SRS Researcher Output Clearance Guidance

- Version 2.6 (updated 21/10/2022)
- Authors: Jonathan Flavell (SRS Statistical Support); Alex Lock (ADR Data Sourcing & Curation); Claire Greenwood (ADR Data Sourcing & Curation)
- This document is written from the perspective of SRS Statistical Support and is intended as a guidance to SRS outputs for researchers.
- Nothing in this guide overrides any regulation. Every effort has been made to make this guide as accurate as possible, but in the event of any difference, the regulations will apply.
- Clearance procedures and clearance levels are currently under review are subject to change. This guide is based on the regulations current at the time of writing.

Contents

1 Background

The Office for National Statistics (ONS) Secure Research Service (SRS) is a Trusted Research Environment (TRE). We give accredited or approved researchers secure access to a wealth of de-identified, unpublished data to work on research projects for the public good.

We have been accredited as a Digital Economy Act (DEA) 2017 processor by the UK Statistics Authority (UKSA) for the preparation and provision of data for research purposes.

For safe use of secure data, the Secure Research Service (SRS) uses the Five Safes Framework. This is a set of principles adopted by a range of secure labs, of which researchers and their organisations must adhere to. These protocols provide complete assurance for data owners. The Five Safes are:

- Safe People: researchers have appropriate experience, training, motivation, and authorisation to access and use data appropriately
- Safe Projects: data that are only used for valuable, ethical research that delivers clear public benefits
- Safe Settings: settings in which access to data is only possible using our secure technology systems
- Safe Data: data are treated to protect confidentiality and disclosure concerns
- Safe Outputs: outputs are screened to ensure they are not disclosive and are in scope of project and data owner permissions.

This document focuses on the Safe Outputs aspect of the Five Safes and how this is practically implemented by the SRS Statistical Support team in partnership with Data Owners.

---

2 What is an output?

An output is any content you want to be removed or is removed from the SRS. All outputs to be removed from the SRS must be ‘cleared’ by SRS Statistical Support (and sometimes cleared or reviewed by the data owner too) before they are released – the full clearance process is covered later.

An output can also be content that is derived from, or informed by, already cleared outputs. Such outputs are usually generated outside of the SRS, but clearance may still be required to permit sharing of them.

Outputs could be one of or a combination of the following: statistics, tables, figures, presentations, reports, guides, articles, models, code, discussion of data issues or broad trends etc.

Researchers are responsible for appropriate use of their outputs. If you are in any doubt about whether content needs to be cleared, then contact SRS Statistical Support (statistical.support@ons.gov.uk).

---

3 How is an output cleared?

All outputs must be cleared by SRS Statistical Support (and sometimes the data owner) before the researcher shares the content. Each clearance will be ‘first checked’ and ‘second checked’ separately by SRS officers who perform all checks independently. Outputs may be queried by either officer, but you will not usually be informed of the progress of the checks.

3.1 Process of requesting clearance

To get an output cleared from the SRS:

1. Check that the output complies with your project’s permissions and scope. Only elements necessary for the completion of the project should be cleared.
2. Apply appropriate Statistical Disclosure Control (SDC). Your Safe Researcher Training (SRT) will cover how this should be applied.
3. Prepare all underlying, unweighted counts that were used to create the output.
4. Prepare any supplementary material that will aid staff when checking your output.
5. Complete all relevant sections of the output form.
6. For outputs from inside the SRS:
    a. Put the output form, output, underlying counts, and any supplementary material in an appropriately named folder in the ‘Ready for Checking’ folder of your project space.
    b. Email SRS Statistical Support (statistical.support@ons.gov.uk) with:
        i. The email header containing project number and request type (Code, Pre-publication, or Publication level)
        e.g., ’Project 1234567 Publication request’
        ii. The email body containing the 7-digit project number, request type (Code, Pre-publication, or Publication level), and any special considerations.
7. For outputs from outside of the SRS:
    a. Email SRS Statistical Support (statistical.support@ons.gov.uk) with:
        i. The email header containing the 7-digit project number and request type (Code, Pre-publication, or Publication level)
        e.g., ’Project 1234567 Publication request’
        ii. The email body containing the 7-digit project number, request type (Code, Pre-publication, or Publication level), and any special considerations.
        iii. The output form attached.
        iv. The output, underlying counts, and any supplementary material attached or linked.

On receipt, SRS Statistical Support generate a ticket to track the request and assign a 5-digit ID to it (e.g., STATS12345). Replies to your email will feature this ID in the header – please do not edit the header of the email yourself.

