

UK STATISTICS AUTHORITY

Minutes

**Tuesday, 16 December 2014
Boardroom, London**

Present

UK Statistics Authority

Sir Andrew Dilnot (Chair)
Professor David Rhind
Professor Sir Adrian Smith
Dame Colette Bowe
Ms Carolyn Fairbairn
Dame Moira Gibb
Professor David Hand
Mr Ed Humpherson
Dr David Levy
Mr John Pullinger
Mr Glen Watson

Secretariat

Mr Robert Bumpstead
Mr Joe Cuddeford

Apologies

None

Other Attendees

Mr Simon Crine (from item 9)
Ms Laura Dewis (for item 9)
Mr John Flatley and Ms Roma Chappell (for item 8)
Mr Ross Young (for item 12)

1. Apologies

There were no apologies received.

2. Declarations of Interest

There were no new declarations of interest.

3. Minutes and matters arising from previous meetings

The minutes of the previous meeting held on 6 November 2014 were agreed. The meeting reviewed progress with actions.

4. Report from the Authority Chair

The Chair reported on his recent activities, which included a half-day expert seminar on 25 November called 'Better Statistics, Better Decisions', giving a keynote lecture at the University of Sheffield, and meeting with staff in ONS to hear of progress with the development of a new website. The Chair noted recent issues with statistics on overseas travel and tourism and construction statistics, and also problems which staff had experienced because of inadequate information technology; these issues were discussed further in the Report from the Chief Executive.

5. Reports from Committee Chairs

Regulation Committee

- 5.1 Professor Rhind reported on the meeting of the Regulation Committee held on 20 November. The meeting had considered:

- i. a draft Business Plan for Regulation;
- ii. issues with statistics on overseas travel and tourism and construction statistics;
- iii. emerging findings from a review of the coherence and accessibility of statistics on income and earnings; and
- iv. progress with a review of the use of deflators in official statistics.

Audit and Risk Assurance Committee

- 5.2 Dame Colette Bowe reported on the meeting of the Audit and Risk Assurance Committee held on 10 December. The Committee had discussed how to take forward the strategic risks identified by the Authority Board at its risk workshop of 6 November, and had noted that further work was needed to fully define the specific risks. The National Statistician was taking this forward and would present a draft business plan to the January Authority Board with links to the strategic risks. In order to determine the risk appetite of the Authority Board, Board members would be given an opportunity to discuss risk appetite on a one-to-one basis. It was noted that, in order to be able to make judgements about risk, Board members required appropriate information.

6. Report from the Chief Executive [SA(14)46]

- 6.1 Mr Pullinger introduced a report which provided the Authority Board with an overview of activity and issues for the month of November. A number of examples of excellence from the statistical system were noted.
- 6.2 Recent errors in overseas travel and tourism were a cause for concern, but the response from both the production and regulation function had been swift and transparent. Barriers that many statistical teams across government faced because of inadequate technology had become more apparent, although it was noted that some departments had more effective IT models and best practice was now being shared.

6.3 The results of the People Survey for ONS had been encouraging, however the headline result for statisticians across government was less positive. Further information would be provided to the January meeting of the Authority Board.

6.4 The meeting considered the medium term financial outlook for ONS. In a context of decreasing resources, it would be necessary for ONS to consider which of its activities it should stop doing, and whether alternative business models, such as partnerships, were possible. It was agreed that income generation would be considered at a future meeting.

7. Report from the Director General for Regulation [SA(14)47]

7.1 Mr Humpherson provided an update on regulation activity since the last meeting. The Board heard that recent developments showed progress was being made towards increasing the impact, agility and responsiveness of the regulatory function.

7.2 The Board discussed the current workload pressure on the regulatory team. A new focus on active engagement and promotion of regulatory reviews had increased this pressure.

7.3 The Authority's role in making public interventions on matters of statistical controversy was considered. It was noted that the speed at which the Authority considered, investigated, and responded to issues could perhaps be increased. But it was also the case that the issues raised seemed increasingly complex and it was critical that the Authority came to the right judgement in each case, which could sometimes take time. The likelihood of an increasing volume of complaints ahead of the General Election was raised. It was agreed that the Authority Board would consider the Authority's public interventions in more detail at a future meeting.

8. Crime Statistics [SA(14)48]

8.1 Mr Pullinger, Ms Chappell, and Mr Flatley presented a paper which provided the Authority Board with an update on progress and plans to improve trust in crime statistics, including the work needed to bring police recorded crime statistics up to the standard required of National Statistics.

8.2 The Board noted the progress which had been made towards meeting the requirements from the Authority's assessment report. A recent report on a national audit by HM Inspectorate of Constabularies had found that 19 per cent of crimes were not being recorded by police, and that there was considerable variation between local forces. The Board considered the steps that would need to be taken, and the evidence that would need to be presented, for recorded crime statistics to regain their National Statistics status. A reassessment would take place in 2015.

8.3 It was suggested that there would be value in a review to bring together the various issues, including recommendations made in previous crime reviews, and to address the question of what crime statistics were for, and the scope for partnerships with other institutions.

8.4 The meeting heard of initial plans for a crime statistics improvement programme, which would be led by ONS working with the Home Office and Ministry of Justice, and would explore and address some of the more substantial issues with crime statistics. Mr Humpherson outlined proposals for a possible Authority-led event to enhance the continuing development of crime statistics across the UK.

9. ONS Website [SA(14)49]

- 9.1 Ms Dewis presented a paper which provided an update to the Authority Board on progress with the Alpha phase of development of the new ONS website. Ms Dewis also provided a demonstration of the Alpha website. The meeting heard that the Alpha site had been made available to the public for testing and initial feedback suggested a positive reaction from many users.
- 9.2 Members of the Board were impressed with the Alpha website. The meeting discussed the testing process and critical success factors. The current position to focus initially on meeting the needs of the 'data expert' and the 'information forager' user personas, and ways that ONS could best reach the 'enquiring citizen' persona, were considered.
- 9.3 Ms Dewis confirmed that the Alpha would be evaluated against Government Digital Service standards and the critical success factors in January. The Authority Board agreed that, once the critical success factors had been met, the Chief Executive could give his approval to move from the Alpha phase to the Beta phase of development.

10. Website task and finish group – update [SA(14)50]

- 10.1 Mr Bumpstead introduced a paper which provided an update on the implementation of recommendations from the Authority's Task and Finish Group on the ONS website.
- 10.2 The Board welcomed the update and noted that progress against the recommendations was satisfactory.

11. General Election 2015 [SA(14)51]

- 11.1 The Board discussed the crucial role that official statistics play in informing democratic debate. This role was a continuous priority and was not exclusive to the period before an election. To help inform democratic debate, ONS would consider ways to ensure statistics were brought together and made accessible to a wide audience.
- 11.2 Mr Bumpstead provided an update on discussions with the Cabinet Office regarding the guidance for civil servants during the pre-election period.
- 11.3 Mr Humpherson introduced a paper which sought the views of the Authority Board on the proposed review of statistical activity during the election period. The review would be published after the election. The Board approved the proposal.

12. Reflections on Better Statistics, Better Decisions

- 12.1 The Board reflected on the recent half-day expert seminar held on 25 November called 'Better Statistics, Better Decisions'. The event had been designed to develop further understanding of the decisions informed by official statistics, identify the future capabilities necessary in the statistical service, and help make the case for the future infrastructure of UK statistics.
- 12.2 The meeting heard that feedback from attendees had been very positive. It was agreed that a programme of further stakeholder events should be drawn up for consideration at a future meeting.

13. Any Other business

The meeting noted a paper for information on plans for the Authority's Annual Report for 2014/15, and an update on the establishment of an Ethics Committee. There was no other business. The Authority Board would meet next on 30 January 2015 at 10:30 in London.

