

## Data for Children – Data Protection Impact Assessment (DPIA)

### Definitions

*personal data* means any information relating to an identified or identifiable natural person

*processing* means any operation or set of operations which is performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, combination, restriction, erasure or destruction

*controller* means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data

*processor* means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller

*special categories of personal data* means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, the processing of genetic data, biometric data, data concerning health, sex life or sexual orientation

*data minimisation* means to process only the minimum amount of personal data necessary to achieve the lawful processing purposes

### Step 1: Requirement for a DPIA

*Explain what the project aims to achieve.*

*Explain what the benefits will be to the organisation, to individuals and to other parties.*

*Explain why the need for a DPIA was identified.*

### **Aim/s**

Data for Children is a linked administrative data resource created to facilitate research in to children's lives in the context of their families and socio-economic background. It's an initiative developed by the Data for Children partnership.

The Partnership is formed by Office for National Statistics, government departments, academics and charities working together to deliver a child-centric data source that supplies evidence for interventions to improve the lives of the Nation's children.

The linked administrative data resource comprises 2011 Census data, English School Census data and data from the National Pupil Database. The dataset will be curated over time through the linkage of additional data assets to enhance the relevance, timeliness and usability for researchers and policy-makers.

This DPIA will be reviewed and updated every time a new source is added to the dataset.

### **Benefits**

ONS is committed to meeting the statistical needs of Government, society, academia, and business to enable better decisions to be made. Therefore, creating the dataset has several benefits to ONS in moving us towards achieving our corporate aims laid out in the Better Statistics, Better Decisions strategy.

Data for Children is a unique data source that researchers and policy makers can use to understand how household characteristics (e.g. number of people, relationships and socio-economic characteristics) may determine outcomes for children. Through understanding the determinants of those outcomes, measures can be put in place to support vulnerable children to achieve their potential.

One such proposal to use the data has come from the Children's Commissioner for England (CCE). CCE has a statutory remit to understand what children and young people think about things that affect them and encourage decision makers to always take their best interests into account as well as to serve as a public advocate for them.

Utilizing this data source will improve the CCE's ability to advocate for vulnerable children, and to be an informed influence on public policy. Identifying trends will help the Children's Commissioner to direct policy-makers and service delivery organisations such as local authorities to where more support is needed, and identifying what kinds of support will have the greatest impact, protecting the most vulnerable children in the country.

Further needs to be met through creation of this data source include:

- Understanding what social and economic influences lead to young people becoming Not in Employment, Education or Training. Greater Manchester Combined Authority
- Understanding the underlying drivers, such as household type and structure and parental qualifications, of geographical differences in educational attainment. Department for Education.
- Evaluation of educational attainment by gender and socio-economic background of the family. Inequalities office.

### **Why is a DPIA required?**

Data for Children is a new type of linkage project designed to meet multiple needs whereas before a bespoke linked dataset was created on a case-by-case basis. As it is the first of its kind, and involves large-scale linkage (approximately 6 million records) it warrants careful consideration of the protection in place for the individuals involved.

This DPIA covers the initial build of the dataset (linkage of 2011 Census to English School Census and National Pupil Database for England) and its subsequent research use. It will be reviewed upon the new addition of data assets.

The storage and processing environments named are the secure research environment and secure research service in ONS. Over the next few months the secure research environment (a computer network physically separated from the ONS network) is being replaced by the secure data access platform (users will access data from a virtual display interface on an ONS network computer. Access will be controlled remotely). When the data comes to be transferred to that environment this DPIA will be reviewed and updated.

