18th Meeting of the
National Statistician's Data Ethics Advisory Committee

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Minute, Agenda and Papers

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Tuesday, 29 October 2019

11:00 – 14:00

Board Room, UK Statistics Authority

London

UK STATISTICS AUTHORITY

NATIONAL STATISTICIAN'S DATA ETHICS ADVISORY COMMITTEE

Agenda

Tuesday 29 October 2019
Drummond Gate London
11:00am – 2:00pm

(11:00am to 12:40pm)

1 11:00am	Minute and matters arising from the previous meeting	Presentation Simon Whitworth
2 11:20am	NSDEC Terms of Reference Review	NSDEC(19)13 Simon Whitworth
3 11:40am	Management and Expectations Survey (MES) feedback and trial	NSDEC(19)14 Russell Black & Philip Wales
4 12:00pm	Qualitative research exploring the ethics of asking selected questions on the Crime Survey for England and Wales by online data collection mode	NSDEC(19)15 Peter Betts & Meghan Elkin
5 12:20pm	Request for advice to inform the next steps for the child abuse prevalence survey feasibility study	Presentation Alexa Bradley & Meghan Elkin

Lunch (12:40pm to 1:10pm)

(1:10pm to 2:00pm)

6 1:10pm	Research Strand of the Digital Economy Act	Presentation Simon Whitworth
7 1:30pm	Research on homeless mortality among St Mungo's clients	NSDEC(19)16 David Wilson
8 1:50pm	Any other business	

National Statistician's Data Ethics Advisory Committee
Minute

Tuesday, 29 October 2019
Boardroom, Drummond Gate, London

Present
Members
Dame Moira Gibb (Chair)
Ms Vanessa Cuthill (on phone)
Mr Colin Godbold
Ms Annie Hitchman
Dr Brent Mittelstadt
Ms Isabel Nisbet
Dr Emma Uprichard

UK Statistics Authority
Dr Simon Whitworth
Dr Emily Mason-Apps
Ms Lily O'Flynn (on phone for item 6)

Office for National Statistics
Mr Peter Betts (for item 4)
Mr Russell Black (for item 3)
Ms Alexa Bradley (for item 5)
Ms Meghan Elkin (for items 4 and 5)
Mr Ed Palmer (on phone for item 3)

Other
Mr Paul Mizen (for item 3)
Mr David Wilson (for item 7)

Apologies
Mr Stephen Balchin
Mr Rob Bumpstead
Ms Marion Oswald

1. Minutes and matters arising from the previous meeting

1.1 The Chair welcomed members to the eighteenth meeting of the National Statistician's Data Ethics Advisory Committee (NSDEC).

1.2 Members approved the minutes from the previous meeting.

1.3 Dr Whitworth updated the meeting with progress on actions from previous meetings. Most actions were complete or in progress.

2. NSDEC Terms of Reference [NSDEC(19)13]

2.1 Dr Simon Whitworth presented a paper proposing some updates to the NSDEC Terms of Reference. These updates involved the inclusion of the new project approval arrangements under the Research Strand of the Digital Economy Act 2017.

2.2 The Committee approved the changes to the Terms of Reference.

2.3 **Action: The secretariat to publish the updated Terms of Reference on the UK Statistics Authority website.**

3. Management and Expectations Survey (MES) feedback and trial [NSDEC(19)14]

3.1 Mr Russell Black from ONS presented a project proposal lead by ONS researchers in collaboration with the Economic and Social Research Council, the Economic Statistics Centre of Excellence (ESCoE) and Be the Business. The proposed project involves ONS conducting the voluntary Management and Expectations survey in April 2020, following earlier surveys in 2016 and 2017. Survey respondents will be offered the opportunity to receive feedback on their business's management practices and how these compare to similar firms. Those that choose to receive this feedback will also be provided with information about a trial being carried out by the ESCoE to explore the potential causal impact of a management practices programme (Mentoring for Growth organised by Be the Business) on productivity.

3.2 The Committee approved this project subject to following points being addressed and signed off by the secretariat:

i. The researchers should make it clear what the relationship between ONS and ESCoE is, and clearly define the roles of ONS and the researchers conducting the trail in the application;
ii. Because of limitations on the number of firms that Be the Business will be able to deliver the programme to during the trial, the researchers should be clear that this isn't strictly going to be a Randomised Control Trial;
iii. The researchers should ensure that they enable participation from as wide a range of firms as possible;
iv. The researchers should make it clear to prospective participants that the trial is designed to evaluate the potential impact of this programme on improving management practices and productivity, and make sure that the language used to communicate this to prospective participants is not misleading and clearly reflects that the causal links are not firmly established.

3.3 **Action: Mr Russell Black to address the comments from the committee and provide an updated application to be approved by the secretariat.**

4. Qualitative research exploring the ethics of asking selected questions on the Crime and Survey for England and Wales by online data collection mode [NSDEC(19)15]

4.1 Ms Meghan Elkin and Mr Peter Betts from ONS presented a project proposal to conduct qualitative research to seek the views of relevant groups and stakeholders about moving the Crime Survey for England and Wales (CSEW) to an online mode. These groups will include representatives of organisations who support crime victims and survivors, and members of the public who have experienced the types of crimes of interest.

4.2 The Committee acknowledged the careful consideration that had gone into developing the project proposal, and approved this project subject to the following points being addressed and signed off by the secretariat:

i. The researchers should carefully consider the consent procedures;
ii. The researchers should also consider at what point during recruitment they seek consent from participants, to ensure that participants feel comfortable and able to withdraw;
iii. The researchers should be mindful that the participants may require prompts to focus discussions around the specific ethical challenges of moving the CSEW online;
iv. The Committee agreed that there would be great value in conducting interviews with the field staff who currently collect responses for the CSEW, and encouraged the researchers to pursue this;
v. The Committee also agreed that the researchers should consider including participants who have not yet sought help or support following being a victim of crime, but that they should ensure that recruitment information is very clear about what taking part involves and provides clear signposting to where potential participants can seek support.

4.3 The Committee requested that the researchers provide an update on this work at a future meeting.

4.4 **Action: Mr Peter Betts to address the comments from the committee and provide an updated application to be approved by the secretariat.**

5. Request for advice to inform the next steps for the child abuse prevalence survey feasibility study

5.1 Ms Alexa Bradley and Ms Meghan Elkin from ONS presented to the Committee in order to seek advice on some key ethical issues related to the practicalities of conducting a pilot survey to measure the prevalence of child abuse in the UK. The ONS Centre for Crime and Justice have previously discussed the feasibility study they are conducting into whether a prevalence survey of child abuse could be effective with NSDEC (in October 2018 and in February 2019). This qualitative research is still in progress, with a report due to be published in 2020.

5.2 In this instance, the Committee were only asked to consider and advise on the potential options for consent and anonymity/disclosure procedures. If it is deemed feasible to conduct this survey, then it was agreed that the Committee would review a full application at a future meeting.

5.3 The Committee agreed that further consideration was required around the issue of consent, and raised the following points during discussion for the researchers to consider:

i. The researchers should seek specialist legal advice, and consider seeking consent for the different stages of the research, so firstly for obtaining the data from individuals and secondly for further processing of that data for the purposes required to produce the prevalence estimates;
ii. The researchers should carefully consider the practicalities around conducting this survey in schools and how the decision that is made about consent procedures will align with schools' own policies, and how this will potentially bias the sample;
iii. Given the nature of the research, the Committee recognised the potential disadvantages of relying upon opt-in parental consent. The Committee agreed that opt-out parental consent would be favourable as it would ensure that parents were informed about the research, but reduce the potential biases that may result from relying on opt-in parental consent;
iv. The Committee also recommended that the researchers consider whether it is truly necessary to conduct this survey with younger children to achieve the objective of establishing the prevalence of child abuse, and whether the same objective could be met by conducting this survey with participants 16 years old and over.

5.4 The Committee raised the following points during discussion around anonymity and disclosure:

i. The researchers should establish exactly what the obligations would be to report instances of abuse that may be disclosed by participants taking part in a survey of this nature, as the ethical duty to report any suspicions of abuse in order to protect the welfare of children is likely to override the legal obligation to maintain anonymity;
ii. The researchers should consider the resources that would be required to ensure that disclosures of abuse can be managed appropriately.

5.5 The Committee also recommended that the researchers should make it clear what decisions a prevalence survey on child abuse would inform, and how the findings would be used.

6. Research Strand of the Digital Economy Act

6.1 Dr Simon Whitworth presented on the progress that has been made in operationalising the Research Strand of the Digital Economy Act.

7. Research on homeless mortality among St Mungo's clients [NSDEC(19)16]

7.1 Mr David Wilson from St Mungo's presented a project proposal seeking to match organisational records of client deaths with data from the England & Wales deaths registrations data. This will enable St Mungo's to have an accurate and robust understanding of their clients' causes of death and how, if at all, these have changed over time. The findings will be used to inform future work in terms of targeting resources to deliver services more effectively, with the ultimate aim of to preventing client deaths.

7.3 The Committee agreed that the results of this research are likely to be of interest and relevance a wide range of stakeholders. The Committee therefore approved this project subject to confirmation that St Mungo's commit to publishing the results of this research in a format that is freely available to the general public.

7.4 **Action: Mr David Wilson to provide the secretariat with confirmation that St Mungo's commit to publish the results of the project in a format that is free available to the general public.**

8. Any other business

8.1 The secretariat will confirm Committee meeting dates for 2020 as soon as possible.

UK STATISTICS AUTHORITY

NATIONAL STATISTICIAN'S DATA ETHICS COMMITTEE

NSDEC(19)13

NSDEC Terms of Reference Review

Purpose

1. This paper presents some updates to the National Statistician's Data Ethics Advisory Committee's (NSDEC) terms of reference.

