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Dear NASF members,

I am aware that, following my letter to you of 28 March, in which I announced that we would be embarking on a trial of dental x-rays, some corporate partners have raised concerns about the trial, as has the Chief Medical Officer and the Children's Commissioners.

I believe that we should strive to improve the age assessment process –because of the potential child safeguarding benefits that it will bring, in terms of ensuring that both children and adults are diverted to age-appropriate services, and because of the potential benefits in terms of improving immigration control. You will be aware that the trial is aimed at individuals who have already been assessed as adults by Croydon Council using a Merton-compliant age assessment. Participation in the trial would be entirely voluntary and no adverse inference would be drawn if an individual decided not to participate.

We have discussed our proposed trial with the National Research Ethics Service (NRES) as the Chief Medical Officer suggested. I wanted to make you aware of the outcome of these initial discussions, which is that the NRES has concluded that our proposed trial constitutes 'research' and that, as such, it requires the approval of a research ethics committee before it can proceed.

This conclusion was contrary to our expectations – our view was that the trial did not constitute 'research' and that ethical approval was not therefore necessary. However, the agency respects the view of the NRES, and, in light of this, we now intend to work further with our partners in the proposed trial (Croydon Council and Professor Graham Roberts), and with the NRES to seek formal ethical approval. In the interim, we have paused the trial. Croydon Council has confirmed that no letters of invitation have been sent. No x-rays will take place until such time as we have the appropriate ethical approval. The NRES has confirmed that it is satisfied that there has been no activity connected to the trial that would have required ethics approval. On this basis, it is satisfied that we have not breached the Research Governance Framework.

Yours sincerely,



**Zilla Howell**  
**Director of Asylum**