

Better Use of Data in Government: Consultation

A Government Summary of Responses

June 2016
Cabinet Office

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Executive Summary

1. This document is a summary of the responses the Cabinet Office received to its public consultation, *Better Use of Data in Government*, published on 29 February 2016. The consultation closed on 22 April 2016.
2. Openness is at the heart of both the development of the proposals and the approach we have taken to analyse responses to the consultation. The consultation set out proposals to improve public sector access to data to support:
 - The delivery of better targeted and more efficient public services to citizens;
 - The detection and prevention of fraud against the public sector and citizens to manage debt more effectively; and
 - Better research and official statistics to inform better decision-making..
3. There were 282 responses to the consultation. The majority of responses were supportive of the proposals and the need to ensure appropriate safeguards, accountability and transparency are in place to build trust with citizens on the usage of their data. Respondents have provided suggestions for additional objectives for which data could be shared to improve the lives of vulnerable people in society. Furthermore, we have received recommendations for strengthening the principles and practices to be set out in the Codes of Practice.
4. The volume of responses submitted is indicative of the strength of interest in the potential benefits to citizens and government by using data better as well as the support for appropriate levels of privacy underpinned by key protective principles:
 - no building of new, large, and permanent databases, or collecting more data on citizens;
 - no indiscriminate sharing of data within Government;
 - no amending or weakening of the Data Protection Act; and
 - safeguards that apply to a public authority's data (such as HMRC) apply to the data once it is disclosed to another public authority (i.e. restrictions on further disclosure and sanctions for unlawful disclosure).

Background

5. The Cabinet Office consulted on a set of specific measures intended to simplify a complex legal landscape and unlock the potential of publicly held databases to improve the lives of citizens through three thematic policy headings:
 - The delivery of better targeted and more efficient public services to citizens
 - To help detect and prevent fraud against the public sector and help citizens manage debt more effectively, and
 - To increase the use of administrative data for research purposes and official statistics

Overview

- 6. The consultation received 282 formal responses. They have been read and categorised in relation to the questions asked in the consultation. A significant number of respondents provided more general comments about the proposals outside of the scope of consultation questions. All comments have been given full consideration as part of the Government response as well as for the purpose of further developing proposals. We are grateful to everyone who took the time to respond to the consultation as well as those that participated in the open-policy making process from which the proposals were developed.
- 7. The table below gives a breakdown of consultation responses by the type of respondent.

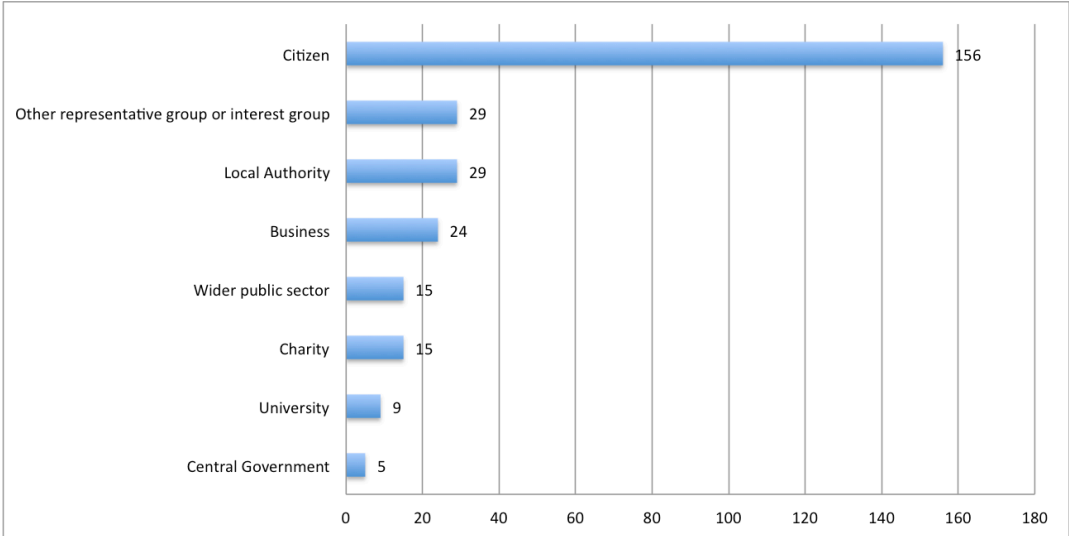


Table 1 - Breakdown of consultation responses by type of respondent

Consultation responses

- 8. This following section provides a summary of the responses received to the consultation. The details of each proposal is set out in the consultation document. Annex C provides a summary of the approach used to analyse responses as well as a breakdown of responses for each question. Many respondents limited their responses to answering questions relating to specific areas of interest and as such response rates will vary across consultation questions.

Chapter 1.1 - Improving public service delivery

General comments

- 9. The majority of responses were supportive of the proposal to introduce a new legal gateway to share data for the purpose of supporting the delivery of public services. The majority of representatives from local authorities and other bodies who deliver front-line services were supportive of the proposals and felt the proposed new power would simplify the legal landscape and allow more coordinated interventions to support vulnerable people.

10. A number of responses from civil society questioned the creation of a new gateway on the basis that citizens should have explicit control of the sharing of their data. Many of these respondents also felt that the potential purposes for which data could be shared was too broad. Furthermore, some respondents felt there was insufficient clarity on key definitions and details of how data-sharing would operate under the proposals. A number of respondents raised the issue of alignment with the General Data Protection Regulations (GDPR), which are due to come into force across the European Union in 2018.
11. A number of respondents commented on the importance of health and social care data being in scope of the powers, particularly to support preventative rather than reactive action. Many of these respondents also recognised the need to ensure appropriate safeguards are in place to gain the trust of citizens.
12. Many respondents expressed support for robust safeguards for ensuring data under the proposed power is accessed and used appropriately. Transparency was a key recurring theme raised by citizens and representatives from across the range of sectors. The view expressed was that trust could be built by ensuring that citizens could understand what data was being accessed, how it was being used and for what purposes. Respondents also raised the importance of ensuring there was clear accountability in those bodies participating in a data share. This was seen as a way of ensuring data is handled securely and allowed for sanctions to be applied where bodies had acted unlawfully.

Question 1

Question 1: Are there any objectives that you believe should be included in this power that would not meet these criteria?

13. Sixty-two responses were received to this question. A number of responses suggested that the objective proposed for addressing troubled families should be amended. Respondents recommended that the objective be expanded to allow data to be used to monitor and evaluate programmes and initiatives as well as support early intervention for those that have narrowly failed to meet the threshold.
14. Particular objectives suggested by those that responded to this question included:
 - Local information sharing in multi-agency setting to support earlier intervention to protect children at risk;
 - Local information sharing in multi-agency setting to support earlier intervention to protect vulnerable adults; and
 - Local demonstration pilots on mental health and frail elderly issues.