### **Step 2: Description of the processing**

*Describe the nature of the processing – collection, use, storage, deletion.*

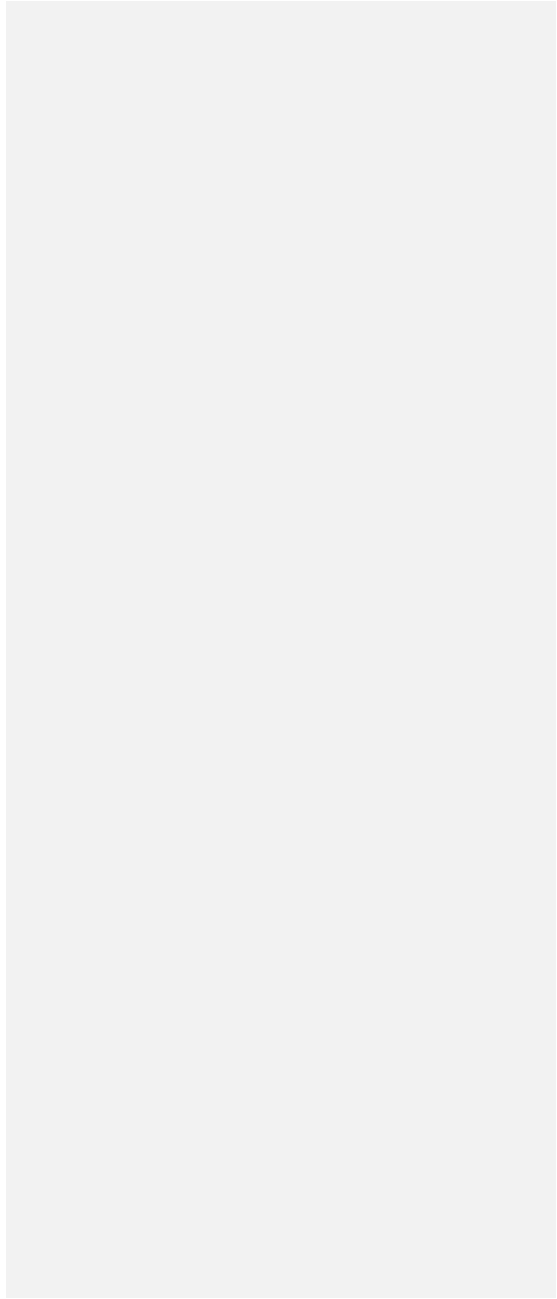
*Describe the scope of the processing – the amount of data, how often it will be processed.*

*Describe the context of the processing – relationship with individuals, personal data of children.*

Relevant questions	Description of processing
How will personal data be collected?	Personal data has been collected by ONS for census purposes, and by Department for Education for administrative purposes. ONS has access to Department for Education data to fulfil its statistical functions under the SRSA 2007.
What will the personal data be used for?	<p>Personal data will be used to identify persons that are the same across all data sources. This will use the 'match key' method. Combinations of forename, surname, sex, date of birth and postcode will be reviewed across both sources and where that combination is the same, a match is made.</p> <p>This directly identifiable information will be removed from the dataset and the remaining indirectly identifiable (attribute) data made available for research purposes.</p>
How and where will it be stored and in what format?	<p>Directly Identifiable data will be stored in the ONS secure research environment as SAS files.</p> <p>Indirectly identifiable data will be stored in the Secure Research Service environment for access by approved researchers for approved projects.</p>
How and when will the personal data be deleted?	Personal data will be stored on an ongoing basis to allow for ONS to fulfill its statistical functions, including the ongoing curation of the linked dataset and access for approved and accredited researchers. <b>If the linked data resource is not used for a period of one year then it will be destroyed using appropriate techniques following Government guidelines.</b>
What is the source of the personal data?	<p><b><u><a href="#">2011 Census</a></u></b>  Statistics from the England and Wales census help paint a picture of the nation and how we live. They provide a detailed snapshot of the population and its characteristics, and underpin funding allocation to provide public services. The 2011 Census took place on 27<sup>th</sup> March.</p> <p><b><u><a href="#">English School Census</a></u></b>  Statistics from the English School Census are used to allocate funding and measure school accountability. Local Authorities submit information on the characteristics of schools and pupils to the Department for Education on the 18<sup>th</sup> January each year. Independent schools, general hospitals and suppliers of alternative provision submit separate returns, this data is not included in data for children.</p> <p><b><u><a href="#">National Pupil Database</a></u></b>  <i>"The National Pupil Database (NPD) holds a wide range of information about students who attend schools and colleges in England. The NPD combines the examination results of pupils with</i></p>

