

# National Statistician's Data Ethics Advisory Committee

## Guidelines on completing the Application for Ethical Review Form

### General guidelines

1. The application form should be completed in plain English which is understandable to lay members.
2. All abbreviations should be explained the first time they are used. The form should contain sufficient information to ensure a thorough ethical review can take place.
3. Please complete the form using Arial or Times New Roman font, size 11. Where necessary, expand text boxes on the form to accommodate answers, but **ensure word counts are adhered to where specified**.
4. Avoid including any references to names except in section C of the application form
5. Where sections are not relevant to your study please mark as N/A.

### Basic information

#### Project title

Please provide a short title, no more than two lines, to describe the project. Please make sure that the title is indicative of the project.

#### Project start and end date

This section should provide the expected start and end dates of the project. You are encouraged to provide accurate dates but a month–year format would suffice for most projects.

#### Project lead(s), sponsor(s) and collaborator(s)

Please provide details on the people/organisation leading the research, the people/organisation sponsoring the research, and also, any person or organisation collaborating with the research. The **project sponsor** is a term referring to the organisation(s) who are funding the research. In practice, the project sponsor is often the organisation requesting the research. For each **collaborator** you should provide details on the agreement enabling this collaboration.

### **Additional Ethical Approval**

It is very important to specify if the application has been previously reviewed or expected to be reviewed by an ethics committee, or a relevant body with similar responsibilities. If that is the case you will be also required to share what was the outcome of the committee, e.g. approved / rejected and the date of the committee meeting.

### **Project Summary** (max. 300 words)

In this section you are asked to provide a short background of the project. Please ensure that you stay within the word limit. Make sure you include the following:

1. the aims of the research. *e.g. this research plans to link ONS survey data with administrative data from HMRC to explore wage disparity in different regions of the UK;*
2. an outline of the datasets used;
3. information about where the research will take place. This should include detail of where any data linkage and/or data analysis will be conducted, *e.g. the ONS Secure Research Service;*
4. the need for doing this research. *e.g. there has been an expressed interest from local authorities to understand how low income households can be supported by national initiatives;*
5. a summary of the benefits to the public. Please note that the need for the project does not necessarily explain its benefit. *e.g. understanding how low income households can be supported by national initiatives will be used to inform local authority initiatives, improve resource and increase public awareness, to support households in need. Our guidance on [considering and articulating public good](#) in research projects may be useful here.*
6. a summary of the project outputs. *e.g. the results, methods or tools that this project will produce;* and
7. any useful background information relevant to the application.

### **Areas of potential ethical risk (and mitigations)**

Please provide detail on any currently identified ethical issues or areas of the project that you are requesting specific ethics advice on. To supplement this, please provide any current mitigations in place within the project to minimise the potential effects of these identified risks.

## Section A: Project details

### A1: Data subjects to be studied

Please mark 'No' if your project or research applies methods equally/aims to produce results which are equally applicable to all subsections of the population. If it does not (i.e. it targets specific groups by age, sex, ethnicity etc.) please mark 'Yes' and select which groups (from the checklist provided) the project or research focuses on.

Please also provide a justification for focussing on those groups. If the group your project focuses on is not listed in the checklist then please select other and state what group(s) you are focussing on.

### A2: Research methodology and protocol (max. 500 words)

In this section you should provide some details on the research protocols and type of methodology or procedures you intend on using. You must provide sufficient information so that the National Statistician's Data Ethics Advisory Committee can appreciate exactly what you intend to do and how this will result in you achieving your research aims.

You are expected to present:

- an overview of what datasets are considered and why they are necessary to conduct the research;
- key variables that will be used in these datasets, and a justification for why they are required;
- methods, tools and techniques used and consideration of alternatives; and
- research outputs, sharing arrangements and future access to data.
- **Where possible, please include a visual representation to support your methods and protocol explanation, that shows the input, process and output, as an annex to this application.**

In general, applicants should clarify why the data sources and methods were selected with regards to the public benefit of the research. A consideration of alternatives is always helpful in ensuring that the research has taken into account methods with minimal harm to data subjects.

Transparency is very important when providing ethical scrutiny on a project. A list of variables would allow NSDEC to determine if the proposed data use and linkage complies with its ethical principles. All research outputs, the future use of the data and the methods developed should be promoting the transparency principle.

#### **Example (aggregated variables)**

Structure of household: information about the household, for example the type of residence and accommodation, tenure, sleeping rough, communal establishment, household deprivation score, living arrangements and household composition. This information will be used to determine whether data subjects have the same access to social housing and other housing schemes as the wider UK population.