Government response - question 1

15. The Government welcomes the extensive and detailed feedback from respondents on additional objectives. It is clear from responses received to the consultation that

the right balance needs to be struck between providing the flexibility for Government to respond to emerging needs whilst ensuring the proposed power is suitably constrained to clear purposes that benefit citizens. We will ensure that explanatory notes and the Code of Practice will provide the appropriate information to aid understanding of the proposed power.

16. Although many constructive suggestions for new objectives were provided, a number were considered unsuitable on the basis that they were either too broad or did not fit the conditions specified in the proposed power. For example, the suggestion of improving the ability of public authorities to deliver services within available budget is considered too broad to be an objective for the purpose of this power.
17. Further work will be carried out on those recommendations around protecting children and vulnerable adults at risk, supporting those who are frail elderly and those who suffer from mental health issues, as well as expanding the troubled families objective to understand how data access can support the delivery of better services.
18. The Government acknowledges the importance of health and social care data in multi-agency preventative approaches and early intervention to prevent harm. We will do further work with the National Data Guardian following the publication of her review/report to consider how health data is best shared in line with her recommendations.

Question 2

Question 2: Are there any public authorities that you consider would not fit under this description?
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19. There were fifty-four responses to this question. A majority of responses (twenty-eight in total) indicated support for the definition of a public authority as a 'person who exercises functions of a public nature'. A few responses questioned what is 'public' and sought further clarity on the definition. A number of respondents felt the definition was too broad and could be interpreted in ways which might allow a high number of organisations to access data under the proposed powers.
20. Particular types of public authorities suggested by those that responded to this question included:
 - All schools, including academies and free schools
 - All universities and colleges;
 - Combined authorities, unitary authorities, metropolitan boroughs and districts, two tier authorities and parish councils.
 - Registered social landlords;
 - Police and National Crime Agency; and
 - NHS bodies.

21. A number of the responses received highlighted the need to provide clearer explanation of 'functions of a public nature'. A number of responses suggested types of public authorities and other bodies that should be captured within scope of the power or specifically listed in the schedule (e.g. different types of local authorities and academies). In light of these helpful responses we will review the clauses and schedule and will develop a Code of Practice to guide appropriate use of the power.

Question 3

Question 3: Should non-public authorities (such as private companies and charities) that fulfil a public service function to a public authority be included in the scope of the delivering public services power?

22. There were eighty-two responses to this question of which the majority supported non-public authorities that fulfil a public service function to a public authority being included in the scope of the delivering public services power. A majority of responses stated that non-public bodies should be in scope of the proposed powers to maximise the benefits of the provisions. A number of respondents expressed concerns and indicated their opposition to private bodies having access to information under these proposed powers. Some responses included concerns about perceived potential conflicts of interest of a private body, where they provide multiple services to public authorities and data received is used for a secondary purpose, such as the removal of a benefit to an individual or developing tenders for new business. A number of respondents stated that non-public authorities should only have access to data for clearly defined purposes relating to the delivery of objectives set out in legislation.
23. A few respondents went further to state that private bodies should only be in scope if they are providing services directly on behalf of a public authority. A number of respondents questioned whether non-public authorities would have appropriate data security and governance in place to handle data securely. A few respondents took a more positive view, stating that extending the scope of the power to private bodies would ensure that consistent conditions and safeguards would be applied to data access, whereas current arrangements under contractual arrangements may be inconsistent and less robust.

Government response - question 3

24. There were eighty-two responses to this question of which the majority of respondents were supportive of the proposals as long as appropriate strict controls are in place to safeguard citizen's data against misuse. As such, Government intends to proceed with the proposals to enable non-public sector organisations who are fulfilling a public function on behalf of a public authority to be in scope of the powers. We will strictly define the circumstances and purposes under which data-sharing will be allowed, together with controls to protect the data within the Code of Practice. We will set out in the Code of Practice the need to identify any conflicts of interest that a non-public authority may have and factor that information in the decision-making

process for whether a non-public sector organisation should be involved in specific data-sharing arrangements. The proposed legislation allows information to only be shared for the specific objectives listed and we will ensure that this and other restrictions are clearly communicated in the Code of Practice and explanatory notes. The Code of Practice will also set out auditing and enforcement processes, which will be critical to ensure that everyone can understand what information is being accessed, who is accessing it, the purposes for which the information is being used, and the limitations placed on the use of the data.

Question 4

Question 4: Are these the correct principles that should be set out in the Code of Practice for this power?

25. There were sixty responses to this question. The majority of respondents expressed satisfaction with the principles, with a smaller number of responses stating that the principles given in the consultation paper lacked definition. Of these respondents, a number were critical of the consultation question and felt there was insufficient detail to usefully comment on the proposal.
26. A number of responses stated the importance of transparency to help build trust with citizens about the use of data, with audit trails and annual reports published on the use of powers. A smaller number of respondents asked for citizens to have greater control of the usage of data under these proposed powers, recommending that provisions be included for citizens to change, update and revoke consent for the use of data through a model that allows citizens' preferences to be captured and acted upon. A few respondents also asked for the proposed power to include the means for citizens to report complaints about the use of data so that appropriate sanctions can be applied.
27. A number of responses from public authorities commented about the risk of creating a Code of Practice that placed excessive bureaucratic requirements on those bodies wishing to share data under the proposed power. These respondents cautioned that overly bureaucratic requirements would result in low levels of usage of the powers by public authorities.
28. Additional principles and information to be set out in the Code of Practice suggested by respondents included:
 - Clear principles and step by step guide to the use of power;
 - Templates and guidance to ensure all parties are clear on data protection application;
 - Guidance on successful implementation;
 - Guidance on assessing the quality of data;
 - Requirement of evidence to measure the effectiveness of data to achieve/support objectives; and
 - Establishing a presumption that data should be shared where there is public benefit, subject to statutory and service specific safeguards.

Government response - question 4

29. A majority of respondents felt the broad principles were right, although a number of responses expressed the need for further clarification. We will develop a Code of Practice to provide greater detail on how the power will work and set out best practice so public authorities make use of the power and share data securely and proportionately.

Chapter 1.2 - Providing assistance to citizens living in fuel poverty

General comments

30. The majority of responses were supportive of the proposal to introduce a new gateway to provide assistance to citizens living in fuel poverty. A few respondents welcomed this proposal as an example of constrained power for limited defined purposes. Respondents also raised the importance of ensuring appropriate safeguards are in place to ensure that data that is shared is used only for specified purposes and not for any other purposes, for example targeting marketing.

Question 5

Question 5: Should the Government share information with non-public sector organisations as proposed for the sole purpose of providing assistance to citizens living in fuel poverty?