An output request can be either at ‘Code’, ‘Pre-publication’ or ‘Publication’ levels. Mixing levels within a request is not permitted.

You must always provide a justification for the output request at whatever level is requested. SRS officers will query your request if sufficient detail is not provided.

3.2 Service Level Agreement (SLA)

The SRS Statistical Support team operate a ‘5 working day’ Service Level Agreement (SLA) from 9am to 5pm Monday to Friday. This means that a request will normally be returned within 5 working days of it arriving e.g., a request submitted on Monday should normally be cleared by the following Friday. A request submitted after hours or very late in the day is likely to start its SLA on the following working day.

Sometimes outputs must be checked by data owners as well as SRS Statistical Support (see later sections for detail). Data Owners operate their own SLAs (usually 10 working days or less) which can lengthen the clearance process so researchers should accommodate the sum of SLAs when planning their outputs. Note that all parties aim to clear requests as soon as possible.

The Statistical Support SLA is reset when a ticket is blocked for any reason e.g., if queries have been raised. If a researcher submits on Monday (day 1) and is blocked on Wednesday (day 3), researcher responds on Thursday (day 4) meaning that the end of SLA is now the following Wednesday (day 9). Researchers should prepare outputs with proper care to reduce to the risk of blocked tickets and allow time for resolutions when planning their outputs.

SRS Statistical Support complete requests by SLA queue from oldest first.

Expedited requests can be considered and will be accommodated where possible but should be avoided unless truly necessary. The Statistical Support team is extremely busy and can only rarely facilitate these requests. Expedited requests are not guaranteed by the requested date and may be queried or denied.

Data Owner SLAs vary by organisation. Statistical Support’s SLA is paused whilst awaiting Data Owner approval. Data Owner SLAs should be queried with the Data Owner directly rather than with SRS Statistical Support.

3.3 Application of Statistical Disclosure Control (SDC)

By default, underlying counts have a threshold of 10 but this may be lower/higher depending on the data owner and your project permissions – this should be clear in your project documents, and there is a threshold guidance document within the SRS Libraries drive (*Libraries / SRS and SDC Guidance / SDC Guidance by Dataset*). Outputs with counts below your threshold may be considered in exceptional cases, where you can demonstrate the necessity to your research for producing public benefit as original new knowledge and that the output is safe and non-disclosive. Clearance of outputs is at the discretion of the SRS checking officers and Data Owners.

3.4 Blocked tickets

Tickets may be blocked for several reasons e.g., if your request does not have the correct forms, has incorrect or inappropriate application of SDC, if there are concerns around the compliance with project scope, if there is insufficient justification for the output at the requested level etc.

If blocked, the SRS Statistical Support SLA is stopped and is reset when the researcher responds.

The decision responsibility and application of SDC sits with researcher so checking officers do not always provide recommendations by default though they will try to facilitate output and can advise on the course of action where appropriate or requested. Note that neither SRS Statistical Support or Data Owners will amend your outputs to comply with regulation or recommendation.

3.5 Contacts for clearing outputs

Most SRS teams are available Monday to Friday from 9am until 5pm.

All outputs, both created inside and outside of the SRS, must be cleared through the SRS Statistical Support team before sharing. Output requests can be sent to them at: statistical.support@ons.gov.uk

For all other SRS requests and questions, please contact the SRS Customer Support team at: srs.customer.support@ons.gov.uk or +44 1329 447871

---

4 Levels of clearance

There are three levels of clearance: ‘Code’, ‘Pre-publication’, and ‘Publication’. Every clearance request can only contain one level e.g., a request for Code and a document should be made separately with one for Code clearance the other for Pre-publication or Publication clearance. This is for auditing purposes.

If submitting material for clearance that has already been cleared in part or in full then please start a new email thread and be sure to report the identification number provided with the earlier clearance (e.g., STATS12345) in output form and the body of the email but not in the header (please never edit email headers because they are used for tracking). All clearances are assessed as whole, on individual merit, and with the most up-to-date regulations and recommendations in mind so previously cleared material will be subject to normal checking. However, to aid clearance please in some way identify the material that has already been cleared or has been changed.

4.1 Code Clearance

Cleared code can be kept indefinitely and shared freely once approved. Code files must not contain data, identifiers, or any commands that may attempt to search or identify individual entities. Statistics or discussion of results must not be included. Code should be annotated or have commentary provided to show the intended outcome of the code to assist the SRS Statistical Support with the clearance.