UK STATISTICS AUTHORITY

Agenda

Tuesday 16 December 2014
Board Room, London, 10:30 – 16:00

Chair: Sir Andrew Dilnot

Apologies: None

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|---|--|---|
| 1 | Minutes and matters arising from previous meetings <ul style="list-style-type: none"> Declarations of interest | Meeting of 061114 |
| 2 | Report from the Authority Chair | Sir Andrew Dilnot |
| 3 | Reports from Committee Chairs: <ul style="list-style-type: none"> Regulation Committee Audit and Risk Assurance Committee | Professor David Rhind Dame Colette Bowe |
| 4 | Report from the Chief Executive | SA(14)46 Mr John Pullinger |
| 5 | Report from the Director General for Regulation | SA(14)47 Mr Ed Humpherson |
| 6 | Crime statistics <ul style="list-style-type: none"> Improving trust in crime statistics Plans for a crime statistics event | SA(14)48 Mr John Pullinger Mr Ed Humpherson |
| 7 | ONS Website | SA(14)49 Ms Laura Dewis |
| 8 | Website task and finish group – update | SA(14)50 Secretariat |

| <i>Looking to the year ahead</i> | | |
|----------------------------------|--|---|
| 9 | General election 2015 <ul style="list-style-type: none"> The evidence base Guidance for civil servants during the pre-election period Monitoring Review | SA(14)51 Mr John Pullinger Mr Rob Bumpstead Mr Ed Humpherson |
| 10 | Reflections on: <ul style="list-style-type: none"> Better Statistics, Better Decisions Risk workshop | Discussion Sir Andrew Dilnot |
| 11 | Any other business | |

UK STATISTICS AUTHORITY

SA(14)46

Chief Executive's Report, December 2014

Purpose

1. This report provides the Authority Board with an overview of activity and issues for the month of November.

Discussion

2. In my first paper to the board I said we must be on the wavelength of those who make decisions, inside and outside government. Six months into my role, we have taken some useful steps forward. On 25 November we hosted a successful event for key stakeholders. In addition, a mock-up of the new Office for National Statistics (ONS) website has now been opened to the public to seek feedback.
3. I have seen some excellent examples from across the Government Statistical Service (GSS) where statisticians are really well connected with those they are seeking to serve. The desire for better statistics to inform decisions is clear. We need to develop these relationships and to innovate fast to make the most of the opportunities presented by the rapidly changing data landscape.

Review of November

4. Over the last month I have seen a number of examples of excellence from the statistical system. The showcasing of these examples is helping to drive curiosity and peer to peer learning. I was especially impressed by presentations given at the GSS Northern Conference hosted by Department for Environment, Food and Rural Affairs (DEFRA) in York. These included use of funnel plots and run charts by Health and Social Care Information Centre (HSCIC) to bring to life complex data on mortality for local healthcare providers, work at HM Revenue and Customs (HMRC) drawing out what is really going on with error and fraud in tax credits, a team at Department of Business, Innovation and Skills (BIS) talking about data science for statisticians, Health and Safety Executive (HSE) describing how they had sustained statistical quality in the face of severe budget cuts and colleagues at Department for Education (DfE) demonstrating their hunger to maximise response to the Longitudinal Study of Young People in England. We have also seen some valuable developments designed to demonstrate that our success is to be judged through the eyes of those we seek to serve. Our event *Better Statistics: Better Decisions* was a potent symbol of this, bringing together a wide range of interested parties to explore how better we can assist them as decision makers and citizens.
5. At the same time, there have been reminders that we are skating on quite thin ice in some areas. Unfortunate errors have been dealt with promptly and with admirable openness but demand a systematic response that will support staff at all levels get the skills, confidence and tools necessary reliably to deliver the kind of professional service we need.
6. The results of the People Survey for ONS are quite encouraging - the figures are moving upwards at a slightly faster rate than for the civil service as a whole. However, the headline result for professional statisticians across government was less positive – 'engagement' was slightly lower than for ONS or the civil service as a whole and did not change.
7. As political debate intensifies ahead of the general election, our statistics are being picked up avidly, none more so than the latest quarterly release on migration which showed continuing high levels of net in-migration both from inside and outside the EU. Other releases that brought new insights during the month were data on earnings

showing relatively strong growth in median earnings for those in continuous employment, and new data on e-cigarettes which informed the debate on whether they are a gateway to smoking.

8. At the same time the barriers that many statistical teams face across government because of inadequate technology are becoming more and more apparent to me and need to be a focus of attention in our future planning.
9. Other noteworthy activities during the month were:
 - i. Launch of the Administrative Data Research Network
 - ii. Launch of the Web Data Access API
 - iii. Agreement to the creation of a Government Data Science Partnership with a substantial role for the GSS
 - iv. 30 GSS staff have taken up opportunities to support the voluntary sector as part of a scheme to improve community links and a second wave of placements is getting started.
 - v. Iain Bell has taken over as statistics Head of Profession at DfE as part of his new role as Director for Data and Education Standards Analysis. In addition, ONS has appointed Pete Benton as Director of Data Collection, Terry Makewell as Chief Digital Officer (from the Met Office) and Simon Taylor as Chief Technology Officer (from the Intellectual Property Office).

Current Performance

10. The main performance issues currently under review by the National Statistics Executive Group relate to errors. Errors in releases in Overseas Travel and Tourism and Overseas Trade have highlighted weaknesses in quality assurance. Follow up actions cover both support for staff and improvements to IT designed to reduce risk in future.
11. Efforts by BIS and ONS to improve estimates of prices in the construction sector have thrown up questions about proposed new methods and how to measure this important area. ONS has been able to substitute modelled inputs into its latest release in order to provide a consistent series to users. I have been grateful for the helpful engagement of Ed Humpherson and his team throughout this process.

Finance

12. ONS spending for the current financial year remains on track. A critical milestone will be HM Treasury (HMT) review of our £15million Reserve claim for 2014-15 agreed in 2013 as part of a two year package of remedial financing for essential programmes.
13. The Autumn Statement gave an indication of the spending challenges to come. We will need to do things differently - finalisation of a balanced budget for 2015-16 depends on resolving outstanding issues on electronic data collection and the IT infrastructure (PRISE) programmes. Our strategic business plan is still on track for review by the Board in January.

Programmes

14. The Portfolio Scrutiny Committee has been challenging all programmes on their costs and benefits as part of the preparation of the business plan. A vital milestone has been passed with the approval by HMT of the Census business case. The significance for the statistical system of this cannot be underestimated and the team deserves great credit for the work that has gone into ensuring that the case is robust and acceptable.
15. The National Statistics Executive Group will meet on 18 December and consider the ONS portfolio, including a substantive item on electronic data collection – one of four

programmes that are rated amber at the time of writing. The others are IT infrastructure (PRISE), the virtual microdata lab replacement, and improving dissemination (website).

Future Look

16. In the month ahead we will complete work on the draft strategic business plan for consideration by the Board in January. In addition we hope to have concluded the recruitment process for the two new Director General positions and have implemented the next phase of governance changes below the level of the National Statistics Executive Group. The driving idea for these changes will be to think 'GSS by default', including making it clear that senior roles in ONS have a wider responsibility across the statistical system. We will also follow through with the creation of a single central policy secretariat and implementation of a review of our international function.
17. January also sees the European Statistical System peer review of UK statistics to assess adherence to the European Statistics Code of Practice, and to highlight innovative practices. The review will involve ONS, HMRC, DEFRA and the Scottish Government.
18. Finally, Paul Johnson's independent review of the range of prices statistics, commissioned by the Authority last summer, will be published on 8 January.

