



Department
for Communities
& Local Government



English Housing Survey

**Data security strategy arrangements
July 2013**

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Introduction

This document is issued and published by the Head of Profession for Statistics in the Department for Communities and Local Government (DCLG), jointly with, and on behalf of his counterpart in the Department of Energy and Climate Change (DECC). DECC contribute funding towards the English Housing Survey (EHS) and receive early access to EHS data in order to allow them to produce official statistics covering their own policy responsibilities. DCLG, along with DECC, perform the role of 'Data Controller' as defined by the Data Protection Act 1988.

The document describes the specific data access, data sharing and data security arrangements which the Departments and their contractors have put in place in order to strike an appropriate balance between their own use of the EHS data for aggregate statistical purposes, and in ways which will contribute to the development, implementation, and monitoring of government policy, and their simultaneous duty to comply with the Data Protection Act 1988, and the Human Rights Act 1988.

It sets out, in particular, the principles and procedures to which all organisations will adhere in order to comply with Principle 5 of the Code of Practice for Official Statistics covering 'Confidentiality'. Thus ensuring that the provided by respondents to the EHS are kept secure during the process of producing statistics, used for statistical purposes only, and that the resultant statistics do not disclose the identity of an individual or organisation, or any private information about them.

A Memorandum of Understanding in Relation to Data Sharing between DCLG and DECC provides further detail on arrangements between the two departments with joint data control of EHS, published here:

<https://www.gov.uk/government/organisations/department-for-communities-and-local-government/series/english-housing-survey>

Background

1. The EHS was launched in April 2008 and brought together two previous surveys funded by DCLG, the English House Condition Survey (EHCS) and the Survey of English Housing (SEH).
2. The EHS collects a range of data relating to respondents' past and current housing circumstances and, through a physical inspection of their property, a range of information relating to the condition and energy efficiency of their homes. Photographs of the property (external) are also taken as well as the collection of address details of landlords of those respondents who live in privately rented accommodation.
3. The surveys up to 2011-12 were managed through three separate contracts: one with the Office for National Statistics (ONS) who managed the interview fieldwork; another with Miller Mitchell Burley

Lane - CA Designs (MMBL- CADS) who managed the surveying field force; and the third with the Building Research Establishment (BRE) who managed the validation and delivery of the physical survey data.

4. In December 2011, a new contract for the survey years 2012-13, 2013-14 and 2014-15 (with an option to extend to 2015-16) was awarded to a consortium led by the National Centre for Social Research (NatCen Social Research). NatCen Social Research undertake the household interviews, and have responsibility for the sampling and weighting process working with Bryson Purdon Social Research, along with overall project management. CADS Housing Surveys recruit and manage the large surveyor field force undertaking the physical inspections. BRE are responsible for delivering training to the EHS surveyors, data validation of the physical survey data, and subsequent data modelling to deliver some of the key measures for analysis.
5. As part of the statistical production process, and since the discontinuation of the market value component of the EHS (2009-10), DCLG uses Valuation Office Agency (VOA) for the annual collection of property values. This is achieved by matching postcodes to council tax band information in order to feed into modelling undertaken by the survey contractors for the production of statistics only. This information is NOT used for any purposes outside the survey e.g. in relation to council tax band revaluations.
6. DCLG owns and funds the EHS and receives funding contribution from DECC. DCLG commissions and manages the project and is responsible for consulting users to update the content and design of the Survey. DECC and DCLG are responsible for analysis and dissemination of the results in their respective policy areas.
7. DCLG and DECC make a commitment to all respondents in the survey that the data they provide will be treated in the strictest confidence by the government survey teams and their appointed contractors in accordance with the Data Protection Act 1988, whose procedures are incorporated into the Code of Practice for Official Statistics. The data will be used to produce anonymous official statistics for decision making in government, and for genuine research and statistical purposes only.

General principles

8. As part of the contractual undertakings all organisations contracted to run the survey undertake to protect the confidentiality of the data collected as set out in the Data Protection Act and the Code of Practice for Official Statistics and associated protocols. All interviewers and surveyors working on the survey agree to abide by a confidentiality policy set out by NatCen Social Research/CADS Housing Surveys.