4.2 Pre-Publication Clearance

An output cleared at Pre-Publication level can be shared with all named members of the project team (a list is available on your project’s RAS page) and those that have commissioned or sponsored the research if they are named on the project. Under no circumstances should these outputs be shared with any other person or organisation.

Any breach of this sharing procedure must be immediately reported to SRS Statistical Support.

On completion of the project, all Pre-publication clearances must be destroyed.

Failure to comply with any of these requirements may result in your accredited researcher status being revoked.

4.3 Publication Clearance

An output cleared at Publication level is intended as one of your final research outputs that you want to publish or share beyond your research team. Justification for Publication level should be provided when requesting the output. Publication cleared outputs can be shared with anyone, whether named on the project or not, and can be retained indefinitely.

Some data owners require oversight/approval before clearance can be granted. After their own checks, SRS Statistical Support will seek such approvals where necessary. This can lengthen the overall clearance time since data owners operate their own SLAs. Whether or not data owner approval is required depends on the content and intention of Publication clearances. Note that data owner requirements can change so researchers should assume longer check periods when submitting for Publication clearance.

Publication clearances must be submitted in the form and file type in which you wish to publish. For example, if you are using PowerPoint for a presentation, your clearances must be submitted in PowerPoint format.

Publication clearances can be kept indefinitely and distributed freely after they are approved by the Statistical Support team (in partnership with Data Owners where appropriate). But see section 5 for additional information.

Where appropriate, the SRS Statistical Support team will pass outputs to Data Owners so you should send outputs for clearance to Statistical Support only. We ask this to reduce the risk of different versions of documents be sent and double-checked. Note that some data owners require researchers to pass on published material separately after clearance has been granted – researchers should check their project documentation carefully.

You should always aim to submit publication-ready outputs for clearance in their final form e.g., combined with already cleared outputs and/or external content.

---

5 What doesn't need to be cleared

In some circumstances, your cleared outputs may not need to be re-cleared. Some examples are outlined below. If you are in any doubt, then contact SRS Statistical Support (statistical.support@ons.gov.uk) or SRS Customer Support (srs.customer.support@ons.gov.uk).

Intentional or negligent incorrect use of outputs constitutes a breach of terms of use.

5.1 Regarding Publication clearances

Since outputs cleared at Publication level can be kept indefinitely and distributed freely, they typically do not need to be re-cleared after editing unless they are combined with content derived from SRS data which has not been Publication cleared or unless the additional content poses a disclosure risk.

Examples not requiring further clearance:

- Changes to a Publication cleared output which do not include or reference any non-Publication cleared material e.g., changes to formatting, changes to structure, addition of content derived from information outside of SRS.
- Combining two or more Publication cleared outputs.
- Combining one or more Publication cleared outputs with one or more code clearances.
- Combining one or more Publication cleared output(s) with non-SRS derived content (note that if any of the non-SRS derived content has been ingested into the SRS project space then the output may need to be re-cleared – contact SRS Statistical Support for advice).

Examples requiring further clearance:

- Combining one or more Publication cleared outputs with any content which would result in a disclosure risk.
- Combining one or more Publication cleared output(s) with one or more Pre-publication cleared outputs. Here, the output would not inherit a clearance status and must be cleared.
- Combining one or more Publication cleared output(s) with any SRS derived content that has not been cleared. This includes impressions gained from SRS data/analysis that has not been cleared. Here, the output would not inherit a clearance status and must be cleared.

[*see FAQ section for more examples*]

Researchers should note…

- Only publication-ready outputs (i.e., in their final form and already combined with any already cleared outputs and/or external content) should be submitted for Publication clearance and justification for Publication level must be provided when requesting the output.
- The risk of secondary disclosure (discussed in your SRT training) increases as outputs (including Publication level outputs) are combined. As responsible users of data, researchers should take steps to minimise risk of secondary disclosure and should consider submitting new documents for clearance if they are in any doubt.
- Some Data Owners stipulate that data reproduction and/or secondary analysis is not permitted either at all or unless certain conditions are met. Researchers are responsible for appropriate use of data and publications and should carefully study their project documents for approvals and stipulations.

5.2 Regarding Pre-publication clearances

Sharing of Pre-publication clearances is restricted to those named (researchers, commissioners/sponsors) on the project. Any derivation or development of Pre-publication content (including addition of any Pre-publication content to any other material) retains Pre-publication status and all associated restrictions until cleared at Publication level. It is the researcher’s responsibility to ensure that any Pre-publication status material is destroyed at the end of the project.

