POLICY FOR EXTERNAL RESEARCH REQUESTS TO THE SALVATION ARMY NEW ZEALAND, FIJI, TONGA AND SAMOA

Introduction

The mission of The Salvation Army (TSA) New Zealand including Fiji, Tonga, and the Samoa Territory is:

- Caring for people
- Transforming lives
- Reforming society.

TSA has data relating to Māori, Pacific peoples and other ethnicities, poverty, children, youth and family, gender, housing, work and income, addiction, alcohol and drug use, gambling, self-development and financial literacy, crime, and punishment.

Data is disseminated in various forms, including descriptive reports, fact sheets, data tables and datasets transmitted electronically. Data is analysed and used to develop reports for the purposes of influencing social and political policy, certain public awareness and producing submissions to government. Data is also provided to government to fulfil contractual obligations.

This Policy covers sets of data held by TSA and access to staff and clients. Where it is the custodian of data, TSA aims to provide access to datasets while ensuring responsible use to protect individual information. Allowing managed access to datasets is regarded as an important way of increasing the benefit gained from the data collected. Where possible, TSA aims to support researchers in undertaking research by facilitating access to staff and/or clients (eg, as research subjects or subject matter experts) or resource (eg, information and data). TSA datasets are potentially available for statistical purposes to public good researchers working within academic institutions, government agencies and the wider sector, subject to certain conditions.

Good information management, statistical practice and our ethical obligations to individuals require that information collected through TSA services, particularly personal information, is collected through informed consent. People who provide data to TSA understand about the future use of the data and whether it will be shared with others.

TSA must balance the benefits of data access with its obligations to hold data securely and to protect the confidentiality of information concerning individuals. Failing to protect personally identifiable information potentially reduces public trust in TSA services.

In the context of New Zealand, this Policy gives effect to the Treaty of Waitangi through a foundation of ethical principles from which the Policy has been developed (see below). The

Policy encourages researchers to regard tikanga Māori values to guide action appropriate to their specific research context.[1]

In the context of Fiji, Tonga, and Samoa, the ownership, cultural practices and access to Pacific peoples must be respected. In this Policy, Pacific peoples is a broad category encompassing Fiji, Tonga and Samoa, communities who are linguistically, culturally and geographically distinct from each other.[2] This Policy has been developed to encourage respect of Pacific peoples when TSA provides access to data and resources for external researchers.

This document outlines TSA's Policy for providing access to its data and resources including relevant legislation, the protocols governing access and the requirement for external researchers to enter into an Agreement. This Policy applies to all external researchers who request access to TSA data, resources or privileged information. It does not apply to journalists.

Background information

Definitions
For the purpose of this Policy, the following definitions apply:

Data
Data refers to a collection of information. Data can include recorded activity associated with any research project, it includes quantitative (eg, spreadsheets and graphs) and qualitative (e.g. interviews, observations, surveys, reports and fieldnotes).

Datasets
In this document, sets of data are also referred to as datasets.

Individual information
Individual information refers to information about a person or organisation.

Privileged information
Privileged Information has the same meaning as set out in TSA Research Agreement and includes any TSA information made available pursuant to this Policy and the Research Agreement for research purposes.

Privacy, confidentiality and security
These terms are regularly used interchangeably. They are adapted from the Royal Society of New Zealand Code of Professional Standards and Ethics, Technology and the Humanities.[3]

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[1] As set out in *Te Ara Tika Guidelines for Maori Research Ethics*.
[2] As set out in The Health Research Council of New Zealand *Pacific Health Research Guidelines* (2014). TSA accepts that Fiji, Tonga and the Samoa parts of the Territory also share similarities.
[3] https://www.royalsociety.org.nz/who-we-are/our-rules-and-codes/code-of-professional-standards-and-ethics/royal-society-of-new-zealand-code-of-professional-standards-and-ethics-in-science-technology-and-the-humanities/#165

1. Privacy refers to the ability of a person to control the availability of information about themselves.

2. Confidentiality refers to the protection of individuals' and organisations' information and ensuring that the information is not made available or disclosed to unauthorised individuals or entities.

3. Security refers to how a researcher and organisation stores and controls access to the data it holds.

Inappropriate disclosure

Inappropriate disclosure is any data or private information that is released outside the parameters of this Policy such as the public release (accidental or otherwise) of confidential information about an individual, groups or services that are part of TSA. Privacy principles, confidentiality and security methods are applied to datasets available for research to reduce the risk of inappropriate disclosure.

External researchers

External researchers include the principal researcher and members of the research team.

1. The principal researcher takes overall responsibility for the process of accessing data and ensuring that all members of the research team meet terms and conditions for access to data.

2. The research team includes the principal researcher and all co-investigators, including all collaborators, researchers, staff and students who are working on the project with the principal researcher.

External researchers include all researchers who request access to TSA data. An employee of TSA, who collaborates to conduct research with an external agency, including undertaking research as a student at a university, or with any person external to the organisation, is an External Researcher. The Research and Evaluation Analyst, in consultation with the Director of TSA Social Policy and Parliamentary Unit, may declare any researcher not subject to this Policy. This may occur when work is a collaboration directed by TSA with another agency, or other form of relationship that is taken into consideration.

