

# **National Statistician's Data Ethics Advisory Committee Minute**

Thursday, 23 January 2025  
via video conference

## **Present**

### **Members**

Ms Helen Boaden (Chair)  
Mr Stephen Balchin  
Ms Vanessa Cuthill  
Mr Colin Godbold  
Professor Monica Magadi

### **Advisors**

Mr Rhys Nadin, UKSA  
Ms Nicola Shearman, UKSA

### **Secretariat**

Dr Pamela Calderon Ambrossen, UKSA  
Mr Nikhil Harsiani, UKSA  
Ms Stephanie Jacobs, UKSA

### **In attendance**

Mr Larry Bartleet, ONS (for item 4)  
Ms Louisa Blackwell, ONS (for item 5)  
Ms Rita Dadd, ONS (for item 5)  
Ms Fiona Dawe, ONS (for item 4)  
Ms Meghan Elkin, ONS (for item 3)  
Mr Alan Evans, ONS (for item 5)  
Ms Dani Evans, ONS (for item 3)  
Mr Ed Humpherson, OSR (for item 2)  
Ms Helen Miller-Bakewell, ONS (for item 2)  
Mr Isaac Spring, OSR (for item 2)

### **Apologies**

Ms Isabel Nisbet  
Ms Ruth Studley, ONS (for item 4)

## **1. Minute and matters arising from the previous meeting**

- 1.1 Members of the Committee approved the minutes from the 23 October 2024 meeting.
- 1.2 The Chair introduced Ms Nicola Shearman, UKSA, to the Committee, who is the UKSA's new Head of Data Governance, Legal and Protection (DGLP).
- 1.3 The Secretariat updated the Committee with progress on actions from the 23 October 2024 meeting. All actions were completed or in progress.

## 2. The refresh of the Code of Practice for Statistics (NSDEC(25)11)

2.1 Mr Ed Humpherson, Director General of the Office for Statistics Regulation (OSR), and Mr Isaac Spring, also from the OSR, presented this item.

2.2 Mr Humpherson raised the following points in his opening presentation to the Committee:

- i. The OSR is in the latter stages of a [public consultation](#) on the refreshing of the Code of Practice for Statistics (or, “the Code”).
- ii. It is OSR’s opinion that the Code is a fundamentally ethical framework, rather than being more a technical framework.
- iii. The focus of the public good in the Code aligns well with the [ethical principles of the UKSA](#).
- iv. Some of changes made to the Code, for example a focus on social license of producing official statistics, entail that the new Code will be more in concert with UKSA’s ethical principles. One of the standards, in the Data Governance section of the new Code, explicitly states that producers must follow the UKSA’s ethical principles with regard to data collection and use.

2.3 Mr Humpherson suggested the following actions for further alignment between the Code and the UKSA’s ethical principles:

- i. He recommended NSDEC members responding to the public consultation on the Code.
- ii. He praised the [UKSA’s ethics self-assessment tool](#), and suggested a dedicated ethics self-assessment tool for, specifically, producers of official statistics.
- iii. He asked the Committee on their views on the universality of the refreshed Code’s central themes of ‘trustworthiness, quality and value’.
- iv. He recommended that NSDEC and OSR jointly conduct an exercise to align the UKSA’s six ethical principles with the central themes of the new Code.

2.4 The Committee commended OSR for highlighting, in the work of refreshing the Code, the importance of the cultures and leaderships of institutions producing statistics. The Committee asked how, and by which measures, institutions’ cultures and environments can be assessed so that they meet the Code’s standards. Mr Humpherson responded that the OSR have been discussing this with the UK Research Integrity Office. On trustworthiness, Mr Humpherson opined that metrics against to gauge this in institutions has often been binary, which is a challenging but effective approach, and that the refreshed Code aims to incorporate this as much as possible.

**2.5 ACTION: The Committee recognised that a re-examining of the UKSA’s ethical principles might be timely given the refreshed Code.**

2.6 The Committee raised the following further points in discussion:

- i. Given that publications and engagement of official statistics sometimes use jargon and language not easily consumable by a non-specialist, the Committee asked whether this affects the notion that producers are being ‘transparent’ with the public. Mr Humpherson suggested that a statistical product should be published in multiple formats aimed at different audiences, which would benefit both lay citizens and technical users.
- ii. In shaping institutional culture, the Committee commented that the ONS may wish to involve the public more than they currently do. They

mentioned that sessions in the UK Statistics Assembly of 22 January 2025 highlighted the growing desire of users of statistics to contribute their voices to how organisations prioritise which statistics are 'in the public interest'. Mr Humpherson responded that this should be understood via a citizen engagement process, rather than one which engages expert users.