Examples where Pre-publication status is retained or inherited:

- Modification of the Pre-publication cleared output in isolation (retains Pre-publication status).
- Combining one or more Pre-publication cleared outputs(s) (retains Pre-publication status).
- Combining one or more Pre-publication cleared output(s) with non-SRS derived content (retains Pre-publication status).
- Combining one or more Pre-publication cleared output(s) with one or more Publication cleared outputs (retains Pre-publication status).
- Combining one or more Pre-publication cleared output(s) with any SRS derived content that has not been cleared (retains Pre-publication status). This includes impressions gained from SRS data/analysis that has not been cleared.
- Combining any part of a Pre-publication output with any other material (retains Pre-publication status).

[*see FAQ section for more examples*]

If researchers are in any doubt about the status of material, then they should contact SRS Statistical Support for advice.

---

6 Incidents and breaches

If you discover or suspect that content may have been shared in breach of its terms of use, then please contact SRS Statistical Support (statistical.support@ons.gov.uk) immediately so that they can investigate and attempt to mitigate impact. Incidents and breaches are investigated with high priority and should be resolved as quickly as possible.

---

7 Miscellaneous & Links

- Information on using the SRS:
    - https://www.ons.gov.uk/aboutus/whatwedo/statistics/requestingstatistics/secureresearchservice
- The SDC Handbook produced by the Safe Data Access Professionals network:
    - https://securedatagroup.org/sdc-handbook/).
- Information on the Digital Economy Act:
    - https://uksa.statisticsauthority.gov.uk/digitaleconomyact-research-statistics/
- Every output will be considered in isolation. This means for each output we must be provided with the underlying counts for all contained SRS data even if the output has previously been cleared at Pre-publication level. Note that underlying counts for previously

cleared Publication outputs are not always required but may be requested by checking officers for context.

- Checking can be made easier (and usually faster) by ensuring that all forms are properly completed with an appropriate level of detail and context.
- Researchers sometimes refer previously cleared outputs to aid understanding of context or rationale. If doing so then please explain detail as clearly and succinctly as possible, and provide the ticket ID.
- The SRS teams are large and change regularly so it likely that you will have the different output checker for each request. You should not assume that checking officers have any prior knowledge of your project, output, or data format.
- It is the responsibility of the researcher to ensure compliance with clearance levels and appropriate use of their outputs.

---

8 Impact Team

It is the researcher's responsibility to send publications to the Impact Team (IDS.impact@ons.gov.uk) or report output here: https://docs.google.com/forms/d/e/1FAIpQLSeij7_2AMUPgepJOGW47Sqnc3Iahrk2fOx08MM7Hc-rWubqMg/viewform

Queries on this should be directed to the Impact Team or to SRS Customer Support.

When informing the Impact Team, please reference the project number in the subject line/ body of the email as well as the title of the project/output. Researchers may attach the publication files to the email but links to where the output has been published are desirable. Please provide the publication date or expected publication date if notifying in advance of publication.

Researchers should contact the Impact if they're unable to or are no longer planning to publish an output.

The Impact Team are interested in anything related to project impact but must be notified of the following outputs:

- Refereed journal publication
- Book chapter
- Book
- Public facing report from commissioned/sponsored project (e.g., report commissioned by government)
- Internal report (undertaken within a department or organisation)
- Working paper (e.g., for a research centre or academic department)
- Published presentation (ppt/pdf of ppt for conference, workshop, seminar etc.)
- Undergraduate research dissertation (BSc / BA, etc.)

- Research thesis (PhD/ MSc / MA, etc.)
- Press / news article (formal press release)
- News piece (Newsletter or website)
- Published blog post
- Published audio interview (inc. YouTube etc)
- External Case Study
- Any media coverage a publication may receive (include links to any articles / press coverage)

---

9 Q&A

1. Where work is exploratory in nature, or its scope changes in response to stakeholder feedback, for example, should any definitional or other amendments be recorded on RAS prior to submitting for clearance?

    a. Projects in the SRS are defined as 'Exploratory' or 'Full' at the application stage. Note that projects approved as 'Exploratory' are not permitted any outputs from the SRS whereas 'Full' projects are.

    b. Any project change queries should be directed to SRS Customer Support. If project scope changes, then a change request must be made via an addendum request.

2. If an element of an output cannot be cleared, will the checking officer make recommendations for how the presentation of data might be changed for it to be cleared?

    a. If outputs are blocked, the checking officers will explain the reasons. Ultimately the decision responsibility and application of SDC sits with researcher so checking officers do not provide recommendations by default though they will try to facilitate output and can advise on the course of action where appropriate or requested.