John Pullinger

9 December 2014

UK STATISTICS AUTHORITY

SA(14)47

Report from the Director General for Regulation**Purpose**

1. This paper provides an update on regulation activity since the last meeting.

Recommendation

2. Members of the Authority Board are invited to note progress and planned actions.

Discussion

3. Key developments on the regulatory side of the Authority since the last meeting of the Board include the following.
 - i. **National Statistics status - Overseas Travel:** We continue to respond in an agile and appropriate way to evidence that individual statistics no longer merit the status of National Statistics. Since the last meeting, errors have emerged on the *Overseas Travel and Tourism* survey, which had a knock-on effect on the *UK Trade Statistics* release. The Authority decided to use the new policy on temporary removal of designation to remove National Statistics status from both releases. My team are assisting with the ONS review of the error commissioned by John Pullinger. Once we receive this review, we will decide how quickly to reinstate the designation, but our presumption is that we should do so quickly for *Overseas Travel and Tourism*, but do so only after a full re-assessment for Trade Statistics, given that this was the second major error affecting Trade Statistics in 2014 (and the ONS identified a further error affecting the same series later in the month). While the trade statistics team are diligent and professional, I judge that a full re-assessment would be a prudent action to maintain the trustworthiness of the trade statistics.
 - ii. **National Statistics status - Construction output:** The producer side of the Authority also brought to our attention concerns about construction prices. There have been long-running concerns with the quality of construction price statistics, produced by the Department for Business, Innovation and Skills (BIS). The Authority removed the National Statistics designation from these statistics in February 2011 and reinstated in November 2012. This decision to reinstate was finely balanced, and assumed that BIS would introduce a new, improved methodology for estimating construction prices. BIS has now developed a new methodology, but somewhat slower than originally expected. The methodology has raised concerns within ONS, my team, and among some wider experts, and as a result BIS have decided not to publish them in December as originally planned. My advice is to be clear that this situation is not consistent with National Statistics designation; and that also the ONS *Construction Output* series, which depend on the BIS price data to produce real estimates of construction output, should lose its National Statistics designation. I should emphasise that the ONS team have been constructive and open with the Authority, and that they have adopted a pragmatic and appropriate approach to estimating construction output in a very difficult situation.
 - iii. **Policy:** The two cases above - overseas travel and construction output - reflect well on two of the Authority's recent policy developments: to create a route for the swift, temporary suspension of National Statistics status (SA(AC)(14)29 and SA(14)26) and to adopt a firmer line on whether producers are meeting the Requirements for designation set by the Authority (SA(RC)(14)40).

- iv. **Casework:** The Authority has made a series of significant interventions in recent weeks, including on the Prime Minister's statements on savings in public expenditure in this Parliament and projections for the next one; on statements by Alex Salmond alleging undue political influence over the ONS's revisions to GDP estimates; and statements by Ministers in the Department for Education that one third of children leave schools 'unable to read, write or add up'.
 - v. **Administrative data audit:** We continue to advocate our approach to administrative data audit. This is a flagship initiative which we started following the concerns about the lack of assurance about police recording of crime. We are setting out the Authority's position on audit of administrative data, which will:
 - i. establish regulatory standards so it will be clear how we form proportionate judgements on compliance with the Code of Practice (or: what is good enough?);
 - ii. provide a common framework for statistical thinking about the risks of administrative data, regardless of sector (e.g. it will be equally appropriate for hospitals, benefits or police data); and
 - iii. challenge public sector bodies to pay more attention to their statisticians and to statistical issues when designing, implementing, updating and using their management information systems (or, to put it another way: better statistics, better decisions).
 - vi. We also have two very strong reviews of issues facing economic statistics for release in January: on how to help users make better use of *deflators* (i.e. price indices); and how to improve the coherence and accessibility of *income and earnings* statistics.
 - vii. We have continued to engage widely across the Government Statistical Service (GSS) and beyond. I spoke at an event in Belfast organised by the Northern Ireland Research and Statistics agency; at the GSS North event; and at the Head of Profession meeting on 9 December.
4. In terms of challenges, resourcing pressures have eased slightly following my decision to stop the initiation of any new projects; but we remain stretched, particularly given our ambition to promote our key outputs more actively. I am also concerned that we lack sufficient time to keep pace with the rapidly-evolving landscape of digital data and data visualisations, and what it means for National Statistics. The need for agility in the statistical system was a theme of *the Better Statistics, Better Decisions* event. This event also featured a challenge from some speakers calling for a stronger, more assertive public voice for the Authority (e.g. on the misuse of statistics) – though I would be cautious about adopting a dramatically different strategy to the measured approach we are currently adopting.
5. **Annex A** sets out a summary of our key outputs since the last Board meeting.

Ed Humpherson, Director General for Regulation, 9 December 2014

List of Annexes

Annex A Key outputs since the last meeting

Annex A Key outputs since the last meetingAssessment

| | |
|---|-----------------------------------|
| Assessment reports published: | 3 |
| Confirmation of National Statistics status: | 2 (covering 5 sets of statistics) |
| National Statistics status removed: | 2 (overseas travel; and trade) |

Monitoring

We are currently working on the following 'live' monitoring topics:

- i. The Adequacy of Statistical Audit of Administrative Data from which Official Statistics are Produced. Likely publication of final toolkit expected February 2015.
- ii. The Influence of Targets on Official Statistics. To be published alongside the Administrative Data report in February.
- iii. The Use of Deflators in Official Statistics Publications. Final report in January 2015.
- iv. The Coherence and Accessibility of Official Statistics on Income and Earnings. Final report and launch event in February 2015.
- v. Management and Presentation of Health Statistics for Users. Event in Wales in March/April 2015.

Public interventions (casework)

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|-------------------|-------------------------------------|---|------------------|
| Sir Andrew Dilnot | Janet Downs | Literacy and numeracy statistics | 4 December 2014 |
| Sir Andrew Dilnot | Chris Leslie MP | Public expenditure savings and income tax reduction | 1 December 2014 |
| Sir Andrew Dilnot | Rt. Hon. Alex Salmond MSP | Changes to UK National Accounts | 27 November 2014 |
| Sir Andrew Dilnot | Will Moy, Full Fact | Annual tax summaries | 24 November 2014 |
| Sir Andrew Dilnot | Rt. Hon. Andy Burnham MP | Statistics on General Practitioners | 20 November 2014 |
| Sir Andrew Dilnot | John Pullinger | Estimates of expenditure for UK residents' visits abroad and overseas residents' visits to the UK | 14 November 2014 |
| Ed Humpherson | Martin Horwood MP | Impact of 2013 changes to emergency care in Cheltenham | 5 November 2014 |
| Sir Andrew Dilnot | Tony Cox, Chair, RPI-CPI User Group | Regulated rail fare increases | 4 November 2014 |

UK STATISTICS AUTHORITY

SA(14)48a

Crime Statistics for England and Wales

Purpose

1. The paper provides the Authority Board with an update on progress and plans to improve trust in crime statistics, including the work needed to re-designate police recorded crime statistics as National Statistics.

Recommendations

2. Members of the Authority Board are invited to note, and where appropriate comment, on:
 - i. the work towards re-designation of police recorded crime as National Statistics;
 - ii. proposed changes to the Crime Statistics Advisory Committee; and
 - iii. plans for a crime statistics improvement programme.

Background

Police Recorded crime re-designation

3. A crime statistics re-designation project was established in February 2014 to address the 16 requirements set out by the UK Statistics Authority in its assessment report. The re-designation project is a partnership between ONS, Home Office (HO), Association of Chief Police Officers (ACPO) and HM Inspectorate of Constabularies (HMIC). The requirements are being worked through systematically, an update on the action plan is at **Annex A** and progress is generally good. A steering group oversees the work and two working groups, one led by the Home Office and one by ONS, progress the work towards the different requirements. The aim of the project is to apply for re-designation by April 2015.
4. One of the requirements of the assessment report was the need to ensure that users' requirements are better understood. Enhancing user engagement is a theme running through all of our plans to improve trust in crime statistics because without this there is a risk we solve one set of problems to find they have been replaced by new issues.
5. In respect of this project, ONS has begun a phase of planned stakeholder engagement to better understand needs and the impact of recent reporting on the quality of crime statistics. The engagement will capture users' perceptions based on a full picture, including the final HMIC audit report published last month from its recent inspection of crime recording practices in police forces. The inspections concluded that around 1 in 5 crimes were not being recorded by the police. ONS has already been proactive in seeking out opportunities to meet and speak with stakeholders more generally. For example, representatives from the ONS crime statistics team presented at the summit of the Association of Police and Crime Commissioners in December 2014 and this was well received. Early in the New Year, ONS will more systematically meet with a broader range of stakeholders to build up a full picture of user needs in relation to police recorded crime statistics.

