

**Policy on access to
Growing Up in Ireland (GUI)/National Longitudinal Study of Children in Ireland
(NLSCI) Research Microdata Files (RMFs)
relating to data collected under the Statistics Act, 1993**

1. This policy relates solely to GUI/NLSCI RMFs;
2. The legal framework under which access to the RMF(s) is granted is the Statistics Act, 1993;
3. Access to RMF(s) can only be granted by the Director General of the Central Statistics Office (CSO). Appointments made under Section 20(c) of the Statistics Act are signed personally by the Director General of the CSO. **An appointment as an Officer of Statistics is personal and non-transferable;**
4. Only those persons appointed as Officers of Statistics can access RMF(s);
5. An appointment as an Officer of Statistics is time bound and relates to a specified body of work;
6. The confidentiality of data collected under the Statistics Act, 1993 is guaranteed in law. It should be noted in this regard that the Statistics Act, 1993 does not make a distinction between data on the basis of sensitivity (e.g. historical data periods) and data based on the type of information collected;
7. Access to RMF(s) is granted solely for statistical purposes;
8. Requests for access to RMF(s) must be made using the GUI/NLSCI RMF application form;
9. The application for access will be assessed vis-à-vis the GUI/NLSCI RMF(s) assessment criteria. However notwithstanding the specified criteria the ultimate discretion regarding the provision of access to RMF(s) rests with the Director General of the CSO;
10. Where it is practicable and feasible, data requests will be met via the provision of aggregate data or Anonymised Microdata File (AMF) as distinct from the provision of a RMF;
11. In general only one version of an RMF will be created containing the maximum level of detail that can/will be provided for that particular survey instance.
12. Discussions/analysis relating to individual returns, or information (aggregate tables, descriptive text etc.) which could allow individual returns to be identified must be restricted to persons appointed as Officers of Statistics.
13. Access to RMF(s) for students will be restricted to those undertaking at a minimum post-graduate work and in all such cases their supervisor(s) must also apply and be appointed an Officer of Statistics before access can be granted;
14. In general, requests for the provision of RMF(s) to locations outside of the Republic of Ireland will not be facilitated;
15. Access will only be granted once the CSO is satisfied that the confidentiality and integrity of the data can be maintained. This will include an analysis of the detailed specifications of the 'off-site' IT security procedures and infrastructure;

16. It should be noted that:

- a) External devices supporting portable media (e.g. USB sticks, disc drives) must be disabled on the machines used to access the RMFs; and
- b) The facility to print can remain however we re-emphasise that no hard copy record should be made or kept of individual records.
- c) Internet and email access must be blocked on all PC's being used by researchers accessing or analysing RMF material;
- d) The CSO must be satisfied that the IT network, protocols and security provisions are in place to protect the network to ensure only those person(s) appointed as Officer(s) of Statistics can access the specified area of the network.
- e) Data must be stored on a permanent physically secured device. This device must be encrypted and have all methods of data transfer disabled, i.e., Wi-Fi, Ethernet, Firewire, Thunderbolt and Bluetooth. USB ports must not be usable for mass storage devices. Access must only be via user-specific accounts and logon credentials must not be shared or otherwise communicated.
- f) Back-ups of RMFs are not permitted.
- g) All data processing must be undertaken within the specified secure location identified in the standard agreement.
- h) A meeting with the CSO's Data office staff will be required. The purpose of this meeting is to provide a comprehensive reinforcement of the RMF agreement conditions

17. The CSO reserve the right to inspect the procedures in place, at the 'off-site' location without prior notification, to ensure that the appropriate procedures are in place to protect the confidentiality and integrity of the data;

18. RMF(s) will not contain any identifiable information (e.g. name (person or entity) detailed address, PPSN) to avoid the direct identification of an individual respondent;

19. Persons appointed as Officers of Statistics must not attempt to match/link (at a micro level) the RMF(s) to any other data source;

20. In general, subject to adherence with the Statistics Act, 1993 and the associated policy and protocols for accessing RMFs, access will only be granted to:

- a) Individuals who, either in their own right or as employees of a recognised organisation/institution that has a proven track record in data analysis or research; and
- b) individuals or individuals working in organisations/institutions that can give a clear rationale, acceptable to the Director General of the CSO for access being granted;