3. Do data owners publish their own clearance protocols?

    a. Not all data owners perform their own clearance/oversight of outputs – any requirements will be noted in your project documents. Researchers should contact their relevant data owner to confirm / query any requirements.

4. Are data owners involved in Pre-publication clearance?

    a. Rarely directly though sometimes they are contacted to query guidance.

5. Outputs which have received SRS Pre-publication clearance can be shared with the ‘project team only’. Who do the SRS consider to be in the ‘project team’?
    a. The project team are those named persons listed on the project’s RAS page. Only those persons may view Pre-publication outputs. Project sponsors (listed on the approved project application) can also view Pre-publication outputs. It is the researcher’s responsibility to control the distribution, retention, and deletion of Pre-publication material.
    b. People can be added to projects as either Accredited Researchers or Peer Reviewers. Researchers should contact SRS Customer Support for more information.

6. Is there a limit on how many people can be listed on a researcher’s project team?
    a. No but for data security the project research team should be kept to only those truly necessary for the work.

7. Can a Pre-publication level output be shared with a mentor who is not an accredited researcher?
    a. A cleared Pre-publication output can only be shared with persons named on the project (see project’s RAS page). Those persons will either be Accredited Researchers or Peer Reviewers. Note that some peer reviewers are only permitted to view outputs and not the SRS itself.

8. How do I destroy Pre-publication clearances?
    a. Delete files/emails and shred paper copies (or equivalents). If in doubt, please contact SRS Statistical Support.

9. Am I allowed to contact SRS Customer Support whilst working in a SafePod or safe setting? If so, how do I do this?
    a. Terms for SafePod use are beyond the scope of this document but all SafePods have a land-line phone and contact details for SRS teams.

10. How are non-cleared data cleared when writing for peer reviewed publications perhaps some time after the project has ended? The findings may need to be contextualised with reference to the aims/objectives of a particular journal and/or considering new evidence or policy.
    a. At the end of a project researchers lose access to their SRS project folder and must destroy their pre-publication outputs. Only Publication level outputs can be retained indefinitely. Researchers should plan their time and prepare outputs accordingly.

11. I'm pre-registering an analysis plan which doesn't contain any information about the data which isn't already in the public domain. The plan was written outside the SRS. Does the plan still need to be cleared?

    a. The analysis plan would need to be cleared if it was written with any information that the author derived from SRS content even if that information is publicly available. The principle is that publicly available information can be ingested and combined with other information in a way that could increase disclosure risk.

    b. The location of writing (inside or outside SRS) is irrelevant.

    c. If the analysis plan is written <u>solely</u> with information from outside of SRS, then it would not need to be cleared i.e., if it were written with information derived only from publicly available data that was <u>not</u> ingested to the SRS for that project.

12. My findings have been approved in the format of a report. I now want to present the findings at an event in a slide deck. The results are the same as those in the report, although some of the surrounding text is slightly different (e.g., intro/discussion points have been paraphrased to fit on the slide or expanded as relevant to the specific event). Do the slides need to be re-approved?

    a. The presentation would not need to be cleared if the SRS-related content of the presentation is derived only from Publication cleared material. If in doubt, then please contact SRS Statistical Support or SRS Customer Support. Note that researchers should still send new Publication material to the Impact Team as normal.

13. Once outputs are cleared at Publication level, are there any restrictions on how and where the results can subsequently be used or presented e.g., can the content from a Publication cleared Insight document be used to inform a subsequent PowerPoint presentation for a later activity?

    a. Publication cleared content can be kept indefinity and used freely. It may only need to be cleared again if meeting any of the conditions set out earlier in this guidance document (seek clarification if any doubt about re-clearance). Note that some Data Owners stipulate that data reproduction and/or secondary analysis is not permitted either at all or unless certain conditions are met even for publications clearances. Researchers are responsible for appropriate use of data and publications and should carefully study their project documents for approvals and stipulations.

14. PowerPoint presentations may, necessarily, be light on underlying detail and/or analyses. Should any underlying analyses relating to the points being made in a PowerPoint

presentation also be submitted for clearance, or included to assist with decision making around this process?

   a. Underlying unweighted counts are always required when clearing material. These can be submitted as separate documents and don’t themselves need to be output.

15. Do presentations need to be fully scripted for approval?

   a. No. But you should only discuss material that has been cleared appropriately for the audience.