31. Seventy-one responses to question five were received. A significant majority of respondents (fifty-seven in total) supported the purpose of the proposed power, agreeing or strongly agreeing with the Government's proposal to share information with non-public sector organisations for the sole purpose of providing assistance to citizens living in fuel poverty. A number of respondents commented that some of the most vulnerable people in society live in fuel poverty and are the least likely to come forward to apply for assistance. As a result, these respondents welcomed steps to identify eligibility and apply automatic rebates where appropriate. Many of those respondents who were supportive of the proposals also stated that the purpose for which data would be shared should be tightly constrained with strict controls in place to prevent misuse of data, such as direct marketing. A number of energy providers responded and welcomed the proposal on the basis that it would help suppliers meet their regulatory obligations to vulnerable customers and reduce the costs that are involved in administering their obligations, allowing them to reduce costs to consumers.
32. A few respondents expressed concern about the proposal to share data with private companies. These respondents stated that the objective should instead be achieved through a consent based approach. This was offset by a number of other respondents (six in total) who felt that the proposal should go further, for example to

cover water companies or to offer broader forms of support that may fall outside the definition of fuel poverty.

33. A few respondents stated the importance of good communication and engagement ahead of any implementation of the proposal in order to provide clarity and assurance to citizens about the purpose for which their data is shared, who is accessing it and the restrictions in place on the use of the data.

Government response - question 5

34. There were seventy-one responses to this question of which the majority of respondents were supportive of the proposals as long as appropriate strict controls are in place to safeguard citizen data against misuse. As such, Government intends to proceed with the proposals to enable information to be shared with non-public sector organisations for the sole purpose of providing assistance to citizens living in fuel poverty. These proposals will strictly define the circumstances and purposes under which data-sharing will be allowed, together with controls to protect the data which will be outlined in the codes of practice. The codes will include details of the criminal sanctions that may be imposed should data be misused, or used for any purpose other than those that have been outlined in the clauses, such as for direct marketing . This will prevent any organisation from using the data for punitive measures, such as stigmatising families, blacklisting customers or negatively affecting their credit ratings.

Question 6

Question 6: Would the provision of energy bill rebates, alongside information about energy efficiency support, be appropriate forms of assistance to citizens living in fuel poverty?

35. Sixty-five responses were received to question six. A significant majority of respondents (forty-six in total) agreed or strongly agreed that the provision of energy bill rebates, alongside information about energy efficiency support, were appropriate forms of assistance for citizens living in fuel poverty.
36. Whilst a small number of respondents (six in total) highlighted that longer-term solutions to dealing with fuel poverty such as installing energy efficiency measures offer a more sustainable solution, these respondents also agreed that in the short term, energy bill rebates are effective and play an important role in providing assistance to the fuel poor when it is needed most.
37. A number of respondents suggested that the current proposals could be broadened out to include other forms of fuel poverty assistance, for example advice or support with managing debt, in addition to energy bill rebates. Suggestions included that future iterations of the supplier obligation (currently the Energy Company Obligation (ECO)) should be included in the proposals.

38. Some respondents expressed concerns with the quality and completeness of data sets that might be used to identify those in fuel poverty, highlighting that this could pose challenges with the intended objectives of the proposals, and that Government should carefully consider the merits of the various datasets that might be used.
39. As with question five, a number of respondents stated that strict controls should be put in place to ensure that data sharing is in the best interests of the customer, that citizens should be informed of who their data is being used by and why, and that (as stated in the consultation document) any proposals and all bodies involved in a data share should be compliant with the Data Protection Act.

Government response - question 6

40. There were sixty-five responses to this question, of which the majority were supportive. As such, Government will continue to explore options to provide assistance to those living in fuel poverty in the form of energy bill rebates and information about energy efficiency support through data sharing.
41. Due to the wording of this question, there were some queries about whether the Government is proposing that energy bill rebates should always be accompanied by energy efficiency advice. In order to tackle fuel poverty most effectively, the Government recommends a range of measures that include providing information about energy efficiency, installing energy efficiency measures such as insulation and providing financial support and assistance to those living in fuel poverty. A number of different schemes and programmes are used to deliver these interventions and the Government is not suggesting that these measures always need to be delivered alongside one another.
42. Before embarking on data-sharing activities as part of fuel poverty schemes, the Government will need to ensure that the datasets to be used for the data-sharing are of sufficient high quality and accuracy to enable the scheme to reach more fuel poor households.
43. Government will be consulting separately on the future supplier obligation (the successor to ECO), as well as on the future Warm Home Discount scheme.

Question 7

Question 7: Are there other forms of fuel poverty assistance that should be considered for inclusion in the proposed power?

44. In total, fifty-eight responses were received to question seven. Of these, a considerable majority of respondents (forty-four in total) agreed that there are other forms of fuel poverty assistance that should be included in the proposed power and that the definition of 'forms of fuel poverty assistance' should be kept as broad as

possible. This would allow for inclusion of more holistic forms of fuel poverty assistance, for example benefits entitlement checks, advice on smart meters or support switching from pre-payment meters (PPMs).

45. As highlighted in question six, a number of respondents also commented that data sharing should also be utilised within the future supplier obligation (ECO).
46. A number of respondents highlighted that local authorities would be well placed to offer additional services and support for those living in fuel poverty, including advice on switching, advice on energy efficiency and advice on how to avoid health risks associated with living in cold, damp homes. A number of other respondents highlighted how access to data on fuel poverty could help GPs and health providers provide more targeted support to their patients. Others suggested that the rebate amount could be higher for more vulnerable homes.
47. As with previous questions, there was strong support for any data sharing provisions to be compliant with the Data Protection Act.

Government response - question 7

48. There were fifty-eight responses to this question, the majority of which supported taking a broad approach to the forms of fuel poverty assistance that should be included in the proposed power. As with responses to questions five and six, a number of issues relating to the implementation of this proposal were raised in some responses, including clear and strict controls as to how data is used and for what purpose.
49. Government intends the future data-sharing powers should be used to reduce the energy costs of, or improve the health and well-being of, people living in fuel poverty. Within this objective, support may be provided in a number of different ways, depending on the particular support scheme. In order to protect data from misuse, the circumstances and purposes for which the data may be shared, and the persons with whom it may be shared, will all be clearly defined.
50. As stated as a general principle in the consultation document the sharing of any personal data for fuel poverty support must comply with the Data Protection Act. The Government will also put in place a code of practice, and will work with Ofgem and the Information Commissioner's Office (ICO) to ensure the appropriate enforcements are in place through the relevant and most appropriate enforcement bodies.

Chapter 1.3 - Access to civil registration to improve public service delivery

General comments

51. Responses to the proposals on civil registration were mixed. Representatives from bodies delivering public services were broadly supportive of the proposals on the basis that improved access by public authorities to civil registration data could enable

the delivery of better public services that are more seamless and convenient for citizens. Conversely, a large number of individual respondents and representatives from civil society stated strong opposition to the proposed power providing the ability for the bulk sharing of data, believing that the power would effectively create an identity database and enable personal data to be shared between public authorities even where there is no public benefit to do so. Representatives from civil society involved in the open policy making process felt that the proposals did not align with the key principle that proposals would not allow for indiscriminate sharing of data within Government.