### A3: Data Use

In this section you must specify all data you will be using in your project. You should enter the name of the dataset you will be using and the date which the extract relates to, alongside the appropriate row which determines the type of data (Administrative, Survey, Census, Other) and under the relevant column heading which indicates what level the data are (Directly identifiable, de-identified/ identifiable/pseudonymised data, or aggregate/anonymous).

Where possible, you should provide a justification for why each variable within each dataset is needed to conduct the research and provide detail as to how it will be used.

#### **Example**

If for example you were using the de-identified Covid-19 Infection Survey, you would complete the table as follows:

| Type of data  | Data Level                 |  |                            |
|---|----------------------------|--|----------------------------|
|   | Directly identifiable data | De-identified, identifiable and pseudonymised data | Anonymised/ Aggregate Data |
| <b>Administrative data</b><br><i>(please specify, e.g. Patient Register 2011, School Census 2012 etc)</i> |                            |  |                            |
| <b>Survey Data</b><br><i>(please specify e.g. LFS, BRES, etc)</i>   |                            | Covid-19 Infection Survey – UK, 2020-present.      |                            |

## Section B: Assessment against NSDEC ethical principles

### B1: Public benefit (Principle 1)

This section should detail how the research is beneficial to the public. This should not just focus on for example the improvements made to statistics in terms of accuracy, frequency etc., but also how such improvements are likely to be for the public good, for example through delivery of services or evaluation of policy.

This has been disaggregated into four sections based on the UK Statistics Authority's Centre for Applied Data Ethics guidance on articulating the public good. See our guidance on [considering and articulating public good in research projects](#) for further information to help you in completing this section.

- **Type of Impact:** The overall way in which you are contributing to public value (e.g., are you primarily influencing decision-making, service delivery or policy development, or focused more on extending understanding, replicating, validating, challenging or improving statistics or research?). Remember, public good can be achieved by doing just one of these things or all of them.
- **Scale of Impact:** The likely size of the public benefit that you expect to achieve (e.g., is this work potentially influencing a policy that will have substantial social or economic impact?).
- **Population Coverage:** Who will likely benefit (e.g., are the benefits focused on a particular group within society or will they impact the population as a whole?).
- **Impact Strategy:** What practical steps might you take to ensure that the research is seen, and that the public good of the research is realised?

### B2: Confidentiality, data security and consent (Principle 2) (max. 500 words)

This section should detail all safeguards in place to protect the confidentiality of data subjects in the project. Researchers are encouraged to identify any concerns on confidentiality and privacy, and describe how they will be addressed.

Preferably, in a second paragraph, describe the data security arrangements that constitute this site secure. In case the research is to be conducted in a site known to us, to limit the time spend filling in the application, you may ask the secretariat for standard text.

This covers the following data security arrangements:

1. research in the ONS Secure Research Service;
2. research in a [Digital Economy Act accredited processing environment](#).

As the last part of this principle, applicants should specify how the consent by data subjects is obtained for this project. This is particularly important in projects involving data subjects. Risks to specific groups who may be particularly vulnerable to disclosure should also be considered within this section.

In cases where consent is being used as the lawful basis for processing personal data, individuals should be given a say in how their data are used. Unless there are

good reasons to the contrary, their consent should be sought in advance of the project taking place. Consent must be well informed and 'opt-in' rather than 'opt-out'.

There are some instances when consent is not required as the legal basis for processing data (e.g. mandatory surveys, or linkage of UK-wide datasets to produce aggregate UK statistics). However, it is important to note that ethical consent is not necessarily the same as consent required under the Data Protection Legislation. Regardless of whether or not you use consent as a lawful basis for processing personal data, you should still consider whether or not it is ethical for individuals to be given the choice of taking part.

### **B3: Methods and quality (Principle 3)** (max. 500 words)

If the project suggests the use of new technologies or methods, or a novel use of existing methods, you should explain briefly how any risks will be mitigated. You must ensure that human oversight is maintained throughout the project, and that there are appropriate quality assurance controls in place throughout the project. If you are using location data, see our guidance on [ethical considerations in the use of geospatial data](#).

If you are not using new technologies or methods, it is still important to assure the committee that the use of methods are consistent with recognised standards of integrity and quality.