2. The Secretariat has updated the terms of reference and an updated version is presented at Annex A. The terms of reference will be reviewed as part of NSDEC's self-assessment later in the year.

Recommendations

3. Members of NSDEC are invited to consider and agree the updated terms of reference.

Background

3. NSDEC's terms of reference have been updated to include the project approval arrangements under the Research Strand of the Digital Economy Act 2017 (DEA) which includes an important new statutory framework to support the UK research community, both within government and beyond, that permits public authorities to share de-identified information with accredited researchers for the purposes of public good research.

4. Under the DEA, the UK Statistics Authority is the statutory body that will oversee the accreditation of researchers, projects, processors and secure access environments and the National Statistician has established the Research Accreditation Panel (RAP), chaired by Professor Paul Boyle, to ensure that the process for granting access to de-identified data to accredited researchers under the DEA is independent, consistent, and transparent. The Research Accreditation Panel will be able to refer projects to NSDEC for ethical consideration.

Simon Whitworth, Data Governance, Legislation and Policy, 21 October 2019

List of Annexes

Annex A NSDEC Terms of Reference

Annex A NSDEC Terms of Reference

UK Statistics Authority

National Statistician's Data Ethics Advisory Committee

Terms of reference

Introduction

1. At the UK Statistics Authority Board meeting on 6 November 2014, the Authority Board agreed to establish the National Statistician's Data Ethics Advisory Committee (NSDEC), which would be advisory to the National Statistician.

Role and responsibilities

2. The role of the National Statistician's Data Ethics Advisory Committee (NSDEC) is to advise the National Statistician on the ethical considerations concerning the accessing, sharing and use of data.

3. Specific responsibilities of the NSDEC include to:

    i. provide ethical consideration of proposals to access, share and use data;
    ii. advise on individual policies and research projects against NSDEC's ethical principles;
    iii. develop a consistent ethical framework for relevant projects related to official statistics;
    iv. promote transparency around data shares;
    v. provide ethical approval for some government, and third sector researchers who wish to use government data for research and statistics that serves the public good. Some of these projects will be referred to NSDEC by the Research Accreditation Panel that accredits researchers, research projects and processors who wish to use the Research Strand of the Digital Economy Act (2017); and
    vi. provide ethical advice on other data issues within the National Statistician's remit, which includes his role as head of the Government Statistical Service.

4. In reviewing proposals NSDEC will provide advice by consensus.

5. To facilitate timely access to data NSDEC can consider proposals via correspondence.

Meetings

6. NSDEC will meet at least four times a year. The Chair of NSDEC may convene additional meetings as deemed necessary.

7. The Chair may invite other relevant experts as appropriate to advise the Committee.

Reporting

8. The NSDEC Secretariat will provide reports following each of its meetings to the National Statistician.

9. At least seven days prior to its meetings, NSDEC will receive reports on:

    i. proposed new data shares;

ii. relevant projects and programmes and other information as it requires; and
iii. reports from any sub-committees.

10. NSDEC will operate transparently. Meeting agendas, papers and minutes will be made publicly available on the UK Statistics Authority website.

11. Where expedited review is sought and NSDEC approve the proposal by correspondence, the application and summary of members' comments will be presented at NSDEC's next meeting and published as part of the meeting papers.

12. NSDEC will provide an annual report on its activities in the National Statistician's annual report on data access and sharing.

Membership and role of members

13. The members of NSDEC will include:

i. a representative of the National Statistician (Chair);
ii. at least five independent external members, including lay members; and
iii. no more than four members from government.

Quorum

14. NSDEC meetings will be considered quorate when four or more members are present including at least two independent external members as well as the Chair or the Chair's delegated nominee.

15. Substitutes will not be permitted to attend meetings, unless with the invitation of the Chair.

16. In order for any expedited proposal to be formally approved by correspondence a sufficient number of members would need to respond in accordance with a quorate meeting.

Secretariat

17. Secretariat for the NSDEC will be provided by the staff from the Data Governance, Legislation and Policy within the UK Statistics Authority.

Review

18. NSDEC will review the effectiveness of its meetings and its terms of reference annually.

National Statistician's Data Ethics Advisory Committee
Application for Ethical Review

Please consult the guidance document before filling in the application form

Project Title

Please provide a title indicative of the project

Management and Expectations Survey (MES) feedback and trial

Start Date:	01/11/19	**End Date:**	30/12/21, although this may be extended.

Project Sponsor(s)

Please list the project sponsor(s)

ESRC (ES/S012729/1), ONS, Economic Statistics Centre of Excellence (ESCoE)

Project Summary

Please provide a brief high-level summary of the research, giving necessary background information
(max. 250 words)

ONS has an ongoing collaboration with a team of external researchers under Economic Statistics Centre of Excellence (ESCoE) Project 2.5 on research into the relationship between firm-level productivity and management practices.

As part of this research programme, ONS will survey businesses on management practices and productivity in April 2020, following earlier surveys in 2016 and 2017. We intend to (a) offer feedback to businesses on their management practices, and (b) support a proposed Randomised Control Trial (RCT) to be carried out by the ESCoE researchers to provide evidence of the causal impact – or otherwise – of management on productivity. It is the design of this feedback and the implementation of the RCT on which we seek ethical feedback.

Firms with more structured management practices tend to do better, in terms of profits and productivity, than businesses with less structured management practices. Management is not everything, but a variety of quantitative evidence confirms that it matters, including our previous surveys.

The UK now has a "lost decade" of productivity growth, and while there is a vast amount of research into the productivity of businesses, its use to policy is always limited by the difficulty of proving clear causal links – correlation is not causation. And for a complex topic such as this, it is almost impossible to use observational data to find clear causal evidence. Facilitating a randomised control trial (RCT) is the best avenue to address this gap.

Section A
Project Details

A1 Legal gateways

Please provide the assessment of the legal gateways of the project as provided by Legal Services

Voluntary survey information is collected by ONS using our powers under the Statistics and Registration Services Act 2007.

De-identified information is able to be accessed by ESCoE individuals in a secure environment as accredited researchers.

Feedback can be provided to businesses by ONS because the information provided identifies only the business in question and is being done with the businesses' consent, in accordance with section 39(4)(h) SRSA.

A2 Ethical approval

Has the project been reviewed or is it expected to be reviewed by another ethics committee? *(please delete as appropriate)*	**No**

*If **Yes,** please provide the name of the committee, the review date, and the outcome below*

A3 Proposed site of research

Please provide information about where the research will take place, including detail of where any data linkage and/or data analysis will be conducted

The survey will be run by ONS. Data analysis will take place on the ONS network or through the ONS Secure Research Service to safely provide external researchers with anonymised data.

For the RCT, it will be necessary for ONS to link survey forms using identifying information. This will be done securely on the ONS network.

A4 Data subjects to be studied

Does the study include all subsections of the population? (i.e. all ages, sex, ethnic groups etc.) *(please delete as appropriate)*	**No**

*If **No,** please detail which subsections with justification(s) below:*

Subsections of the population (including vulnerable groups) the project focuses on:

The project's subjects will be executives of companies that are selected for the Management and Expectations Survey (MES) 2020 survey. The MES 2020 survey will go to a sample of about 25,000 companies with more than 10 workers, that are in the set of industries covered by the survey.

The RCT will capture those who are surveyed and then opt to receive feedback communications and opt in to an ESCoE-run trial. In the trial, businesses will be split into a trial group and a waiting list control group based on the trial programme availability.

Justification for focusing on these subsections or groups:

The project is for researching the link between business-level practices and business-level outcomes – it will interact with businesses, through executives at businesses. The original MES survey will be addressed to any of the CEO, COO, CFO or Head of Human Resources at the business. To receive feedback, the survey respondent must explicitly give the contact details to which the feedback will be sent.

The project will aim to ensure that the businesses involved are as representative as possible of the UK business population. MES will be stratified by NUTS1 region (i.e. Wales, North-West, South-West, etc.), employment bands (i.e. small, medium, large businesses) and high-level industry classification, so that businesses from each combination of these categories will be represented in the survey. Stratification further than this will be too costly.

It would be prohibitively expensive for the programme managers, the Department for Business, Energy and Industrial Strategy (BEIS), and the BEIS agencies that sponsor and collaborate on the programme, to offer comprehensive geographic coverage. There will also be limits on timing. There would not be capacity on the programme for it to be offered to all firms simultaneously. The trial will use the timing and capacity constraints to determine a trial and control group: the trial group will be businesses that can be offered the programme at the beginning, while the control group will be put on a waiting list to be enrolled on later waves of the programme when there is availability.

An explicit stated remit of the BEIS agencies is to help small and medium-sized enterprises (SMEs) – the programme on offer is tailored to SMEs and would not be suitable for large firms. ONS will offer feedback letters to all companies in the survey, and so a recipient in a large company could still go through to the registration on the ESCoE website, but will be prevented from going further.

A5 Research methodology and protocol

Please provide details of the research protocol or methodology (e.g. data linkage, web scraping etc.) (max. 500 words)

- ESCoE: ESCoE will create a section on its website for the project. The ESCOE website would contain further information on research on management and productivity, information on the RCT and a facility to register for the RCT.

- ONS: will send the voluntary Management and Expectations Survey to a sample of company reporting units in April 2020, addressed to any of the CEO, CFO or head of human resources. The survey will ask questions on management practices (e.g. "how many key performance indicators are monitored in your business?")

- ONS Survey Respondents: Survey respondents will have the option to request feedback on the survey form. Feedback will be in the form of an email sent within a certain window; respondents must provide an email address on their survey return for receiving the feedback.

  ONS: For companies that request feedback, ONS will send an email to the given email address, with a report as an attachment benchmarking the company's management practices responses to similar firms. The email will contain a paragraph explaining that the survey is part of a larger ESRC-funded research project under ESCoE, and contain a hyperlink to the ESCoE project website.