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	<p><i>information on pupil and school characteristics and is an amalgamation of a number of different datasets, including Key Stage attainment data and Schools Census data (formerly known as PLASC), which are linked using a unique identifier for each pupil.” (UK Data Service, 2018)</i></p>
<p>Will the data be shared? Who with? Why?</p>	<p>Directly identifiable personal data will be accessed by the Data Integration team and Admin Data Curation Team for the purposes of linkage. Team members have SC clearance and are trained in data linkage methodology.</p> <p>Indirectly identifiable personal data will be shared with accredited researchers in the secure research environment for approved research.</p> <p>To be an Accredited Researcher, an individual must meet the following criteria:</p> <ul style="list-style-type: none"> <li>• have an undergraduate degree (or higher) including a significant proportion of maths or statistics</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>• be able to demonstrate at least 3 years quantitative research experience</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>• have successfully completed the Safe Researcher or Safe User of Research data Environments (SURE) training course, run by ONS, the UK Data Service, the Administrative Data Research Network or HM Revenue and Customs</li> <li>• agree to their inclusion in a list of all accredited researchers, published on the ONS website<sup>1</sup></li> <li>• agree to publish the results of all research projects completed through the Approved Researcher Scheme<sup>1</sup></li> <li>• sign and adhere to a formal Accredited Researcher Declaration</li> </ul> <p>ONS Researcher Accreditation will last for a period of 5 years.</p>



How much personal data will be processed?	54.5 million census records 7.5 million English school census records
How often will it be processed?	Directly identifiable personal data will be accessed during the initial build and then subsequently when additional data sources are being linked to the dataset. Directly identifiable data may be accessed for the purposes of quality assurance. For example, a sample may be selected for clerical matching.  Indirectly identifiable attribute data will be made continually available to approved researchers for approved projects.
For what period will the personal data be held?	Personal data will be stored on an ongoing basis to allow for ONS to fulfill its statistical functions, including the ongoing curation of the linked dataset and access for approved and accredited researchers.
Will any special categories of personal data be processed?	Ethnicity and religious affiliation will be processed and made available for research in a functionally anonymised form (i.e. ethnicity and religion will be kept separate from directly identifiable information).
What is our relationship with the individuals?	<b>Office for National Statistics</b> are the UK's largest independent producer of official statistics and its recognised national statistical institute. We are responsible for collecting and publishing statistics related to the economy, population and society at national, regional and local levels. We also conduct the census in England and Wales every 10 years.  <b>Department for Education are:</b> <i>"responsible for children's services and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England. DfE is a ministerial department, supported by 17 agencies and public bodies."</i> ( <a href="#">Department for Education</a> , 2018)
Will personal data of children be processed?	Yes – the project is to create a child-centric data resource, that enables research to better the lives of the nation's children. Extensive consultation has taken place to ensure that the processing is in the best interests of the children and is for the public good.
What technology will be used to process the personal data?	Computer programs will be used to link the administrative datasets together (e.g. SAS, Python). Statistical computer programs will be used to analyse and evaluate the data (e.g. SPSS, R).
Will any new technology be used?	This linkage will use an established method (matchkeys) but data linkage is an evolving area of methodology and new innovative methods are emerging. This DPIA will be reviewed if the methodology to link the dataset is changed.

<p>Is there any public concern about the processing?</p>	<p>Limited - In 2014 ONS and ESRC commissioned Ipsos Mori to hold 14 workshops designed to elicit participant's views of the administrative data research network (<a href="#">Dialogue on Data</a>).</p> <p>Participants were supportive of data linkage via the ADRN, if three main conditions are met:</p> <ol style="list-style-type: none"> <li>1. The data is fully de-identified as per the process described in the workshops</li> <li>2. The data is kept secure at all times</li> <li>3. The data is linked for socially beneficial purposes</li> </ol> <p>The Data for Children project meets these three conditions: it uses the matchkey approach described, the data is stored securely with physical and environmental constraints to maintain its security and it's being undertaken to improve the lives of the nation's children.</p>
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### **Step 3: Principles relating to the processing of personal data**

*Describe how your processing meets the principles relating to the processing of personal data and how the processing is lawful.*

Principle	Compliant (Yes/No)	How?
<p>Personal data shall be processed lawfully, fairly and in a transparent manner</p>	<p>Yes</p>	<p><b>Lawful</b>  ONS will rely on the following lawful basis from the GDPR:</p> <p>GDPR Article 6(1)(e) The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller. The authority for ONS to produce, promote and safeguard official statistics is found in the Statistics and Registration Service Act 2007.</p> <p>GDPR Article 9(2)(j) Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect</p>