52. Some respondents also suggested that whilst the focus of the power appeared to be on the bulk sharing of data other methods may be more efficient and secure. A number of respondents commented on the proposed Code of Practice which would set out the details of how public bodies would use the power. Many of these responses were favourable, whilst including recommendations such as requiring the Code to be prepared in consultation with the ICO.

Question 8

Question 8: Should a government department be able to access birth details electronically for the purpose of providing a public service, e.g. an application for child benefit?

53. Fifty-eight responses were received of which the majority of respondents agreed with the consultation question. Many of the responses to this question qualified their answers with comments or conditions to the use of the proposed power. A number of respondents expressed strong support for the Data Protection Act provisions governing decisions on disclosure of data, particularly principles of data minimisation and data retention. Respondents also expressed support for the Code of Practice to set out principles and processes to ensure data is accessed for specific stated purposes with safeguards to protect the privacy of citizens, such as inadvertent disclosure and matching pre and post adoptive identities.
54. A number of responses from local authorities voiced concerns about the potential impacts of these proposals such as loss of income from providing paper copies of registration documents. Other responses from local authorities suggested ways of mitigating this potential issue through a power to charge fees or by reviewing existing fee structures to help recover costs.
55. Respondents who were supportive of the proposals stated that better public authority access to civil registration information could enable better informed decision-making, allocation of resources and service delivery. Others commented that civil registration information is already in the public domain and a power to support the modernisation of public services would be a natural progression. A number of respondents recommended extending the purpose of the power beyond the provision of public services to other purposes such as statistical analysis.

56. The Government welcomes the positive responses to the proposals to share civil registration information which will help meet the digital by default agenda objectives, such as sharing of electronic birth information with a public authority for the purpose of accessing a digital service without having to provide paper certificates. The proposed legislation will include a requirement for a statutory Code of Practice to be developed in consultation with the ICO. The Code will set out principles and processes to ensure that information is only shared on a discretionary basis and with robust safeguards in place to prevent any misuse of data. In addition, as with other proposed powers, there will be strict adherence to the Data Protection Act and the principles contained within the Act when considering requests to use information. Proposed legislation will state that information will be shared on a cost recovery basis to ensure the General Register Office and local authorities are able to recover any costs associated with sharing information. The Code of Practice will be reviewed on an annual basis to ensure it is kept up to date.

Question 9

Question 9: Do you think bulk registration, such as details of all deaths, should be shared between civil registration officials and specified public authorities to ensure records are kept up to date?

57. One hundred and fourteen responses were received. Views expressed were broadly split between those who agreed and those who disagreed with the question. Many of the responses to this question qualified their answers with comments or conditions to their answer. A significant number of respondents supported establishing a robust and clear framework and processes for the use of the power, to be set out in secondary legislation. Specific points recommended to be covered in the framework included:
- Security arrangements for access to and transmission of data;
 - Route of recourse for citizens (for decisions based on error);
 - Transparency so that citizens have clarity about the use of their data; and
 - The adoption of data standards.
58. A number of responses included recommendations for strengthening the safeguards around use of the data. Amongst the recommendations from respondents was a list of purposes for which data could be used under the proposed power, and placing restrictions on the sharing of certain categories of civil registration information into primary legislation rather than within the Code of Practice.
59. Of those respondents who agreed with the consultation question, a significant number asked for the scope of the powers to be extended to cover private bodies such as financial institutions and insurance and pensions companies as well as non-public authorities that fulfil a public service function to a public authority, such as charities and support organisations. A few respondents also expressed the view that

civil registration information should not be shared with private companies or to be used by any institutions for marketing or similar commercial purposes.

Government response - question 9

60. Whilst recognising there are diverging views on sharing bulk information, the Government supports proposals to share bulk registration information where there is a clear and compelling need to do so, such as using birth registration data to reduce the gap in Child Reference Numbers (which eventually become National Insurance Numbers) caused by the introduction of the income threshold for Child Benefit entitlement. To provide assurances around privacy protections, we will ensure that a robust, clear and transparent framework is in place with appropriate safeguards. This will ensure that information is only used for the purpose for which it has been provided and only retained for as long as is necessary. There are no intentions to share data with the private sector or for data to be used for any commercial purposes. A statutory Code of Practice will be introduced which will ensure that security arrangements, rights of recourse for citizens, data standards and transparency requirements are fully covered. Furthermore, the Code will place explicit restrictions on any linking of registration information to prevent the creation of any identity databases.

Chapter 2.1 - Combating fraud against the public sector through faster and simpler access to data

General comments

61. The majority of responses were supportive of the proposal to introduce a new gateway to improve access to data for the purpose of combating fraud against government. Many of the supportive responses welcomed the proposal on the basis that it could potentially support public authorities to work together more effectively to prevent fraud. A few responses from public authorities suggested potential pilots which could be enabled by the proposed power, such as Direct Payment or personal budget fraud as well as supporting the Blue Badge Improvement Service.
62. A number of the responses raised concerns about the lack of parliamentary scrutiny of proposals for pilots under the power, as well as the the approach taken to review the gateway after a defined period of time rather than include a sunset clause.

Question 10

Question 10: Are there other measures which could be set out in the Code of Practice covering the proposed new power to combat fraud to strengthen the safeguards around access to to data by specified public authorities?

63. There were forty-nine responses to this question asking for additional measures to be set out in the Code of Practice. Measures recommended included:

- Minimum security arrangements for access to and transmission of data;
- Identifying any conflicts of interests that private bodies may have and factoring that information into the assessment of their participation on data sharing arrangements;
- Ensuring the same level of scrutiny and auditing of the security of data in systems and processes for non-public authorities as public authorities involved in data sharing arrangements;
- Guidance on data storage, retention and destruction;
- Clear instructions that data can only be used for the specified purpose for which it was obtained;
- The prescribed approval process;
- Guidance on how to develop a business case for a pilot, with appropriate templates and examples of good practice;
- Establishing a process which reduces bureaucracy and allows overarching business cases/agreements which cover multiple participating bodies;
- Establishing transparency as a key underlying principle so that citizens can understand which bodies are accessing what types of data for what purposes; and
- Guidance on how to set and measure appropriate metrics for data-sharing pilots and if successful how pilots can be scaled-up as appropriate.

Government response - question 10

64. The Government welcomes the extensive and detailed feedback from respondents on additional measures. Strong support was expressed in responses received to the consultation for a robust safeguards regime. Bodies wishing to establish pilots under the proposed power will receive clear guidance on required processes and standards, and will be subject to stringent safeguards on data security, storage, retention and destruction practices. Government will now work to develop the Code of Practice in collaboration with the ICO and other appropriate experts, whilst factoring the comments of respondents.

Question 11

Question 11: It is proposed that the power to improve access to information by public authorities to combat fraud will be reviewed by the Minister after a defined period of time. This time will allow for pilots to be established and outcomes and benefits evaluated. How long should the fraud gateway be operational for before it is reviewed?