  A draft version of the email and report can be found at Annex A, although the language used is subject to change after consultation with business groups and policy experts, as well as with ONS communications to ensure that the position of ONS relative to ESCoE is clear. ONS will ensure that existing research on management and productivity is presented objectively.

- ONS Survey Respondents: Survey respondents that visit the ESCoE website will have the ability to register for the RCT with ESCoE.

- ESCoE: ESCoE will manage the RCT for participants who have registered with ESCoE. The RCT will take place from September 2020 to 2021.

  The participants will take part in the Mentoring for Growth programme organised by Be the Business, an organisation set up by BEIS to promote better management of small and medium businesses. In the mentoring programme, an executive from a FTSE 250 company will be chosen and assigned to the business, and the business will be invited to networking events.

  Be the Business are not able to accept a business if it is ineligible (too big, or in a region that is not served) or because they do not have a suitable available mentor. If a business is eligible then Be the Business will want to assign available mentors randomly to some eligible businesses, who will then become part of the treatment group. Other eligible businesses will be put on a waiting list and form the control group.

- ESCoE: The trial will be evaluated by a survey form sent to participants at the end of the trial. The ESCoE survey will ask questions to compare changes against the 2020 ONS survey.

- ONS: ONS will support the trial by matching the post-trial survey forms with pre-trial survey forms. ONS will provide ESCoE with anonymised linked data through the Secure Research Service.

- ESCoE: ESCoE evaluates the trial. ESCoE will not have access to any identifiable data that they have not collected themselves with explicit consent. As part of the evaluation, ESCoE will test the balance between the treatment and control groups to ensure that there is no bias that has contaminated the trial.

One part of the RCT will be understanding at what point take-up fails, and information on failure points will be important for planning future RCTs. One form the monitoring may take is to check how many businesses access ESCoE's website by allowing tracking of the use of the hyperlink from the ONS feedback email. To do this, the hyperlink to the ESCoE website will contain a unique code. ESCoE will be able to count the number of random codes, but receive no other information. The ESCoE website may also do its own tracking of website users, with consent and in compliance with GDPR, and will not involve ONS.

A6 Data use

Please specify the data used **by the research team** including any timeframes *e.g. LFS data 2014-15*

Type of data	**Data Level** *Please specify the name of the dataset* **Aggregate Data**	**Identifiable Data**	**De-identified personal data**	**Anonymised/ pseudo anonymised**
Administrative data *(please specify, e.g. Patient Register 2011, School Census 2012 etc, in the relevant options adjacent)*		IDBR, ongoing for duration of project. Data is anonymised for all purposes that do not directly require identifying details		
Big Data *(please specify e.g. Twitter data, smart meters and mobile phones, in the relevant options adjacent)*				
Survey Data *(please specify e.g.LFS, BRES, etc in the relevant options adjacent)*		MES data, ongoing for duration of project. Data is anonymised for all purpose that do not directly require identifying details		Other survey data for comparison and analysis (ABS, CIS), ongoing for duration of project
Census Data *(please specify year, e.g. Census 2011 in the relevant options adjacent)*				
Other *(please specify e.g. Ordinance Survey Address register in the relevant options adjacent)*				ESCoE website uptake through different anonymised hyperlinks, ongoing for duration of project

Section B
Assessment against NSDEC ethical principles

B1

Principle 1: The use of data has clear benefits for users and serves the public good.

Please outline the proposed benefits of the project (max. 500 words)

There will be benefits to the companies surveyed as part of the project:

- Survey respondents get free additional service, in the form of a feedback email, that would otherwise cost to provide as an ONS ad-hoc release
- Eligible survey respondents get a chance to receive potentially beneficial intervention as part of the RCT

However, there are wider public benefits from the research that will be produced by the project. Policymakers would get a greater understanding of how relatively inexpensive programmes may change business performance. Even if the result is very little change, the evidence base will be greatly increased.

As noted, research on economic topics for businesses is usually stymied by the lack of factors that can be used to identify causal effects. Correlation is easy to identify, and we already know that good management correlates with higher productivity. We have little to no information on if/how good management *causes* higher productivity.

Due to the complexity of factors that can plausibly affect the management practices and productivity of a business, it is incredibly difficult to find a clear causal effect from observational data.

If the RCT finds that there is no causal relationship, e.g. that good management and higher productivity are both caused by a third factor, then that is important information with direct relevance to government policy in promoting productivity growth.

B2

Principle 2: The data subject's identity (whether person or organisation) is protected, information is kept confidential and secure, and the issue of consent is considered appropriately.

Please outline how data security, confidentiality and informed consent is safeguarded in this project (max. 500 words)

Survey respondents' data will be kept secure inside ONS and only given to external researchers through the standard Secure Research Service channels. This is the practice for all ONS survey data. Our exception is that we will provide a company's data back to the company in the feedback exercise.

ONS will only provide the company's data back to the company when consent has been explicitly provided, using an email address that has been explicitly provided by the company for the purpose of receiving the data. ONS will not send data to generic addresses (gmail, hotmail, etc.), and this will be stated on the survey form. ONS will send data within a reasonable timeframe (one-two months) to minimise the chance that the business and the executives change, and because an expectation of timeliness is likely to be present when opting in. ONS would not send feedback if there is an exceptional risk or change of circumstances (e.g. the company had ceased trading or been taken over).

ONS will have a dedicated line and inbox for queries or requests, such as opting out, listed on the survey form and ONS website.

For monitoring the ESCoE website, ESCoE will be able to see that the website was accessed by a unique user from the hyperlink. ESCoE will only see a random number and have no identifying information for the website user.

In conducting the RCT, ESCoE will observe the ESRC requirements for conducting social science RCTs and receiving consent (https://esrc.ukri.org/funding/guidance-for-applicants/research-ethics/frequently-raised-questions/what-is-freely-given-informed-consent/). Participants must register through the ESCoE website, and would need to give explicit consent to the terms of the trial in order to be registered. As a condition for participating in the trial, participants will be required to give consent for ONS to link their post-trial survey with the pre-trial MES 2020 survey and hold this data for the purposes of evaluating the trial.

Access to, analysis and use of the data of the data by external researchers will only take place within the ONS Secure Research Service (SRS) environment. All outputs will be checked by the Statistical Support team to ensure that they do not disclose confidential or personal identifiable data and to confirm that they are proportional and necessary to the project. This process ensures that disclosure control and the confidentiality of data subjects is protected. Outputs that identify small groups or individuals will not be allowed out of the SRS environment. The researchers are accredited as Digital Economy Act (DEA) Accredited Researchers. ONS will have sight of the final report before it is published.

B3 Principle 3: The risks and limits of new technologies are considered and there is sufficient human oversight so that methods employed are consistent with recognised standards of integrity and quality.

Please describe how the any risks from new technologies are been mitigated as well as any quality assurance activities in the project (max. 500 words)

ONS will pay stringent care that the method used to provide feedback is secure and that the correct feedback is provided only to the correct email address.

B4 Principle 4: Data used and methods employed are consistent with legal requirements such as Data Protection Legislation[1], the Human Rights Act 1998, the Statistics and Registration Service Act 2007 and the common law duty of confidence

Please describe the legal frameworks pertinent to this project (max. 500 words)

Data collection and disclosure are in accordance with the SRSA (as set out in A1).

Because the data collected are in relation to businesses only, GDPR does not apply.

ONS only interact with businesses on an equal basis, and only act by providing information.

Businesses must give explicit consent to be trial participants.

The programme will be the Mentoring for Growth programme run by Be the Business, and supported by BEIS. Be the Business is a non-profit and the programme is not offered by Be the Business to companies at cost. Enrolment on this programme is already open to the public. In this sense no service will be provided to a company that is not already available in some form.

Access for external researchers to the potentially disclosive data will be in the Secure Research Service environment and via an approved legal gateway (Approved Researcher scheme). This complies with the SRSA 2007 and the methods used comply with the principles in the Data Protection Act 2018.

B5 Principle 5: The views of the public are considered in light of the data used and the perceived benefits of the research

Please list any public engagement activities (max. 250 words)

The ESCoE team have set up a Management Practices Expert Working Group of relevant policymakers, academics, consultants and representatives from business groups including the Confederation of British Industry (CBI). This group has met at regular intervals to advise on plans for the RCT and will continue to be consulted over the course of the project. The group has given strong backing to the principal of evaluating the effectiveness of programmes, if necessary through an RCT, to provide an evidence base for the cost effectiveness of government policy. In this case a control trial can complement existing qualitative and quantitative observational evidence, by providing evidence where causation has not been confounded.

Be the Business, the organisation that will run the mentoring programme, has very substantial engagement with businesses and managers. The purpose of the organisation is to interact with small and medium sized businesses and promote management, and its advisory board consists of a raft of senior business leaders. The mentoring programme is already established with several hundred businesses enrolled, working in collaboration with Local Enterprise Partnerships and Growth Hubs.

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[1] "Data Protection Legislation" means the full, applicable data protection framework as set out in the Data Protection Act 2018. This encompasses general processing (including the General Data Protection Regulation and the applied GDPR).

B6 Principle 6: The access, use and sharing of data is transparent, and is communicated clearly and accessibly to the public

How will the findings of the research be disseminated? (max. 500 words)

There is a commitment to transparency and publication of freely available outputs as ONS policy.

The research will be shared with policymakers and industry (such as BEIS, Be the Business, the CBI) who have an immediate interest. The research produced on this project will be general academic research that will be presented at academic and policy conferences and published.