		<p>the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.</p> <p><b>Fair and transparent</b></p> <p>A description of how ONS use personal data is available to the public <a href="#">via the ONS website</a> and a description of how Department for Education use personal data is available via the <a href="#">GOV.UK website</a>. The Data for Children build has been publicized on the <a href="#">ADRN website</a> and through partnership meetings.</p>
Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes <i>Statistical exemption</i>	Yes	<p>The supply of this data is permitted under Section 45A(1) of the Statistics and Registration Service Act (Amended) 2007.</p> <p>Although the Department for Education data was not originally collected for statistical purposes further statistical use is permitted under the GDPR.</p>
Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes	Yes	<p>The use of directly identifiable personal data is limited to that required to link the datasets, namely forename, surname, sex, date of birth and postcode.</p> <p>Indirectly identifiable personal data (attribute data with direct identifiers removed) are required to understand how a child's family and socio-economic background affects their outcomes, for example attainment.</p>
Personal data shall be accurate and where necessary, kept up to date	Yes	<p>The data are used for statistical purposes only, having no relevance to decisions affecting the individual data subject. There is no requirement to keep the personal data up to date as updating the records would make processing for statistical purposes redundant.</p>



<p>Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes <i>Statistical exemption</i></p>	<p>Yes</p>	<p>Identifiable data will be stored on an ongoing basis in the secure research environment for the purposes of curation.</p>
<p>Personal data shall be processed in a manner that ensures appropriate security of the personal data</p>	<p>Yes</p>	<p>ONS ensure that their staff, including any contractors, understand and guarantee to maintain the confidentiality requirements of this data supply and will ensure that ONS employees involved with the processing of this data supply comply with the confidentiality declaration, have undergone staff training and appropriate security vetting.</p> <p>Separation of identifiers will be used where necessary for statistical research.</p> <p>In summary, the security controls in place include:</p> <ul style="list-style-type: none"> <li>• <b>physical</b> – the data are held, and all research using them takes place within an assured ONS data analysis environment. Only authorised and security cleared researchers are permitted to access the data, and all access is recorded, monitored and audited by ONS Security Managers on a regular basis, through regular review of technical and procedural records.</li> <li>• <b>procedural</b> – the data acquisition, import, linking and export processes are subject to strict procedural controls. These processes are carried out by a Data as a Service team independent from the business areas researchers and analysts. When linked, data will be used for statistical and statistical research purposes only. In accordance with data protection legislation, there will be no impact on the individual. ONS statistical functions are outlined in SRSA 2007.</li> <li>• <b>personnel</b> – Prior to accessing data, ONS employees will have undergone an appropriate level of security vetting and have an approved business reason to use the data. They must comply with Section 39 Statistics and Registration Service Act 2007 which makes it a criminal offence to disclose information.</li> </ul>

		<p>Non-ONS employees may be given ONS approval in accordance with our published criteria for approved researchers, including approval of both researcher(s) and project.</p>
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**Step 4: Consultation**

*Describe how and when you will seek the views of individuals regarding the processing.*

**How?**

**Partnership meetings** – These meetings were established to bring together those who have a policy interest or research interest in Data for Children. The aims and objectives of this project were agreed at these meetings, as was the data specification. Attendees included:

Department for Education; Department for Works and Pensions; Department for Communities and Local Government; Economic and Social Research Council; National Foundation for Educational Research; Higher Education Statistics Agency; Office for National Statistics; HM Revenue & Customs; Institute for Fiscal Studies; UCAS; HEFCE; Nuffield Foundation; What Works Centre for Crime Reduction; Evidence for the Children’s Commissioners; Next Steps (formerly LSYPE); Early Interventions Foundation; Alliance for Useful Evidence; Avon Longitudinal Study of Parents and Children; Turing Institute.

**When?**

**Partnership meetings**  
 28th September  
 2nd February  
 12th March (technical meeting)  
 13th July

Stakeholder group	Stakeholder	Questions asked	Response
<i>Internal – eg statistical experts</i>	Data Integration	Advice on linkage methodology	ADRN has a standard linkage methodology
<i>Internal – security experts</i>			
<i>Internal – technology experts</i>			
<i>External – privacy groups</i>	NS DEC	Ethical approval for the creation of the themed datasets.	The project was presented to the National Statistics Data Ethics Committee in January 2018. In the <a href="#">published minutes</a> , it stated that:  “Members were supportive of the suggested approach for research in the public good but recommended additional exploration on the public acceptability of this initiative”
<i>External – potential data subjects</i>			
<i>External - suppliers</i>	Department for Education	Agreement for processing.  Advice on the age-scope of the project and linkage of AEDE.	Business case.
<i>External – eg statistical experts</i>	Jude Hillary	Advice on the age-scope of the project and linkage of AEDE.	

