

**Department for Work and Pensions**

**Work and Pensions Longitudinal Study**

**Ethics Committee**

**Report**

**To 31 December 2006**

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## **Foreword**

I am pleased to present the second Work and Pensions Longitudinal Study (WPLS) Ethics Committee Annual Report.

The report outlines the work of the Committee undertaken in 2006 and takes a forward look to some developments expected in 2007.

The setting up of this Committee is innovative within the Department and it is an example of best practice in the area of data handling and statistics. DWP is the first government department to set up such a committee and it is one of the safeguards that we have put in place to ensure that we are seen as behaving responsibly with data from the WPLS.

The Committee now has well-established ways of working and a clear role in respect of the use and access to WPLS. In light of the very useful role that the Ethics Committee has undertaken it has been proposed that the Committee also consider the ethical implication of all Information Directorate's use of non-DWP data.

Lively debates have continued to be held around ethical and other issues connected with using data for research purposes.

The Parliamentary Under Secretary James Plaskitt attended an Ethics Committee in July and stressed the importance of its role in demonstrating responsible data handling and sharing by the DWP

I should like to thank all members of the Ethics Committee for their commitment and work during the past year.

David Frazer

**Chair**  
**Work and Pensions Longitudinal Study Ethics Committee**

## **1. Introduction to the Work and Pensions Longitudinal Study (WPLS)**

- 1.1. The WPLS is a series of linked databases that allows detailed, cross cutting analysis of DWP customers. From January 2004, DWP has been able to link benefit and programme information held on its customers with employment records from HM Revenue and Customs (HMRC).
- 1.2. The WPLS has been used to perform a range of statistical and research analyses, as well as being used for some limited operational purposes, to give the Department further opportunities to evaluate the effectiveness of its businesses. This has included:
  - Providing statistics, management information and research on the success of Jobcentre Plus in helping people into work and keeping them in work;
  - Helping to evaluate individual policies and their impact in the short, medium and long-term;
  - Determining the family unit for pensioners to establish overall pensioner income from benefits;
  - Helping in the investigation of fraud; and
  - Helping DWP to improve the way it targets clients through marketing initiatives.

## **2. Introduction to the Ethics Committee**

- 2.1. An Ethics Committee was considered necessary to ensure that new proposals for utilising the WPLS took account of concerns amongst citizens about how such a potentially rich data source might be used.
- 2.2. The Committee is an ad-hoc advisory group and was set up in spring 2004.

### **Membership of the Ethics Committee**

- 2.3. The Committee comprises twelve members. Six of the members are experts from government departments including DWP Social Research, Office for National Statistics, DWP Communications Standards, HMRC and HM Treasury. The other six members are individuals who were appointed following a national advertisement for suitable candidates. The Committee members and a short biography are shown in **Annex 1**.

## **Role of the Committee**

- 2.4. The Ethics Committee has been appointed to consider proposals for utilising the WPLS database that have a significant ethical dimension.
- 2.5. The goal of the Committee is to foster, through debate and accountability, a proper culture of respect in using and developing the Work and Pensions Longitudinal Study. Consideration is given to human dignity within a framework of active research to support the development of policies for a free, inclusive and prosperous society.
- 2.6. The Ethics Committee are becoming increasingly involved in other high profiles surveys as their advice on ethical issues is invaluable.

## **Aims and Objectives of the Committee**

- 2.7. The committee examines any significant new uses of the WPLS and considers for each for the following:
  - The ethical issues surrounding the proposal
  - Whether the proposal is accepted or not
  - Any modifications to the proposal, which would make it acceptable.
- 2.8. The Head of Data Matching Services is responsible for the day-to-day access to the database and for approving new uses, which are not considered to have a significant ethical dimension. The Ethics Committee is responsible for monitoring these decisions and providing advice as necessary.
- 2.9. The full Terms of Reference for the Committee are at **Annex 2**.

## **Meetings**

- 2.10. The Committee has met four times in January, April, July and October 2006.
- 2.11. The independent members of the Committee have also met separately to consider whether items of interest needed to be brought to the attention of the wider Committee.