B7 Future use of products

Please outline any intended future use for products (such as linked datasets or tools) produced as a result of the research and how they will be accessed (max. 250 words)

The MES 2020 survey anonymised microdata will be made available to researchers through the Secure Research Service, as is standard with ONS surveys. Access to, analysis and use of the data would only take place within the ONS Secure Research Service (SRS) environment. All outputs would be checked by the Statistical Support team to ensure that they do not disclose confidential or personal identifiable data and to confirm that they are proportional and necessary to the project. This process ensures that disclosure control and the confidentiality of data subjects is protected. Outputs that identify small groups or individuals will not be allowed out of the SRS environment. Researchers granted access would be accredited ONS Approved Researchers. ONS will have sight of any final report before it is published.

B8 Collaboration and Sponsors

Please describe the project sponsors and the ***legal gateways*** *to acquire, process use and share their data*

List of Collaborators/Sponsors	**Details and relevant documentation relating to collaboration (you may attach copies of relevant documentation)**
Researchers affiliated with the Economic Statistics Centre of Excellence (ESCoE), based at Stanford, MIT, NIESR, University of Nottingham, Queen Mary University of London	The ESCoE team will manage the RCT; ONS will only assist in the analysis, evaluation and initially providing a hyperlink to the ESCoE project website.
Be the Business	Run the mentoring programme, that will form the treatment for the RCT.
ESRC	ES/S012729/1
ONS	

Section C
Responsible owner and applicant details

C1 Responsible Owner

Full Name: Russell Black

Position:

Address:

Email:

Telephone:

Organisation: Office for National Statistics

Declaration to be signed by the responsible owner

I have met with and advised the applicant on the ethical aspects of this project design (applicable only if the responsible owner is not the Applicant).

I understand that it is a requirement for all researchers accessing the data to have undergone relevant training and to have either relevant security clearances or accredited/approved researcher status in order to access the data.

I am satisfied that the research complies with current professional, departmental and other relevant guidelines.

I will ensure that changes in approved research protocols are reported promptly and are not initiated without approval by the National Statistician’s Data Ethics Advisory Committee.

I will provide notification when the study is complete if it or fails to start or is abandoned.

I will ensure that all adverse or unforeseen problems arising from the research are reported in a timely fashion to the National Statistician’s Data Ethics Advisory Committee.

I will consider all advice received from the National Statistician’s Data Ethics Advisory Committee and should I be unable to implement any of the recommendations made, I will provide reasoning in writing to the Committee.

Signature: -- **Date:** ------------------

C2 Applicant Details (if applicant is not the responsible owner)

Full Name:	**Position:**
Address:	**Email:**
	Telephone:
	Organisation:

NSDEC(19)15

National Statistician's Data Ethics Advisory Committee

Application for Ethical Review

Please consult the guidance document before filling in the application form

Project Title

Please provide a title indicative of the project

Qualitative research exploring the ethics of asking selected questions on the Crime Survey for England and Wales by online data collection mode

Start Date:	November 2019	**End Date:**	March 2020

Project Sponsor(s)

Please list the project sponsor(s)

ONS Centre for Crime and Justice (CCJ) and Social Survey Transformation (SST)

Project Summary

Please provide a brief high-level summary of the research, giving necessary background information

(max. 250 words)

The proposed piece of qualitative research for which ethical approval is sought forms part of the ONS's Crime Survey Transformation project, which is looking at the feasibility of online-first, mixed-mode data collection for the Crime Survey for England and Wales (CSEW). This is part of the wider ONS Social Survey Transformation programme to improve and modernise data collection, processing and outputs.

The research aims to explore whether selected CSEW questions are suitable, from an ethical perspective, to ask in online self-completion mode. This perspective focuses on risk of physical, emotional and psychological harm being caused to respondents or other members of their households. The questions of interest are about potentially sensitive topics – violence, threat, domestic abuse, sexual victimisation, stalking and abuse in childhood (note: the research is limited to the survey of adults, not of children). The scope is limited to these questions for the following reasons:

- Victims of these crimes might be at particular risk as a consequence of responding to the survey online, for example, from retributive violence by an abusive partner on discovering they had responded, or due to triggering an emotional reaction or recall of traumatic experiences by the respondent.

- If the questions of interest – at least certain key questions among them - are not suitable to be asked online then the whole survey would not be feasible online: the survey cannot be modularised, it would not be possible to estimate the level of overall crime nationally and intended cost savings would be unlikely to be realised.

Qualitative research methods (in-depth one-to-one and, potentially, group interviews) will be employed, to collect and analyse the views of i) representatives of organisations supporting crime victims and survivors, and ii) members of the public who have experienced the types of crime of interest. The research will be conducted by researchers from ONS’s Methodology and Social Survey divisions who are trained and experienced in qualitative methods (including in-depth interviewing, focus group moderation, research design and data analysis). An agency researcher, similarly trained and experienced, will be recruited to work on the project.

A report will be written for the ONS Centre for Crime and Justice and Social Statistics Transformation stakeholders, to use in informing the decision on whether it is ethical to ask the questions of interest in an online-first CSEW. The report will be published on the ONS website, in full or an edited version.

Benefits to the public would follow an appropriate decision being taken on the basis of the research findings. If the CSEW is deemed unsuited to online collection, respondents are not put at risk of harm and no public money is spent unnecessarily on online development. Or, if it is found suitable, potential benefits would include improved data quality (for example, higher response rates, reduced non-response bias, more accurate responses) so better informing public policy making; and savings to public budgets, compared with the existing CSEW design (subject to the success of the rest of the transformation process).

This application seeks approval to proceed with the qualitative research. The Committee is not being asked to consider the ethics of the existing CSEW design, nor, at this stage, of the potential design of a transformed survey.

Section A
Project Details

A1 Legal gateways

Please provide the assessment of the legal gateways of the project as provided by Legal Services

No legal gateways are required; qualitative data will be collected from research participants on the basis of informed consent.

A2 Ethical approval

Has the project been reviewed or is it expected to be reviewed by another ethics committee? *(please delete as appropriate)*

No, unless victim/survivor support organisations from whom we request help in identifying and recruiting research participants require it. To be determined in initial contact with such organisations.	**~~Yes~~/No**

*If **Yes,** please provide the name of the committee, the review date, and the outcome below*

A3 Proposed site of research

Please provide information about where the research will take place, including detail of where any data linkage and/or data analysis will be conducted

Research interviews (individual or group) will be conducted in a safe and private environment, where participants can be at ease, at a location to be agreed with each participant. Locations potentially include ONS offices, the facilities of survivor/victim support services, a hired venue such as a hotel conference room, or the participant’s home (subject to careful consideration of participant and researcher safety – see B2).

A4 Data subjects to be studied

Does the study include all subsections of the population? (i.e. all ages, sex, ethnic groups etc.) *(please delete as appropriate)*	**~~Yes~~/No**

*If **No,** please detail which subsections with justification(s) below:*

Subsections of the population (including vulnerable groups) the project focuses on:

The focus is on adult survivors/victims of domestic abuse, sexual assault or victimisation, stalking and abuse in childhood. The survey questions in online mode need to be ethically acceptable for these people to ensure they are not at risk of harm and that data quality would not be negatively impacted by, for example, non-response (unit or item level) or underreporting among them. The focus is on these questions for the reasons given in the Project Summary.

The research will be limited to people who would be able to respond to an online survey. Our scope will not include whether people would be able or willing to respond online for reasons unrelated to the topics of interest. An online first, mixed mode survey design would enable people who cannot or do not want to respond online to be interviewed if they prefer. It will also be limited to people who live in private households (or who can answer probes as though they were, such as those who have recently taken refuge from an abusive relationship) so would exclude groups such as those who are in mental health institutions or are homeless as a result of their experience of any of the offences of interest.

Only adults aged 18 and over will be included; while 16 and 17-year olds can respond to the adult CSEW there are added complexities when researching with this age group, related to obtaining consent from a parent/guardian.

Potentially, the research could also include people who have not experienced such crimes but might otherwise be vulnerable in relation to being asked about the topics, such as older people, those with physical or mental health conditions, cognitive impairments or learning disabilities. However, due to resource and timetable constraints we will not include non-victims/survivors in this research, but potentially cover them at a later stage if relevant.

Prior to the interviews with victims/survivors, interviews will also be conducted with representatives of victim/survivor services that help people who have experienced the types of crime of interest. (See A5 for further details).

Justification for focusing on these subsections or groups:

As discussed above. See also A5 (section on 'Sampling and Recruitment')

A5 Research methodology and protocol

Please provide details of the research protocol or methodology (e.g. data linkage, web scraping etc.) (max. 500 words)

Research questions

The primary research question we will explore is:

- Is it ethically acceptable to place the most sensitive CSEW questions – on domestic abuse, sexual victimisation and stalking, sexual assault, other assault, child abuse (including the screener questions that might encompass such offences, such as the general violence question, as well as the offence-specific modules) - into an online, self-complete mode?

The secondary research questions are:

- What ethical issues relate to asking these questions?
- Are the ethical issues common to all these types of crime or do they differ between them?
- Are the ethical issues similar for individuals who experience repeat victimization as for those who experience a single incident, or do they differ?
- How does the ethical dynamic change with the mode change (from face to face including CASI - Computer Assisted Self Interviewing - to an online first, mixed mode design)?
- What can be done to mitigate risks identified in moving to an online first, mixed mode survey?
- How might the move to an online-mode impact response rates and data quality? Would subgroups be impacted in different ways?

Research method and design

In-depth qualitative data collection methods will be used to collect the data. Open ended probes will be asked, using a protocol or topic guide, to explore the research questions. Appropriately trained and experienced qualitative researchers will conduct the research.

Phase 1: research with survivor/victim support services and CSEW field staff

An initial phase of interviews will be conducted with representatives from survivor/victim support services. These could be either one-to-one or in a group setting, depending on practicalities. The topics of these interviews will cover what ONS needs to be aware of when asking questions about abuse etc. in online mode, including things could affect respondent wellbeing (such as abusive behaviours, including monitoring of technology, and reactions to the content), the survey process and data quality. They will also be consulted about our proposed purposive sample design, recruitment materials and interview protocol for the qualitative research.