The Crime Statistics Advisory Committee

6. The 2011 National Statistician's Review of Crime Statistics recommended that a Crime Statistics Advisory Committee (CSAC) be set up to advise the Home Secretary, ONS and HMIC on how best to ensure that official statistics on crime for England and Wales are

accurate, clearly presented, comprehensive, transparent, trustworthy and taking account of the needs of users and providers. The Terms of Reference are at **Annex B**. This committee has been established for two years.

7. The recent Public Administration Select Committee (PASC) report *Caught red-handed: Why we can't count on Police Recorded Crime Statistics* criticised CSAC and said that its role and composition should be reviewed. CSAC carried out a self review in November which found that CSAC could be braver and should operate with more pace. There was a feeling that the membership is too close to the producers, indeed some of the independent experts are ex Home Office analysts, with the result that there could be more challenge to the existing status quo.
8. Recognising these issues CSAC plans to:
 - i. extend its membership to bring more independent challenge; and
 - ii. use an approach that has been valuable in the past in commissioning regular working groups to report to the CSAC, improving its timeliness, flexibility and responsiveness to issues.
9. John Pullinger will wish to discuss these issues further at the Authority Board meeting.

Plans for a Crime Statistics Improvement Programme

10. Crime statistics transferred from the Home Office to ONS in 2012. The transition project was successful in:
 - i. ensuring continuity in the provision of the statistics, including through transferring systems and staff;
 - ii. establishing appropriate funding for on-going operations;
 - iii. tendering and successfully transferring the crime survey;
 - iv. making some incremental improvements in line with the National Statistician's Review (for example, establishing the Crime Statistics Advisory Committee) and ONS best practice; and
 - v. transitioning the work to Titchfield.
11. However, it is recognised there are more substantial issues with crime statistics (including scope, measurement and quality issues) and their underpinning systems. A paper was brought to the National Statistics Executive Group (NSEG) in November with a proposal for a joint crime statistics improvement programme. The background and discussion of the paper is included in **Annex C**. The proposal was for a three year programme, led by ONS working with HO and Ministry of Justice, to run alongside business as usual (costing in the region of £4 million) in order to implement more radical changes to improve trust. NSEG advised that with the prevailing climate where the view that statistics need improvement is widely shared, this was the appropriate time to set up a programme to address the more fundamental issues. While some resources might be found to initiate work in 2015-16, a bid would need to be made as part of Spending Review 2015 for resources from 2016-17 onwards.
12. A short business proposition is being written so that the National Statistician can determine whether to approach the Home Secretary to gauge the appetite for joint work. NSEG advised that the proposition should be bold in addressing the issues that are of utmost importance to users. The wider potential benefits to key stakeholders - over and above the statistical benefits - should also be emphasised.

Roma Chappell and John Flatley, Public Policy Division, 8 December 2014

List of Annexes

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|----------------|---|
| Annex A | Action plan to address requirements from UK Statistics Authority assessment – Progress update, October 2014 |
| Annex B | Terms of Reference of The Crime Statistics Advisory Committee (E&W) (Last amended August 2013) |
| Annex C | The background and discussion presented to the National Statistics Executive Group (NSEG) in November on a proposal for a crime statistics improvement programme |

Annex A Action plan to address requirements from UK Statistics Authority assessment – Progress update, October 2014

| Requirements | Action planned/undertaken |
|--|---|
| 1. Extend the published information about uses of crime statistics and users' needs in relation to the statistics. | Information about the uses of crime statistics has been published in the Quality and Methodology Information report alongside the quarterly crime statistics bulletin on 24 April 2014. This is reviewed every quarter and updated as ONS gathers more information from users about their needs (see 5c and 5d below). The report was last reviewed by the project working group prior to the quarterly crime statistics release on 17 July 2014, |
| 2. Provide more information to users about the nature and extent of changes made to police records, and how to interpret changes in the published crime statistics from one reference period to another. | ONS has worked with the Home Office Statistics Unit to analyse the differences in the volume of offences for previously published periods following routine updates from police forces. A table giving details of updates to police recorded crime data has first been published alongside the quarterly crime statistics bulletin on 24 April 2014, within table QT1a in the Quarterly Data Tables. This has been updated for the crime statistics bulletin published on 17 July 2014 to include information on the extent of the change and the number of forces conducting revisions during the most recent quarter. Information about police recorded crime revisions in the Quality and Methodology Information report has also been reviewed and updated. |
| 3. Publish information about the roles and responsibilities of the departments involved in the production and publication of crime statistics. | Information about the roles and responsibilities of the departments involved in the production and publication of crime statistics has been published in the Quality and Methodology Information report alongside the quarterly crime statistics bulletin on 24 April 2014. |
| 4. Explain more fully how all the administrative data sources are used to produce statistics about crime. | <p>ONS has published further information on the homicide index and sources of fraud data in sections 5.1 and 5.4 respectively of the User Guide to Crime Statistics for England and Wales, released alongside the quarterly crime statistics bulletin published on 17 July 2014.</p> <p>ONS is working with the Home Office Statistics Unit to provide further information on other sources.</p> |

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| <p>5. a) Publish further detail about the processes used by police forces in updating and submitting data and by the Home Office in validating the data; b) collect information from the Home Office about the quality of the data received from police forces; c) consider the implications of this information for the production of statistics of a quality that meet users' needs; and d) reflect this within the published quality information for users.</p> | <p>ONS has worked with the Home Office Statistics Unit to publish further information on Home Office quality assurance and validation checks. This can be found in section 3.3 of the User Guide to Crime Statistics for England and Wales, released alongside the quarterly crime statistics bulletin published on 17 July 2014.</p> <p>Further information on the processes used by police forces to collate and submit data will be published alongside the quarterly crime statistics bulletin in October 2014.</p> <p>Points c) and d) will be addressed by March 2015 following a user engagement exercise that ONS plans once the results of the HMIC inspection into crime data integrity reports later in 2014.</p> |
| <p>6. Improve, and make more accessible, information about all aspects of the quality of crime statistics and the impact on their use.</p> | <p>The crime statistics Quality and Methodology Information report was published on the 24 April 2014. This is reviewed every quarter and the most recent update was released alongside the quarterly crime bulletin published on 17 July 2014.</p> |
| <p>7. a) Keep users informed about the progress of the HMIC audit; b) review published quality information in the light of the findings of the audit; and c) consider whether statistics based on police recorded crime data can be produced to a level of quality that meets users' needs, taking into account information gathered in the course of meeting this report's Requirements.</p> | <p>ONS first included an update on the progress of HMIC inspections in the quarterly crime statistics release published on 24 April 2014 and this is being updated each quarter. The latest bulletin includes an update and a summary of the findings from the HMIC interim report.</p> <p>ONS will address points b) and c) after HMIC have published the full findings of their inspections in autumn 2014.</p> |
| <p>8. Publish, or clearly link to, information about the changes in the CSEW sample size and response rate over time and the impact of these changes on the quality of the statistics.</p> | <p>ONS has published further information on changes in the CSEW sample sizes in section 2.2 of the User Guide to Crime Statistics for England and Wales. This was released alongside the quarterly crime statistics release published on 24 April 2014.</p> |

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| 9. Work with the Home Office to publish information for users about police forces' progress in switching to use of the Data Hub, and the reason why this has taken so long. | The Home Office Statistics Unit will supply quarterly updates to ONS which will be published in section 3.1 of the User Guide to Crime Statistics for England and Wales . The first update was released alongside the quarterly crime statistics release published on 24 April 2014. |
| 10. Review the staffing profile of the crime statistics team with a view to providing assurance that it remains sufficiently resourced. | ONS has carried out a review of resources in the crime statistics team and allocated additional resource to respond to the Authority's requirements from mid-March 2014 onwards. |
| 11. Review the content of statistical reports about crime, taking into account the information gathered in the course of addressing this report's recommendations. In doing this, consider: (a) whether the differences in recording practices across police forces are such that they have an impact on the suitability of presenting statistics at a national level for recorded crime; and (b) the extent of user demand for a measure of reported crime derived from police administrative systems. | ONS will review the evidence from the HMIC Crime Data Integrity inspection which is expected to report later in 2014. As part of its user engagement exercise that will follow the publication of HMIC findings, ONS will seek users' views on both points and expect to publish its findings by March 2015. |
| 12. Publish more detailed contextual information to explain the impact on the published statistics of the full range of possible actions that can be taken by members of the public, police and other organisations following either being a victim of a crime, observing a crime or receiving a report of a crime. | <p>ONS has published further information on the journey taken from a crime first coming to the attention of the police to it being included in police recorded crime statistics. This was published in section 3.2 of the User Guide to Crime Statistics for England and Wales on 17 July 2014.</p> <p>More explanation of the crime recording process based on extracts from the HMIC interim report have also been published in section 3.2 of the User Guide to Crime Statistics for England and Wales on 17 July 2014.</p> |