### **3. Accesses to the WPLS**

- 3.1.** To gain access to the WPLS, a business case is completed by each user/group of users via an electronic register.
- 3.2.** Details of each application for access to the WPLS are taken from the register each month and presented to Committee members. Where appropriate, the committee will:
  - Discuss individual cases and reach an agreement as to whether there are any ethical considerations; and
  - Request further information about individual cases in order to reach a decision.
- 3.3.** The Committee are notified separately if access is required to non-anonymised data if the data is not to be used for sampling.
- 3.4.** By working closely with the Ethics Committee fewer business cases are being challenged as DWP are now providing better descriptions and reasons around these cases.
- 3.5.** There have been further developments requested by the Ethics Committee in order to improve their ability to monitor accesses.
- 3.6.** The key aspects of this have been:
  - Improving the quality of the descriptions of why access is requested
  - Adding a “risk rating” to the Access List that is sent to the Committee. This risk rating identifies a high, medium and low status against key ethical issues that include legality, control, impact, novelty and giving an overall risk rating.
- 3.7.** Up to the period ending 31 December 2006, the Ethics Committee considered a total of 186 applications to access the WPLS for linking data. Whilst there have been occasions where the Ethics Committee has asked for an explanation of applications there have been no cases to date where the Committee has disagreed with the decision taken.

**3.8. Table 1** - accesses given to the WPLS since the inauguration of the WPLS

| Status of application      | Number of applications to access the WPLS at August 2004 | Number of applications to access the WPLS at 31 December 2005 | Number of applications to access the WPLS at 31 December 2006 |
|----------------------------|--|---|---|
| <b>Total</b>               | <b>18</b>  | <b>89</b>   | <b>186</b>  |
| <i>Of which Current</i>    | 11   | 20  | 45  |
| <i>Renewed</i>             | 0  | 15  | 39  |
| <i>Expired</i>             | 4  | 39  | 82  |
| <i>Refused</i>             | 2  | 12  | 16  |
| <i>Development of WPLS</i> | 1  | 3   | 4   |

**Definition of Terms in above table:**

- Current:** The number of business cases in which access has been approved. This does not include business cases that have been renewed and therefore all current business cases are no more than six months old.
- Renewed:** The number of business cases which have been renewed. It is our policy to review all business cases every six months regardless of how long access is required. This will contain business cases, which have been renewed on a previous occasion.
- Expired:** The number of business cases which have expired and therefore access has been withdrawn.
- Refused:** The number of business cases which have been refused access to WPLS. Requests to access WPLS are challenged rigorously and will often be rejected before a business case is submitted.
- Development of WPLS:** A small number of business cases require access to WPLS in order to improve data processes but do not have an end use of the data.

**Audit and Risk Assessment of DWP**

**3.9.** The Ethics Committee is asked on an ongoing basis to consider the security measures that DWP has in place to protect the data held on WPLS; and DWP regularly updates the Committee about its security and data protection measures.

**3.10.** Following an audit and risk assessment of data protection systems against the audit principles on the Data Protection Act undertaken by Enterprise Privacy Group (EPG), Data Matching has taken forward recommendations. These findings will be published on the internet.

**3.11.** This has included increasing awareness of data protection to users of WPLS data via Data Protection Seminars. In addition a questionnaire is issued to staff selected at random within IFD on a monthly basis to test their knowledge on Data Protection and identify any weaknesses. The results are kept confidential.

#### **4. Key achievements of the Ethics Committee.**

**4.1.** The Ethics Committee has made a major impact since its conception and the following have been identified as a direct result of its role:

- Data sharing initiatives should look at the added value of the shared data and at the same time balance this against the degree of impact the proposal has in respect of interference in public privacy. DWP expects to be challenged to make sure that analysis has a purpose and not be for its own sake and only necessary data is used.
- Following a detailed discussion about data sharing held with the private sector and a general acceptance within the Committee that differing private sector organisations would have different risk factors associated with the sharing of data, DWP have provided imaginative thinking around difficult data sharing issues and a greater appreciation of differences with public and private sector data sharing.
- Finally, there was a reflection back on the Department and Government that for wide-scale data sharing for research and statistics to be acceptable then there is an assumption by the Committee that the findings will help steer operations, policy development and planning and not simply be published and forgotten about. This has helped DWP to take forward its thinking on obtaining informed consent.

**4.2.** The Committee have also helped to establish a strong culture of adhering to security policies. This has been reflected through the completion of data protection questionnaires by analytical staff and staff demonstrating an awareness of security issues.