65. There were thirty-eight responses to this question. The majority of respondents recommended that the gateway be operational for a period of three years before review. Many of the respondents that recommended a time period longer than two years commented on the need to allow sufficient time for pilots to be designed, tested, revised where appropriate, establish infrastructure and partnership agreements, and follow-up work to assess costs, outcomes and benefits. The view held by many of these respondents was that any shorter period of time would risk poor quality information on which to base the review of the gateway.

66. A number of responses asked for the use of the gateway and pilots to be monitored and reviewed on a more regular basis, with some suggesting that reviews or monitoring be carried out on a biannual or ongoing basis. Amongst the comments made by respondents was the recommendation that monitoring data should be available throughout the period the gateway is active to reduce the timeframe at the end of the pilots as well as provide greater transparency on the use and effectiveness of the proposed power.
67. A number of respondents asked for a sunset clause to be included within the proposed power rather than take the approach to carry out a Ministerial review and include provisions to repeal the legislation if necessary.

Government response - question 11

68. The majority of respondents supported a period of three years for the gateway to be operational before it is reviewed, and government will adopt that timeframe. Government set out the view in the consultation paper that sunsetting the power after a defined period of time would result in delays and potential difficulties in reintroducing powers if the powers proved to be effective in combatting fraud. We also recognise the concerns about the lack of parliamentary scrutiny of the final review and will consider further how external independent assessment of the power can be factored into the decision-making process in an open and transparent way that builds public confidence.

Chapter 2.2 - Improving access to data to enable better management of debt owed to the public sector

General comments

69. A number of responses, including those from charities that support customers with debt management problems, were supportive of the proposal and commented that greater information sharing could help maximise collection of debt as well as support citizens in hardship and crisis. Comments received from respondents included the view that the use of the data sharing power is reasonable, as long as it is proportionate and takes affordability into consideration. The power must also ensure fairness is considered, and sufficient safeguards should be included, especially for vulnerable customers.
70. Conversely, there were calls from individuals and civil society organisations to drop the proposals due to concerns about the privacy implications for vulnerable people facing hardship. Furthermore, a number of respondents felt that the data-sharing power could result in unfair treatment of those affected. A number of respondents questioned how the proposal will add value to addressing the problem. Some also suggested that this power should link to a broader debt management strategy.

Question 12

Question 12: Which organisations should Government work with to ensure fairness is paramount when making decisions about affordability for vulnerable debtors who owe multiple debts?

71. Question 12 requested recommendations for types of organisations Government should work with to factor fairness considerations into the use of the proposed power. There were thirty-three responses to this question. Organisations recommended by respondents included:

- Debt charities and consumer groups;
- Citizens Advice Bureau;
- Money Advice Service;
- National debt line;
- Which;
- Local advocacy groups;
- Voluntary sector infrastructure organisations;
- Community interest groups;
- Regulators such as the Financial Conduct Authority;
- All public authorities to which debts might be owed including HM Courts and Tribunals Service;
- Housing associations; and
- Financial institutions (e.g. banks and credit card companies).

Government response - question 12

72. The Government welcomes the recommendations from respondents on organisations to consult. Government will make an assessment of the recommended groups and work with a range of organisations to ascertain the factors that lead to individuals owing multiple debts which will inform the development of fairness criteria to be included in the Code of Practice.

Question 13

Question 13: How can Government ensure the appropriate scrutiny so pilots under the power are effectively designed and deliver against the objectives of the power?

73. Question 13 asked for views on how Government can ensure pilots under the proposed power are appropriately scrutinised so they effectively deliver stated objectives. There were thirty responses to this question. Measures recommended by respondents included:

- Governance via a steering group comprised of representatives from Government, industry experts and other representative organisations;
- Engagement with local public agencies and a range of partners at an early stage to ensure the direct and indirect impacts are scrutinised;
- Involve citizens, consumer organisations and debt charities in the design and evaluation of pilots;

- Independent oversight with external evaluation of pilots to ensure there is no bias;
- Regular review points during the pilot so that practices and policies can be changed as required;
- Clear benefit plan and measurement of outcomes; and
- Objectives stated clearly in advance and clear guidelines that pilots be terminated if they do not meet their objectives or have unforeseen negative consequences.

Government response - question 13

74. The Government welcomes the extensive and detailed suggestions from respondents. Government will make an assessment of the suggested measures and will factor many of them into the Code of Practice.

Question 14

Question 14: It is proposed that the power to improve access to information by public authorities for the purpose of better managing debt owed to government will be reviewed by the Minister after a defined period of time. This time will allow for pilots to be established and outcomes and benefits evaluated. How long should the debt power be operational for before it is reviewed?

75. There were thirty-four responses to this question. The majority of respondents recommended that the gateway be operational for a period of three years before review and government will adopt that timeframe. Many of the respondents who recommended a time period longer than two years commented on the need to allow sufficient time for pilots to be designed, tested, revised where appropriate, establish infrastructure and partnership agreements, and follow-up work to assess costs, outcomes and benefits. The view held by many of these respondents was that any shorter period of time would risk poor quality information on which to base the review of the gateway. A number of respondents also recommended that the timeframe should be consistent with the timeframe established for the proposed fraud powers.
76. A number of responses asked for the use of the gateway and pilots to be monitored and reviewed on a more regular basis, with some suggesting that reviews or monitoring be carried out on a biannual or ongoing basis due to the potential high negative impact on affected citizens. Amongst the comments made by respondents was the recommendation that monitoring data should be available throughout the period the gateway is active to reduce the timeframe at the end of the pilots as well as provide greater transparency on the use and effectiveness of the proposed power.
77. A number of respondents asked for a sunset clause to be included within the proposed power rather than take the approach to carry out a Ministerial review and include provisions to repeal the legislation if necessary.

Government response - question 14

78. The majority of respondents supported a period of three years for the gateway to be operational before it is reviewed. Government set out the view in the consultation paper that sunsetting the proposed power after a defined period of time would result in delays and potential difficulties in reintroducing powers if the powers proved to be effective in addressing debt issues. We also recognise the concerns about the lack of parliamentary scrutiny of the final review and will consider further how external independent assessment of the power can be factored into the decision-making process in an open and transparent way that builds public confidence.

Chapter 3.1 - Access to data which must be linked and de-identified using defined processes for research purposes

General comments

79. The majority of comments received have been supportive of this proposal in principle, although there have been a number of suggestions as to how the current draft illustrative clauses might be improved. A number of responses, particularly from the research community, expressed the view that the proposals should go further than the permissive power as currently drafted. These respondents felt that there should be greater incentives for public authorities to share data in order to provide greater assurance that a greater number of administrative datasets would be made available for research purposes. Further, it was felt that there should be clarity over the types of data that could be linked under this power, including survey data, property reference information and other datasets that would be useful for research projects.
80. A number of responses expressed the view that the generic process model as set out in the draft illustrative clauses is too restrictive and may unintentionally exclude linking data through other secure process models. Several responses also sought assurance that the proposed accreditation process for participants under this power should not exclude existing accreditation schemes or add additional complexity to the process. Some responses sought similar clarifications regarding how the new process would be implemented, including resourcing issues. Generally, there was strong support for clear and robust safeguards to promote assurance.
81. A number of respondents felt strongly that health and social care data should be in scope for this power.