As far as practical a range of services specialising in different crime types (such as those helping survivors of rape, other sexual assault, domestic abuse, so-called ‘honour’-related abuse, child abuse and stalking and harassment) and in various survivor characteristics (such as women, men, LGBT people, older people, ethnic groups) will be consulted. Preliminary discussions have already been held with various support organisations (such as Victim Support, Women’s Aid, The Men’s Advice Line, Galop and the National Association for People Abused in Childhood) seeking their advice on the conduct of the qualitative research – and so informing the content of this application - and asking if they would be willing to be interviewed in the initial phase of research and willing to help us in recruiting participants. Agreement has been expressed by several of them. We aim to contact further organisations.

The initial phase will, if possible, include ONS consultation with CSEW field staff, to learn from their experiences about the existing design, regarding the questions and subgroups of interest, and how they might apply to the online mode. The survey's fieldwork contractor has agreed to this exercise.

The findings from the initial phase will be both analysed and reported in their own right and used to inform the design of the main phase.

Phase 2: research with survivors/victims

Following the initial phase, the main phase of interviews with survivors/victims will be conducted. We envisage these to be one-to-one face-to-face interviews, for reasons of participant comfort, privacy, and the depth of discussion and individual perspective that is made possible. However, consideration will be given to the additional use of group interviews, each with up to 6-8 participants, if appropriate: for example, if that would elicit useful information due to group dynamics, if participants felt comfortable with or preferred such a setting, and to enable a greater number and variety of participants. The appropriate composition of such groups (such as the degree of homogeneity or heterogeneity) would be considered. Potentially, existing survivor groups that meet at support services could be co-opted for this purpose (though each member would be asked individually so they do not feel any pressure to join a group discussion). The advice of victim/survivor support organisations will be used in deciding this.

The interviews with survivors/victims will explore their reactions to the content of the CSEW survey questions, whether or not they would be willing and able to answer them in an online survey, what risks there might be to their physical, emotional and psychological wellbeing, and how, if at all, those risks could be mitigated. The protocol/topic guide will include probing on various topics identified in advance, to address the research questions in detail, and also allow participants to mention anything else they think important that had not been probed. (Note this research is not intended to test the CSEW questions cognitively or regarding online usability.)

Interviews will be audio-recorded and transcribed, subject to each participant's permission. A thematic content analysis of the data will be conducted.

Sampling and recruitment

Purposive sampling will be employed. This does not aim to achieve statistical representation of the study population but to cover a diversity of views, behaviours and experiences related to the research questions. We have thought through the sample design that is needed to answer the key research questions sufficiently well while taking into consideration the ethical constraints around safe recruitment and participation, and the practical constraints of researcher resource and the timetable.

There are many subgroups (and thus potential purposive sample criteria) within the broad study population of adult survivors/victims of domestic abuse, sexual assault or victimisation, stalking and abuse in childhood:

- Victims/survivors of each of the four broad types of offence above
- Victims/survivors of different aspects of those broad types (for example, domestic abuse encompasses physical violence, threat and controlling behaviour; spouse/partner abuse, parental abuse of adult children and vice versa, elder abuse)
- Victims/survivors who have sought help/support and those who have not
- Repeat and single incident victims (of any single crime type)
- Victims of multiple crime type (e.g. domestic abuse and abuse in childhood)
- People currently experiencing these crimes, those who have recently experienced

them and those who experienced them longer ago

- Socio-demographic characteristics, to include a range of victims/survivors across each of the following:
  - Gender
  - Sexual orientation
  - Age
  - Household/family type (e.g. with/without children)
  - Ethnicity, cultural background, language(s) spoken
  - Educational attainment, literacy
  - Economic activity status, socio-economic classification
  - Health and disability
  - Geographical (e.g. urban/rural, country/region)

There are limits to our ability to conduct research across all these subgroups, for the following reasons.

- There are several criteria, several categories within each criterion, and numerous possible combinations of them. (To some degree this can be mitigated given that a proportion of victims/survivors will have experienced more than one of these types of offence.)
- There are practical limits to the number of interviews that can be conducted and analysed within the time and resources available. It is our intention that around 25 one-to-one interviews will be conducted. A small number of group interviews – perhaps five – could also be conducted, in part to increase the representation from some subgroups, if feasible to arrange.
- There will potentially be difficulty in finding and recruiting participants in some subgroups, such as those who have not sought help or support.

Therefore, we will prioritise certain criteria and characteristics when designing our purposive sample. We will focus primarily on the following:

- including several participants who have experienced each of the crime types - domestic abuse, sexual assault, stalking and abuse in childhood
- those who were abused or assaulted by someone who was living in their household at the time (being most relevant to any potential issues around completing an online survey in a household environment)
- those who are receiving or have received support and can be recruited via support agencies, who are likely to be easier to locate, perhaps be in a better situation to cope with the subject matter and be safer to participate.
  - We will consider including victims/survivors who have not sought help or support, if we can find them with reasonable ease and are satisfied about their safeguarding and interviewer safety (taking expert advice from support agencies). Information about support services would be provided to any such participants (including at the recruitment stage) and it would be made clear to them that ONS is not a support provider.

We will attempt to cover as many characteristics as possible across the overall sample and, if necessary and possible, adjust the recruitment to target less-well represented groups. However, practicalities are likely to mean there will be some exclusions. The report would include caveats accordingly. If the findings indicated that it would be ethical to ask these questions online, consideration would need to be given to those subgroups who could not be included at all or were not well-represented. For example, whether further research should be conducted, or consultation with experts/stakeholders to consider the potential impact on such subgroups.

Recruitment of participants will primarily be conducted through survivor/victim support services and charities, who will be asked to help us recruit people meeting the criteria specified to them by ONS (but also taking the services' advice into consideration). Such people may be receiving help from the service currently, or have been helped previously, or be found through, for example, putting a recruitment request on their websites, social media channels or newsletters.

If we include victims/survivors who have not sought help, we will consider what are the appropriate sources, such as the research recruitment agency regularly used by ONS, 'snowballing' (where participants identify other people they know who might be suitable for the research) and requests to ONS staff to pass our recruitment information to friends and family members who meet specified criteria.

We will take great care not to compromise the safety of potential recruits, from whatever source, such as by making clear potential risks they should consider when deciding to respond, and asking for their preferred communication methods, including for example emails, telephone calls and voicemail messages. (See B2 for further description of procedures around consent, confidentiality, and participant wellbeing.)

Incentives and covering costs
A token of appreciation (£30) will to be given to all participants, as is standard for qualitative research. Payment will not be dependent on completion of a full interview. Payment method – such as cash, gift card or e-voucher - may vary depending on the recruitment source. Participants will be asked for their preference, taking into account, for example, the potential for an abusive partner to question the source of the money.

As far as is possible within the available budget, reasonable costs of attending incurred by participants, such as travel or childcare, will be covered, to enable wider participation particularly among harder to recruit subgroups.

Other
Matters relating to consent, privacy, confidentiality and safeguarding of participants, and the wellbeing of researchers, in connection with all of the above, are covered at B2.

Should the Committee request it, draft recruitment and field materials will be shared for comment and approval.

A6

Data use

Please specify the data used **by the research team** including any timeframes *e.g. LFS data 2014-15*

Type of data	**Data Level** *Please specify the name of the dataset* **Aggregate Data**	**Identifiable Data**	**De-identified personal data**	**Anonymised/ pseudo anonymised**
Administrative data *(please specify, e.g. Patient Register 2011, School Census 2012 etc, in the relevant options adjacent)*				
Big Data *(please specify e.g. Twitter data, smart meters and mobile phones, in the relevant options adjacent)*				
Survey Data *(please specify e.g.LFS, BRES, etc in the relevant options adjacent)*				
Census Data *(please specify year, e.g. Census 2011 in the relevant options adjacent)*				
Other *(please specify e.g. Ordinance Survey Address register in the relevant options adjacent)*				Qualitative data collected specifically for this project

Section B
Assessment against NSDEC ethical principles

B1 Principle 1: The use of data has clear benefits for users and serves the public good.

Please outline the proposed benefits of the project (max. 500 words)

The CSEW's benefits to users and service to the public good are well established. The estimates of the level of crimes of different types produced are important in informing government policy. They include crimes that are not reported to or recorded by the police. The statistics are used by providers of services to crime victims/survivors and to inform debate widely. It is important to make the right decision as to whether to change data collection mode. The research is the key first step in the process of understanding whether changing mode would have an impact on CSEW respondents and on the quality of estimates, whether adverse or positive.

The qualitative data collected in this research will be used to inform a decision by the ONS Transformation Board (escalated to the National Statistician if necessary), as to whether it is ethical to ask the survey questions of interest in an online mode. This is a critical question, with the feasibility of moving the CSEW to an online-first, mixed mode design hinging on the answer. This research will identify the factors that the decision makers will need to take into account and some key findings to inform their decision.

The findings from this qualitative work will benefit users and ensure that the CSEW continues to serve the public good, regardless of whether or not they suggest that moving the CSEW online is feasible. Seeking the views of those who have experienced the crimes asked about in the questions of interest enables us to get informed user opinions as to the potential risks and difficulties of moving this survey online

1) If the findings indicate it is not ethical to ask these CSEW questions in online mode, users and the public will be served in the following ways.
    - Future CSEW respondents will not be at put at risk of physical, emotional or psychological harm (that is, no greater risk of harm compared with the current survey design)
    - Public funds would not be spent unnecessarily on other CSEW online transformation activities. Development of an online CSEW could be precluded: if the questions of interest are not ethical online, the survey as a whole cannot be transformed. It cannot be modularised by splitting topics across the sample, because both screener, victimisation module and crime-specific modules need to be asked of all respondents, for analytical purposes. Therefore, it would not be possible to estimate national crime levels, a key output of the survey and of high importance in public policy making and informing national debate.