## **5. Committee Meetings and Papers**

- 5.1.** The Committee Meetings have included a number of oral presentations and detailed papers. Subjects have included:

### Family Resource Survey – Update on linking data with administrative data

- 5.2.** In March 2006 an update paper was provided to the Ethics Committee on the work being carried out in DWP to link data from the WPLS to the Family Resources Survey (FRS). The FRS is an annual survey of around 29,000 private households, designed to be representative of the UK population; it gathers information on incomes, benefit receipt and related household characteristics.
- 5.3.** The paper outlined the work carried out by DWP and the fieldwork contractors (the Consortium of ONS and NatCen) to develop a question to seek informed consent of FRS respondents for their personal details to be passed to DWP for the linking. Cognitive testing of wording was carried out in February 2006 and following this, several improvements were made to the question. The paper then described the next steps in the work, which were to carry out quantitative pilots of the consent question in May and June 2006. It was agreed that the Ethics Committee would be kept informed of the continuing work in this area.

### Use of WPLS for Fraud and Error

- 5.4.** Following requests from Ministers, Information Directorate have been asked to investigate the potential benefits of using WPLS to identify fraud and error. A study has been compiled to investigate the feasibility of this. This study showed that WPLS could be used to enhance the effectiveness of fraud and error data matching.
- 5.5.** The Committee agreed that the early results of the work showed that there are worthwhile benefits from this approach.
- 5.6.** As a result of the advice given by the Ethics Committee there has been improved co-ordination between officials using WPLS for analytical and operational purposes.

### Job Outcome Target (JOT)

- 5.7.** A presentation was given to the Committee to highlight the changes to the Job Entry Target to Job Outcome Target (JOT) within Jobcentre Plus.
- 5.8.** JOT will allow Jobcentre Plus staff to focus on getting the right people into the right jobs; spend more resources on helping customers with the greatest need; and provide an improved service both to jobseekers and employers.

- 5.9.** From April 2006, Jobcentre Plus is totally reliant on WPLS for performance results, which will mean a change in culture for Jobcentre Plus staff and managers.
- 5.10.** The Committee commented that this was a positive use of WPLS as it improved confidentiality, as less personal data would be held. JOT will also lead to a better outcome for customers and employers.

#### Data Warehousing

- 5.11.** A presentation was given to the Committee.
- 5.12.** Data Warehousing is a technical approach to make more efficient use of data. It will allow DWP to look at events that take place over time in connection with the business processes of a claim. It will also allow data from various different sources to be amalgamated in a generic fashion.
- 5.13.** Data Warehousing will provide a far richer source of data, which is more easily managed by DWP.
- 5.14.** The Committee agreed that there may be an increase in applications to access the data and it would need to consider the impact.

#### Increasing clarity of ethical issues in WPLS applications

- 5.15.** A paper was presented to the Committee putting forward options that DWP will implement to help to identify applications to access the WPLS that need further consideration of ethical issues.
- 5.16.** The Committee suggested that all applications to use the WPLS to match data should have some form of rating to identify ethical issues.
- 5.17.** It was agreed that business cases will be assessed against four risk areas (legality, control, impact on individuals and novelty) and each area will be allocated a high, medium or low rating in terms of ethical consideration.

## **6. Ministerial Visit**

- 6.1.** James Plaskitt, Parliamentary Under Secretary was invited to attend the Ethics Committee meeting in July.
- 6.2.** The Committee delivered a presentation summarising the work of the Committee including how, when and why it was set up, the expertise of Committee members, the process for monitoring applications to access the WPLS and specific issues that the Committee has addressed to date.
- 6.3.** The Minister encouraged the Committee to continue to be proactive and to take discussions outside their remit. He also thanked them for their work and stressed the importance of its role.

## **7. Future of the Ethics Committee**

- 7.1.** With the advent of historic data through the Work and Pensions Longitudinal Study, there is increased desire to use historical data to better identify the risk of fraud and error entering the benefits system and also to improve the effectiveness of data matching.
- 7.2.** The fraud and error data matching service is now part of Information Directorate and the role of the Ethics Committee needs to be revised to avoid the possible scenario of ethically sensitive work being completed without advice from the Ethics Committee.
- 7.3.** Following a number of discussions surrounding the remit it has been agreed in principle that its scope will now be widened to include all of Information Directorate Cross-Cutting Government Initiatives involving HMRC.
- 7.4.** Work will continue during 2007 to implement these measures.

