



Ms Jane Todorovich
Head of Profession, Social Research
Department of Communities and Local Government
Eland House
Bressenden Place
London
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23 August 2012

Dear Ms Todorovich,

Complaint about breach of ethical standards in DCLG social research

I am writing as an academic social researcher to make a formal complaint about the ethical standards of a piece of research conducted and published by the Department for Communities and Local Government. The report is titled 'Listening to Troubled Families' and was written by Louise Casey, Director General for the Troubled Families Team and published in July 2012.

I believe you are the individual with personal responsibility for ensuring that DCLG research meets the required ethical standards, as set out in the Government Social Research Code. I am writing to request that you investigate whether there has been a significant breach of the ethical standards in this case and, if you find that there has been, that you take appropriate action.

Report falls within the scope of the GSR's ethical standards

The Government Social Research Unit publishes guidance on ethical standards. The guidance states that: "All social research conducted for government should adhere to the principles" (GSRU, 2006: p4 - emphasis in original). The GSRU document makes it clear that individual staff conducting social research must ensure that they are aware of their ethical responsibilities (p6) and that responsibility for oversight will lie with a named individual or post (p4), usually the Head of Profession within the Department (p15).

It is clear that this report falls within the scope of this guidance. In response to an FoI request which I made, however, the Troubled Families Unit (TFU) argued that this was not the case. They stated:

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‘The report ... ‘Listening to Troubled Families’ was not research, and it clearly stated this in the Introduction. “*It must also be noted that this is not formal research and that these interviews and the information they gave us is not representative of the 120,000 families that are deemed as ‘troubled’*”

The TFU position is incorrect. First, the statement that the report is not “formal research” implies that it is therefore “informal research”, but research nonetheless. The GSRU guide does not recognise any distinction between formal and informal research. Second, regardless of what the report says about itself, it is clear objectively that it constitutes research and has been widely reported as such in the media:

1. It seeks to provide answers to *specific questions about a particular social issue*: “What kinds of problems do [troubled families] face? How did they get to be so troubled?” (p1). The aim of the report is stated as being to “inform [government] thinking and policy development” (p5). I assume that ‘government thinking’ is meant to be based on sound evidence stemming from research, and not merely individual opinion or conjecture.
2. The report pursues this aim by *gathering information using a systematic approach*, based on a recognised research method – in-depth qualitative interviews. The report provides the usual kind of details on methods, including: the criteria used to select families; the means used to identify and contact individual families; the geographic spread of the individuals; how interviews were conducted (families were “formally interviewed” - p4); and how material was collected (interviews were “recorded and transcribed” - p5).
3. This material is *analysed in a systematic fashion*. After descriptions of each case study (p6-45), a long list of cross-cutting thematic issues are identified with the discussion drawing on material from individual cases (p46-63).

Report breaches GSR’s ethical standards

Ethical standards for government social research are set out in the GSRU’s (2006) guidance. This is based around five principles and I believe the report may breach four of these.

Principle 1: Sound and appropriate methods, and interpretation of findings

It is unethical to ask participants to give up their time for a study which is poorly conceived or executed, or one where findings are distorted or misrepresented.

I believe the risk of misrepresentation arises in this case because the report does not do enough to recognise how selective and partial the picture is which it provides. To be selected for interview, families had to have been working with Family Intervention Projects and to still be in contact with those projects. The Projects themselves had to then select the families as a case suitable for interview by the person in charge of funding their work. There is enormous risk therefore that the group interviewed were highly unrepresentative of the wider population of ‘troubled families’ about which the report is concerned to draw conclusions.

Indeed, there is evidence to suggest that this is the case. The Family and Children Survey on which the Cabinet Office estimate of 117,000 multiply-deprived families was based did not find a statistically significant difference between that group and the wider population in the prevalence of families with four or more children, which is about 4 per cent. A reasonable representation of such families would therefore have included only one in a sample of sixteen, the number in Casey’s study, which is

already equivalent to over 6 per cent. In fact, the sample in this report included eight such families, a full 50 per cent; seven of the sixteen families had five or more children.

