing of new services throughout the development process, formal evaluation of key projects – especially those which introduce a change in the way people interact with the courts and tribunals system – and rigorous monitoring of process and outcome data as services go live (and in steady state) to identify and address any unexpected patterns quickly.

10. Additional data we need to collect - the vast majority of evaluative data Dr Byrom recommended collecting is administrative data. We will collect this through the new digital systems built in our reform programme, which significantly improve the efficiency of data collection and storage.

11. Collection of administrative data is increasingly supporting our day-to-day management of services, process iterations and project development. Implementing Dr Byrom's recommendations will also support overarching MoJ evaluation – we expect to make the data available for wider use through our data governance structure.

a. Understanding fairness for different groups of users – work has already started on the collection of more consistent, higher quality data on protected characteristics. This includes the implementation of appropriate safeguards for storage and processing of these data sets. We collect data in online and paper channels and are working with experts to design our approach. We have started in the civil, family and tribunals jurisdictions with people who engage directly with reformed services (rather than via a legal representative). We began to ask users for protected characteristics data in live reformed services from August 2020, and will continue to do so as part of all new services entering public beta from 2021. We will use lessons from this initial implementation as we extend coverage to users who have legal representation and or are in the crime jurisdiction.

b. We will develop a data linking methodology to support a more detailed understanding of court and tribunal users. By connecting information on people who have more than one case or litigation involving multiple parties we will be able to improve user support, communications and streamline case management. Our approach is shaped by strong privacy principles. Appropriate procedural and system protections will manage how the data is viewed by staff or shared.

c. User experience is being measured by the collection and analysis of data on users' perception of the courts and tribunals service and system. We will publish this data, starting with users' views of our digital services. In parallel, we are developing 'effort, experience, perception' measures as part of our overall performance framework and will publish the relevant metrics.

12. Other information to support evaluation – we will continue to pursue transparent processes for the evaluation of HMCTS' support of the judiciary. From the 'triage' procedures for reformed processes to the online dispute mechanisms, we will consider how we could share more information about the impact of our design choices on users. We welcome engagement from expert stakeholders about possible proxies for user engagement with services, as the obvious measures (e.g. time that users spend in the system) could be ambiguous in interpretation.

13. All of these steps represent the first advances in the development of a wider data strategy. We want to use data to evidence user needs, improve our operational performance and the quality of the services we offer. We aim to have data which not only helps us manage our systems, but which also supports research and drives effective change, we recognise that producing these data requires investment. This framework describes the building blocks we need. Data architecture, analytical and modelling capability, specialists and individuals with deep institutional knowledge can come together to improve the system for everyone. We have begun to implement this data strategy.

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4    Our response to the Public Accounts Committee in January 2019 provides more details: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/775588/Public_Accounts_Committee_Recommendation_4_31_Jan_2019pdf.pdf

# Annex

## Summary of Recommendations

This table sets out Dr Byrom's recommendations and our response.

| | | Response |
|---|---|---|
| **1** | HMCTS consider the benefits and risks of introducing unique identifiers for individual users of the justice system. | We agree that HMCTS' understanding of users of the justice system should be deepened. HMCTS is currently developing approaches to this. Unique identifiers for individuals are not part of the current scope of work. |
| **2** | HMCTS should commit to embedding the collection of the thirteen data-points relating to vulnerability (outlined above in Table 1) into each service. The collection of this data should take place at the earliest possible opportunity in the user journey, whether this is initiated through digital or paper processes.It is recommended that HMCTS commit to embedding the collection of this data into reformed services before they reach public beta stage. Those services already in public beta stage should be prioritised for immediate work to embed the collection of this data. | We agree with this recommendation. Following consultation across government and with stakeholders about the design of our approach, work has begun to collect all thirteen points outlined by Dr Byrom. We have begun with collection of data from those who engage directly with CFT digital services and have built protected characteristics into digital services for Probate and Online Civil Money Claims (OCMC), while Divorce is scheduled for release soon. We will introduce this for new digital services entering public beta in 2021. We will also collect data through paper channels. Appropriate measures will be taken to reassure the public that the collection of this data is unconnected with case outcomes, and that personal information will be protected in compliance with the applicable legislation. |
| **3** | HMCTS should commit to the ongoing collection of data on the characteristics of users initiating and defending cases via different channels to identify and monitor disproportionalities, e.g. individual vs bulk claimant, geo-demographic characteristics of claimants and defendants, represented vs. unrepresented. | We accept this recommendation. We have already started collecting data on protected characteristics and other vulnerability measures in the probate digital service and are working to extend coverage over the next year. Appropriate measures will be taken to reassure the public that the collection of this data is unconnected to case outcomes, and that personal information will be protected in compliance with the applicable legislation. |
| **4** | HMCTS should commit to the ongoing collection of data on the types of cases initiated via different channels to identify disproportionalities and refine services. This data should be presented at a level of specificity that would support useful analysis, e.g. for a money claim, the amount type of claim and amount claimed. | We agree. Work is underway to gather information on initiation channels. Future sharing of data (including levels of specificity) will depend on data sharing principles to protect individuals' privacy and will be approved using the new open and shared data governance mechanism. Appropriate measures will be taken to reassure the public that the collection of this data is unconnected to case outcomes, and that personal information will be protected in compliance with the applicable legislation. |
| **5** | HCMTS should publish and consult on the metrics/data proxies used to assess the cost and effort associated with initiating and defending a claim via different channels. Once these metrics are agreed, the data collected should be analysed and reported on according to both case type and user characteristics. | We accept this recommendation and are engaging with experts, academics and stakeholders on the metrics used to assess effort, experience and perception. Subject to governance including judicial agreement, publication will follow current scoping of academic research in this field. |