## **Step 5: Necessity and Proportionality**

*Describe and justify why the processing is necessary and proportionate.*

Relevant questions for assessment of necessity and proportionality	Description and justification
<p>Describe the lawful basis for processing.</p> <p><i>Consent</i></p> <p><i>Necessary for the performance of a contract</i></p> <p><i>Necessary for compliance with a legal obligation</i></p> <p><i>Necessary to protect vital interests</i></p>	<p><i>Necessary for the performance of official authority vested in the data controller</i></p> <p>GDPR Article 6(1)(e) The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller. The authority for ONS to produce, promote and safeguard official statistics is found in the Statistics and Registration Service Act 2007.</p> <p>GDPR Article 9(2)(j) Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.</p>
<p>Describe how the processing achieves the purpose.</p>	<p>Processing of personal data is necessary to bring together the sources of information and make sense of them. This enables research to better understand child outcomes in the context of their family and socio-economic backgrounds. This will provide a rich data source to inform public policy and research that affects children's lives, allowing them to make informed decisions in relation to the distribution of public funds and targeting of interventions.</p>
<p>Is there another way to achieve the same outcome? If so why is this the preferred method?</p>	<p>No other method can produce the array and depth of information as can the linkage of these two administrative data sources.</p>

Is there another way to achieve a similar outcome? If so why is this the preferred method?	A survey could be used to collect similar information, however: <ul style="list-style-type: none"> <li>- A survey couldn't collect the range and depth of topics as the two administrative sources combined</li> <li>- It would require a large sample size to be as representative as the administrative data</li> <li>- Survey response is declining so re-using existing data reduces the burden on the public</li> <li>- Surveys are costly to produce and run</li> </ul>
How will data minimisation be ensured?	The use of directly identifiable personal data is limited to that required to link the datasets, namely forename, surname, sex, date of birth and postcode.  Indirectly identifiable attribute data will be made available through the Secure Research Service. Approved researchers will have to define what data they require and why before it is made available.
What privacy information will be provided to data subjects? How and when will it be provided?	A dedicated privacy information document is available on the <a href="#">ONS website and the Department for Education website</a> .
What third party processors are being employed?	None.
What processes are in place to ensure that the processors comply with your instructions? What contracts are in place?	N/A

## **Step 6: Risks**

*Describe the risks associated with the processing.*

Describe the risk and potential impact on individuals	Likelihood of harm	Severity of harm	Overall risk
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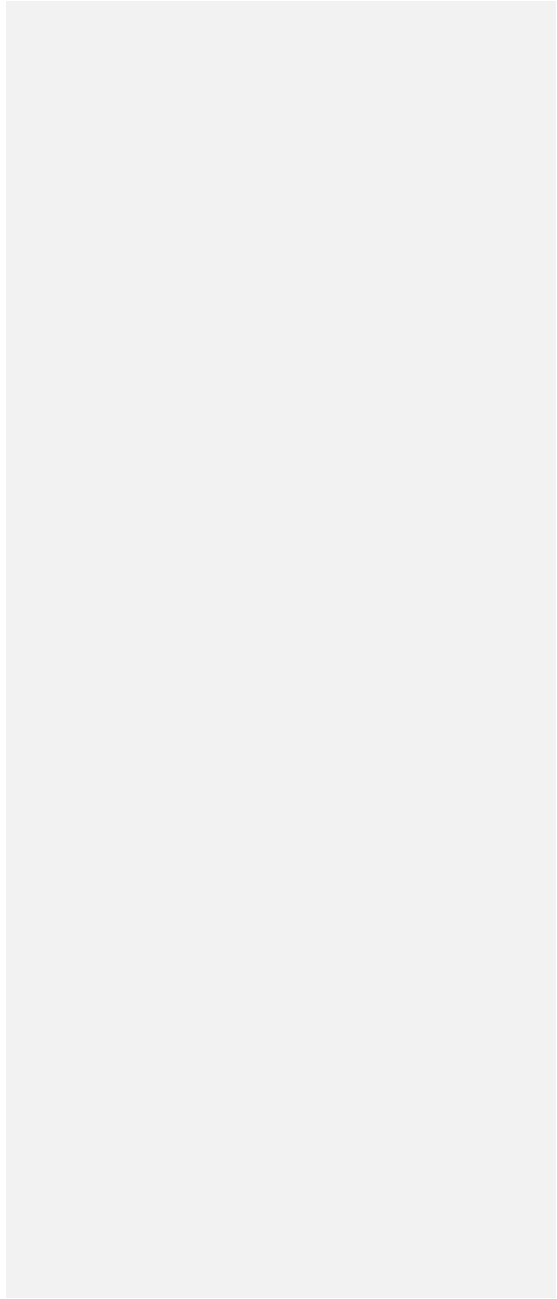
	<i>Remote, possible, probable</i>	<i>Minimal, significant, severe</i>	<i>Low, medium, high</i>
<b>Fairness and lawfulness of the data processing</b> – if the processing is unfair to individuals, the project cannot continue. This may occur if no public benefit is generated from the processing.	Possible	Significant	Medium
<b>Identification risk</b> – linkage of datasets increases the depth of information held on each record. As more data is added, the more unique that record becomes. This means it's more likely that a researcher could identify a person from the record.  For example, a child from Gosport who has been excluded could be one of many. A child from Gosport who has been excluded from Bay House School becomes one of a few. If the date of exclusion was linked then it is possible that a researcher from the area could identify the person.	Possible	Severe	Medium
<b>Loss of data in transfer</b> – personal data could be obtained by third parties whilst being transferred between secure environments and misused.	Possible	Severe	High
<b>Malicious Acts – e.g. hacking or rogue researchers</b> Personal data could be obtained and misused by malicious parties without authorization to use the data. This could occur if access to secure environments aren't properly maintained.	Remote	Severe	Medium
<b>Exporting data for research</b> – risk to the safety of personal data from publications or outputs using Data for Children	Possible	Severe	Medium
<b>Disposal of data</b> – if the personal data is not disposed of in an appropriate manner, it may be possible for third parties to obtain the data	Remote	Severe	Medium