## **Conclusion**

- 8.1.** The Ethics Committee has had a successful second year in which it has established itself as a key part of the process for using the Work and Pensions Longitudinal Study and made impacts to help DWP improve its consideration of ethical issues relating to the expansion and use of the WPLS. .

## **9. Contacting the Ethics Committee**

WPLS Ethics Committee Secretariat

Department for Work and Pensions

Level 2, Kings Court

Sheffield

S3 7UF

Telephone: 0114 209 8562

Fax: 0114 209 8189

Web site:

[http://www.dwp.gov.uk/asd/longitudinal\\_study/ic\\_longitudinal\\_study.asp](http://www.dwp.gov.uk/asd/longitudinal_study/ic_longitudinal_study.asp)

Email: [wpls@dwp.gsi.gov.uk](mailto:wpls@dwp.gsi.gov.uk)

## **Work and Pensions Longitudinal Study**

### **Ethics Committee**

#### **Stuart Burgess: Independent Member**

Stuart is a Church Leader (Methodist Church) on an international, national and regional basis. His interests include: education - especially in higher education; ethics - especially medical ethics and holding the balance between theory and practice; debt cancellation for poor countries and related issues, i.e. HIV/Aids; working with the police on creating safer neighbourhoods. Stuart chairs the Patient Liaison Group of the British Medical Association. He is also Chairman of the Countryside Agency and Rural Advocate.

He is interested in travel, music and playing tennis.

#### **Siobhan Campbell: HM Treasury**

Siobhan Campbell is a principal researcher within the Government Social Research Unit (GSRU). She is responsible for all professional guidance developed by GSRU for the Government Social Research community, including ethical guidance. In addition she has been working with Professor Roger Jowell to develop a training course for government researchers on ethical issues.

Siobhan has a first degree and a Ph.D. in psychology and has worked as a government social researcher since 1999. Her first post was within the Home Office, working in a variety of areas from youth crime and justice, to mentally disordered offenders, to drug and alcohol-related crime. She has also worked in the Scottish Executive, running their criminal justice research programme.

#### **George Clark: DWP Head of Social Research Division**

George Clark is the Head of Strategic Research and Modelling Division at DWP. He is also the Head of Profession for the 90 Social Researchers across DWP who provide research-based evidence through designing and commissioning programmes of research and evaluation. He has a particular interest in the ethical issues involved both in undertaking social research and in linking research and administrative data.

George started work as a government researcher in the Department of the Environment on regional planning issues. He moved to the Manpower Services Commission to work on local labour market issues, then to the former Employment Department commissioning research on labour markets, working patterns and small businesses. From 1991-2000 he was Deputy Head of Housing Research at DoE/DETR covering homelessness, private renting, HB, owner occupation and the Housing Green Paper.

**Gabrielle Cox: Independent Member**

Gabrielle Cox was Head of Social Inclusion Policy at the Northwest Development Agency prior to retirement in 2004. She was responsible for the mainstreaming economic inclusion perspectives across the whole of Agency's work. Before this she had worked for thirteen years as Director of the Greater Manchester Low Pay unit, overseeing the Unit's extensive research and advice work. During this time she was also a member of the Churches Enquiry on Unemployment and the Future of Work, which published a major report in 1997.

Gabrielle was for five years a member of the Greater Manchester County Council and was Chair of the Greater Manchester Police Authority. She has also worked for the North West Community Health Councils, as a teacher in inner city schools in Manchester, and as a community worker. She began work with Unilever before studying at the London School of Economics.

She has extensive experience of the voluntary and community sector, and has been active in community issues in Moss Side, where she lives, for over thirty years. She is currently a Non-Executive Director of the Central Manchester Primary Care Trust, a member of the Board of United Utilities Trust, and does occasional consultancy on economic and social inclusion issues.

**Mike Daly: DWP**

**Deputy Head, Disability and Work Division (Welfare, Work and Equality Group)**

Mike is responsible for evaluation and analysis of the Department's range of disability employment programmes and policies, and contributing to strategy development in that area. He has a particular interest in evaluation methods, and the use of administrative data in evaluation.