- iii. That codifying ethical principles (or subprinciples) under the 'trustworthiness, quality and value' tenets of the new Code might better engender the desired behaviours and practices of statistical producers.
- iv. That OSR should, in their refreshing of the Code, think carefully about which are the most appropriate signifiers of trustworthiness (for example a named statistician or an organisation's press office). Mr Humpherson agreed with this recommendation.
- v. That the refreshed Code should make clear that producers of official statistics have a commitment to being transparent about their findings, even if such findings were not initially expected. The Committee stated that, in these situations, how the dissemination of the statistics is handled becomes vital. Mr Humpherson acknowledged this point.
- vi. There might be a gap in our understanding of the 'social licence' afforded to the production of official statistics, given that public consultations might not now always seek opinions of large-scale data linkages. Mr Humpherson agreed that what it means for a research producer to obtain 'social licence' necessarily changes over time. Mr Humpherson, also, acknowledged that there is a potential gap in understanding the trade-off in doing something (like producing a wide-scale survey) in the public good with recognising some individuals desire to not participate. Mr Humpherson said he will talk with the [Public Engagement in Data Research Initiative \(PEDRI\)](#) to find out if there is more knowledge about this trade-off **ACTION: NSDEC Secretariat to follow up on the outcomes of OSR's engagement with PEDRI.**

2.7 Ms Nisbet (in absentia) sent, via correspondence, comments on this item. All of her comments were covered, and responded to by Mr Humpherson, as part of the in-meeting discussion.

2.8 The Committee thanked Mr Humpherson and Mr Spring for their paper and presentation.

### **3. Safety During Childhood Survey (SDCS): Initial school pilot (NSDEC(25)12)**

- 3.1 Ms Dani Evans and Ms Meghan Elkin, both from the ONS, presented on this item. This item has been through NSDEC numerous times, most recently as an application for ethical review (via correspondence) in January 2025.
- 3.2 The Committee praised the research team for the care they had demonstrated in producing the initial school pilot for the SDCS, which involves very sensitive topics. NSDEC members commended the research team for their engagement with schools and parents, some of which addresses prior feedback NSDEC had raised regarding SDCS.
- 3.3 NSDEC supported the decision to remove Year 7 schoolchildren from the survey sample.
- 3.4 In discussion, the Committee raised:

- i. The question of what happens in a situation where a schoolchild perceives their completing the survey, which is anonymised, as a means of 'crying for help'. The research team responded that the survey will remain anonymous in that survey responses cannot be attributed to any particular participant. However, they added that responsive messaging will appear during the questionnaire, if their survey response(s) indicate cause for concern, to point the child to resources from which they can seek support. Children will also be given leaflets to flag support options, and these options will be clearly marked as anonymous or not.
  - ii. The question of whether parents will know that their children had completed the survey in the post-survey research. The research team stated that being transparent with parents is imperative, so parents will be given a detailed leaflet before the survey, and invited to an information session before their child takes part.
  - iii. The potential that SDCS's school pilot will be perceived as some as a 'reaction' to recent interest in child exploitation cases across the UK. The research team informed NSDEC that their long-standing collaboration with the National Society for the Prevention of Cruelty to Children's (NSPCC), being a non-government body, will mitigate some risk of this perception.
- 3.5 The research team addressed some of the feedback NSDEC (via correspondence, prior to the meeting) had for their project. The research team's comments include:
- i. That questions on child-to-child abuse are within scope of the survey.
  - ii. An acknowledgment of the risk that some children may be pressured not to partake in the survey, but that emphasis in the messaging of the survey that participation is anonymous will go some way to alleviating this risk.
  - iii. That there is an option for a child to play games on the tablet while in the classroom during the time of the questionnaire, if they choose not to partake.
  - iv. A recognition that piloting the survey in one school might not translate to all schools, but that this first smaller-scale stage is important to understand methodological and operational elements before expanding the survey.
  - v. That there will be a pressure on safeguarding and the NSPCC's input if and when the survey is scaled up. The research team are working on ways, such as potentially holding information sessions for children and parents on the same day in the school setting, to optimise efficiency.
- 3.6 The Committee highlighted the potential impact to SDCS's proposal of the incoming [Children's Wellbeing and Schools Bill](#). The research team responded that they are confident that the Bill will not affect their proposal.
- 3.7 The Committee, again, commended the SDCS team on their work, and wished them luck with the schools pilot.

