

Annex A: Methodology

A.1 Research design

This research project consisted of:

- A review of the academic and grey literature, and existing government policy
- An online survey of 2,103 over-18s across the UK, carried out by Populus 21-22 August 2019, weighted to be nationally representative
- A survey and focus group with members of Money and Mental Health's Research Community with lived experience of mental health problems
- A half-day conference and two private roundtable discussions with representatives of UK financial services providers, co-hosted with the Financial Conduct Authority (FCA)
- A series of depth interviews with representatives of financial services firms.

Further details on each component of the research are provided below.

This mixed methods approach combines statistics on consumer appetite for banks and building societies to use financial data to identify potential vulnerability and offer support, with rich qualitative data about the perceived benefits and risks of this approach. Engagement with firms provided a technical perspective on the challenges of identifying potential financial difficulties in data and the complexities of offering support. This triangulation of perspectives allowed us to develop a sound understanding of the issues and arrive at innovative, pragmatic solutions.

We are grateful to all those who supported this research, both in a professional capacity and those who shared their personal experience. Special thanks to colleagues at the FCA for co-hosting and facilitating these workshops to ensure we engaged with as many firms as possible.

A.2 Literature review

Researchers completed a broad review of the existing literature around use of consumer data. This included a thorough review of relevant data protection law and government guidance, and examination of the ongoing public debates around privacy and data use, in financial services and more widely.

A.3 Populus Survey

To assess public appetite for banks and building societies to use financial data to identify potential problems and offer support, we commissioned Populus to conduct an online survey of 2,103 over-18s across the UK, weighted to be nationally representative. This survey was carried out 21-22 August 2019 and included people with and without experience of mental

health problems. Populus is a founding member of the British Polling Council and abides by its rules. See www.populus.co.uk for more details.

We asked participants “Have you ever experienced a mental health problem?” and used this variable to compare outcomes between those who have and have not experienced a mental health problem:

- 34% had ever experienced a mental health problem
- 61% had never experienced a mental health problem.

Participants were asked a series of closed questions covering:

- Appetite for banks and building societies to use data to identify potential problems
- In what circumstances people would want banks and building societies to offer help
- Concerns about data being used in this way
- Preferences for safeguards to be put in place if programmes using data to identify potential vulnerability are established

A.4 Research Community surveys

A survey was conducted with Money and Mental Health’s Research Community, a group of 5,000 volunteers with personal experience of living with a mental health problem, or of supporting someone who does. Research Community members with lived experience of mental health problems were surveyed online between 17 April and 15 May 2019. Surveys were distributed by email, and through the secure online portal to Money and Mental Health’s Research Community.

540 people with lived experience of mental health problems participated in the survey. A mix of closed and open survey questions asked participants how useful they would find it if their bank or building society could use their financial data to identify potential problems and offer support. Questions also explored participants’ fears about data being used in this way, and how they would prefer for data to be analysed, including what sort of safeguards they would want to be put in place.

To avoid causing distress to participants, all questions were optional after initial screeners, which means that the base size for questions varies.

Where statistics from these surveys are quoted in this report, we also provide sample size and a description of the base. Responses to qualitative questions were analysed thematically and used to develop the topic guide for our focus group and illustrate the report.

A.5 Research Community focus group

A focus group was held on 15 May 2019 to explore the potential risks and benefits of banks and building societies analysing financial data to identify potential problems and offer support. The six participants all self-identified as experiencing mental health problems. The focus group

was carried out online to maximise accessibility and protect participant anonymity. All focus group participants were offered a £30 Amazon voucher as a thank you gift for taking part.

The focus group worked through several examples of how financial data could be used to identify vulnerabilities, exploring the pros and cons, and then used this insight to develop a set of principles for safely using data to offer timely support.

A written transcript of the focus group was thematically coded. Emerging themes were used to formulate an understanding that was checked with other members of the research team, and cross-checked with data from the surveys and the literature.

These findings were used to inform policy and best practice recommendations, ensuring our proposals were grounded in experience and practice.

A.6 Financial services engagement - half-day conference and roundtable discussions

This project was initiated with a half-day conference on 31 January 2019, co-hosted with the FCA. This event brought together nearly 100 people, including a wide range of financial services firms, technology experts, consumer representatives, mental health experts and regulators to discuss the potential benefits and risks of using financial data to identify signs of vulnerability. This broad conversation helped to set the parameters for the remainder of the work programme, setting out initial legal and ethical considerations and beginning to explore practical and design implications.

Questions posed by these initial conversations were picked up in two further roundtable discussions with a smaller number of financial services firms, also co-hosted with the FCA.

The first roundtable, held on 13 June 2019, explored customer and firm appetite to use transactions data to identify potential vulnerability, and considered the design of supportive interventions. It identified some of firms' concerns about using data to identify possible problems and the barriers to action.

The second roundtable, held on 4 July 2019, examined questions about data protection, and considered ways to manage the risks associated with using financial data to identify potential vulnerabilities. In this workshop, firm representatives collaborated to build a list of best practice principles for identifying vulnerability using financial data, which was combined with the list generated by focus group participants to create the best practice recommendations in our report.

A.7 Firm interviews

The complexity of the issues discussed in this project and the existence of some areas of ongoing ethical and legal debate meant that to fully understand the challenges firms faced, we also needed to speak to them individually.

Interviews were held with a handful of financial services firms to gain a deeper understanding of the specific challenges and barriers they faced when considering using financial data to identify customers in need of support. These conversations helped us to bottom out areas of regulatory uncertainty, and where further guidance was required.

As this research also overlapped with several ongoing policy and regulatory discussions, we also had conversations with relevant regulators and government bodies working on related areas, including the Smart Data Review team at BEIS and the Centre for Data Ethics and Innovation.

These discussions informed our policy recommendations, helping to ensure our ideas were grounded and practical. We are grateful for participants' generosity of spirit in sharing insight and innovative ideas.