## Step 7: Measures to reduce risk

*Describe the measures put in place to reduce or mitigate risk.*

Risk	Options to reduce or eliminate risk (Measure)	Effect on risk (eliminated, reduced or accepted)	Residual risk (low, medium or high) *	Measure approved (Yes/No)
<p><b>Fairness and lawfulness of the data processing</b> – if the processing is unfair to individuals, the project cannot continue. This may occur if no public benefit is generated from the processing.</p>	<p>The dataset is designed to extend our understanding of the factors and how household members can influence the attainment of children.</p> <p>social trends by improving our knowledge and awareness of how meet Government Areas of Research Interest as well as the interests of academics and third-sector organisations. Expressions of interest have been sought from partnership members prior to linkage to understand what public benefit can be achieved from combining the data sources.</p> <p><b>Relevant Approved Projects</b></p> <p>PROJ-0090*            What Drives University Applicants' Choices? Resources, Research, and Rankings</p> <p>PROJ-0097            The role of student background in choice of university degree program, social mobility and university admission policy in the UK.</p> <p>PROJ-0107*            Evaluating the fairness of admissions decision making in UK higher education</p> <p>PROJ-0134</p>	<p>Accepted</p>	<p>Medium</p>	

	<p>Exploring the contingency of University-led outreach activities on the transition of University outreach participants into the UCAS system  PROJ-0137*</p> <p>STEM persistence: What goes wrong?  PROJ-0138</p> <p>Selecting the best medical workforce: The UK Medical Applicant Cohort Study  PROJ-0141*</p> <p>The impact of widening participation initiatives aimed at medical schools  PROJ-0149*</p> <p>Undermatch in higher education: prevalence, drivers and outcomes  PROJ-0156</p> <p>Investigating the impact of outreach activities on the Widening Participation students  PROJ-0190</p> <p>Understanding what drives students' choices in university applications  PROJ-0187</p> <p>Characterising the use of out-of-home care among children in England using administrative social care data  PROJ-0186</p> <p>Head or Heart Study- A dormant trial linkage feasibility study.  PROJ-0162*</p> <p>The relationship between education and health outcomes for children and young people across England: the value of using linked administrative data  PROJ-0026</p>			
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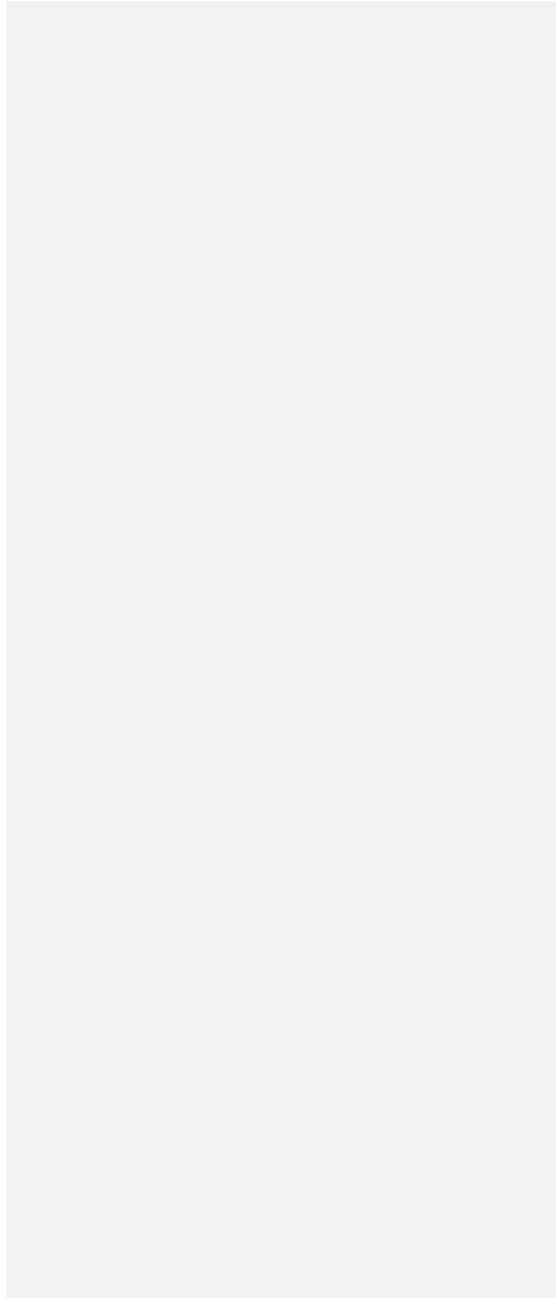
	<p>Understanding the determinants of educational achievement and the association with health and well-being by age 14 in Wales PROJ-0096</p> <p>The effects of BMI feedback on childhood weight loss PROJ-0071*</p> <p>Non-education follow ups of Education Endowment Foundation RCTs PROJ-0098</p> <p>Linking Annual Survey of Hours and Earnings to HMRC administrative data to analyse the impact of (vocational) education investment on earnings PROJ-0125</p> <p>Linking Annual Survey of Hours and Earnings to HMRC administrative data to analyse the impact of (vocational) education on jobs performed. PROJ-0146</p> <p>The importance of household background, social class and deprivation for young people's education decision making and their long-term labour market success: An analysis using linked data of the Census and education register data</p>			