#### **4. Update on the Future of Population and Migration Statistics (FPMS) Recommendation and Programme (NSDEC(25)13)**

- 4.1 Ms Fiona Dawe and Mr Larry Bartleet, both from the ONS, presented on this item. This item has come to NSDEC before, most recently as an update item in the February 2024 meeting. Ms Ruth Studley sent her apologies.
- 4.2 The research team presented an update on the FPMS programme. They informed the Committee that the FPMS recommendation is scheduled to be published in the coming months. The UKSA Authority Board will monitor FPMS' progress.
- 4.3 The research team spoke of a notable product of the FPMS programme being the Census based on administrative data sources being an individual level dataset derived from administrative data sources (or 'admin-based census', ABC). ABC will be a set of microdata produced for researchers. The first microdataset was made available for accredited researchers in December 2024 included data for age, sex and lower layer super output areas (LSOA). The FPMS programme proposes to produce the next ABC microdataset including additional characteristics and attributes of resident population of England and Wales, in August 2025. The microdataset currently available to accredited researchers is 2023-based, with an ambition to update the dataset with an increasing number of characteristics over time.
- 4.4 The research team informed the Committee of some methods they will use to protect individuals from direct or indirect identification, and the two proposed means by which datasets could be made available to accredited researchers.
- 4.5 The Committee sought assurance that the proposed ABC datasets available to researchers will not constitute a higher disclosure risk than that which currently exists in the traditional decennial Census datasets. The research team confirmed that they will be using the same disclosure control methods for ABC datasets as traditional Census datasets, and that all person-level records in the ABC datasets available to researchers will be deidentified.
- 4.6 The Committee questioned how the public might perceive the ABC, especially given that the FPMS programme intends to trial, in the first instance, certain variables including ethnicity and veteran status. The Committee also asked if trialling variables was led by user need. The research team made the following points in response:
- i. That there is a strong user need, and a high policy need, for information on veteran status.
  - ii. That the understanding gained from data access can enable the FPMS team to better handle similar issues that arise with future variables.
  - iii. That, while the FPMS team work closely with the Ministry of Defence (MoD) with regards to analysis of veteran statuses data, they should increase their engagement with veterans' organisations.
  - iv. The prioritisation of the variables was a result from the FPMS consultation in 2023, and from subsequent engagement with statistical users. This user need is weighed up with the availability of data. For example, while there is a strong user demand for admin-based statistics on disability, there are limitations on the uniformity of sources disability data.
- 4.7 **ACTION: The research team to provide NSDEC with an update on their engagement activities with veterans' organisations to further understand public perception of trialling veteran status as an ABC variable.**

- 4.8 The Committee asked about the risks of security breaches as additional data was added in to the ABC. The FPMS team assured the Committee that security control will be reviewed as more characteristics on the ABC.
- 4.9 The Committee recommended the FPMS team seek opinions from users on the proposed approach of making ABC data available in a 'flat file' (as opposed to in separate files), and then conduct follow-up research on how useful the 'flat file' format was to users. The FPMS team said that they will be conducting this work.
- 4.10 The Committee raised the following points in discussion:
- i. The question of the impact of swapping records in nearby geographical areas, and what the FPMS team have learnt from prior examples of this disclosure control method. The FPMS team responded that they will use the methodology applied to the 2021 census, but that they can provide the Committee with more detailed information on this. **ACTION: The FPMS team to return to NSDEC with more information about disclosure control methods proposed for the ABC.**
  - ii. There needs to be careful management of bias given that ABC will involve linking administrative data with survey-based data, both of which contain different types of bias. **ACTION: The FPMS to return to NSDEC to present an approach of managing biases in the ABC.**
  - iii. The question of the impetus behind meeting the needs of genealogists and social historians, in particular. The FPMS team responded that an ABC could change which historical records genealogists and historians could access compared to those which they currently can access with a physical decennial census. **ACTION: The FPMS team to return to NSDEC with more information on what historical records the ABC will be able to provide future genealogists and historians.**
- 4.11 The FPMS team committed to continue engaging with NSDEC, via updates, written applications and meeting appearances, as the programme progresses. The Committee thanked the FPMS team for their work and time.