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| <p>13. Improve the accessibility of the crime statistics on the ONS website and publish information about the relationship between the crime statistics and other related statistics produced across the criminal justice system.</p> | <p>ONS has improved the accessibility of the crime statistics on the ONS website, for example adding more signposting and links to key outputs on the Crime and Justice theme page.</p> <p>ONS has also produced the 'Guide to Finding Crime Statistics', a tool to help guide users through the range of crime and criminal justice statistics produced by ONS and other government departments. This was published in March 2014 on the ONS website.</p> <p>ONS will continue to monitor use of the website and seek users' views on possible future enhancements.</p> |
| <p>14. Provide guidance about the uses and purposes of the various statistics available about crime based on police data, and explain the distinct purpose of ONS statistics based on police recorded crime data.</p> | <p>ONS has published further information on the published sources of police recorded crime in section 3.7 of the User Guide to Crime Statistics for England and Wales alongside the quarterly crime statistics release on 17 July 2014.</p> |
| <p>15. Ensure that pre-release access for crime statistics is only granted where absolutely necessary.</p> | <p>The ONS has carried out a corporate review to minimise pre-release access. As a result there has been a substantial reduction in the number of people granted pre-release access to ONS crime statistics with effect from the quarterly crime statistics bulletin published on 17 July 2014.</p> |
| <p>16. Add the Homicide Index dataset to the Statement of Administrative Sources and include in the Statement information about the arrangements for auditing the quality of all the administrative data used to produce statistics about crime.</p> | <p>ONS has made arrangements for the Homicide Index dataset to be added to the Statement of Administrative Sources. The update took effect when the Statement of Administrative Sources was updated in September 2014.</p> <p>The second part of the requirement will be addressed through work being carried out on requirement 4.</p> |

Annex B**Terms of Reference of The Crime Statistics Advisory Committee (E&W)
(Last amended August 2013)****1. Aim**

- 1.1 The committee advises the Home Secretary, the Office for National Statistics and Her Majesty's Inspectorate of Constabulary on how best to ensure that official statistics on crime for England and Wales are accurate, clearly presented, comprehensive, transparent and trustworthy taking account of the needs of users and providers.

2. Overview

- 2.1 The Crime Statistics Advisory Committee (E&W) is a non-statutory body, established by the National Statistician.
- 2.2 It functions as a strategic, high level advisory body offering independent advice to the Home Secretary, the Office for National Statistics (ONS) and Her Majesty's Inspectorate of Constabulary (HMIC) on matters related to the measurement of crime and the collection and presentation of crime data for England and Wales.
- 2.3 In carrying out its functions, the Committee can call for papers on relevant issues or topics and can consider matters referred to it, including by or on behalf of the Home Secretary, the Office for National Statistics and Her Majesty's Inspectorate of Constabulary. In addition, committee members may also raise issues for consideration, through the committee's secretariat, working to agreed deadlines for submission.
- 2.4 Membership is at senior level. Members are subject to a Code of Practice. The Committee reserves the right to invite others to meetings to provide advice on specific topics.
- 2.5 In carrying out its functions the Committee has due regard to the needs of users and providers; the Code of Practice for Official Statistics; the legal framework in which it operates; the wider affordability of proposals for change; burden or bureaucracy in respect of Police Recorded Crime and on the public who provide survey data; and international developments and obligations
- 2.6 The minutes of all meetings will reflect broad arguments and the conclusions reached. The minutes will be ratified after the meeting via correspondence and be made publicly available, along with all committee papers, on the committee's web pages. All additional Committee correspondence will also be made publicly available unless a specific case is made to the Chair not to do so.

3. Role of the committee

- 3.1 The role of the committee is to:

- a) Advise on changes in the coverage, definitions, classifications or methodologies underpinning crime statistics, both for the Crime Survey for England and Wales or other crime surveys and police recorded crime including keeping a watching brief on the Crime Survey for England and Wales to see how it can be developed further;
- b) Review the crime categories used for collection and publication of police recorded crime;

- c) Consider how some currently non-notifiable offences might be reflected in published statistics, with a view to reducing burden on the police and improving presentation in statistical releases;
- d) Advise the Home Secretary on the statistical implications of any changes, additions or deletions to the Home Office Counting Rules (HOCR) and the National Crime Recording Standard (NCRS);
- e) Advise the Home Secretary on any changes to the crime statistics data requirement to feed into the Annual Data Requirement (ADR) on the police;
- f) Advise ONS on the handling and presentation of changes in published series, paying due regard to the need for transparent analysis of the impact of any change on trends;
- g) Receive regular reports from HMIC on their audit programme of police crime recording and data integrity and advise HMIC on the statistical and quality requirements for police recorded crime including advice on areas for further review;
- h) Monitor delivery of a programme of research into the improvement of crime statistics according to demand and resource availability;
- i) Consider other proposals for research on improvements to the coverage and/or methodology of crime statistics, and recommend change;
- j) Take due regard of international requirements on crime statistics;
- k) Take into account the wider affordability of any proposals for change;
- l) Take due regard of the impact of any changes on burdens placed on the Police or the public;
- m) Consider how "Crime Statistics" can be made comprehensible to all and provide advice on how public understanding and confidence in crime statistics can be enhanced;
- n) Provide a report on the work of the Committee to the Home Secretary for her consideration on a financial year, public basis; and,
- o) Have regard to how crime information is presented on websites and other formats including web mapping.

3.2 The following working principles will be applied when Committee members are assessing a change or issue prior to a decision being reached:-

- cost effectiveness;
- burden on respondents;
- coherence with other sources and consistency across fora;
- interdependencies – with other depts (MoJ), legal;
- achievability – time, affordability;
- comprehension to users and its impact on users and uses;
- continuity of any time series;
- international impact.

3.3 In the event that a consensus of opinion cannot be reached, the following procedures will be applied:-

- additional information or clarity be sought from subject experts to provide the additional detail that maybe required;
- members to consider any additional information and apply the committee's principles in paragraph 3.2 before reaching a decision; and,
- in the event of a consensus not being reached, the Chair will liaise with the subject expert to establish the impact and agree the way forward.

4. Police Recorded Crime – Matters to be referred

4.1 The National Crime Registrar (NCR), as an ex officio member of the Committee, has the delegated authority to determine whether proposed changes to the HOCR or NCRS require referral to the Committee for consideration prior to implementation. This decision is arrived at on statistical grounds and agreed with the Committee Secretariat. The NCR provides the Committee at each meeting with a report setting out any changes not referred. If the NCR wishes to discuss his/her delegated authority then he/she should approach the Chair.

5. Frequency

5.1 In the first year and initial phase of establishing the Committee it is expected to meet four times. Thereafter meetings will be held 2 or 3 times per year. Secretariat is provided by the National Statistician's Office.

6. Membership

- 6.1 Membership comprises a mixture of permanent members ie representatives of organisations, and non-permanent members ie members acting in an individual capacity given their skills and experience (see attached list).
- 6.2 Non-executive members sit on the Committee for a fixed period on a rotational basis with the option for renewal.
- 6.3 It is expected that the Committee will comprise of a majority of non-Government members.
- 6.4 Meetings are held providing a quorum of members is available at the discretion of the Chair. It has been agreed that a quorum should consist of the Chair and at least four non-executive members.
- 6.5 Membership of the Committee is not remunerated (although travelling expenses are paid for those attending from outside Government).