9. All information from the Survey is handled in strictest confidence. It is used to produce aggregated statistics for decision-making in government and for genuine research and statistical purposes only. No information which could be used to identify individual households is released outside the government survey and contractor teams.
10. A range of outputs from the EHS are delivered by the contractors to the DCLG and the method of delivering and handling the data by DCLG and their contractors will vary according to the level of anonymity associated with each set of outputs. These are described separately below.
11. Data are processed in accordance with the Data Protection Act (1998). DCLG, BRE and NatCen Social Research are registered with the Data Protection Act - DCLG: Z7123035 BRE: Z4827934 NatCen Z6133294. Additionally, NatCen has ISO 27001 accreditation (GB10/80232).
12. DECC, as Data Controllers of the EHS, receive early access to published EHS data, including responses to the survey alongside postcode details, for the purpose of complementary statistical production. A Memorandum of Understanding in Relation to Data Sharing is in place with the relevant data management team within DECC.
13. Contractors appointed by DCLG to deliver the EHS will only access and utilise EHS data to deliver the data requirements set out in the EHS contract with DCLG. Similarly, any contractors appointed by DECC will only access and utilise whichever EHS data are required to deliver the specific analyses described in their contracts with the respective departments, for the purpose of complementary statistical production only.
14. Access to these data will not breach any commitments made to respondents to protect the confidentiality of the data provided.
15. The information will only be used for valid statistical research purposes and its use will meet the criteria and principles established in the Code of Practice for Official Statistics and the National Statistician's Guidance covering the Confidentiality of Official Statistics. The principles of the Freedom of Information Act will also apply.
16. Responsibility for the implementation of these measures rests with the DCLG EHS Project Manager. The team undertake to ensure that their staff, including any contractors, know, understand and guarantee to maintain the confidentiality requirements of each of their statistical resources and will ensure that anyone involved with the processing of the statistical resource is aware of the penalties of wrongful disclosure.

17. The physical and technical security of the data will be maintained at all times. Data are held on firewall-protected, dedicated data servers accessible only by the DCLG or their contractor teams. Wherever possible data are held in an anonymised form identified through unique case serial numbers only, and with no address details attached.
18. The confidentiality of the data will be preserved at all times and no information will be released in publications, tabulations or data sets that are likely to identify an individual unless specifically agreed with them.
19. Any disputes arising between organisations will be resolved initially between the principals to these agreements. Otherwise, outstanding issues will be referred to the National Statistician.

Anonymised data files

20. The main set of outputs to be delivered to DCLG by the data collection contractors encompasses a set of anonymised data files at household and individual level containing data from the interview survey and physical survey. These files will be used by a team of analysts at DCLG and their appointed contractors to generate and report aggregate level information only. DCLG accepts a duty of care to ensure the data are not misused by its own study team or by any organisation it contracts to assist in analysis of the data.
21. The DCLG may make anonymised survey data available to external organisations for bona fide research purposes e.g. for secondary analysis by academic researchers through the UK Data Archive. Recipients of this data will be advised they must uphold the terms of the Code of Practice for Official Statistics and the National Statistician's Guidance covering the Confidentiality of Official Statistics and thereby meet the pledge of confidentiality given to survey respondents.
22. When making the datasets available, and to minimise the possibility of non-intentional disclosure of information, the DCLG will seek to remove all identifiers that might permit intentional or accidental disclosure of personal information. When depositing the datasets at the UK Data Archive any textual information (string variables) in which disclosive information could be present will be removed.
23. Similarly any publications or tabulations based on data from the survey will be produced at an aggregated level so that the potential of accidental disclosure of information is minimal.
24. Researchers based at academic institutions (including some research centres) may apply for access to more detailed but anonymous data from the survey e.g. geographical identifiers including postcodes, via the Secure Data Service at the UK Data Archive. Restricted access to data will be given only to approved researchers who will conduct

analyses within a secure remote environment. All outputs (including tables and interpretations) undergo a Statistical Disclosure Control process to ensure that individual respondents or households cannot be identified. Access by commercial organisations for commercial purposes is not permitted.

Address details

25. The DCLG also receives a file of all sampled addresses (not names) with an identifier to link these to the associated data records on the above anonymised data files. A range of geographic identifiers including census output areas are also delivered attached to each address. This information may be used by the DCLG if required to:
 - Collect additional information for the EHS sampled dwellings to create a comprehensive database for aggregated statistical analysis purposes only.
 - Re-contact households or occupants of sampled dwellings to generate a longitudinal component for future phases of the EHS (provided explicit consent for such re-contact is agreed by respondents during the interview).
 - Re-contact households or occupants of sampled dwellings to conduct a DCLG follow-up to the EHS to collect more data on specific issues (provided explicit consent for such re-contact is agreed by respondents during the interview).
 - Match against other geographic data sets (see below).
26. The address and main data files contain information that if matched together will enable the creation of disclosive information relating to individuals and dwellings. Consequently, additional safeguards have been put in place, as detailed below.
27. The sample of addresses is initially drawn by a sub-contractor to NatCen (UK Geographics) who select addresses from the Postcode Address File (PAF) and provide to BRE/NatCen Social Research. The address file is delivered on an encrypted password protected file to the DCLG EHS data base manager via secure FTP server from BRE/NatCen Social Research. The password does not accompany the data but is transmitted to DCLG separately. The EHS data base manager stores the file on a part of the secure local server that is password protected and accessible by the EHS data base manager and deputy only.
28. The DCLG are responsible for the security of this file and for ensuring that there is no unauthorised access to its contents. Its use within DCLG will be restricted to those members of the EHS study team or of