### **B4: Legal compliance (Principle 4)** (max. 500 words)

This section should provide assurance that the project will be legally compliant. This includes the legal bases for processing data involved. ONS applicants should seek advice from Legal Services in writing for any data share and use required for the research project. Written advice from Legal Services outlining the legal gateways under which access is given is required too. This should be captured clearly in this section.

The proposed research project should clearly outline the legal frameworks in place and compliance against these frameworks. This section should identify the relevant legislation to enable the acquisition, processing, analysis, use, sharing and curation of data.

If you are using third party data, you should specify what data you are accessing from a third party and how you will be accessing it. You should ensure that information obtained is in line with Data Protection legislation. This means the full, applicable data protection framework as set out in the Data Protection Act 2018 which encompasses general processing (including the General Data Protection Regulation and the applied GDPR). For further information on ethical considerations when using third-party data, see our [high-level ethics checklist focused on this data type](#).

### **B5: Public views and engagement (Principle 5)** (max. 250 words)

Please detail any public engagement activities (e.g. consultations, focus groups) to identify the views of the public in light of the data use and the perceived benefits of the research project.

There may be instances where it is felt public engagement is not required, this in itself would need to be justified. However, it is still important to gauge the overall awareness of public acceptability. Information from engagement events for similar projects, government initiatives, public polls and literature reviews may be a reasonable alternative

See our guidance on [considering public views and engagement](#) for research and statistics projects when completing this section

**B6: Transparency (Principle 6)** (max. 500 words)

Please detail how your project findings will be disseminated. As part of the National Statistician's Data Ethics Advisory Committee's transparency principle, some information relating to your project may be published on the UK Statistics Authority Website.

Please detail any intended future uses for products which are created as a result of the project. This may include new or linked datasets, tools and other intellectual property. This section should also detail how users may go about accessing such products, which may involve legal gateways or licenses.

## Section C: Responsible owner and applicant details

### **Responsible Owner/Lead researcher**

This is the person responsible for the study. The responsible owner will need to sign the declaration, by typing their name or providing a signature (electronic or scanned) as well as the date this application was signed off.

The responsible owner must ensure that ethical standards are maintained throughout the research project life cycle. Their responsibilities include reporting serious and adverse events.

### **Reporting Serious or Adverse Events**

A serious or adverse event is an information loss that could cause harm or distress to individuals and impact an organisation's reputation.

#### **Office for National Statistics**

On discovery of the breach or data loss, or if one is suspected, the responsible owner should report the incident immediately to the Data Protection Office ([dpo@statistics.gov.uk](mailto:dpo@statistics.gov.uk)) and to Legal Services ([legal.services@ons.gov.uk](mailto:legal.services@ons.gov.uk)) who will then determine whether to refer the matter to the Information Commissioner's Office. The responsible owner should also contact the secretariat of NSDEC to inform them of the incident and to confirm that it has been logged accordingly.

#### **Government Statistical Service**

On discovery of an adverse event such as the loss of data, GSS staff should notify the Head of Profession for statistics. The Head of Profession for statistics within the department should inform the National Statistician or the NSDEC secretariat of the breach. Departments should also escalate the event in line with their own organisational data loss management.

#### **Other researchers**

Proposals which make use of other accredited processors should follow all reporting routes as specified by the accredited processor.

## Submission of Application and Supporting Documentation

The responsible owner should sign the application form and send it to [Data.Ethics@statistics.gov.uk](mailto:Data.Ethics@statistics.gov.uk).

The role of NSDEC, and therefore the National Statistician, differs depending on where the research proposal originates from.

- i. **Office for National Statistics:** decisions of NSDEC for ONS projects are definitive unless overruled by the National Statistician, who as Chief Executive of the Authority and ONS, is accountable for their work. In this instance there is no appeals mechanism.
- ii. **Government Statistical Service and devolved administrations:** any outcome would be advisory to the department(s) concerned and therefore no appeals process would be required.
- iii. **Digital Economy Act (DEA) accredited research:** NSDEC may provide advice on projects from the research community for the DEA Research Accreditation Panel. Accredited researchers may appeal against unfavourable decisions of NSDEC. Appeals should be directed to the Research Accreditation Panel.

## NSDEC Outcomes

In reviewing projects NSDEC will advise the National Statistician to:

- i. approve the research;
- ii. approve the research subject to minor revisions. These will be checked for compliance by the Secretariat;
- iii. recommend major revisions to the research. The researcher would need to reconsider the research in light of recommendations made by the committee, and return the application to a future committee meeting; or
- iv. reject the research advising that the research be stopped from proceeding.