| | | Response |
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| 6 | Capturing data on subjective perceptions of procedural justice using standardised tools, replacing the user satisfaction survey currently used. | We agree that perceptions of procedural justice are important, in addition to understanding overall user satisfaction. The evaluation of reform will develop an approach to this in collaboration with academics, subject to the appropriate governance including agreement from the judiciary. HMCTS is committed to adopting this recommendation as part of our long-term approach. |
| 7 | Working with experts in ODR to develop objective indicators of procedural fairness for new online processes, and using this data to augment the data captures on subjective perceptions of procedural fairness. | We accept this recommendation and recognise the importance of objective indicators of procedural fairness in maintaining access to justice. We are working with MoJ to include this issue as part of the published departmental Areas of Research Interest (ARI). The ODR currently under development is Continuous Online Resolution (COR) in the SSCS tribunal. If we develop COR into a public beta stage, then we will ensure that we work with experts in ODR as well as with the judiciary to develop objective indicators of fairness for the evaluation. |
| 8 | HMCTS should commit to sharing data collected on the impact of design architecture and behavioural "nudges" incorporated into forms and reformed processes with researchers to validate and check assumptions and build trust in new processes. | We accept the principle. Extensive user research is underway; it is a central part of our reform work. We will periodically summarise our findings. These will be used as a basis for further engagement with academics. All plans to publish and/or share data will be governed through our new mechanisms – including the Senior Data Governance Panel's role in setting precedent and shaping our approach to novel, sensitive or contentious issues. |
| 9 | Working with expert stakeholders to identify proxies for user engagement with reformed processes, e.g. management of information such as volume and quality of evidence provided, uptake of procedural safeguards etc. | We accept this recommendation and already work with stakeholders as part of our academic and public user engagement. We will continue to do this and consult with experts, where applicable, as we identify measures for user engagement with reformed processes. The development of measures, as well as any future publication, will be properly governed, including by way of judicial agreement. |
| 10 | Collecting data on patterns of engagement by users with legal advice and representation across paper and reformed processes to test the assumptions underpinning pilots. | We accept this recommendation. We will collect data on legal representation. We are working to develop robust procedures for measurement and linkage of data on whether our users have sought legal advice. |
| 11 | Collecting data on the characteristics of users and cases "triaged" to different processes, to assist the judiciary in understanding whether the Practice Directions they have made are being applied correctly and to assist in the training of Authorised Officers who are intended to assist with these processes. | We accept this recommendation. We are developing approaches to collecting data on the protected characteristics of litigants in person who use our services, as well as information about cases. We will be able to use this data to evaluate decisions made by HMCTS. The approach taken, as well as any future publication, will be properly governed, including by way of judicial agreement. |
| 12 | Collecting data on the outcomes of cases e.g. abandoned/withdrawn/settled/ determined and the amounts awarded/settled for across the different processes, e.g. Continuous Online Resolution, Online Civil Money Claims. | We accept this recommendation and will collect data on outcomes of cases in the future. First, we will conclude our ongoing analysis of user journeys in Online Civil Money Claims. We will use the resulting case pathways to capture case outcomes. The approach taken, as well as any future publication, will be properly governed including, including by way of judicial agreement. |