7. Review

7.1 Terms of reference are subject to annual review.

Membership

Permanent members:

- Chief Statistician – Ministry of Justice (Mike Elkins)
- Chief Statistician – Home Office (David Blunt)
- Chief Statistician – Welsh Government (Glyn Jones)
- Senior Statistician with responsibility for crime statistics – Office for National Statistics (Roma Chappell)
- Her Majesty's Inspectorate of Constabulary (HMIC) (Tom Winsor)
- Association of Chief Police Officers (ACPO) (Jeff Farrar)
- Director of Crime – Home Office (Mike Warren)(temporary)

Non-executive members:

- Professor Allan Brimicombe - Professor and Head, Centre for Geo-Information Studies, University of East London, Chair of Crime and Justice Statistics Network
- Ms Giselle Cory - Policy Researcher-Victim Support
- Mr Junaid Gharda – Head of Corporate Performance, Learning & Skills Improvement Service
- Professor Mike Hough – Institute for Criminal Policy Research, School of Law, Birkbeck
- Professor Michael Levi – Professor of Criminology, Cardiff University
- Professor Chris G Lewis - Visiting Professor, Institute of Criminal Justice Studies, University of Portsmouth
- Ms Patricia Mayhew - Independent criminological consultant
- Professor Stephen Shute - Head of the School of Law, Politics and Sociology and Professor of Criminal Law and Criminal Justice, University of Sussex (Chair)

Ex-officio members:

- • National Statistician (John Pullinger)
- • National Crime Registrar - Home Office
- • Secretariat – National Statistician's Office

Annex C The background and discussion presented to the National Statistics Executive Group (NSEG) in November on a proposal for a crime statistics improvement programme

1. Crime statistics transferred from the Home Office to ONS in 2012. The move was made to increase trust in statistics that would be produced by an independent body, the ONS, rather than the Home Office. The prevailing context at the time of the transfer was that there was a general recognition of a need to overcome barriers to trust in official statistics on crime levels and trends. Some of these barriers surrounded the way the statistics were (selectively) used or misused by politicians or the media; others were around the lack of perceived independence of the statisticians involved in producing them and others to do with known gaps in the coverage of the statistics themselves.
2. A project was set up to transfer the work to ONS. The key aims were to:
 - i. ensure continuity in the provision of the statistics, including through transferring systems and staff and maintaining relations with HO, where there is relevant expertise (for example, criminologists);
 - ii. establish appropriate funding for on-going operations;
 - iii. tender and successfully transfer the Crime Survey for England and Wales (CSEW);
 - iv. make some initial incremental improvements in line with the National Statistician's Review (for example, the establishment of a Crime Statistics Advisory Committee (CSAC)) and ONS best practice; and
 - v. move the work from London to Titchfield. The transition project was seen as successful and it was closed in 2013.
3. Incremental improvements continue to be made to crime statistics. For example, there have been improvements to the releases, more transparent reporting of the statistics and the media appreciate the access they now have to independent statistical experts. ONS has taken over management of the crime survey bringing some improvements to the estimates. All of this has gone well but it is recognised that there is still some way to go and at its recent review meeting the Crime Statistics Advisory Committee reinforced the need for a crime statistics improvement programme because more radical changes are needed to make a real difference and improve trust in these high profile and important statistics. Additional dedicated resource would be needed to achieve a greater scale of change.
4. Despite a successful transition and the incremental improvements made, not everything has gone according to plan. Earlier this year, the Authority de-designated police recorded crime in England and Wales, primarily as a result of the gap between the police reporting and the crime survey being large, having increased in recent years and the consequent user concerns. ONS had published an analysis which showed the scale of the gap and this was picked up in a critical report from the Public Administration Select Committee. As a result, the crime survey based estimates became the only official estimates that have the National Statistics badge and these estimates are widely seen as the more reliable estimates of crime levels and trends, for the crimes it covers. However, press reporting over the summer highlighted the weaknesses of the crime survey that is used as a benchmark for police recorded crime (for example, in not covering internet fraud). Work is underway to address this gap but more work is required to not only address gaps in coverage but also to make sure that new types of crime can be measured.
5. There is a need to make more radical improvements to reporting and to develop a framework for crime and justice statistics. The team have found it difficult to address all of these growing user requirements alongside the daily business.

9. The proposal is for a three year programme to improve crime statistics, working closely with HO, HMIC, ACPO and MoJ. The bid to cover the work streams suggested would be of the order of £4 million over three years. This would improve:
 - i. the coverage and content of the CSEW;
 - ii. our ability to ensure that future management of the CSEW is in line with the ONS data collection strategy;
 - iii. estimates we would be able to provide from a new business victimisation survey;
 - iv. continuing work to ensure that police recorded crime achieves re-designation as a National Statistic and retains this kite mark;
 - v. reporting through establishment of a new cross government working group to produce a framework for crime statistics and oversee joint reporting; and
 - vi. stakeholder engagement and management.
10. Since the transition of crime statistics to ONS, system changes have been accommodated at no extra cost and the steps that have been taken have mitigated the risk of system failure sufficiently that it is not seen as a high priority by IM or the business area. Therefore, further system work has not been included as part of this bid over and above some allowance for making the changes that the improvements themselves would necessitate. However, there is a chance that at some point in the next three years we will have to address other system issues, for example the crime survey processing is done in SPSS rather than SAS software.
11. Although it is survey costs that push up the size of the bid, there is also some allowance for a small team to provide project management, to research and to implement the changes. If approved, the programme would start in April 2015. The improvement team would be co-located with the business as usual team in Titchfield with strong interaction between the two teams to aid coherence and implementation.
12. The programme would be part of the ONS Portfolio, with business cases being presented to the Portfolio Scrutiny Committee (PSC) and reporting upwards included within portfolio reports.
13. Views are sought from members of NSEG on the proposal for a crime statistics improvement programme, to make a bid for funding from HMT and to be prepared to cover off funding in 2015/16, subject to PSC internal clearance. The programme would be led by ONS but would involve close working with key players such as the HO, MoJ, HMIC and the ACPO. The suggested bid is for just under £4 million over three years, with the bulk of the costs being for funding for survey improvements. [A detailed table of costs per year was provided to NSEG as an annex].

UK STATISTICS AUTHORITY

SA(14)48b

Crime Event – Monitoring and Assessment perspective**Purpose**

1. This paper considers ways in which the Authority might enhance the continuing development of crime statistics across the UK.

Recommendations

2. Members of the Authority Board are invited to comment on the proposed Crime Statistics event.

Discussion

3. The November meeting of the Regulation Committee considered likely issues arising from the three assessments of crime statistics undertaken in 2014. The Committee agreed that this and other aspects of crime statistics should be brought to the Board.
4. We think that there may be real value and impact in an open event, under the Authority's auspices, which brought together external stakeholders – the Crime Statistics Advisory Committee (CSAC), the Inspectorates, academic criminologists, senior members of police forces across the UK, Crime Reduction Partnerships, third sector organisations, and the media – and senior representatives of the main producers of crime and criminal justice statistics in the UK.
5. Such an event might reflect the approach taken to *Better Statistics, Better Decisions*, with a view to informing priorities for the development of crime statistics across the country. It might provide an opportunity to explore some potentially radical suggestions, such as a crime index, and a reduction in the notifiable offence list.
 - i. Crime index – a standardised measure based on a selected group of offences that enables comparisons over time and between geographic areas. This approach is used by the FBI in the US with eight serious offences (wilful homicide, forcible rape, robbery, burglary, aggravated assault, larceny over \$50, motor vehicle theft, and arson).
 - ii. Reduction in the notifiable offence list – police recorded crime statistics do not cover all crimes recorded by the police but only those on the notifiable offence list. The last time the Home Office had a fundamental review of the list was in 1998 when the list of notifiable offences was extended. It was additionally required that each individual victimisation experience was counted by the police as a crime. There previously has been the suggestion that it would be better if the national crime statistics focused on a stable and representative basket of serious crimes.
6. An event might also be a stimulus to the production of a definitive guide to crime and criminal justice statistics, covering exactly what is published about crime and the criminal justice system in the UK: who is responsible, the nature of the producer, the status of the 'statistics', the level of geographical disaggregation, and so on.