Datasets available for research

Datasets available for external research purposes have been modified to protect individual information without affecting the overall integrity of the data. Subject to certain terms and conditions, these datasets are available to appropriately approved external researchers for use outside TSA.

Metadata

Metadata is a synthesis of data presented in articles and reports.

Relevant Legislation and Ethics Guidelines

Several pieces of legislation and guidelines are relevant to accessing individual information, however these cannot be relied on without reference to the full documents, which should be consulted by researchers as necessary.

Statistics Act 1975

The Statistics Act guides the work of agencies that produce official statistics and sets out obligations on Statistics New Zealand to protect the confidentiality of information provided by persons and businesses. While other agencies providing access to their datasets are not subject to this part of the Act, unless it has been collected jointly with Statistics New Zealand, the Act provides an example of good practice regarding security and confidentiality of information. The five safes framework stipulates 'five safes' conditions which are to be met by researchers before access is provided to integrated data.

1. **Safe people—**researchers are vetted and must commit to use data safely before they can access the data.

2. **Safe Projects**—to gain access to integrated data, researchers must have a project they can demonstrate is in the public interest.

3. **Safe settings**—a range of privacy and security arrangements keep data safe.

4. **Safe data**—identity is protected. Data has had identifying information removed, and researchers only get access to the data they need

5. **Safe output**—all information is checked to ensure it does not contain any identifying results.

TSA Policy and TSA Researcher Agreement give effect to the five safes conditions (see below).

Privacy Act 2020

The Privacy Act is designed to promote and protect individual privacy. It establishes principles with respect to data collection, use and disclosure of information relating to individuals. While there are exceptions that permit use for statistical or research purposes, it is good practice to adhere to the principles where possible.

Code of Professional Standards and Ethics

The Royal Society of New Zealand Code of Professional Standards and Ethics is compulsory for Society members and a voluntary code for all other persons involved in science, technology and the humanities in New Zealand. It can be found at:
http://www.royalsociety.org.nz/organisation/about/code/.

Operational Standard for Ethics Committees

The Operational Standard for Ethics Committees (Ministry of Health, 2006) provides guidance on principles that should be considered when reviewing research proposals and sets out consistent operational and administrative procedures common to all ethics committees. The TSA Research Agreement requires external researchers to have their research approved by an accredited institutional ethics committee or reviewed by a recognised human ethics body.

Principles of Access to Resources, Data and Confidential Information

TSA Policy for External Researchers' Access to Resources, Data and Confidential information consists of an overall principle, and seven key principles relating to data, purpose, researchers, quality, confidentiality, security, review (and modification)`.

Overall Principle—Access to data and resources for research

TSA will make available the best possible quality data and facilitate access to resources for research:

- In as much detail as is necessary and possible

- As widely as practicable

- As soon as possible

- As conveniently as is reasonable, having regard to the impact on the activities of the TSA while ensuring all legislative and ethical obligations governing access to, and safekeeping of, its services and individual information is followed.

Principle 1—Data and resources

TSA will make almost anything available for research.

1.1 Any data of suitable quality that is owned (or managed) by TSA is potentially eligible for research use.

1.2 The process for making decisions on access to TSA data or access to TSA resources will be transparent.

1.3 Datasets will be produced in accordance with Principle 4 (Quality) and Principle 5 (Confidentiality).

1.4 Access to data and TSA resources are subject to the level of demand, availability of resources and confidentiality risk.

1.5 Where TSA does not have the authority to provide access to data, access is subject to the agreement of the data owner, including any additional terms, conditions and processes specified by the data owner.

1.6 No ownership of data is conferred on researchers.

Principle 2—Purpose

Research must be for the public good.

    2.1 Research must not be inconsistent with the purposes for which the data were collected.

    2.2 Research must be for public good purposes, with value and benefits for New Zealand, Fiji, Tonga, and Samoa Territory. Access to resources or data is unlikely to be permitted where people or organisations stand to gain commercially.

    2.3 The value of using TSA resources or data rather than other sources of information, or the use of other resources must be shown.

    2.4 Research must be valid, based on scientifically sound methodology, and satisfy any appropriate research ethics requirements.

    2.5 Research results must be made publicly available. TSA must be informed prior to the dissemination of results, such as publications and presentations, to be aware, in advance, of potential public interest.

    2.6 Researchers are expected to commit to undertaking research and disseminating results in a timely manner.

Principle 3—Engagement with researchers

We want to engage with researchers and their organisations.

    3.1 Researchers proposing research consistent with Principle 2 (Purpose) are eligible to apply for access to TSA data and resources, subject to the following criteria:

- They are connected to a recognised organisation.

- They have a proven history of public good research or are supervised by a person with a proven history of public good research.

- Where necessary, the research team includes a researcher (statistician/analyst) with recognised skills in analysing data.

- A student cannot be the principal researcher.

