MSD Survey Standard

Approved by:	Privacy Security Oversight Board (PSOB)
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Standard Owner:	General Manager Information

Introduction

The Ministry of Social Development ("the Ministry") often surveys clients, staff, stakeholders, and the public to help inform insights into our performance or areas for improvement around projects, programmes and initiatives being undertaken.

Surveys may be undertaken by the Ministry alone, in partnership with another organisation, or by a third party creating and conducting surveys on the Ministry's behalf.

This Standard is intended to provide guidance to Business Units who may undertake or facilitate surveys on the Ministry's behalf, and to set out the basic requirements that must be met.

1 Standard

1.1 Applicability

1.1.1 This Standard **must** be applied by any Business Unit that conducts or facilitates a survey.

1.1.2 Surveys **must** only collect information classified at 'Unclassified' and 'In-Confidence', in accordance with MSD's Information Classification Standard.

1.1.3 The Information Group **must** be consulted immediately if, for any reason, a survey relates to information classified above 'In-Confidence' (i.e., 'Sensitive' or 'Restricted').

1.2 Definitions

1.2.1 "Survey" means research questions on one or more topics, to which people are invited to voluntarily respond to for the purposes of gaining insights.

1.2.2 "Personal information" is any information about a specific individual. The information does not need to name the individual, if they are identifiable in other ways, like through their home address (it does not include a company, or a Trust, or an NGO).

1.2.3 "Collection" includes collection by phone, mail, email, the internet, in person, on social media, or through a specialised survey tool.

1.2.4 "Bias" is an inclination or prejudice for or against one person or group, especially in a way that could be considered to be unfair.

1.2.5 "Discrimination" is an unjust or prejudicial treatment of different categories of people, especially on the grounds of race, age, sex, or disability.

1.2.6 "Responses" to questions may be yes or no, on a scale, multi-choice, or free text.

1.2.7 "Conducting" a survey includes (but is not limited to):

- creating survey questions
- choosing participants
- distributing the survey
- collecting responses
- storing responses
- analysing responses
- sharing responses or analysis of responses with others (whether inside the Ministry or externally)
- disposing of responses.

2 Meeting the Standard

2.1 Demonstrating compliance

2.1.1 Compliance with this Standard **must** be clearly documented and agreed by the Control Owner or relevant Manager responsible for the Survey.

2.2 Purpose and collection

2.2.1 The Business Unit **must** document a clear purpose for the survey and the rationale for each survey question and associated collection of information from participants.

2.2.2 The Business Unit **must** engage the Information Group to review survey questions **if** any personal information is likely to be collected.

2.2.3 Prior to conducting any survey participants **must** have the purpose for collection and use of information explained to them.

2.3 Transparency and consent

2.3.1 Participation in all surveys **must** be voluntary, and it **must** be clear that participation is voluntary.

2.3.2 There **must** be clear, relevant, and accessible information made available for all participants in advance of their consenting to participate.

2.3.3 At a minimum, the information **must** make clear:

- what the purpose of the survey is
- that participation is voluntary and that a decision not to participate will not affect a prospective participant's relationship with the Ministry
- whether responses will be kept anonymous or whether the participant will be identifiable
- how responses will be used by the Ministry or by others
- who will view the responses (e.g., if they are to be shared with other organisations, which organisations will view the responses)
- what will happen to the survey responses on completion of the survey (e.g., analysis, storage, destruction, etc.)
- [**if** personal information is being collected] that those individuals have the right to access and correct information collected about them; and that they are provided with appropriate MSD contact information.

2.4 Anonymising surveys

2.4.1   Where identifying an individual is not necessary, there **must** be a process in place to ensure that no personal information is collected. Surveys **must not** include free-text fields for this purpose.

2.4.2   **If** surveys need to include free-text field the Information Group **must** be consulted for guidance.

2.4.3   Where identifying an individual is not necessary, the participants of the survey **must** be advised not to enter any personal information into the survey.

2.4.4   There **must** be a documented process for removing and destroying any unexpected collection of personal or identifiable information that participants supply in response to the survey, as per the Ministry's Information Retention and Disposal Standard.

2.4.5   Where identifying an individual is necessary, but their personal information is not necessary for research and evaluation, there **must** be a process in place to ensure that the information is de-identified.

2.4.6   Where participants need to create a profile or log-in to use a survey tool, usernames and passwords **must** meet the MSD Password Standard.

2.5   Research and Evaluation responsibilities

2.5.1   Surveys with the **explicit** purpose of Research and Evaluation **must** have their survey questions reviewed by the Research and Evaluation team to reduce the risk of unintended bias or discrimination. An Ethics assessment form must be completed and sent to the Information Group.

2.5.2   Consistent with 2.4, if personal information is collected from surveys, it **must** be de-identified after relevant research and evaluation purposes are met.

2.5.3   If analysis of a survey creates or reveals data capable of identifying an individual, the Privacy team **must** immediately be contacted for advice.

2.6   Tool selection

2.6.1   The method or tool used for publishing or submitting the survey **must** be certified and accredited, with its use approved by the Ministry and the Chief Information Security Officer (CISO) and Chief Privacy Officer (CPO). The Information Group can be contacted to confirm a method or tools certification status.

2.6.2   The method or tool used **must** be appropriate for the purpose intended and be used in the way for which it has been approved. Some tools have been approved at MSD Enterprise level. See 3.2 for further details and their accompanying patterns to ensure use is consistent with Information Group expectations.

2.7   Managing bias and discrimination

2.7.1   Care **must** be taken to ensure that the end-to-end conduct of surveys does not introduce bias or discrimination at any point. Bias or discrimination may be introduced through the creation of inappropriate survey questions, the selection of participants, the distribution of surveys, access to surveys, and the analysis and implementation of survey responses.

2.7.2   If surveys have the potential to include or introduce any bias or discrimination, or it is uncertain if they will, the survey **must** be reviewed end to end by the Information Group to minimise any potential risk.

2.7.3   Where surveys produce results that are (or appear to be) biased or discriminatory, steps **must** be taken to identify and remove or mitigate the unintended bias or discrimination.

2.7.4 Accessibility options for surveys **must** be explored to ensure that those who may not be able to engage with surveys through conventional methods and tools are still able to have their responses collected.

2.8 Engaging with third parties

2.8.1 When using a third-party to deliver a survey or part of a survey, the Third-Party Assurance Standard for Information **must** be met.

2.8.2 If the third-party cannot meet the Third-Party Assurance Standard, the Information Group **must** be consulted immediately.

2.9 Retention and access to data

2.9.1 Access rights of MSD staff members (or third-party) to the information **must** be controlled to ensure that user access is controlled, and access removed when no longer required.

2.9.2 Any survey related information including participants details and responses **must** be managed in a secure manner in accordance with the Ministry Information Retention and Disposal standard, including being stored in an appropriate corporate information repository such as Objective (EDRMS).

3 References

3.1.1 Key artefacts used as inputs in the development of this Standard or that directly support the application of this Standard.

Third-party Assurance Standard

Third-party Assurance Standard – operational guidance

Information Classification Standard

Privacy Policy

Information Retention and Disposal Standard

MSD Password Standard

Research and Evaluation Team - Ethics Toolkit

3.2 Draft patterns to be approved at a later date:

3.2.1 SurveyMonkey – Attestation Document Template (A14199362)

• Recommended to be used for activities, such as Anonymous surveys, non-sensitive information.

3.2.2 Citizen Space – Attestation Document Template (A14303716)

• To be used for activities, such as Engagement and consultation with members of the public, or surveys which may or may not permit anonymous responses.