21. Responsibility for ensuring the confidentiality of all outputs (reports, publications, presentations, articles etc.) based on the research carried out on the RMF(s) (or using any element of the RMF(s)) rests with the individual(s) appointed as an Officer(s) of Statistics;

22. All completed outputs (reports, publications, presentations, articles, dissertations etc.) from the research project should be provided to the DCYA's NLSCI Project Office.
23. The CSO reserves the right to put outputs from the research into the public domain if the researcher (individual appointed as an Officer of Statistics) has not already done so;
24. The RMF(s), regardless of any amendments made during analysis by the researcher(s) will at all times continue to be the property of the Minister for Children and Youth Affairs;
25. The analysis/research undertaken must comply or be consistent with the specific purpose for which the access was granted;
26. 'Growing Up in Ireland' should be acknowledged as the data source in all outputs (i.e. in reports and analyses). This acknowledgement should also note that:
 - a) 'Growing Up in Ireland' has been funded by the Government of Ireland through the Department of Children and Youth Affairs (DCYA) in association with the Central Statistics Office (CSO) and the Department of Social Protection (DSP).
 - b) These data have been collected in accordance with the Statistics Act, 1993.
 - c) The DCYA, CSO and DSP takes no responsibility for the views expressed or the outputs generated from the research undertaken on the RMF(s). In presenting results/analysis etc from the research project this point should always be highlighted (e.g. in footnotes to aggregate tables, analysis based on derived variables).
 - d) The project has been designed and implemented by the joint ESRI-TCD Growing Up in Ireland Study Team. © Department of Children and Youth Affairs.
27. The access must be lawful;
28. The researcher may not copy the RMF(s) (or subsets thereof), or any disclosive analysis/aggregates based on the RMF(s), to any medium or portable device (e.g. print, disk, CD, memory stick);
29. The RMF(s) (or subsets thereof) must not be copied or moved from the agreed location within the organisations IT infrastructure without the prior approval of the CSO;
30. On completion of the research or termination of the conditions relating to the appointment of the individual(s) as an Officer of Statistics all versions of the RMF(s) (or subsets thereof) must be:
 - a) Deleted/destroyed by the researcher; or
 - b) Returned to the CSO. The RMF(s) will be stored in situations where amendments have been made to the RMF(s) by the researcher appointed as an Officer of Statistics, and who may want to access the amended data file at some point in the future (which will only be possible under the Statistics Act, 1993).

31. Where the RMF(s) is to be deleted/destroyed the person(s) appointed as an Officer of Statistics must certify, in writing, that this task has been completed (Appendix 2 of the RMF(s) Agreement refers);
32. The RMF(s) will only be provided once the researcher(s) has
 - a) Been appointed an Officer of Statistics; and
 - b) Signed the Declaration of Secrecy; and
 - c) Formally agreed to abide by the RMF(s) Agreement
 - d) Had a meeting with staff from the CSO's Data Office, who will provide a comprehensive reinforcement of the RMF agreement conditions.
33. The file will be transmitted via a secure transmission mechanism and will always be encrypted regardless of the transfer mechanism;
34. It should be noted that RMF(s) will not contain any identifiable information to avoid the direct identification of an individual respondent (person or entity). In that context the CSO consider the following transmission mechanisms to be secure:
 - a) Transmission of encrypted data via a dedicated site-to-site secure pipe;
 - b) Encrypted CD delivered face-to-face (by hand);
 - c) Transmission of encrypted CD via registered post;
 - d) Transmission of encrypted CD via a recognised courier service;
35. Any breach of the Statistics Act, 1993 is an offence, which may be subject to prosecution;
36. The CSO may undertake an audit (unannounced) of the access granted to ensure compliance with the Statistics Act, 1993 and the policy and protocols attached to the assignment;
37. Failure to comply with the protocols etc. specified in the RMF(s) Agreement may have implications, for the individual and the organisation/institute for whom they work, and for future access to RMF(s). In addition, failure to comply with the protocols etc. will lead to a termination of the appointment as an Officer of Statistics and all data provided must be destroyed/deleted or returned to the CSO;
38. The CSO will maintain a detailed register of individuals appointed as Officers of Statistics for the purpose of accessing RMFs.
39. By signing the RMF Application form and Agreement, the Applicant agrees to the inclusion of their name along with details of their research project(s), including details of any subsequent outputs, in a publicly available GUI/NLSCI RMF Register of Use data base.