    3.2 Access to data being offered by this Policy is granted as a privilege not a right. In collecting these types of data TSA has an obligation to individuals to protect their information. All researchers must agree to accept these obligations by adhering to terms and conditions of access and relevant legislation and protocols as set out in this Policy and the Research Agreement.

Principle 4—Quality

Researchers are expected to produce good quality outputs that are subject to acceptable quality assurance processes.

Quality of datasets

4.1 Datasets provided to researchers will be of the best possible quality and contain as much detail as possible, notwithstanding data integrity and the need to safeguard privacy and individual information.

4.2 Datasets will be supported by necessary metadata to allow appropriate research.

Quality of outputs

4.3 Researchers are expected to produce good quality outputs that are subject to acceptable quality assurance processes.

4.4 Researchers must follow any quality rules and statistical obligations stipulated by TSA and/or by the data owner.

Principle 5—Confidentiality
The confidentiality of individual information will be maintained.

5.1 The confidentiality of individual information will be maintained by TSA by modifying datasets to reduce inappropriate disclosure risk without affecting the integrity of the data. For external research requests, details such as names, dates of birth and addresses will be removed by TSA that are likely to lead to spontaneous recognition and identity of an individual.

5.2 Datasets will be modified so that the identification of individual information is unlikely without a disproportionate amount of time, effort and expertise on behalf of an outside party who has a disclosure to the data.

5.3 Researchers must apply the Privacy Act 2020 principles and any confidentiality rules stipulated by TSA and/or by the data owner, before outputs are released.

5.4 In addition, researchers must ensure that outputs are presented in such a way that individual information is safeguarded should dataset modification and confidentiality rules be insufficient protection.

5.5 Data collected and produced by the research and shared with other approved researchers must be done with the explicit consent of all participants.

5.6 Research involving TSA staff and/or clients must not commence until after it has been approved by the TSA Research Evaluation Analyst and an appropriate ethics committee. Research must also adhere to a Code of Ethics or Ethics Policy covering research participants developed by their research institutions.

5.7 Research conducted in Fiji, Tonga and Samoa conforms to the same ethical standards as those pertaining to New Zealand, while endeavouring to follow local ethical requirements and codes which are compatible with New Zealand.

Principle 6—Storage, security and disposal of data
Researchers will maintain the security of individual information by complying with relevant terms and conditions.

Despite steps taken to ensure effective confidentiality of data, it is important to also protect the security of datasets if the dataset modification is insufficient, and to prevent public concerns or perceptions about how TSA and individual information is being used.

6.1 Researchers will maintain the security of TSA and individual information by complying with relevant terms and conditions in the TSA Research Agreement regarding access, use and storage.

6.2 If researchers belong to institutions, they should store data on secure networks of their institutions.

6.3 All data should be password protected. The security of data should be always maintained, this includes the transfer of data on a flash drive and the disposal of information and datasets.

Principle 7—Review of the research
To ensure research meets the intent of this policy and its principles, TSA may periodically undertake an independent audit of some external research.

7.1 This policy and principle will be updated as required, to ensure it remains relevant and workable for both TSA and researchers.

7.2 TSA will periodically undertake an audit of external research projects.

Requirement to enter into a Research Agreement

1. The principal researcher or organisation responsible for the research team must enter into a TSA Research Agreement, which sets out specific terms and conditions with which the researcher(s) must comply. The TSA may also require, before granting research approval and entering into a Research Agreement, that members of the research team undergo vetting checks. Individual researchers failing the vetting standard may only be granted access at the discretion of the Research and Evaluation Analyst in consultation with a member of the TSA Executive.

2. The principal researcher and all members of the research team must sign the TSA Research Agreement to be granted status as authorised researchers. The principal researcher must send a copy of the signed TSA Research Agreement, retain the originals on file and make them available for audit, as required.

3. The research team will be responsible for all research undertaken and ensuring the quality, confidentiality, privacy and security of all information and data associated with the research project. No support will be provided by TSA staff unless they are formal collaborators on a project, apart from that necessary to ensure that sufficient information is available to allow the proposed research to be undertaken.

Dataset production

TSA will follow a standard process for creating data, as follows:

1. Ensure the data will have no personally identifiable contact details, such as name and address, or other identifying information such as a date of birth, likely to lead to recognition of a person or an individual record.

2. Undertake a preliminary assessment of inappropriate disclosure risks and the ability to adequately protect data. This includes considering the extent to which it is possible to protect the dataset whilst retaining a dataset of value. Potential difficulties in protecting the dataset might arise because of the sensitivity and/or identifiability of the data or because of publicly available data that could compromise the ability to sufficiently protect the dataset.

3. Produce the data and associated risk-assessed documentation.

   - Aim to standardise data production as much as possible to reduce the time and resources required to create it and to eliminate as far as is possible the risk of different data inadvertently compromising confidentiality protection.

   - Identify any rules that researchers will be required to apply to ensure the quality and confidentiality of outputs.

   - Costs to produce the data may be recovered from the researcher.