The report does make passing acknowledgement of this: “the information [interviewees] gave us is not representative of the 120,000 families that are deemed as ‘troubled’” (p5). But this falls a long way short of any kind of systematic evaluation of the extent to which it is appropriate to draw any kind of conclusion about ‘troubled families’ on the basis of these unrepresentative interviews.

Principle 2: Informed consent

This principle is designed to ensure that participants can make a free and informed decision about the risks involved in participation.

Participants should be freely able to decline and “should not in any way feel pressurised to take part in social research” (GSRU 2006, p9). Here, there is at least the risk that participants may have felt pressurised to participate. The report notes that the projects which recruited participants had a power of sanction over those participants (p4). There is no evidence that this issue was considered.

Participants should have sufficient and appropriate information on the risks of participation. The Information Commissioner has advised that, under the Data Protection Act, “there should be some active indication that consent has been given” (GSRU, p9). It is widely accepted good practice that information is provided in a written form so participants have a record they can refer to. No such information leaflet exists for this work, according to the DCLG response to my FoI request. No written records appear to have been kept of consent being obtained from participants.

Particular consideration needs to be given to issues of informed consent in the case of children and ‘vulnerable’ adults. It is clear from the reporting of case study families, that some of those interviewed should be considered ‘vulnerable’; for example, ‘Chris’ (p15) who is described as having learning difficulties and ADHD, and whose partner also has learning difficulties. There is no evidence that issues of informed consent in those cases have been properly considered or handled.

In some cases, GSR guidance states that additional consent should be collected after completion of fieldwork where very personal data will be used in the presentation of findings (p9). There is no evidence such enhanced consent was considered here although it was certainly warranted, given the way material on families was presented.

One further issue about informed consent arises because the report provides details about whole families, including children and other adults. Their personal details are being exposed but there appears to have been no consideration given to seeking consent from anyone beyond the immediate interviewee.

Principle 4: Avoiding personal harm

There was obviously a high risk that the interview process would cause participants distress as they were asked to recall painful or traumatic incidents from their past. There was also an obvious risk that tensions within families would be exacerbated or dormant conflicts would be re-opened. Interviewees are described as being “shockingly candid” (p5) and as having given “painful and distressing details of their personal histories” (p65).

To minimise the risks of personal harm arising from the interview process, it would be standard practice for the researchers to have prepared a protocol for dealing with such issues. There is no evidence that this was considered by the researcher.

Principle 5: Non-disclosure

One of the most alarming aspects of the report is the extent to which the personal details provided on the individual families make them potentially identifiable. Many of the families are large which automatically makes them much easier to identify. In addition, enormous detail is provided on family composition including number, ages and genders of children, massively increasing disclosure risks. The report only states that names have been changed, with the implication that all other details are reported accurately.

Furthermore, the risks associated with disclosure are extremely serious, given the nature of the material involved. We are given information about participants being the victims of serious sexual assaults, having drug or alcohol dependency or attempting suicide, to give just a few examples. We are given details about their experiences as children themselves and about their views of themselves as parents.

Even more worryingly, we are given very personal information about their children and about other friends and family. Those people had no choice at all about being represented in this study (see 2. above) and so an even greater duty of non-disclosure is owed to them.

Action requested

Ethical guidelines exist to minimise the risks of harm to individuals who participate in social research. They are also designed to ensure that the reputation of social research – and of the organisations which commission and use it – is not undermined.

The risk of individual families being harmed by this research and by the way it is reported already exist, and cannot now be removed. I sincerely hope no-one suffered harm or goes on to do so. My main aim in raising these concerns, however, is to protect the credibility of social research and of public policy making processes which depend upon it. No public organisation should be seen to be using research which is based on such a complete disregard for basic ethical practices. If your enquiries show that this report does indeed contravene the GSR's guidance, I would ask that the report is withdrawn, along with all statements made on the back of the analysis it presents.

I would also hope that you will take the necessary steps to minimise the risks of future lapses in ethical practice.

I look forward to hearing your response to this request.

Yours sincerely

Nick Bailey
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