Government response - general comments

82. The Government is committed to improving the availability of administrative data for research in safe settings, and we note that the majority of responses were broadly favourable towards this proposal. In the light of the constructive responses which we have received, we will review the proposed legislation to ensure it that it maximises the potential for accessing administrative data for various types of valuable research (including, for example, longitudinal studies), in a way that does not complicate existing processes. Strong safeguards to protect the identity of individuals or organisations remain key to the effectiveness of this proposal.

Question 15

Question 15: Should fees be charged by public authorities for providing data for research purposes, and if so should there be a maximum fee permitted which is monitored by the UK Statistics Authority?

83. Seventy-one responses were received to this question. Of those who expressed an opinion on whether fees should be charged for providing data for research purposes, forty-three were in favour and fifteen opposed. Whilst many respondents who were in favour of fees being charged were from public authorities, and many of those opposed to fees being charged were from the research community, it is not the case that all responses conformed to this pattern.
84. Of those who supported fees being charged, a number supported the view that fees should be charged on a cost recovery basis. Many expressed the view that charging of fees should be undertaken in a proportionate and transparent manner. Those who opposed the charging of fees included the view that this would have a deterrent effect on new research. Others stated that, as a certain amount of research is government funded, the levying of fees by a public authority on a research organisation that receives public funding was not a joined-up approach. Several respondents favoured a more flexible approach, including suggestions that certain types of research should be exempt from fees. A number felt strongly that publicly-held data should not be accessed by researchers for commercial or profit-making purposes.
85. Responses were divided on the question of whether there should be a maximum fee. Some felt strongly that government should not be subsidising private research, whilst others felt that a maximum fee should apply to research with a discernible public benefit. Forty-three were in favour of a fees policy, and a number were also of the view that this policy should be published and monitored by the UKSA as the accrediting body.

Government response - question 15

86. For access to administrative data by researchers to be effective, there must be an approach to fee charging that is fair, proportionate and transparent. In the light of responses received the government intends to permit the charging of fees by data holders on a cost recovery basis, although we will set out in a Code of Practice how there will be consistent and transparent mechanisms for calculating costs of providing data. Research will only be allowed where there is a public benefit.

Question 16

Question 16: To ensure a consistent approach towards departments accepting or declining requests for disclosing information for research projects, should the UK Statistics Authority as the accreditation body publish details of rejected applications and the reasons for their rejection?

87. There were fifty-seven responses to this question, an overwhelming majority (fifty-four responses) of which appeared to support some form of publication of declined requests. Many agreed that this would encourage a transparent and consistent approach by data holders. Some also believed that details of successful applications should also be published. In addition, a number thought that this would encourage a high standard in the quality of applications. A number of positive responses also believed that in the interests of individual privacy and academic integrity certain details, including the name of the applicant, should not be published.

Government response - question 16

88. Transparency and consistency should be at the heart of the applications process under this power, and in the light of responses to this question we agree that publishing details of applications rejected by data holders would support these aims. We will ensure, through setting out appropriate criteria in a Code of Practice, that the process will be governed in a way that is fair both to data holders and research applicants, and which benefits the long term interests of research for public benefit.

Question 17

Question 17: What principles or criteria do you think should be used to identify research that has the potential for public benefit, or research that will not be in the public benefit?

89. Fifty-nine responses were received to this question. Whilst several responses expressed agreement with the examples given in the consultation, or cautioned against being overly specific in trying to define “public benefit,” a number of responses advocated some form of agreed criteria (including worked examples) that could be used to assess whether a proposed research project was in the public interest, including being ethically sound and having a defined and measurable outcome.
90. A number of responses emphasised the need for consistency with Data Protection Act principles (including proportionality) and the new European GDPR, whilst others cited existing criteria for determining the public good in the Statistics and Registration Service Act 2007, or the guidelines set by the NHS Confidentiality Advisory Committee as examples.
91. Amongst specific suggestions as to what criteria could be used to determine public interest, responses included research that could inform or evaluate public policy, or lead to the improvement of health, education or economic and social well-being. Several responses called for the explicit exclusion of research for private profit or gain, and a number included the requirement that all findings should be made public. A number of responses raised concerns that criteria should not exclude, or be

interpreted as excluding certain types of research such as longitudinal studies, or the use of aggregated data.

Government response - question 17

92. The Government believes that criteria for helping to determine whether research is of public benefit should be set out in a Code of Practice. It is important that the agreed approach is clear, transparent and does not present additional complexity for data holders, and potential users. The Government agrees that we should be careful to avoid restricting certain types of research, and ensure that principles and criteria allow for long-term benefits of this power to be realised for our economy and society. The need to uphold personal privacy, and in particular to comply with the Data Protection Act and other data protection legislation, is paramount.

Chapter 3.2 - Access by UK Statistics Authority to identified data for the purpose of producing official statistics and research

General comments

93. A significant majority of respondents supported the proposals on the basis they represented appropriate and necessary updating of legislation so long as appropriate safeguards are in place to ensure data is handled securely and for clear purposes. A small number of respondents emphasised that legislative change was required to support future plans for the Census and support the greater reuse of Government data. Among the supportive comments received was the view that accurate and up-to-date statistics are important to better understand the modern economy and the proposed power was required to ensure the UK does not fall behind other nations in terms of timely access to administrative data for the purposes of producing economic statistics. The view was also expressed that the proposals should go further and include a right of access to data held by Crown bodies to support these objectives. The Government recognises the importance of UKSA being able to obtain information from a range of bodies, including Crown bodies, when meeting its statutory objectives to produce national and official statistics, and statistical research for public good. In relation to Crown bodies, the Government proposes the appropriate mechanism would be a clear presumption of engagement by Crown bodies together with a requirement on that body to explain any non compliance by formal letter, underpinned by a statement of principles and procedures. UKSA may then at its discretion lay that letter before Parliament which will ensure transparency.
94. A small number of respondents made specific observations about the proposal. The Minister for Finance and Personnel in the Northern Ireland Executive responded to the consultation requesting that devolved matters are fully factored into the proposal, including the consultation of Northern Ireland Ministers in the development of the Code of Practice and onward disclosure of data where appropriate for the production

of official statistics. Constructive discussions with the Devolved Administrations at official-level are continuing.

Question 18

Question 18: Is two years a reasonable maximum period of time for the duration of a notice for the supply of data to the UK Statistics Authority for the purposes of producing National and official statistics and statistical research?

