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To: David Sterling, Head of the NICS

27 May 2020

SUPPLY OF COMMERCIALLY SENSITIVE DATA FROM ONS FOR COVID-19 POLICY DEVELOPMENT – DATA SHARING ARRANGEMENTS

Dear David,

As you will be aware, NISRA have recently negotiated the support of the ONS Data Science Campus (DSC) regarding the production of NI level analysis that will help to shape COVID-19 policy and decision making in NI. The data will inform decisions around the COVID-19 containment strategy and the relaxation of restrictions (to include the potential need for stricter measures to be re-introduced if new guidelines fail to be adhered to and the R rate increases). This data will also form part of any NI participation in the Joint Biosecurity Centre (JBC).

There are two main datasets used to produce this analysis:
- **Project Venus (see Annex 1 for further details)**. This is weekly consumer spending data from card payments within a proprietary banking processing system (including face-to-face transactions and online, postal and phone transactions).
- **Project Mars (see Annex 2 for further details)**. This is weekly Telecoms data used to assess the movement of citizens and levels of social interaction within the population.

The main policy applications of the **Project Venus** data have been identified as follows:
- Confirm whether more citizens are shopping on-line or in person at local stores.
- If the latter, how far are citizens travelling to these stores
- Confirm the kind of goods that are being purchased,
- Confirm whether spending trends going up or down
- Confirm how household expenditure has changed since the advent of COVID-19
- Confirm what retail sectors are being impacted negatively and to what degree
- Assess what is happening on the ground in terms of the impacts on products, sectors, supply chains, prices and how supply and demand might be affecting these
- Correlate behaviours and consumer spending trends to establish the success of the policy response and the need for additional/ different measures.

Given the insight that this analysis will offer in terms of various economic, income and social disadvantage indicators, the main users of this data within the NICS are anticipated to be the Department for the Economy, the Executive Office, the Department of Finance and the Department for Communities.

The main applications of the **Project Mars** Telecoms data have been identified as follows:
- establish compliance with current and future social distancing and travel restrictions.
- assess how many people are leaving their homes, how frequently and how far they are travelling.
- assess how many people are make cross-border trips and how frequently
- determine how trends with regard to each of the above points varies by geographical area (LGD)
- Correlate behaviours with the social distance and travel restrictions in place for the same time period to establish the success of the policy response and the need for additional/ different measures.

Given the insight that this analysis will offer in terms of adherence to existing and future social distancing policies, the main users of this data within the NICS are anticipated to be the Executive Office, the Department for Infrastructure and the Department of Health including the Chief Scientific Officer.

The continued supply of this data is dependent on strict adherence to agreed data sharing measures. Both datasets are commercially sensitive and have only been shared with the DSC on a legally binding basis. The supplier of the banking data in particular has insisted that their details be kept confidential and secure at all times.

The DSC have therefore prepared a data sharing agreement (DSA) that I or one of my senior staff must sign on behalf of the NICS. The signatory of the DSA must ensure that all those who are granted access to the analysis:
- Use the insights or analysis only for the specified purpose: to supporting the UK Government and Devolved Administrations' COVID-19 response
- Not attempt to identify the name of supplier of the aggregate data used in the analysis, or purport to make any such identification.
- Ensure the secure storage of the analysis and that all communications are labelled as, and treated as, OFFICIAL SENSITIVE: COMMERCIALLY SENSITIVE
- Ensure access to the analysis is limited to the minimum number of individuals required to achieve the purpose.
- Make all reasonable efforts to destroy all copies (digital and physical) of the analysis (or insights derived from it) once the information is no longer needed.
- Report to ONS immediately any breach or suspected breach of these conditions
- Secure advance written confirmation from anyone requesting access to the analysis that they understand and agree to the terms in this agreement.
- Maintain an accurate record of all those who have access to the analysis (to include their proposed use of the data).
- If there is a requirement to share the data and/or analysis with external consultants, DSC require advance confirmation as to whether the consultants are under contract and are

legally bound by confidentiality clauses. A decision will then be taken as to whether permission can be granted.