Mike graduated from Cambridge University in 1979 with a degree in Mathematics, and subsequently obtained a postgraduate Diploma in Mathematical Statistics before joining the then Department of Employment in 1980.

He has worked on a variety of subject areas including: retail prices, labour supply analysis and forecasting, small business statistics and research, monitoring and evaluation of youth and adult training programmes. He joined the Employment Service in 1997 specifically to develop evaluation databases for the New Deal programmes using administrative records. He was heavily involved in the extension of these databases to cover a much wider range of sources and programmes, before becoming more involved with programme evaluation, often using the evaluation databases as data sources.

**David Fraser: Independent Member**

David Fraser lives in Edinburgh, and was a Chief Executive in the public sector in Scotland. His experience included working with Ethics Committees in the health service. His present portfolio includes Directorships of the Scottish Refugee Council, Castle Rock Edinvar Housing Association and the Air Transport Users Council. He has a particular interest in how organisations can learn to improve service delivery to customers.

**Christopher Hughes: Independent Member**

For many years, Christopher has taken an interest in the governance of the public domain and ensuring effective leadership and decision-making by public bodies. He has served as a member of various health authorities and has worked for and been a member of local authorities. His current roles include chairing a Regulatory Body, Mental Health Tribunals, tribunals hearing cases of alleged misconduct by members of local authorities, and the Chemical Stakeholder Forum. Christopher is a solicitor and a member of the Institute of Biology and the Board of the Legal Complaints Service.

**Paul Jackson: Office of National Statistics**

Paul joined ONS as a Senior Research Officer to manage the 1999 Census Quality Survey and to develop the 2001 Census validation methodology. He joined ONS Methodology Group as a Principle Methodologist in 2001 to set up a Confidentiality and Data Sharing centre of expertise in ONS. As this work became so closely tied to the development of the National Statistics Code of Practice, the centre moved into National Statistics and Planning Group where he now runs the Legal and Data Sharing branch. This branch is the home of ONS casework and case law in legal matters, including Data Protection, Human Rights, Freedom of Information. It is also the home of data sharing and micro-data release policy for ONS, and 'owns' the Protocol for Data Access and Confidentiality. The branch maintains ONS' links with the Office for the Information Commissioner and the Information Rights division of the Department for Constitutional Affairs. Like all functions of the NSPG, there is a Government Statistical Services function.

**Liz Kettle: DWP**

**Communication Standards**

Liz Kettle was born in Washington DC. Her family returned to the UK when she was five and she grew up in Cambridge and Sussex. After graduating in philosophy and economics from LSE, Liz spent some years working in publishing publicity and promotion in London and Edinburgh. She gained further experience as a BBC press officer in Glasgow, followed by a period in academic bookselling, subsequently moving over to the editorial side of academic and educational publishing. Liz has also had considerable freelance experience as a writer, editor, journalist, PR practitioner, advertising copywriter, book reviewer (press and broadcasting) and reader for a literary agency.

Liz joined the civil service in 1994 as a Benefits Agency national press officer and is now leads the team responsible for the development, maintenance and

monitoring of standards applied to customer information products across DWP.

**David Leibling: Independent Member**

**Freelance transport and motoring consultant**

**Formerly Director of Corporate Communications for Lex Service PLC**

David is a Member of Advisory Board for Driving Standards Agency and attends its Audit and Risk Management Committee. He is also a Member of Public Policy Committee for RAC Foundation for Motoring. He is Trustee of Roadsafe (Prince Michael Road Safety Awards), the motor industry's road safety initiative and Trustee of a number of community charities.

**Simon Sapper: Independent Member**

Simon has been an Assistant Secretary (National Officer) at the Communications Workers' Union since 1989. Before that, he worked for the Institution of Professional Civil Servants (now Prospect) and the Anti-Apartheid Movement. He serves on a number of other bodies including the Secretary of State's Legal Services Consultative Panel, advising on legal services and those who provide them, and is Independent Chair of the London Borough of Merton's Standards Committee.

In addition to this specialism in the areas of Ethics and Governance, Simon has practical experience in research work from his principal areas of employment.

**Sean Whellams: HMRC**

Sean Whellams joined the civil service in 1986 as an assistant statistician in the Ministry of Defence. He has had a number of different statistical posts and is currently the Chief Statistician in HMRC's information centre.