2) If the findings indicate it is ethical to ask these questions online, the benefits potentially include (subject to the success of the rest of the transformation process):
    - improved CSEW data quality - for example, higher response rates and reduced non-response bias, because potentially more people might be willing to respond online than to an interview and give more accurate responses - so better informing public policy making and national debate
    - more efficient use of public budgets, if cost savings are realised compared with the existing CSEW design

3) If the findings are inconclusive/equivocal, further exploration and development work would be necessary to build on what has been learned, filling in known gaps.

B2

Principle 2: The data subject's identity (whether person or organisation) is protected, information is kept confidential and secure, and the issue of consent is considered appropriately.

Please outline how data security, confidentiality and informed consent is safeguarded in this project (max. 500 words)

In conducting the qualitative research we will conform to established social research ethical guidelines (such as those published by Social Research Association, the Government Social Research profession and the Economic and Social Research Council), the advice of professionals who work with crime victims/survivors (which has been sought during initial discussions with representatives of support services and researchers with survivors), and guidance/frameworks for researching with survivors of domestic abuse.

Informed ethical consent

Research participants (potential and actual) will be given sufficient information and the ability to make choices at every stage of the research process. This will be by both written and verbal means.

- Participation will be voluntary, and it will be made clear that people can opt out or withdraw at any point, from initial contact through fieldwork to the point of analysis, without any negative consequence for them.
- Participants will be informed about the purpose of the research and its potential benefits.
- They will be informed about the content of the interviews.
- They will be warned about the potential for the subject matter to trigger emotional reactions or the recall of traumatic experiences.
- They will be informed that they do not have to answer questions if they prefer.
- They will be offered choice regarding the location, date and time of interview, whether the interview would be one to one, and asked if they prefer a female or male interviewer. If their preferences cannot be accommodated, they will be given choice as to whether or not to proceed.
- Participants' written legal consent to participate is not required by GDPR rules applying to the processing of participants' data by ONS (see B4), but verbal ethical consent will be sought at the start of interviews. It is difficult to clearly convey to participants the distinction between ethical and legal consent in order to obtain written ethical consent only. We will provide participants with written and verbal explanations of their ethical rights, such as those listed above, during recruitment and at the start of the interview. We will ask for verbal agreement and take their participation in an interview/focus group as indication of their agreement.

Participant wellbeing

Researchers will be sensitive to the wellbeing of participants at all stages. They will be trained in or have experience of conducting interviews of a sensitive nature. Our general aim is for interviews to last for approximately one hour. They can be shorter or longer depending on participant's state of mind and their willingness to continue. If they should express or show indications of distress, they will be given the option to pause, move to a different topic or end the interview, as appropriate.

The research does not require collection of detailed information about participants' experiences of the crimes of interest, or their answers to any of the CSEW questions of interest. Rather it will be a discussion of their reaction to such crimes being asked in an online CSEW. However, it will be necessary to inform participants of the content of the survey questions, in enough detail to enable them to give due consideration (which might include showing them examples of current CSEW questions and them relating the questions to their own experiences). Therefore, there is potential for triggering of emotional reactions or recall of traumatic experiences in the course of their responses to probing. We will prepare participants by informing them in advance of this potential. We will say to participants they may go into as much or as little detail as they are comfortable with. Researchers will be sensitive to the degree of detail each participant appears happy to go into as the interview proceeds, beginning at a high level then asking if they would be content to discuss things in more detail (such as showing them specific questions). Projective techniques may be used to create distance between the participant and their personal experience of the subject matter, such as fictional scenarios about which they are invited to respond, or by asking them how someone else in a similar situation might react, rather than about their own reaction or experience directly. The advice of experts at support services will be sought, in this regard.

When recruiting participants through support services we will follow their advice as to the suitability of individuals in respect of their mental health and readiness to participate. Survivors who have recently been in a state of crisis will not be included.

Interviews will be conducted by a single researcher, so the participant feels comfortable. Group interviews will be conducted by two researchers, one of whom can, if required, attend to any participant who becomes upset or distressed. When possible, support workers from the organisations helping us to recruit and host interviews will be on hand to assist as necessary. Research that is not conducted at support services premises will not be conducted on Friday afternoons or at weekends, when support services are less likely to be available should participants need to call them.

Safeguarding and disclosure

Researchers will provide information about support services/helplines to participants, should they need to seek help following the research.

The researchers will follow ONS's Safeguarding Policy, which sets out when and how staff should recognise, respond to and report safeguarding concerns (belief of serious risk to someone's safety) and how such reports will be dealt with. The Chief Safeguarding Officer, Safeguarding Contacts and Survey Enquiry Line will be informed in advance of the research being conducted. Researchers will take the Civil Service's e-learning course on safeguarding children and adults.

A protocol will be developed based on the Policy and the context of this research, as to what action to take in certain circumstances, relating to who is at risk (the participant, or another adult or a child they mention), different types of risk (to life, threat of physical violence, reference to suicide or self-harm), whether it has been reported already, and whether the decision on action is the researcher's only or to be discussed and/or agreed with the participant.

Prior to interview, participants will be informed of the fact that the researcher might be obliged to report such risks. For example, 'All the information gathered will be confidential to the research team. The only exception to this is if we are told that a child or vulnerable person is at risk of serious harm. In this case we may need to inform someone, but we would try to talk to you about these concerns first.'

Data security and Confidentiality

Participants will be told how we will look after their personal information and the data we collect in the interviews, and that they will not be identifiable in our research outputs.

Personal data collected and processed during the course of recruitment, data collection and analysis will be stored securely on ONS devices and systems (password/PIN protected) and accessible only by the researchers working on the project. Any paper documents required will be looked after carefully if taken outside ONS offices (such as during fieldwork) and locked away when inside.

Confidentiality will be maintained in the reporting of the findings. The report(s) written for internal use by CCJ/SST and, if relevant, for publication, will not include any personal information nor describe views and experiences of participants in such a way that they could be identified indirectly. A transcription agency will be used to transcribe the audio recordings: the agency will abide by strict confidentiality and security terms and conditions, and recordings and transcripts will be transferred securely between ONS and the agency via MoveIT.

All personal data, including recordings and transcripts, will be securely deleted/destroyed after completion of the project. That is, once the report has been delivered and a decision made about next steps made.

Researchers' wellbeing
The personal safety of the researchers will be managed. Interviews at people's homes will be avoided unless the participant is not living with an abuser and unless support services deem it safe. It is planned that researchers will carry lone worker personal safety devices as used by ONS field interviewers. Researchers will be aware of each other's whereabouts.

Researchers' emotional and psychological wellbeing will be looked after. They will be mentally prepared for the likelihood of hearing about distressing experiences and vicarious trauma. We have had an offer of training for our researchers, from a specialist research unit at a university, on understanding and researching domestic abuse, sexual violence and abuse in childhood. Researchers will debrief with each other and/or a manager after each interview and periodically to monitor cumulative effects. Researchers will be able to access counselling through ONS's Employee Assistance Programme if required.

B3 Principle 3: The risks and limits of new technologies are considered and there is sufficient human oversight so that methods employed are consistent with recognised standards of integrity and quality.

Please describe how the any risks from new technologies are been mitigated as well as any quality assurance activities in the project (max. 500 words)

No new technologies/techniques will be used in this research.

B4 Principle 4: Data used and methods employed are consistent with legal requirements such as Data Protection Legislation[1], the Human Rights Act 1998, the Statistics and Registration Service Act 2007 and the common law duty of confidence

Please describe the legal frameworks pertinent to this project (max. 500 words)

The research will comply with GDPR requirements as they apply to ONS. The lawful basis for the processing of personal data is that it 'is necessary for the performance of a task in the exercise of official authority vested in the controller'. The lawful basis for the processing of special categories of personal data is that it 'is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.' (See B2 regarding our ethical consent procedure).

Participants (and anyone who is approached but does not eventually participate) will be provided with the following standard text explaining the legal basis for collecting and processing their personal information:

Confidentiality: *UK legislation allows us to collect and process your data to produce, promote and safeguard statistics for the public good. Your personal information will be treated as confidential as directed by the Code of Practice for Statistics and will not be shared with any third parties. Feedback you provide will be used to develop questions for official surveys. The information you provide will not identify you or anyone in your household. Your name and address will be used for interview arrangements only and will be deleted upon completion of the project.*

How to find out more: *If you have a question about how we process your personal data and you can't find the answer on our website, you can contact our Data Protection Officer at DPO@statistics.gov.uk or 0845 601 3034. To find out more about your rights under data protection legislation, or how to raise a concern with the Information Commissioner, see our website at www.ons.gov.uk/dataprotection or the Information Commissioners Office at: https://ico.org.uk*

How to find out more *about the research you took part in by email: [research team email address will be inserted]*

Principal Investigator *– [name and telephone number of research manager will be inserted]*

In writing to: ONS Methodology, Office for National Statistics, [address to be inserted]

B5 Principle 5: The views of the public are considered in light of the data used and the perceived benefits of the research

Please list any public engagement activities (max. 250 words)

As described, the research project is for the purpose of directly engaging with a specific subsection of members of the public, by means of interviews and focus groups. Informed consent will be obtained during their recruitment – including through explanation of the purpose and benefits of the research. Participants will be representing people who might be impacted by changing the CSEW to an online first design. Furthermore, the views of victim/survivor support agencies and researchers have already been sought to inform the research design and drafting of this application (telephone discussions were held with

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[1] "Data Protection Legislation" means the full, applicable data protection framework as set out in the Data Protection Act 2018. This encompasses general processing (including the General Data Protection Regulation and the applied GDPR).

representatives of approximately 10 organisations). Further consultation with these and other organisations, about transforming the CSEW, will be part of the research, as described above.