DSC have confirmed that whilst it is not necessary to get written agreement from Ministers, any Ministers who are granted access to this analysis or are briefed on its contents must be made aware that the analysis, the name of supplier of the aggregate data and any insights derived from the analysis must be protected, and that the information should be labelled and treated as: OFFICIAL SENSITIVE: COMMERCIALLY SENSITIVE

This is quite a tall order in the current environment and auditing it will be difficult. However, if we want to continue to receive this data then we need to make sure that only those who need the data have access and that they all understand the commercial sensitivity. The recipients should be those informing decision making and as such I do not think it is appropriate for the data to be included in the daily sit rep given its very wide circulation.

In order to ensure the continued weekly supply of the aforementioned data and analysis I would be grateful if you could please confirm the officials within each department who you feel should be the main recipients of this highly sensitive information, taking into consideration the need for that list to be as restricted as possible. We can then get the necessary paperwork in place.

Please do not hesitate to contact me if you would like to discuss further.

Yours sincerely,

Personal Data

SIOBHAN CAREY, CBE
Registrar General for Northern Ireland & Chief Executive NISRA

c.c: Sue Gray DoF,
        Anthony Harbison NIHub
        Name Redacted NISRA
        Dr Tracy Power NISRA

Annex 1:

Summary of PROJECT VENUS Weekly Consumer Spending Data (Card payments both face-to-face transactions and online, postal and phone transactions)

- All UK transactions, value and number of transactions
- All UK transactions, card-present, value and number of transactions
- All UK transactions, card not present, value and number of transactions
- All UK transactions by card issuer region (domestic, foreign), value and number of transactions
- All UK transactions by UK regions and countries, value and number of transactions
- All UK transactions by UK regions and countries by card issuer region, value and number of transactions
- All UK transactions by merchant category, value and number of transactions
- All UK transactions by merchant category, card present, value and number of transactions
- All UK transactions by merchant category, card not present, value and number of transactions
- All UK transactions by merchant category by card issuer region, value and number of transactions

Annex 1a: Copy of most recent Project Venus analysis

- See attached slides.

Annex 2:

Summary of PROJECT MARS Telecoms Data (used to assess movement of citizens and levels of social interaction within the population)

- % of aduts (18+) who interact with the mobile network by no. of sectors (i.e. locations) during each day
- Percentage Point change relative to the 7 days prior in the % of people who interact with the mobile network from 1-2 sectors/ locations during each day by age group
- Percentage Point change relative to the 7 days prior in the % of people who interact with the mobile network from 1-2 sectors/ locations during each day by age group
- Percentage Point change since 23/3/20 relative to the 7 days prior in the % of people who interact with the mobile network from 1-2 sectors/ locations during each day by age group
- Footfall at key locations such as transport hubs, shopping centres, beauty spots etc. in NI (analysis to be made available in coming weeks)
- Numbers of WiFi connections at supermarkets, train stations, retail units, hotels, cinemas, hotels and motorway services since 12th March 2020
- % of all users using their mobile phone broken down by whether they left their local area once
- % of all users using their mobile phone broken down by whether they left their local area more than once
- % of all users using their mobile phone and NOT leaving local area by gender
- % of all users using their mobile phone each day and leaving local area more than once by gender
- % of all users using their mobile phone and NOT leaving local area by age
- % of all users using their mobile phone each day and leaving local area more than once by age
- % of People Travelling twice of more per day by Local Authority
- Change since 1/4/20 of the % of People Travelling twice of more per day by Local Authority
- Top ten groups with highest percentages of people making two trips or more per day (combined summary analysis by Local Authority Distruct, Region, Gender, Age Number of Trips)
- Top ten groups with lowest percentages of people making two trips or more per day (combined summary analysis by Local Authority Distruct, Region, Gender, Age Number of Trips)
- Purpose of Trips (work, home, other) by hour of day
- Number of trips made on the 12/2/20 compared to 15/4/20 by income group and whether the trip is incoming or outgoing
- All UK transactions by merchant category by UK regions and countries, value and number of transactions

Annex 2a: Copy of most recent Project Mars analysis (next update will include more detailed NI analysis as per points listed above)

- See attached slides