**Work and Pensions Longitudinal Study**

**Ethics Committee**

**Terms of Reference**

**Aim**

The WPLS Ethics Committee will provide ethical advice to the Department for Work and Pensions on issues relating to the use of the Work and Pensions Longitudinal Study to ensure that the rights, dignity and welfare of the individual are protected and balanced against the common good.

**Terms of Reference**

To provide ethical advice on the uses to which DWP put the Work and Pensions Longitudinal Study taking account of relevant professional standards, legal, methodological and other relevant advice given.

To review the decision-making of the Head of Data Services on access given to the Work and Pensions Longitudinal Study and ensure that full ethical consideration has been made throughout the decision-making process.

To provide ethical advice on the development of the Work and Pensions Longitudinal Study taking account of relevant professional standards, legal, methodological and other relevant advice given.

To ensure an accurate record is kept of decisions taken by the Committee.

Advice provided by the Committee is made available to the Secretary of State through the Chair and Secretariat.

**Membership**

The Committee comprises 6 Government members and 6 publicly appointed members.

The current membership is:

**Publicly appointed members**

Simon Sapper  
Gabrielle Cox  
David Leibling  
Stuart Burgess  
Christopher Hughes  
David Fraser

### **Government members**

Siobhan Campbell HM Treasury

Paul Jackson, Office for National Statistics

George Clark, Head of Social Research Division, DWP

Sean Whellams, Inland Revenue

Mike Daly, Disability and Work Division, Welfare, Work and Equality Group, DWP

Liz Kettle, Deputy Head of Marketing, Department for Work and Pensions

### **Chair and Secretariat**

David Frazer, Head of DWP's Information Directorate chairs the committee with secretariat provided by Douglas Edwards and Caroline Caterer from DWP's Database and Matching Service.

DWP Solicitors Office provides legal advice, representatives of which will attend each Ethics Committee meeting.

### **Ways of working**

When deciding the ethical framework, the Committee agree that the following themes should act as a starting point for any ethical debate:

- Consideration of the public interest of proposals
- Ensuring that the ethics as well as the legality of confidentiality are considered
- Considering the likelihood of any proposals to cause distress or harm to an individual against the common good of the citizens.

The Committee is committed to equality of opportunity and inclusion and all proposals will be asked to show that they promote equality and inclusion.

Where any member has concerns about how the Committee is working, they should raise these with the Chair in the first instance.

### **Behaviour of Members**

Members of the Committee have a duty to provide advice to the best of their ability to the Secretary of State. In order to retain the confidence of the public and the Secretary of State:

- Unless they have the prior approval, Individual Members will not speak for the Committee at public conferences or seminars, or in articles or broadcasts. While they may identify their role on the Committee, they equally should take care to identify that they do not speak for the Committee unless approved. Approval should be sought from the Committee in session where this is possible or from the Chair or Secretariat where this is not possible.

- Members of the committee owe a duty of confidence. Information shared in confidence with the member either within or out of committee meetings should not be disclosed without approval.

### **Meetings and Decision-making**

The Committee will meet quarterly.

It is the aim of the Committee to reach conclusions by Consensus wherever possible and to fully debate issues in order to achieve this. However, there may be occasions where a Consensus cannot be reached. In these circumstances, the Committee will revert to a modified majority voting system. The Committee is quorate when at least 7 members, or their named representatives, are present of which at least 4 are publicly appointed. A majority is achieved when at least 7 members of the Committee or their named representatives agree that a proposal is ethical of which at least 4 votes are from the publicly appointed members. (NB only named Government members can supply representatives not publicly appointed members).

The Chair and Secretariat are present to facilitate the workings of the Committee and as such have no voting rights.

### **Role of the Chair**

The Chair is to provide a non-voting lead to the work of the Committee. The key roles of the Chair are:

- To facilitate the work of the Ethics Committee to ensure that debate at meetings is conducted openly, honestly and taking account of all views held around the table
- To summarise and record the decisions of the Ethics Committee and to ensure these are fully incorporated into the work of DWP in the development of DWP's work in this area.
- To ensure that any public announcements on developments of the WPLS or new uses of the databases contain the advice of the Ethics Committee and that the Secretary of State is aware of the advice of the Ethics Committee when taking decisions.
- Where DWP has chosen not to follow the advice of the Ethics Committee to ensure that the reasons why are communicated to the Committee and made publicly available.