<p><b>Identification risk</b> – linkage of datasets increases the number of unique cases within a dataset, increasing the possibility of individuals being identified.</p>	<p>Attempting to re-identify respondents is a criminal offence. If an approved researcher wrongfully discloses personal information they could be liable to imprisonment or a fine as set out in s.39 of the SRSA.</p> <p>To prevent this happening the following precautions are in place:</p> <ul style="list-style-type: none"> <li>- Approved researchers undergo training prior to accessing the data</li> <li>- All direct identifiers are removed from the dataset before being made available to approved researchers</li> </ul>	Accepted	Low	

Commented [RJ2]: Equivalent under DEA

	- Approved researchers must specify what personal data they require from the dataset and why			
<b>Loss of data in transfer</b> – personal data could be obtained by third parties whilst being transferred between secure environments and misused.	<p>To reduce the risk of data loss, Local Authority data will be transferred using an agreed, secure, electronic transfer facility which adheres to Government requirements and assurance. ONS will be providing each Local Authority with a <a href="#">MoveIT</a> account. Further details on MoveIT can be found on their website <a href="https://www.ipswitch.com/moveit">https://www.ipswitch.com/moveit</a>.</p> <p>The data transfer will be overseen by ONS personnel who have undergone the relevant training, security vetting and are aware of their obligations under Data Protection legislation and Section 39 SRSA 2007.</p>	Reduced	Medium	
<b>Malicious Acts</b> – Personal data could be obtained and misused by malicious parties without authorization to use the data. This could occur if access to secure environment aren't properly maintained.	<p>The physical and technical security of the data will be maintained at all times.</p> <p><b>Environment controls</b></p> <p>ONS operate an assured analysis environment that includes the following elements of security control:</p> <ul style="list-style-type: none"> <li>• Need To Know applied through user account access and management</li> <li>• Controlled account access using unique credentials based on job role</li> <li>• Logged access of user activity within the environment</li> <li>• Secure build configuration for infrastructure, including Cloud services</li> <li>• Encrypted data will be stored within the environment using controlled zones where this is applied to sensitive data</li> <li>• Vulnerability tested infrastructure with appropriate remediation and patching</li> <li>• Compliance checks against security enforcing controls</li> <li>• Architectural review against standards and best practice</li> <li>• Staff security cleared to the appropriate level based on their supervised and/or unsupervised access to sensitive data in</li> </ul>	Reduced	Low	