Ed Humpherson, Director General for Regulation
December 2014

List of Annexes

Annex A **Themes that might be explored at an Authority-event about crime statistics**

Annex A Themes that might be explored at an Authority-event about crime statistics

Data quality:

- i. PRC data – based on the various Inspectorates' reports, recording quality is a significant issue (for some offences) in some England and Wales police forces; less of an issue overall in Scotland (though there is some variation between Police Scotland districts); and seemingly still less of an issue in Northern Ireland. Likely themes would include standards and variability, and data quality for different types of offences, and a forward look to proposed new offences. Discussion about efficacy of reducing the notifiable offence list.
- ii. Cybercrime including online fraud.
- iii. Commercial crime.
- iv. Sub-national needs: interest in reliable, robust data at small areas (such as Parliamentary Constituencies and Police Forces). Possible boost to the Crime Survey of England and Wales (CSEW).

Analysis:

- i. Analysis of multiple sources (particularly PRC / victimisation surveys) – variable across the UK. Likely themes would include organisational boundaries, and analysts' culture.
- ii. From crime to criminal justice: end-to-end analysis. Likely theme of institutional barriers.
- iii. Potential innovations such as a crime index

Reporting:

- i. Many producers of crime and criminal justice statistics; absence of coherent reporting at national levels.
- ii. Concerns about value of some crime mapping (of PRC data), given known data limitations.
- iii. Plethora of local websites which include crime statistics, perhaps without appropriate caveats.

Structures, coordination and governance:

- i. Role of Force Crime Registrars (in assuring data quality)
- ii. Other organisations, eg CPS (Violence against Women and Girls, reports on eg hate crime)
- iii. Role of the NS Theme Group
- iv. CSAC (E&W only).

UK STATISTICS AUTHORITY

SA(14)49

4

Progress of the Alpha phase of the ONS website**Purpose**

1. This paper provides an update to the Authority Board on progress with the Alpha phase of development of the new Office for National Statistics (ONS) website, as requested at the July 2014 meeting of the Authority Board. This paper also seeks approval for the decision making process for the next steps in the development of the new ONS website.

Recommendations

2. Members of the Authority Board are invited to:
 - i. note the actions taken to date;
 - ii. note the critical success factors (CSFs) for the Alpha phase at **Annex B**, as agreed by the National Statistics Executive Group (NSEG);
 - iii. agree that once the CSFs for the Alpha phase have been met, the Chief Executive of the Authority can give approval to move from the Alpha phase to the Beta phase of development; and
 - iv. provide strategic oversight, challenge and comment on whether the appropriate technical expertise is involved in providing assurance.

Background

3. In July 2014, the Authority Board was provided with criteria which the team considered to be essential for evaluating possible solutions during the Alpha phase. These were:
 - i. improve the ability for users to find our statistics (site search, external search, navigation) in order to extend the reach of our work;
 - ii. improve the speed of 9.30am publishing;
 - iii. meet the Government's Digital by Default service standard;
 - iv. build on Agile and Continuous Delivery principles to enable safe and regular deployment of code; and
 - v. meet the anticipated needs of an evolving digital product portfolio (e.g. new output formats such as data visualisation).
4. The Authority Board made it clear that it was essential that work on the development of a new ONS website moved forward at pace and requested an update on progress by the end of the calendar year. It was agreed a paper would be provided at the December 2014 Authority Board meeting.

Discussion**Summary of progress of the Alpha phase**

5. Since the Authority Board gave approval for ONS to embark on the Alpha phase in July 2014, an external technical team have been procured (Methods Digital) and started work on 15 September. A prototype website was released to the public on 8 December, enabling the ONS to test assumptions, and identify and prioritise the highest value user needs. The full scope of the Alpha phase (see **Annex A**) has been delivered within 12 weeks at a cost of £605,000, within the allocated budget of £650,000.
6. The prototype website is being made available to the public for four weeks and will be publicised via ONS social media (60,000 followers), email newsletter (33,000 subscribers), the current ONS website, key stakeholder relationship managers and via communication with users who have taken part in any of our user research activities

over the previous year, with regular updates provided via the ONS Digital Publishing blog. The Alpha website is clearly marked as a prototype, and visitors are warned that content is only limited, illustrative and that the available statistics are not necessarily the most up to date ONS data. Users are encouraged to provide feedback via an online tool on the prototype website.

7. In addition to developing working software during the Alpha phase, there have been investigations to help ONS better understand solutions for effective and secure publishing at 9.30. We have worked with a Government Digital Service (GDS) approved security specialist to validate our proposed approach and an outline of the investigation is being prepared for the January Programme Delivery Board. During the Beta phase, we will engage in an Architecture Review, involving the ONS Design Authority to further validate the proposal.

User testing and stakeholder engagement

8. To date, the team have undertaken user research with over 1500 users, representative of the 'Information Forager' and the 'Expert Analyst' persona types. During the Alpha phase, approximately 100 users have already used the prototype and provided feedback, which has fed into new iterations of the Alpha prototype every two weeks.
9. The key findings from user research are set out below:
 - i. Users want to be able to view data over time and decide what they download.
 - ii. Users need a clear picture of what ONS offer on a particular topic.
 - iii. Statistical bulletins are well used, but need to be easier to find, reference and print.
 - iv. Single statistics, without contextual information, were unpopular.
 - v. Users like the concept of fewer, but more precise, search results.
 - vi. Statistical jargon is a real problem – even for some expert users.
 - vii. Users want better signposting to related information.
 - viii. Users want to be able to create their own 'collections' of statistics that they can return to.
 - ix. Users want to be able to drill down into local statistics from the ONS website, without being sent elsewhere.
 - x. The equality of access/09.30 issue was regularly raised.
10. The Alpha phase directly addresses i - v, has made in-roads where possible with vi and vii and can continue this work during the Beta phase, viii is currently under consideration for inclusion in the Beta phase and ix and x fall out of the immediate scope of the Alpha but will be core to the planning during the Beta and beyond.
11. As requested by the Authority Board in July 2014, we are prioritising pace and seeking to meet only critical user and business needs during this project, to ensure a new website can go live as soon as possible. The live site will be able to deliver regular improvements to rapidly go beyond the users' essential requirements.
12. The team have engaged with a number of high profile stakeholders (see **Annex D**) to elicit feedback on the Alpha phase. In particular, Tom Loosemore, Deputy Director of Strategy at the GDS, has provided regular input to, and oversight of the work.

Evaluating the Alpha phase

13. In October 2014, NSEG agreed the CSFs by which to assess the Alpha phase. The CSFs are provided at **Annex B**, along with a brief statement on progress to date for each.

14. A final evaluation of the Alpha website will be undertaken in January 2015. This will provide the team with results from user testing and objective quantitative measures collected via a web analytics package. The software will track a number of user journeys identified during the research phase and identify whether users are able to meet goals effectively and efficiently. Additionally a large scale online piece of 'summative' user research will be undertaken, comparing task completion times on the Alpha website against the current ONS website. Alongside this, the team will be observing and interviewing a smaller group of users interacting with the prototype seeking to complete the same tasks.
15. The evaluation report will be presented to NESG on the 16 January 2015 in order to make the case for moving into the Beta phase of development. The roadmap provided at **Annex C** provides the high-level scope of the Beta alongside the timetable for the work.