| | | Response |
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| 13 | HMCTS should commit to collecting data on the characteristics of users and cases that reach judicial determination and analyse this data against the types of users that initiate cases, to explore patterns in the characteristics of users and cases that reach the judicial determination stage. | We accept this recommendation. HMCTS have identified the data needed across all of our reformed services and are working to ensure that this data can be used effectively to evaluate future decisions made by HMCTS. The approach taken, as well as any future publication, will be properly governed, including by way of judicial agreement. |
| 14 | HMCTS should capture and publish data on applications for enforcement, time from decision to enforcement and whether enforcement proceedings are defended across both paper and reformed services as part of any evaluation of the impact of the reform programme on access to remedy. Examples of data to be captured (in the context of Civil Money Claims) could include: whether enforcement is applied for; type of enforcement applied for (warrant of execution, attachment of earnings order, third party debt order, charging order, bankruptcy petition); whether an application for suspension of a warrant/variation of order is made and whether an application notice, certificate of cancellation or satisfaction is applied for by the defendant. It has been claimed that enforcement is easier following mediation,or less necessary because people comply more willingly with negotiated settlement agreements. As such, data comparing compliance with ODR settlement terms to compliance with determinations should be captured. | We accept this recommendation. Our next step is to work with our current case management systems team to extract the information already recorded on enforcement. Where the information recommended for collection is not currently available, we will investigate whether and how we can fill the gap. All plans to publish and/or share data will be governed through our new mechanisms – including the Senior Data Governance Panel's role in setting precedent and shaping our approach to novel, sensitive or contentious issues. |
| 15 | HMCTS should conduct an urgent review of their internal position with regard to data and prioritise the production of an external-facing data catalogue. This catalogue should:<br><br>• list what data is held<br><br>• explain who is responsible for each dataset<br><br>• detail where the data is stored and who stores it<br><br>• provide an indication of the relative quality of different datasets<br><br>• explain who is currently allowed to access the data and for what purposes<br><br>• describe existing arrangements for accessing data and detail any charges associated with access to particular types of data. | We accept the principle of this recommendation to create an external-facing data catalogue, and will take a phased approach.<br><br>With the support of Dr Byrom, we have mapped the existing arrangements for accessing existing data and reviewing good practice across government to inform the development of our approach to open and shared data.<br><br>The MoJ) has received funding from ADR UK for an ambitious data linking programme called 'Data First'.[5] Data First aims to unlock the potential of existing data by linking data across the justice system. HMCTS are partners with MoJ on this project, providing de-identified HMCTS data.<br><br>Magistrates and Crown Court datasets have been shared on the ONS Secure Research Service. Work is underway to make Family Court data available from March 2021. These data sets are supported by detailed catalogues and notes for users. The release of these data sets was approved by the judiciary earlier this year.<br><br>Please see paragraph [7] above for further details. |

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5    <https://www.adruk.org/our-work/browse-all-projects/data-first-harnessing-the-potential-of-linked-administrative-data-for-the-justice-system-169/>

| | Response |
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| **16, 17** HMCTS should work with the judiciary and colleagues in the MoJ to commission an independent report which reviews the current arrangements for disseminating judgments to the public and maps the information flows from courts to publication. On the basis of this report, HMCTS and the MoJ should engage with key stakeholders to develop a publication solution that delivers free and comprehensive access to judgments in a structured machine-readable format. | We <u>accept the principle</u> that more work is needed about access to judgments. This is a complex area and we will work with MoJ and the judiciary to develop proposals over the next 12 months. We expect this to be a priority area of focus for the Senior Data Governance Panel. |
| **18** HMCTS should consider approaches to meeting the other areas of priority [data] need identified by stakeholders through a transparent process as part of the development of the HMCTS data strategy. Tools such as the ODI Data Ethics Canvas could be deployed to devise an approach in partnership with internal and external stakeholders. | We <u>accept</u> this recommendation and will capture feedback and requests for data from other stakeholders through the new open and shared data governance mechanism. The Senior Data Governance Panel will play a central role in setting approach and precedents for decisions on open and shared data, especially on novel, sensitive or contentious issues. |
| **19** The appropriate standard for approving or denying requests to access data should be based on the robustness of the research design, rather than utility to the business. [...] the Insight and User Research Division or another function in HMCTS must be resourced with adequate additional funding to deliver this function if volumes of requests increase as expected in line with the rollout of reforms. | We <u>accept</u> this recommendation and have already begun to implement it - decisions on requests to access data now focus on the robustness of the research design alongside consideration of the public benefit, access to justice as well as risks to privacy and practical implications. We are reforming the current Data Access Panel (DAP), which will have oversight of all of HMCTS' data sharing activity and will be fully resourced with a combination of HMCTS and research funding resources to receive requests and help applicants. From this autumn, the Senior Data Governance Panel (operating initially in 'shadow' mode) will have a further role in advising on novel, sensitive or contentious issues and setting precedent for future decision-making. |
| **20** Functions and roles should be clearly articulated and resourced, particularly with regard to Quality Assurance, GDPR and Privacy Assurance. | We <u>accept</u> this recommendation and are in the process of standing up a full Data Access Secretariat. This will be a key element of reforming the DAP and its membership. The roles will be articulated and resourced with regard to quality assurance, GDPR and privacy assurance. The Senior Data Governance Panel will be able to scrutinise and provide oversight. |
| **21** The production of an external-facing data catalogue to guide applications should be prioritised as a matter of urgency. Data Engineering Fellowships should be established to deliver this work (see Chapter 7 below). Work to engage external funders where needed to deliver this should be prioritized. | We <u>accept the principle</u> of this recommendation to create an external-facing historic data catalogue, please see the response to recommendation 15. We currently do not plan establish HMCTS Data Engineering Fellowships. Much of this scope of work has been covered in the Data First Project. |
| **22** Minutes of future DAP meetings should be made publicly available. | We <u>accept</u> this recommendation. Once our reformed Data Access Panel is in place, we will publish the minutes of the meetings. The Senior Data Governance Panel will set the framework and provide oversight. |