Commented [RJ3]: What about transfer to the researchers?

	<p>accordance with ONS clearance policies and data access processes</p> <ul style="list-style-type: none"> <li>• Education and awareness of environment users covering security policies and secure working practices</li> <li>• Operational support processes to securely manage the environment</li> <li>• Risk assessment to identify security risks and mitigation actions to reduce this risk.</li> </ul> <p>User access to the environment is through ONS standard laptops or desktops connecting to the ONS network that then connect to a separate virtual desktop infrastructure, logically within the ONS boundary, through a controlled channel that does not provide for any data transfer outside the environment.</p> <p>ONS and supplier premises are secured to Government standards. Site access is controlled and audited supported through regular reviews of technical, procedural and CCTV records.</p> <p>The sensitivity of the information in each dataset is identified by the originating organisation.</p> <p>This is reviewed regularly via statistical research to ensure appropriate controls are maintained.</p> <p><b>Researcher controls</b></p> <p>ONS ensure that their staff, including any contractors, understand and guarantee to maintain the confidentiality requirements of this data supply and will ensure that ONS employees involved with the processing of this data supply comply with the confidentiality declaration, have undergone staff training and appropriate security vetting.</p> <p>Separation of identifiers will be used where necessary for statistical research.</p>			
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	<p>In summary, the security controls in place include:</p> <ul style="list-style-type: none"> <li>• <b>physical</b> – the data are held, and all research using them takes place within an assured ONS data analysis environment. Only authorised and security cleared researchers are permitted to access the data, and all access is recorded, monitored and audited by ONS Security Managers on a regular basis, through regular review of technical and procedural records.</li> <li>• <b>procedural</b> – the data acquisition, import, linking and export processes are subject to strict procedural controls. These processes are carried out by a Data as a Service team independent from the business areas researchers and analysts. When linked, data will be used for statistical and statistical research purposes only. In accordance with data protection legislation, there will be no impact on the individual.</li> </ul> <p>ONS statistical functions are outlined in SRSA 2007.</p> <ul style="list-style-type: none"> <li>• <b>personnel</b> – all researchers working on the assured ONS data analysis environment work for ONS and are security cleared.</li> </ul> <p>Non-ONS employees may be given ONS approval in accordance with our <a href="#">published criteria for approved researchers</a>, including approval of both researcher(s) and project.</p>			
<p><b>Exporting data for research</b> – risk to the safety of personal data from publications or outputs using Data for Children</p>	<p>Any ONS publication or output using Data for Children data undergoes an appropriate level of disclosure control to ensure that the identity of individuals cannot be deduced, either by being specified in the output, deduced from the output, or can be deduced from the output taken together with any other published outputs.</p>	<p>Reduced</p>	<p>Low</p>	

Commented [RJ4]: No they don't, what about researchers?

	No personal, identifiable data will be shared with other organizations without prior consent of data owners. Aggregate information will meet our statistical disclosure control guidelines. Any onward disclosure, outside of these criteria, will be notified to Local Authorities.  Data for Children data will not be transferred outside of GB.			
<b>Disposal of data</b> – if the personal data is not disposed of in an appropriate manner, it may be possible for third parties to obtain the data	Once ONS has no further use for the supplied data, it is destroyed using appropriate techniques following Government guidelines.	Accepted	Medium	

\*If any residual risk is still high the DPIA will need to be approved by the Data Protection Officer

**Step 8: Sign-off**

*Describe the sign-off procedure for the project including names and dates.*

Approved by	Position	Date	Comments

The questions within the tables are not exhaustive. Additional relevant information should be provided if known.

For further information please contact the Legal and International Team: [legalservices@ons.gov.uk](mailto:legalservices@ons.gov.uk)