## **5. Refugee Integration Outcomes (RIO) extension to accredited researchers (NSDEC(25)14)**

- 5.1 Ms Louisa Blackwell, Mr Alan Evans and Ms Rita Dadd presented on this item. This item has previously come to NSDEC, most recently in an application via correspondence in November 2023.
- 5.2 The Committee highlighted that there must be a balance struck between the need for making the data held in RIO as available as possible for research, and the political sensitivity of the data. The Committee asked the research team to explain how the dedicated 'user support service' (or 'board') would be governed. In response, the research team made the following points:
- i. There are other examples in the ONS of longitudinal studies that have research boards. These boards review the legitimacy of studies, and check that researchers intend to use the data to address relevant and valid questions. Additionally, RIO colleagues have experience serving on such dedicated boards.
  - ii. To take into account the differing political sensitivities that researchers applying to use RIO data might have, the dedicated 'user support' board would comprise of members from not only the ONS, but from the

Home Office and the Ministry of Housing, Communities and Local Government (MHCLG), too.

- 5.3 The Committee also sought understanding of how long this proposed service from RIO will be available for, given that the Committee would favour longevity of the resource. The research team responded that, while they cannot yet give assurance of obtaining long-term funding, there is a lot of policy interest in the current RIO proposal, and that the ESRC (who partially fund the ONS' Longitudinal Study) have made some provision for academic support for RIO. The research team are working to secure further funding.
- 5.4 The research team confirmed the proposed scope of RIO does not follow cohorts of people that were born in the UK.
- 5.5 The research team acknowledged that longitudinal studies of refugees in the UK are relatively unprecedented, but that NSDEC's input is valuable to guide them through ethical sensitivities.
- 5.6 The Committee thanked the RIO team for their time and work, and wished them luck.

## **6. Feedback from the Statistics Assembly of 22 January 2025 (NSDEC(25)15)**

- 6.1 The Committee discussed the UK Statistics Assembly of 22 January 2025, which some NSDEC members attended.
- 6.2 The Committee commended the variety of speakers that led breakout rooms and the work that went into organising them. They opined that if the UKSA were to host a similar assembly in future, they might consider further involving members of the public and civil society organisations, as meaningful public involvement is vital.
- 6.3 The Committee noted that ethics ran through central themes discussed during the assembly, such as transparency and trustworthiness.

## **7. Any other business (AOB)**

- 7.1 The Committee further discussed the OSR's presentation on the refreshed Code of Practice for Statistics (see NSDEC(25)11). They recognised and appreciated the work OSR are doing on refreshing the Code, and they will share their views with the National Statistician. **ACTION: NSDEC Secretariat to summarise the Committee's view on the refreshed Code, and send it to the National Statistician's Private Office.**
- 7.2 Mr Godbold informed the Committee that the next meeting (in April 2025) will likely be his last as an NSDEC member. He offered his support in the process of handing over responsibilities to new members.
- 7.3 Ms Stephanie Jacobs informed the Committee that feedback from a users' challenges and barriers questionnaire sent out by the Research Accreditation Panel (RAP) indicated that users desire a more simplified process for the UKSA ethics self-assessment. As a result of this user feedback, CADE will work with RAP and Trusted Research Environments (TRE) to streamline the ethics stage of the Research Accreditation process. One such proposal is to streamline the ethics and feasibility requirements into one form, while removing the self-assessment for projects seeking accreditation through the Digital Economy Act 2017 (DEA). If this change is adopted by TREs, CADE will produce, in concert

with OSR, an ethics assessment specifically for research and projects conducted within ONS. In discussion, the Committee raised:

- i. That forms, both for ethics self-assessments and for applications made to NSDEC, should be written in as plain English as possible. Ms Jacobs concurred. **ACTION: NSDEC Secretariat to develop guidance for research applicants to assist them with writing their submissions to NSDEC in plain English.**
- ii. That while they support the streamlining of the ethics self-assessment process, the current edition of the tool should still exist in some format. Ms Jacobs responded that the self-assessment will not be removed in its entirety; the intention is to remove the self-assessment only for research accreditation under the DEA. A new version of the self-assessment will be created that contains the relevant parts of the UKSA ethics framework for ONS research and wider best practice across the research community.

7.4 The Committee expressed interest in publishing a novel piece on the implications of future technology, given the rising linkage of very large datasets and increasing dependence of artificial intelligence (AI).

7.5 Mr Nikhil Harsiani updated the Committee on some of CADE's recent work, including ongoing international engagement, presenting on ethical issues in ONS-wide events, and communicating the importance of data ethics via media appearances.

7.6 The Chair informed the Committee that members' information, including length of membership and declarations of interest, will be published on the NSDEC website in due course.

7.7 The next meeting of NSDEC will be held on the week commencing 21 April 2025, date to be confirmed.