29. The DCLG and its contractors may match this file against other geographic data sets to provide further classificatory variables to assist with analysis e.g. rurality classification. These derived classifications will be used to support analysis of the EHS by DCLG and its partners only and will only be released to external users if at a sufficiently high level of aggregation to avoid data disclosure. Any matching or linking will conform to the principles of the Code of Practice for Official Statistics.
30. The DCLG will only make this address information available outside the DCLG team in the following circumstances:
- Where another organisation formally contracted to the DCLG draws a longitudinal sample of addresses to revisit in either one subsequent wave of the EHS or in a follow-up exercise to collect, for example, more detailed information of particular policy interest. Associated survey data will not be made available unless specifically needed for bona fide analytical purposes. All such contractors would be formally bound under the terms of their contract to non-disclosure of any information relating to this survey.
 - Where it has been agreed that the consent of respondents to be re-contacted by DCLG, DECC or their contractors will be sought as part of the initial English Housing Survey interview, and where only those respondents who give their consent will be re-contacted directly by DCLG (or DECC).
 - The above will apply except in the extremely limited circumstance where the purpose of the follow up contact is to establish a sample of dwellings (rather than of the occupants) in which case the prior permission of the current occupants will not be required.
 - Where another Government Department or their appointed agent wish to undertake a follow-up survey to the EHS e.g. to collect more detailed energy related data. Wherever possible DCLG will seek to ensure no single organisation holds both the address file and the associated data records. Where another Department or agency needs access to both the address identifiers and the associated data records then DCLG will ensure that the other government department and their contractor sign an Access Agreement. As joint Data Controllers, DECC will hold both the address file and associated data records, the terms of this data sharing are covered in the aforementioned Memorandum of Understanding In Relation to Data Sharing.
 - Any re-contacts with householders will only be made after NatCen Social Research or DCLG have obtained active consent for their

address and associated data records to be passed to the Government Department concerned.

- Where another public sector agency needs to match address information against administrative records in order to establish additional information about the particular address for the purposes of enhanced internal statistical processing/analyses only e.g. whether a dwelling has received a housing-related grant; ownership history etc. In these circumstances the data will remain non-disclosive because only the address details will be provided to the external body and not any associated data records.
 - At no time will either the address file and associated data files be made available to any organisation – public or private - for the purpose of interrogation of data relating to individuals or individual properties.
31. In delivering outputs to the DCLG, NatCen Social Research will indicate where consent has been obtained from households to be re-contacted.
 32. CADS Housing Surveys require details of the selected sample addresses prior to the start of fieldwork. This information is provided in a file containing addresses (no names are provided) plus some geographical identifiers, and is sent via a secure FTP server. The information is used by CADS Housing Surveys to plan work for their surveyors.
 33. During the course of the survey fieldwork NatCen Social Research upload regular encrypted data extracts to the secure CADS Housing Surveys website. Data provided for the full sample is restricted to information required to monitor fieldwork progress. Alongside this, address and contact information is provided for households that agree to take part in a Physical Survey. CADS Housing Surveys are not provided with access to the full interview data.
 34. CADS Housing Surveys subsequently provide NatCen Social Research with general information on the progress of the Physical Survey. Responsibility for final delivery of anonymised data files from completed physical surveys to the DCLG rests with BRE. Prior to delivery to DCLG, BRE provide selected anonymised files to NatCen Social Research for checking purposes each year to ensure interview and physical data are consistent.

Private landlord address details

35. As part of these arrangements the NatCen Social Research will seek to collect contact details for the landlords/letting agents of respondents who occupy privately rented accommodation. Respondents are

advised during the interview how this information will be used. Some of these addresses may be used by the DCLG's appointed contractors to generate a sample for a follow-up Private Landlord Survey, should the decision be taken to commission such a survey.

36. The DCLG require delivery of the complete list of contact addresses. This information will be delivered and handled as for the main address file, and as detailed above.
37. Where the landlords/agents have taken part or been contacted as part of the Private Landlord Survey their consent will be sought to be re-contacted by DCLG or their contractors for further surveys. Where this consent is forthcoming DCLG or their appointed contractors may re-contact these landlords/agents for any follow-up study.
38. Where no contact has previously been made with landlords/agents, DCLG or their contractors may make use of these addresses to contact landlords/agents in order to seek their participation in a follow-up study.
39. In delivering the landlord contact details NatCen Social Research will undertake to provide an indication of whether a landlord/agent has been contacted and if so whether consent to re-contact has been secured.

Photographs of properties

40. As part of the EHS physical survey, surveyors are instructed, with the occupants' verbal agreement, to take photographs of the outside sampled property. Respondents are advised about this arrangement within the survey information leaflet.
41. The DCLG and its contractors may make use of the photographs for query resolution purposes and for illustrative purposes in reporting. If potentially disclosive photos are to be included in reports we will seek prior permission from the respondent. Photographs will not be released to external users either independently or alongside other data sets.

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