### **Role of Secretariat**

The Secretariat is responsible for:

- Ensuring that the Ethics Committee are kept fully informed of all work relating to the Work and Pensions Longitudinal Study
- Providing high quality papers which allow the Committee to function properly

- Publishing all papers according to the processes of the Ethics Committee
- Providing all reports on access given and access denied and the reasons for this
- Responding to enquiries on behalf of the Ethics Committee
- Providing minutes of the meetings and ensure that all papers are prepared and circulated on time
- Facilitating the efficient running of the Committee
- Suggesting a forward work programme for the Ethics Committee
- Preparing and publishing the Committee's annual report

### **Transparency of the meetings of the Ethics Committee**

The Ethics Committee aims to be as transparent as possible in the conclusions it has reached. Where a proposal from DWP is already in the public domain then the conclusions of the Committee will be made available as soon as possible after the meeting.

However, there will be occasions when the Committee are considering proposals, which have yet to be publicly announced. In these circumstances, the ethical advice will be released at the time of announcement of the idea.

All members of the Ethics Committee have agreed that their details, alongside these Terms of Reference should be placed on the WPLS website. Individual members of the Committee will not respond to enquiries relating to their work as members of the Ethics Committee. All enquiries about the work of the Committee should be handled through the Secretariat.

The Ethics Committee will produce an annual report of its work.

**DATA PROTECTION SELF CERTIFICATION SYSTEM**

DWP Information Directorate successfully creates a system to efficiently train staff in data protection skills and monitor the effectiveness of that training.

The DWP Information Directorate (IFD) has successfully created a system that combines data protection awareness training with ongoing monitoring of data protection skills across the Directorate. IFD's innovative response addresses two of the key findings of a 2004 audit of the Work and Pensions Longitudinal Study (WPLS). The results of the audit, conducted by data protection specialists 'The Enterprise Privacy Group', were overwhelmingly positive, and included recommendations for IFD to provide a rolling programme of data protection training for staff authorised to handle WPLS data, and to implement a management mechanism that provides assurance of the effectiveness of data protection skills across the Directorate.

The IFD team quickly identified the opportunity to automate both requirements within the same automated solution. The Data Protection Self-Certification System (DPSCS) delivers a random questionnaire to each staff member every six months. The questionnaire tests the user's knowledge of data protection and how it is managed within DWP; particular attention is given to the management processes that govern access to WPLS data. The system, then reports the results back to IFD management.

Working closely with the Enterprise Privacy group team, IFD developed a database of over 250 questions and tested their suitability with a cross section of staff members through a series of focus groups. The questions are delivered through a web interface that greatly simplifies system management by dispensing with the need for a client application. Workflow monitoring ensures that users complete the questions within the required timescales, and then generates automated management reports. These are supported by 'confidence factor' measurements that provide the management team with assurance that the questionnaire results reflect 'real world' behaviours.

The DPSCS has been operational for over a year, and the results are very positive. Users report that it has encouraged them to find out more about data protection, and that they have learned a great deal from completing the questionnaires. The data protection team has used the results to target training delivery to those individuals who have the greatest need for it. Confidence factors have provided assurance of the effectiveness of the system.

The DPSCS has proved to be a cost-effective delivery mechanism that has reduced the administrative burden on the IFD Data Protection team whilst allowing it to target data protection training at those areas where it is most needed. The IFD Data Protection team is now planning potential upgrades to the system that will expand the range and style of questions, and customise questionnaires to target those areas where individual users need further assistance.

## **Bullet Points**

- In response to an audit of WPLS, the DPSCS was developed to deliver data protection training across EFD and prove the effectiveness of staff data protection skills
- The system delivers randomised questionnaires to each staff member every six months. Questionnaires are supported by a workflow process that ensures responses are completed, and reports the findings back to IFD management
- DPSCS has been running for over a year, and has received positive feedback from users. The IFD Data Protection team has used the results to reduced their administrative workload and focus their training effort where it is most needed.
- Plans for the next iteration of the system have already been developed, and include enhancements to the style and complexity of the questionnaires.