B6 Principle 6: The access, use and sharing of data is transparent, and is communicated clearly and accessibly to the public

How will the findings of the research be disseminated? (max. 500 words)

A report will be written for the ONS Centre for Crime and Justice and Social Statistics Transformation stakeholders, to use in informing the decision on whether it is ethical to ask the questions of interest in an online-first CSEW. The report will be published on the ONS website, in full or an edited version. The report will describe the research background, purpose and methodology, and the findings, conclusions and recommendations arising. Participants in the research will not be identifiable in the report.

B7 Future use of products

Please outline any intended future use for products (such as linked datasets or tools) produced as a result of the research and how they will be accessed (max. 250 words)

Not applicable: the personal data collected and processed is for use in this project only. The resulting report of findings will not contain personal data – it is for a specific purpose as described above though may potentially provide findings that could inform subsequent research.

B8 Collaboration and Sponsors

*Please describe the project sponsors and the **legal gateways** to acquire, process use and share their data*

List of Collaborators/Sponsors	**Details and relevant documentation relating to collaboration** **(you may attach copies of relevant documentation)**
Not applicable – ONS internal work	

Section C
Responsible owner and applicant details

C1 Responsible Owner

Full Name: Meghan Elkin	**Position:** Head of ONS Centre for Crime and Justice
Address:	**Email:**
	Telephone:
	Organisation: Office for National Statistics

Declaration to be signed by the responsible owner

I have met with and advised the applicant on the ethical aspects of this project design (applicable only if the responsible owner is not the Applicant).

I understand that it is a requirement for all researchers accessing the data to have undergone relevant training and to have either relevant security clearances or accredited/approved researcher status in order to access the data.

I am satisfied that the research complies with current professional, departmental and other relevant guidelines.

I will ensure that changes in approved research protocols are reported promptly and are not initiated without approval by the National Statistician's Data Ethics Advisory Committee.

I will provide notification when the study is complete if it or fails to start or is abandoned.

I will ensure that all adverse or unforeseen problems arising from the research are reported in a timely fashion to the National Statistician's Data Ethics Advisory Committee.

I will consider all advice received from the National Statistician's Data Ethics Advisory Committee and should I be unable to implement any of the recommendations made, I will provide reasoning in writing to the Committee.

Signature: -- **Date:** ------------------------

C2 Applicant Details (if applicant is not the responsible owner)

Full Name: Peter Betts	**Position:** Social Research Methodologist, Social Statistics Hub, Methodology division
Address:	**Email:**
	Telephone:
	Organisation: Office for National Statistics

UK STATISTICS AUTHORITY

NATIONAL STATISTICIAN’S DATA ETHICS ADVISORY COMMITTEE

Request for advice to inform the next steps for the child abuse prevalence survey feasibility study

Presentation

Alexa Bradley and Meghan Elkin

UK STATISTICS AUTHORITY

NATIONAL STATISTICIAN’S DATA ETHICS ADVISORY COMMITTEE

Research Strand of the Digital Economy Act

Presentation

Simon Whitworth

NSDEC(19)16

National Statistician’s Data Ethics Advisory Committee

Application for Ethical Review

Please consult the guidance document before filling in the application form

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Project Title

Please provide a title indicative of the project

Research on homeless mortality among St Mungo’s clients

Start Date: November 2019 **End Date:** February 2020

Project Sponsor(s)

Please list the project sponsor(s)

n/a – St Mungo’s project only

Project Summary

Please provide a brief high-level summary of the research, giving necessary background information

(max. 250 words)

St Mungo’s is one of the largest providers of homelessness services in the UK. This project will build our understanding of homeless mortality by exploring causes of death among our clients (service users). Although we keep a record of all client deaths, we do not have reliable data about what causes them.

As part of the project, we will match our organisational records of client deaths with data from the England & Wales deaths registrations data (from 2013 to the most recent year of data available). This will allow us, for the first time, to have an accurate and robust understanding of our clients’ causes of death and how, if at all, these have changed over time.

This information would help St Mungo’s better understand an important area of our work. Our hypothesis is that the data will show a rise in drug-related deaths in line with recent ONS homeless mortality releases. Ultimately, we envisage that it would allow us to more effectively work to prevent client deaths by better targeting our energy and resources. There may also be knock-on benefits on other public and charitable services disproportionately used by our clients including the health service, drug and alcohol treatment services, criminal justice system and welfare system.

This strand of work is part of a larger research project on client mortality. We are also conducting an internal review of our systems for preventing, investigating and recording client deaths and a literature review on homeless mortality.

Section A
Project Details

A1 Legal gateways

Please provide the assessment of the legal gateways of the project as provided by Legal Services

As part of this project, St Mungo's will provide the ONS with data for St Mungo's clients who have died going back to 2013. This data will then be matched with deaths registration records to provide further information on cause and location of death.

The St Mungo's data will contain a minimum of information required to match records and conduct the analysis. Specifically we envisage this will include name, date of birth, local authority and region, gender, ethnicity, age, St Mungo's service and service type and approximate date and location of death. Further information can be provided if necessary for the matching.

The information collected about client deaths falls outside the scope of GDPR, which only relates to the information of identifiable living individuals and is therefore kept beyond our normal (3 year) data retention schedules.

St Mungo's has a duty not to use this data in a way that would infringe subjects' human rights. This use of the information passes that threshold. This data would be used for our legitimate interest to understand more about an important topic and improve our service delivery for public benefit. No individual would be identifiable from the outputs.

Subject to accreditation of this project and researchers at St Mungo's, de-identified death registration data will be disclosed by ONS using section 64 of the Digital Economy Act 2017 (disclosure for research purposes).

A2 Ethical approval

Has the project been reviewed or is it expected to be reviewed by another ethics committee? *(please delete as appropriate)*	**No** *(St Mungo's does not have an internal ethics committee)*

A3 Proposed site of research

Please provide information about where the research will take place, including detail of where any data linkage and/or data analysis will be conducted

The proposal is that this project is conducted using data from the ONS Secure Research Service. St Mungo’s will securely transfer our deaths data to the ONS for matching with deaths registration records. We will then access the matched and de-identified data at the Secure Research Service Lab at the ONS offices in London. We do not require and will not apply for remote access to the data.

A4 Data subjects to be studied

Does the study include all subsections of the population? (i.e. all ages, sex, ethnic groups etc.) *(please delete as appropriate)*	**No**

*If **No,** please detail which subsections with justification(s) below:*

Subsections of the population (including vulnerable groups) the project focuses on:

Clients of St Mungo’s (approximately 450 individuals who have died while using our services since 2013). These individuals are typically people who are currently homeless, or who have lived experience of homelessness and are being supported by St Mungo’s to live independently through one of our floating support services.

St Mungo’s clients may also have a number of other needs, including drug and alcohol addiction needs, mental health needs and histories of incarceration and/or the care system.

Our most recent data indicates that our clients are demographically mixed. Around 70% are men and 30% are women. Roughly 60% are white and 40% are Black, Asian and minority ethnic.

Justification for focusing on these subsections or groups:

This project specifically focuses on our clients as a lens for understanding more about patterns in mortality for people who have experienced homelessness. There is a large amount of evidence to suggest that people who have experienced homelessness are a particularly vulnerable group, with the highest risks of premature mortality of any population. A *Lancet* systematic review published in 2017 identified international estimates of homeless mortality rates as varying between 3 and more than 11 times larger than the population as a whole. The recent ONS release on homeless mortality in England and Wales estimates that the average age of death for a homeless man is 45, and just 43 for a woman.

We hope that this research will provide us with more information about the causes of death of individuals who have experienced homelessness and provide an evidence base for better delivery of services to support our clients.

A5 Research methodology and protocol

Please provide details of the research protocol or methodology (e.g. data linkage, web scraping etc.) (max. 500 words)

The first stage will involve matching our organisational information on client deaths with deaths registration data. We will provide the Data Processor with records of all clients who have passed away between 2013 and the most recent date that deaths registration data is available. This data relates to around 450 people who have passed away in this period. The data will include:

- The client's name
- Date of death (which may in some cases be approximate)
- Year of death
- Age at death (including date of birth in some cases, but this may not be available or may be estimated in some cases)
- Gender
- St Mungo's service and service type
- Ethnicity
- Region
- Local authority

If necessary for the matching process, we can also provide additional information on request (e.g. the local authority in which we believe the client's death would be registered).

Every time a client dies in one of our services, the death is logged as an 'incident report' on our client management system. The dataset used for the matching will be generated via a SQL query of all deaths incident reports for the relevant period.

Before sharing it with the Data Processor we will clean the data to ensure that no living individuals' information is shared. This process will also involve removing all information relating to people who died on the streets in areas where we work but who were not clients of St Mungo's, as there may be some information about these people in the dataset at the moment.

After the matching process is complete, we would do a simple analysis on the data exploring causes of death and how these have changed over time. We would use the WHO's International Classification of Diseases categorisation system for cause of death (10th revision, ICD-10). This is the same method used in ONS mortality releases, including the homeless mortality data. If it is available, we would also do an analysis on death locations (i.e. the proportion of clients dying on the streets, in our services and in hospitals.).

We will analyse the data by exploring trends over time and by gender, ethnicity, age, region and St Mungo’s service type. We are not planning to do any complex statistical analysis or modelling of the data, beyond a significance test on any changes over time.

The findings from the analysis would feed into a wider research project on client mortality. This includes an internal review of our systems for preventing, investigating and recording client deaths and a literature review on homeless mortality. The main output from the research would be an internally-facing report exploring the issue of client mortality from a number of angles and containing recommendations for changes in practice.