95. Thirty-eight responses were received to this question. Whilst there may have been some confusion as to whether the question referred to the time required for the notice to provide data to run, or for the time taken to establish the supply of data to the UK Statistics Authority (and the purpose of the question was unclear to several respondents), a significant number of responses (thirty-one in total) expressed agreement with the two year time period. Some responses stressed the need to extend that time limit in exceptional circumstances, and several felt that it should be three years or longer, but a number were of the view that a shorter timescales might be desirable.
96. Some responses highlighted the problem of aligning business processes to comply with the proposed new power, and that organisations would need early clarity on what would be required of them to allocate resources accordingly. A number of others saw the proposal as an opportunity to improve the efficiency of the production of national and official statistics. Others were of the view that determining a maximum time limit would depend on the nature of the request and the resources involved in complying with it.

Government response - question 18

97. Whilst some flexibility may be required to allow organisations to comply effectively with the proposed power, it would appear that thirty-one respondents believe two years to be a reasonable time period for the duration of a notice to supply data, albeit with reservations in some cases. It should be emphasised that a notice for the supply of data to the UK Statistics Authority would be part of an ongoing collaborative process with the organisation concerned, and that the resourcing required to meet that request would be discussed fully as part of that process.

Question 19

Question 19: If your business has provided a survey return to the ONS in the past we would welcome your views on:

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

98. Responses to part (a) of the question were few in number (sixteen responses in total) but varied. Although several responses considered business surveys to be burdensome, a larger number considered them to be either requiring a minimum or reasonable amount of resource. Several responses felt that surveys were outdated, and a number welcomed the possibility of electronic data collection under this power. Several responses expressed the view that new methods should be tested to ensure that they provide good data quality before changing from the current survey regime.
99. Of the small number of responses received to part (b) of this question (twelve responses in total), several advocated the importance of greater electronic data collection but also supported strong safeguards against unauthorised onward disclosure. To facilitate implementation, one response stated that data should be supplied in standard formats, whilst another expressed the requirement for the minimum amount of data to be requested from businesses, with clarity on the statistical purposes of a given supply of data. Some also felt that businesses should only be required to provide information where it could not be obtained from another public authority.

Government response - question 19

100. Reducing the administrative burdens on business is a key priority for the Government. Whilst it is important to improve the quality of national and official statistics in a digital age, modernising the way in which data is collected for these purposes should also lead to the reduction of burdens on businesses through the eventual replacement of paper surveys by electronic data collection. This system would be supported by a statutory statement of principles, and, as with the previous question, this would be undertaken through a collaborative approach between UK Statistics Authority and business organisations.

Question 20

Question 20: What principles and factors should be considered in preparing the Code of Practice on matters to be considered before changes to processes that collect, store, organise or retrieve data?

101. There were forty-two responses to this question asking what principles and factors should be considered before making changes to processes that collect, store, organise or retrieve data. Recommendations from respondents included:
- Data protection principles;
 - Data quality and standards;
 - Proportionality;
 - Strong governance;
 - Security infrastructures and procedures that keep pace with the development of technology
 - Clear reasons for collecting and storing data;
 - Least interference with the lives of clients/citizens;

- Least interference with the ability of an organisation/data provider to function efficiently;
- Create a published register of all statistical information being collected including summary of datasets, purpose and evidence of value.

Government response - question 20

102. The Government welcomes the extensive and detailed recommendations from respondents on principles and factors to be considered in preparing the Code of Practice. The UK Statistics Authority will now work to draft illustrative principles for the Code of Practice in collaboration with the Information Commissioner's Office and other appropriate stakeholders factoring in the recommendations from the respondents. The draft Code of Practice will undergo public consultation.

Annex A - List of consultation questions

Improving public service delivery

1. Are there any objectives that you believe should be included in this power that would not meet these criteria?
2. Are there any public authorities that you consider would not fit under this definition?
3. Should non-public authorities (such as private companies and charities) that fulfil a public service function to a public authority be included in the scope of the delivering public services power?
4. Are these the correct principles that should be set out in the Code of Practice for this power?

Providing assistance to citizens living in fuel poverty

5. Should the Government share information with non-public sector organisations as proposed for the sole purpose of providing assistance to citizens living in fuel poverty?
6. Would the provision of energy bill rebates, alongside information about energy efficiency support, be appropriate forms of assistance to citizens living in fuel poverty?
7. Are there other forms of fuel poverty assistance for citizens that should be considered for inclusion in the proposed power?

Access to civil registration to improve public service delivery

8. Should a government department be able to access birth details electronically for the purpose of providing a public service, e.g. an application for child benefit?
9. Do you think bulk registration information, such as details of all deaths, should be shared between civil registration officials and specified public authorities to ensure records are kept up to date (e.g. to prevent correspondence being sent to families of a deceased person)?

Combating fraud against the public sector through faster and simpler access to data

10. Are there other measures which could be set out in the Code of Practice covering the proposed new power to combat fraud to strengthen the safeguards around access to data by specified public authorities?
11. It is proposed that the power to improve access to information by public authorities to combat fraud will be reviewed by the Minister after a defined period of time. This time will allow for pilots to be established and outcomes and benefits evaluated. How long should the Fraud gateway be operational for before it is reviewed?

Improving access to data to enable better management of debt owed to the public sector

12. Which organisations should Government work with to ensure fairness is paramount when making decisions about affordability for vulnerable debtors who owe multiple debts?
13. How can Government ensure the appropriate scrutiny so pilots under the power are effectively designed and deliver against the objectives of the power?
14. It is proposed that the power to improve access to information by public authorities for the purpose of better managing debt owed to government will be reviewed by the Minister after a defined period of time. This time will allow for pilots to be established and outcomes and benefits evaluated. How long should the debt power be operational for before it is reviewed?

Access to data which must be linked and de-identified using defined processes for research purposes

15. Should fees be charged by public authorities for providing data for research purposes, and if so should there be a maximum fee permitted which is monitored by the UK Statistics Authority?
16. To ensure a consistent approach towards departments accepting or declining requests for disclosing information for research projects, should the UK Statistics Authority as the accreditation body publish details of rejected applications and the reasons for their rejection?
17. What principles or criteria do you think should be used to identify research that has the potential for public benefit, or research that will not be in the public benefit?

Access by UK Statistics Authority to identified data for the purpose of producing official statistics and research

18. Is two years a reasonable maximum period of time for the duration of a notice for the supply of data to the UK Statistics Authority for the purposes of producing National and official statistics and statistical research?
19. If your business has provided a survey return to the ONS in the past we would welcome your views on: (a) the administration burden experienced and the costs incurred in completing the survey, and (b) ways in which the UK Statistics Authority should seek to use the new powers to further reduce the administrative burdens on businesses who provide data to the ONS for the purposes of producing National and other official statistics.
20. What principles and factors should be considered in preparing the Code of Practice on matters to be considered before making changes to processes that collect, store, organise or retrieve data?