16. In the Q&A session after a presentation, someone asks a follow-up question about an analysis (e.g., ‘*in the presentation you showed an association between X and Y. Do you know if the association varies according to gender?’*). I know the answer, and the finding in question has been cleared as part of another report, but I did not ask for it to be cleared as part of this specific slide deck. Am I allowed to answer the question?”

   a. If the answer has been cleared at Publication level, then it can be shared freely. All information gained from the SRS (written or otherwise) must be cleared before it is shared with anyone.

17. Slides relating to this project will just form part of a wider presentation I’m doing on my programme of work. Do the SRS / Data Owner’s need to see the whole slide deck, or just the slides that relate to this project?

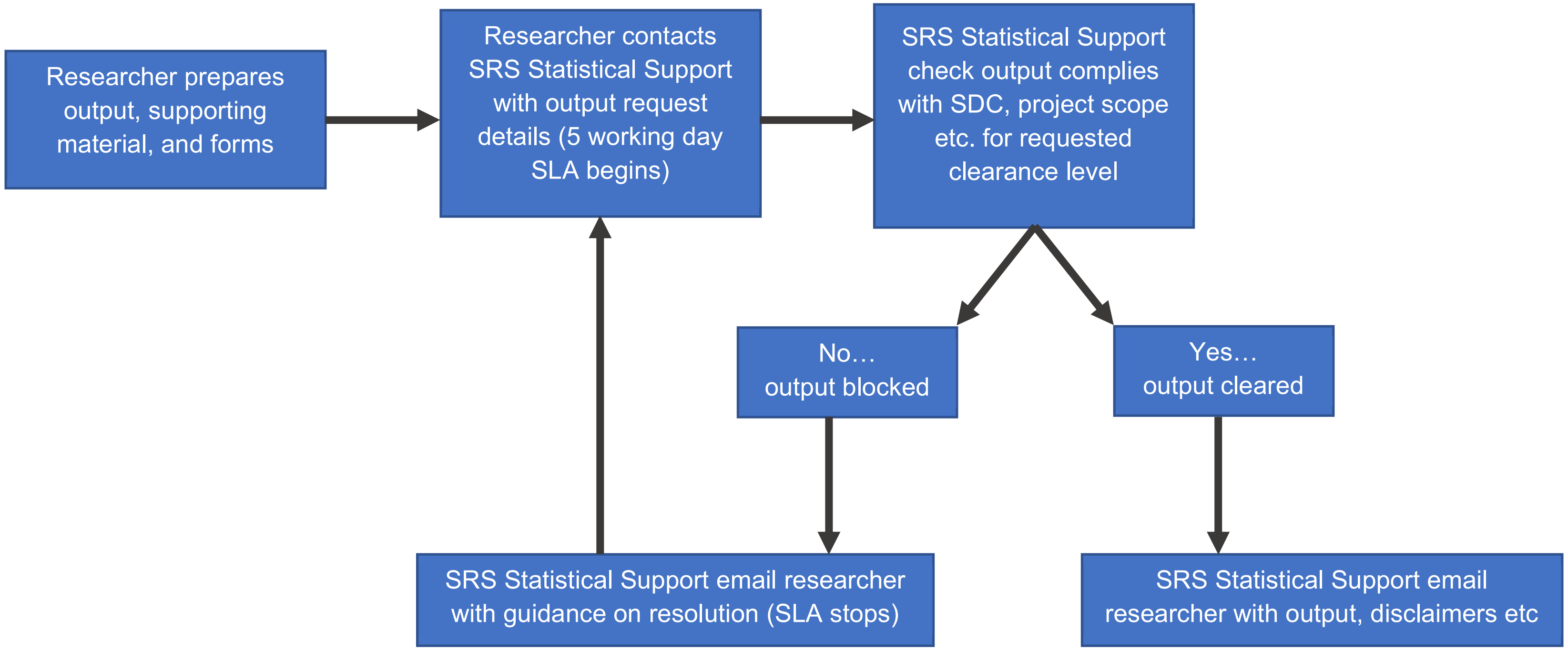
   a. The principle is that a Publication level clearance should be submitted for approval in its final form (or as close as possible) which means that the presentation should be submitted as a whole, though you should highlight what is SRS data (e.g., slide numbers, which content etc) and, of course, provide the underlying unweighted counts. The whole document is requested to provide context for the clearance.

---

10 Process Diagrams

The following process diagrams are intended as rough guides for researchers – actual processes, order of operations, and actions may differ.

Pre-publication Clearance



Publication Clearance