A6 Data use

Please specify the data used **by the research team** including any timeframes *e.g. LFS data 2014-15*

Data Level

Please specify the name of the dataset

Type of data	**Aggregate Data**	**Identifiable Data**	**De-identified personal data**	**Anonymised/ pseudo anonymised**
Administrative data *(please specify, e.g. Patient Register 2011, School Census 2012 etc, in the relevant options adjacent)*		**Deaths registrations in England and Wales** (2013 – the most recent year in which data is available).		
Big Data *(please specify e.g. Twitter data, smart meters and mobile phones, in the relevant options adjacent)*				
Survey Data *(please specify e.g.LFS, BRES, etc in the relevant options adjacent)*				
Census Data *(please specify year, e.g. Census 2011 in the relevant options adjacent)*				
Other *(please specify e.g. Ordinance Survey Address register in the relevant options adjacent)*		St Mungo’s records of client deaths (2013 – the most recent year that the deaths registration data is available).		

Section B
Assessment against NSDEC ethical principles

B1 Principle 1: The use of data has clear benefits for users and serves the public good.

Please outline the proposed benefits of the project (max. 500 words)

St Mungo's is largely funded by government contracts and can be considered a public service delivery organisation. The findings from the project would help St Mungo's better understand an important area of our work and allow us to better target our resources to deliver those services more effectively. This will be of wider benefit to the public by providing the evidence base we need to tackle homelessness more effectively. Ultimately, we envisage that it would allow us to more effectively work to prevent client deaths. There may also be knock-on benefits on other public and charitable services disproportionately used by our clients including the health service, drug and alcohol treatment services, criminal justice system and welfare system.

Our hypothesis is that the data may show an increase in the proportion of drug-related deaths. This would be in line with our existing evidence about increasing levels of drug use on the streets, and the increase in drug poisoning deaths among homeless people detailed in the latest ONS homelessness statistics. If we do discover this, it will provide important evidence to dedicate more emphasis and resources on improving access to drug treatment services and speeding up the roll-out of Naloxone, an opiate antidote used by some, but not all, of our services.

One alternative approach to this project would involve manually collecting the data by paying for death certificates. Conducting the project by data matching would incur a considerable saving of charitable time and money. Specifically, it would save several thousands of pounds of direct spending on paying for death certificates and further resource in the form of staff time acquiring, recording and coding the data.

We also anticipate that this project could be a platform for another piece of work to validate and improve the ONS's own work on homelessness and mortality. For example, we may be able to provide the ONS with a list of services and addresses where our clients are known to have died to validate the method in the ONS homeless deaths statistical release.

There is limited potential harm to the public from this project. It follows from a similar piece of work by the ONS to better understand homeless deaths across the country as a whole. This project does not require any complex statistical methods or analysis whose results could be easily misinterpreted. In addition, it uses a well-established and widely-used dataset (the deaths registration data) that the ONS features regularly in its statistical releases.

B2 **Principle 2: The data subject's identity (whether person or organisation) is protected, information is kept confidential and secure, and the issue of consent is considered appropriately.**

Please outline how data security, confidentiality and informed consent is safeguarded in this project (max. 500 words)

Homeless deaths are often widely publicised. This, combined with the relatively small sample size of the dataset, create a theoretical risk that an individual client could be identified from the research outputs.

We will ensure that we keep the risks as low as possible, by limiting the subgroup analysis in our outputs to ensure that numbers are always above the threshold of 10, in line with the ONS requirements for non-disclosive outputs. We will also limit our analysis of deaths in particular local areas. Notably, none of the outputs entail any risks of identification above and beyond the risk in the ONS's own homeless deaths statistical releases, which include a breakdown of homeless deaths by individual local authorities.

Access, analysis and use of the data will only take place within the secure ONS Secure Research Service (SRS) environment. All outputs will be checked by the Research Support and Data Access team to ensure that they are not personally identifiable and to confirm that they are proportional and necessary to the project. This process ensures that disclosure control and the confidentiality of data subjects is protected. Outputs that identify small groups or individuals will not be allowed out of the Secure Research Service environment. The researchers will be accredited researchers under the Research Strand of the DEA

B3 **Principle 3: The risks and limits of new technologies are considered and there is sufficient human oversight so that methods employed are consistent with recognised standards of integrity and quality.**

Please describe how the any risks from new technologies are been mitigated as well as any quality assurance activities in the project (max. 500 words)

This project will use deaths registrations data. Since this is recorded and signed off by experts in their fields (doctors and coroners) we believe it will be high quality and reliable.

The method we have outlined does not require any complex statistical analysis or modelling which could pose a risk of drawing misleading or incorrect conclusions. Furthermore, the methods and outputs will be informed by the ONS's own work in the homelessness deaths release and use the same, respected method for categorising cause of death (ICD-10).

Before sharing our organisational deaths data with the Data Processor, we will exhaustively check and clean it to ensure that no living individuals' information is sent to the ONS.

This project has been developed under the terms of the St Mungo's research policy. This was designed in consultation with our clients, staff and colleagues from other organisations and provides for rules around research ethics, confidentiality and data security (among other things).

B4 Principle 4: Data used and methods employed are consistent with legal requirements such as Data Protection Legislation[1], the Human Rights Act 1998, the Statistics and Registration Service Act 2007 and the common law duty of confidence

Please describe the legal frameworks pertinent to this project (max. 500 words)

The information collected about client deaths falls outside the scope of GDPR, which only relates to the information of identifiable living individuals and is therefore kept beyond our normal (3 year) data retention schedules.

In line with the common law duty of confidence and the Human Rights Act, St Mungo's has a duty not to use this data in a way that would infringe subject's human rights. This use of the information passes that threshold. This data would be used for our legitimate interest to understand more about an important topic and improve our service delivery for public benefit. We would also meet our duties by ensuring that the minimum threshold of 10 is used in our outputs to ensure no individuals are identifiable from the research.

We plan to access the matched deaths registration data using the Secure Research Service and fully comply with the processes required under the SRS Act 2007 and Digital Economy Act 2017 to ensure subjects' confidentiality.

B5 Principle 5: The views of the public are considered in light of the data used and the perceived benefits of the research

Please list any public engagement activities (max. 250 words)

Homeless deaths are an area of high, and growing, public interest. Following the publication by the Bureau of Investigative Journalists of the first data on homelessness deaths, the ONS committed to and published homeless death statistics beginning in 2018.

The very high level of press coverage for the most recent ONS homeless deaths release, on 1st October 2019, is evidence of this interest. The release was covered (to give a few examples) on the front page of the BBC news website, on the Channel 4 nightly news and by the Times editorial leader.

St Mungo's has also conducted its own campaign activity around the deaths release, which has so far received a very high level of interest from our campaigners.

St Mungo's clients are involved in every aspect of our work, including our research projects. This project will involve clients in the reporting and dissemination of the findings too. For example, we are likely to consult with our client involvement committee, *Outside In*, on the planning, writing and dissemination of the research. *Outside In* is composed of former and current clients of St Mungo's with personal experience of homelessness.

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[1] "Data Protection Legislation" means the full, applicable data protection framework as set out in the Data Protection Act 2018. This encompasses general processing (including the General Data Protection Regulation and the applied GDPR).

B6 Principle 6: The access, use and sharing of data is transparent, and is communicated clearly and accessibly to the public

How will the findings of the research be disseminated? (max. 500 words)

We will publish the data in the form of a briefing on homelessness and mortality, to appear publicly on our website and to be used as a resource with stakeholders (e.g. civil servants, MPs, commissioners and sector partners). This would include the findings from this piece of research, alongside recent ONS releases on homeless mortality and published literature on homelessness and mortality.

We will put the findings from this research in context, for example, by referencing the growth in the overall number of St Mungo's clients in the relevant period.

The findings from this research will also form part of a larger, internal report which will also include the findings from an internal review of our systems for preventing, investigating and recording client deaths. This will include organisationally sensitive information and we are not proposing to publish it externally in this format. For example, it will include anonymised feedback about the impact of a client death on members of staff and the support that was available to those staff after a death.

B7 Future use of products

Please outline any intended future use for products (such as linked datasets or tools) produced as a result of the research and how they will be accessed (max. 250 words)

The matched deaths registration data will only be accessible in the ONS Secure Research Service, and we will not be able to use the identifiable data outside this setting.

B8 Collaboration and Sponsors

Please describe the project sponsors and the ***legal gateways*** *to acquire, process use and share their data*

n/a – no partners or sponsors for this project

Section C
Responsible owner and applicant details

C1 Responsible Owner

Full Name: David Wilson	**Position:** Evaluation & Impact Officer
Address:	**Email:**
	Telephone:
	Organisation: St Mungo's

Declaration to be signed by the responsible owner

I have met with and advised the applicant on the ethical aspects of this project design (applicable only if the responsible owner is not the Applicant).

I understand that it is a requirement for all researchers accessing the data to have undergone relevant training and to have either relevant security clearances or accredited/approved researcher status in order to access the data.

I am satisfied that the research complies with current professional, departmental and other relevant guidelines.

I will ensure that changes in approved research protocols are reported promptly and are not initiated without approval by the National Statistician's Data Ethics Advisory Committee.

I will provide notification when the study is complete if it or fails to start or is abandoned.

I will ensure that all adverse or unforeseen problems arising from the research are reported in a timely fashion to the National Statistician's Data Ethics Advisory Committee.

I will consider all advice received from the National Statistician's Data Ethics Advisory Committee and should I be unable to implement any of the recommendations made, I will provide reasoning in writing to the Committee.

Signature: .... **Date:** ....

C2 Applicant Details (if applicant is not the responsible owner)

Full Name:	**Position:**
Address:	**Email:**
	Telephone:
	Organisation:

UK STATISTICS AUTHORITY

NATIONAL STATISTICIAN’S DATA ETHICS ADVISORY COMMITTEE

Any other business