Annex B - List of respondents

Below is a list of those who submitted a response to the Better use of Data in Government consultation. There were a small number of respondents who wished to be anonymous or did not wish their response to be made available into the public domain.

Merseyside Fire and Rescue Service	Liverpool University Department of Biostatistics
Committee on Fuel Poverty	Administrative Data Research Network
Sport Wales	ESRC Seminar Series on Information Sharing
Financial Conduct Authority	School for Policy Studies, University of Bristol
Centre of Excellence for Information Sharing	Association of Electoral Administrators
NHS Business Services Authority	Optical Confederation and Local Optical Committee Support Unit
Bank of England	National Association of Head Teachers (NAHT)
Economic and Social Research Council	Play Therapy UK
Food Standards Agency	Healthwatch England
London Fire Brigade	Media, Communication and Cultural Studies Association (MeCCSA)
National Panel for Registration	National Data Guardian's Panel
Metropolitan Police	Credit Services Association (CSA)
iStandUK	CIFAS
Core Cities Group	Big Brother Watch
Department for Finance and Personnel Northern Ireland	Royal Academy of Engineering
UCL Energy Institute	No2ID
CLOSER, UCL Institute of Education	Academy of Social Sciences
UK Data Service	Private Housing Officers Group
Centre for Longitudinal Study Information and User Support (CeLSIUS)	Society of IT Managers (Socitm)
Big Data Network BDN2	Association of Directors of Children's

	Services (ADCS) National Performance and Information Management Group (PIMG)
Local Government Association (LGA)	Knowsley Metropolitan Borough Council
Scale-Up Institute	Walsall Council
Health Statistics User Group	Westminster City Council
Open Rights Group	South Wales Registration Managers Group
Open Data Institute	Oldham Council
Tech UK	Birmingham City Council
Royal Statistical Society	Greater Manchester Combined Authority
Energy Saving Trust	Wakefield Council
Market Research Society	Warwickshire County Council
Institute for Fiscal Studies	Devon County Council
defenddigitalme	South Lanarkshire Council
Information Commissioner's Office	Sunderland City Council
Mediconfidential	Leeds City Council
Independent Review of Economic Statistics	Gloucestershire County Council
Libraries, Museums, Culture and Registration Services, Lancashire County Council	Energy Efficiency Projects, Oxford City Council
Registration and Coronial Services, Leicester Town Hall	Sheffield City Council
Aberdeen City Council	East Sussex County Council
Spatial Planning Team, Cheshire East Council	Somerset County Council
Resources and Business Transformation, Buckingham County Council	West Midlands Combined Authority
Highways and Energy Services, LB of Islington	Impington Parish Council (Cambridgeshire)
Suffolk County Council	Parkinson's UK
Greater London Authority (GLA)	Association of Accounting Technicians
National Foundation of Educational Research	SSE plc

Social Research Association	EMC
Higher Education Statistics Agency (HESA)	[Confidential response]
Citizens Advice	GeoPlace
Stepchange Debt Charity	Scottish Power
Children's Charity	Elmshurst Energy
Nuffield Foundation	Energy UK
[Confidential response]	Amberhawk Training Limited
Energy Action Scotland	RWE npower
National Energy Action	Ordinance Survey
NatCen Social Research	Flying Binary Limited
NCVO	British Gas
British Computer Society (BCS)	EDF Energy
HM Land Registry	Callcredit Response
Counter Fraud and Investigation Team, Government Internal Audit Agency	e-Tech Solutions Ltd
NHS Protect	Alun Kime
Auditor General for Wales	Rosemary Jay
OFGEM	Prof Jane L Hutton
Mydex CIC	Andy Maggs
Southern Water	Dr Mary Hawking
First Utility	E A Whitley
Sustain Ltd	Simon Briscoe
BAE Systems	Piers Elias
Privitar	Martin Ward
Northgate Public Services	Graham M Phillips
Civica Group	Antonn Cheeseman
E.ON UK	Alex Duce
[Anonymous]	[Anonymous]
Lynda Creek	Zoe (via Lynda Creek)

Zac (via Lynda Creek)	Aron Edwards
Alan Harrison	Andy Maclean
Andrew Meredith	Andrew Morgan
Anna Sandfield	Alan Sekers
Adrian Webb	Andy Williams
Alex s01	Brian J Jones
Ben Lawrence	Ben Livingstone
Ben Midgley	Ben Wickenden
Chris Bowe	Clive Britton
Chris Driver	Christopher Heywood
Mrs Carol Milner	Carlos Nicholson Plaza
Cris Page	Christos Retsinas
Caroline Ryan	Craig Stirrat
Carl Wilson	Deidre Balaam
David Beck	David Bennett
D Braun	David Chappell
David Donaghy	David Ellsmore-Petty
Denis Gryzlov	David Hammond
Denis Hawkins	Dale Le Fevre
David Melville	[Anonymous]
David Ross	Denis Watterson
Edward Bryan Cox	Frank Cammock
George Forrester	Dr G S Mead
Geoff Revill	Hugh Fitzpatrick
Glenn Sutherland	Ian Dixon
Iain Henderson	[Confidential response]
John Barnes	James Barron
Joe Cassels	James Clarke
Jane Dallaway	Jonathan Dixon

Jon Dracup	Jennifer Gray
Joyce Grimshaw	[Confidential response]
John Keen	James Kelly
Jim Killock	John McDonald
Joshua Meeklah	John Mitchell
[Confidential response]	Julia Perez
Judith Swain	Joan Taplin
Jeanette Thompson	Juliet Wilson
Konrad Kowalski	Louise Chick
Luke George	Leslie Murphy
[Confidential response]	Michael Bryant
Mal Colman	Mark Hawes
Michael Hutchison	Marwan Kathayer
Mark Lansbury	Matty Mitford
Margaret Muirhead	Michael Roy Hill
Margarida Silva	Mark Stewart
Mark Stewart	Matt Weaver
Mike Wheeler	Michael Williams
Nic Brough	Neal Champion
Nick S Walker	Neil The-Hippy
Nick_C	Philip Branigan
[Confidential response]	Philip Cudworth
Philip Dixon-Philips	Peter Newman
Philip Hurd-Wood	Philip Meek
Peter O'Riordan	Paul Richards
Rowan Braithwaite	R B Clary
Ryan Errington	Robert Janssens
Robert Janusko	Richard Lane

R Lockwood	[Confidential response]
Rory Winter	Simon Banister
Soonera Esscopri	Stuart Fyfe
Steffan Jones	Sharaz Mckie
Stephen Wheeler	Satinder
Trevor Jackson	[Confidential response]
Tim Orting	Toby Rodgers
Tom Wilkes	Ursula Riches
Victoria Holland	William Powell
William Rooney	Wayne Rutter
Zoe Williamson	Lee Clements
Alan Ware	Gary Joseph
Anthony Setchell	Dr Mike Gilbert