| | | Response |
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| 23 | Scenarios (including resource implications) should be urgently developed for how to handle increased demand [for access to data] in 2019 and meet HMCTS' public commitments in the near term. | We accept the principle of this recommendation to ensure we are able to respond to requests for access to data in a timely way. We will keep resourcing of the Data Access Panel structure under review once it is fully set up, and expect that the Senior Data Governance Panel will scrutinise levels of demand and DAP capacity. |
| 24 | HMCTS should publish its vision with regard to shared/open data and develop its overarching strategy in line with existing legal and ethical principles through a transparent and accountable process. | We accept this recommendation. We have developed an open and shared data strategy, drawing on substantial work by Dr Byrom to draw out existing legal and ethical principles. We will issue further communications this autumn. |
| 25 | In terms of developing wider open/shared data principles: consolidating, publishing and consulting on the aims of the future open/shared data strategy with key stakeholders at the earliest possible opportunity is recommended. HMCTS should publish details of their approach across the ODI data spectrum with indicative timeframes for engaging stakeholders. | We accept the principle of this recommendation to engage widely in developing our approach before publishing our plans. We have extensively consulted key stakeholders within the MoJ and the judiciary during the development of the open and shared data principles. The (shadow) Senior Data Governance Panel will play a central role as this develops, in particular in setting precedents and advising on our approach to novel, sensitive and contentious issues. As the new governance mechanism is set up, we plan on expanding our stakeholder engagement. |
| 26 | [When considering open/shared data,] HMCTS should dedicate resource to reviewing national and international best practice, existing legal frameworks, engaging a wide range of stakeholders and publics and testing the acceptability of different models with stakeholders and the public. | We accept the principle of this recommendation to draw widely on existing practice and frameworks, as well as engaging with stakeholders and the public. HMCTS did an initial scoping of international best practice in this space; the Legal Education Foundation has now funded specialist academic work led by Dr Judith Townend to establish international best practice; we have also been able to draw on significant and substantive further analysis by Dr Byrom of existing legal frameworks and good practice from other UK sectors, including the NHS. |
| 27 | Once draft principles are agreed, the datasets identified as a priority need by stakeholders should be catalogued and used as a case study to evaluate the utility of the approach designed, starting with case level data. | We accept this recommendation and have already started to test the proposed approach to data governance, including from this autumn the (shadow) Senior Data Governance Panel. |
| 28 | Existing models for sharing data with researchers are available and should be utilised in the medium term to facilitate the delivery of HMCTS' public commitments to make data available for evaluation and research. See for example, the SAIL Databank, and the forthcoming ADRP hosted by ONS which provides safe accredited access for accredited researchers to administrative data. | We accept this recommendation. The MoJ Data First project has been using the ONS Secure Research Service (SRS) and has begun to deposit data already, with agreement of the judiciary. We plan on doing the same and making the SRS one of our primary means of sharing data. |
| 29 | Data Engineering Fellowships should be funded for between 6-12 months. Consultation with internal and external stakeholders suggested that the key responsibilities, skills and person specification should be modelled on the recently advertised role of Ministry of Justice Lead Data Engineer. | We accept the principle of this recommendation to create an external-facing data catalogue, please see the response to recommendation 15. We currently have no plans to establish HMCTS Data Engineering Fellowships. |

# HM Courts & Tribunals Service