Assurance mechanisms

16. On the 15 January, GDS will conduct an independent assessment of the Alpha and evaluate our readiness to move into the Beta phase. ONS will need to pass this assessment in order to meet one of the critical success factors agreed by NESG. The assessment will look at areas such as:
 - i. the quality of the user research;
 - ii. the capability and structure of the team;
 - iii. the security of the data storage;
 - iv. the tools and systems used to build, host, operate and measure the service;
 - v. the use of agile methods;
 - vi. the performance benchmarks;
 - vii. the features and tasks identified for the next stage of development;
 - viii. the usability of the service;
 - ix. the quality of the design;
 - x. whether there is the technical flexibility to update and improve the service on a very frequent basis;
 - xi. whether open standards have been used;
 - xii. whether the end-to-end service can be tested adequately to ensure the safe release of code; and
 - xiii. value for money.
17. We will be able to tell NESG whether we have passed the assessment on the 16 January.
18. The overall Improving Dissemination Programme reports progress against scope, budget and risk management into three internal boards. It is currently reporting a delivery confidence of Amber, due to uncertainties around the Treasury reserve bid funding and the need to enhance the software delivered by the Web Data Access Programme in order to release complex datasets as open data.
19. The Programme is undergoing an internal audit in November 2014, which will deliver its recommendations in December. In addition, an external Gateway Review will be conducted in February 2015, to evaluate the inception of the Beta phase and the panel will include at least one external digital expert.
20. Risks are considered as part of all these assurance mechanisms. High scoring risks/dependencies and mitigation plans are provided in **Annex F**.

Transition to Beta phase: costs and timescales

21. The Alpha evaluation will inform the development of a Final Business Case (FBC) for the Improving Dissemination Programme between February and March 2015. Best estimates of timescales and costs will be based on real data from the evaluation, giving more accuracy than we can provide at the time of writing.
22. The timescales, indicated in the high-level roadmap at Annex C, are based on the information we have to date, such as the speed and quality at which the Alpha team are delivering, and emerging user needs which will define the scope of the Beta phase.
23. The estimated capital costs of the Beta to 'Live' phase are £1.4 million, based on a 32 week development period and an assumption that we will move to a secure cloud based hosting solution (with market evaluations suggesting ongoing capital costs of approximately £100,000 per annum). These estimates are based on discussions with potential suppliers and current assumptions about the scope of the Beta, which is not yet fixed. The full estimated costs of the Improving Dissemination Programme, as supplied in the Outline Business Case, are provided at **Annex E**.
24. The team has started the procurement process for the Beta phase to avoid any delays between the Alpha and Beta phases. We are preparing for the Beta delivery team to start work as soon as possible in January 2015, pending NSEG agreeing on the 16 January 2015 that the CSFs for the Alpha phase have been met.
25. We expect to submit the FBC to internal committees in March 2015 and to the Cabinet Office Efficiency and Reform Group and HM Treasury in April 2015.
26. We anticipate the ongoing running costs of the development and support team when the website goes live to be in the region of £300,000 per annum, with £200,000 per annum estimated to cover additional consultancy for specialist projects (e.g. security assessments).
27. In 13/14 we reported website costs of £1,670,637 for development and support resource, and £759,800 for hosting, infrastructure and licenses (relating to the existing website). With the new website, we are expecting to reduce the costs of ongoing development and support, and increase value for money by deploying enhancements more regularly to the live environment. We also expect the hosting and infrastructure costs to reduce as we make use of cloud based services and open-source software. The FBC will set out the anticipated savings.

Next Steps

28. It is anticipated that the Alpha will move to Beta in early 2015, following a successful evaluation of the Alpha against the GDS Standard and the CSFs outlined in this paper being met. The evaluation will be considered by NSEG and the GDS in mid-January 2015. We would like to seek the approval of the Authority Board at the December 2014 meeting, for the Chief Executive to make the decision about whether the ONS can move into Beta phase.

Conclusion

29. This paper has set out the scope of the Alpha phase and the process for evaluating its success. We would welcome an opportunity to report the outcome of the Alpha evaluation to the Authority Board in February 2015.

**John Pullinger, Chief Executive, UK Statistics Authority,
Laura Dewis, Deputy Director, Digital Publishing Division,
8 December 2014**

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Annex A Scope of the Alpha

The aim of the Alpha phase was to develop a prototype website by December 2014 that enables us to:

- understand and prioritise user and business needs for a future ONS website; and
- decide on the skills, budget and technologies we will need to deliver a Beta phase and live release by the end of 2015/16.

The scope of the Alpha phase was as follows.

- i. A front-end website based on wireframes and pattern library covering sufficient content and page types to provide a reasonable browse experience for users. This will allow the new information architecture to be sufficiently tested.
- ii. A new site search implementation based on ElasticSearch that implements current best practice for search performance. This will include the search improvements previously investigated and documented.
- iii. A specific User Experience piece of work focused on presenting the search results and improving the search query experience.
- iv. The development and implementation of a lightweight content management system/publishing system that allows the easy updating of content, data and new pages to the site by an expert internal team to support i.
- v. A combination of formal, laboratory based testing, guerrilla testing and expert reviews by usability specialists will be undertaken throughout the Alpha project sprints. The analysis will be used to prioritise development decisions and influence the planning of the Beta.
- vi. Using the Alpha 'user stories' as a starting point, a number of custom reports, experiments and filters will be set up in Google Universal Analytics to collect data to provide a quantitative set of data to support (or not) the intelligence provided by the user testing. An updated set of user stories will be produced and prioritised based on user testing, feedback and analytics data. These will be the starting point for any Beta planning.
- vii. Investigation into the 9:30 publishing issues, researching alternative approaches and recommending potential solutions that can be prototyped during the Beta. This is a technical business analysis piece without an expectation for working code but a report outlining outcomes of the research will be required.
- viii. Taking into account the outcomes from i, ii, iii and vii a recommendation on a sustainable solution to manage ONS content/data publishing needs is a 'must have'. Any recommendation to move to Beta will need to include a clear roadmap as to how the project will provide an end-to-end publishing solution within the constraints identified in vii while providing the user experience proposed in i to vi.
- ix. An ongoing background activity will be to capture any recommendations regarding best practice and specific approaches in the context of the work undertaken. This will be documented throughout by the Product Manager. A lightweight, lessons learned capture will also take place during the final sprint as well as during each sprint retrospective.

Annex B Critical success factors agreed by NSEG, October 2014

| Critical Success Factor | Progress to date |
|---|---|
| 78 per cent of users are satisfied with the information architecture ¹ . | Analytics software is configured to track user journeys through the prototype and will be monitored when the Alpha is opened to the public in mid December. User testing will observe and interview a smaller sub-set of representative users and track success rates against set tasks. |
| 78 per cent of users in user testing are satisfied with the search experience. | Analytics software is configured to track search journeys through the prototype and will be monitored when the Alpha is opened to the public in mid December. User testing will observe and interview a smaller sub-set of representative users and track success rates against set tasks, based on the most entered search terms on the current site. |
| All features are considered useful by 78 per cent of intended user group. | User researchers have observed and interviewed 100 representative users, using their feedback to refine the features offered and gain feedback on satisfaction. A wider survey of users has been undertaken to identify common needs that would satisfy the majority of users. |
| User needs are well enough understood for us to develop a product backlog as a basis for the work needed during the Beta phase. | Work is underway on producing user stories for the Beta. This will be split in to three primary groups: user experience improvements; the publishing platform and infrastructure. |
| The requirement to publish statistics at 9.30 is well understood from the perspective of: <ul style="list-style-type: none"> i. the UK Statistics Authority; ii. Key Accounts who do not rely on the website as they have direct access to ONS databases after 9.30; iii. journalists and other syndicators and their users; and iv. users of the ONS website, in order to inform a report on potential technical solutions and the trade-offs between these. | A Senior Business Analyst is conducting an investigation into the business, policy and user need behind the requirement of 'equality of access' to statistics. A report is scheduled for discussion at the January Improving Dissemination Programme Delivery Board. |
| Publishing needs are understood well enough for us to select effective technologies to support the sustainable publishing of content and data in multiple formats over the next three to five years. | A technical publishing platform proposal is currently undergoing sense checking by the (Methods) Technical Architect. This will be discussed in an upcoming workshop to discuss the wider implications of the publishing model and a final proposal will be provided at the January Improving Dissemination Programme Delivery Board. |
| Working code has delivered value at the end of each two week sprint. | Working code has delivered value at the end of each sprint with the main deliverables being: <ul style="list-style-type: none"> Sprint 1: A skeleton user interface, front-end including core templates and navigation. Sprint 2: Search engine operational (ElasticSearch), responsive elements implemented, migrated to AngularJS framework to allow faster development for prototyping, all page templates available. Sprint 3: Time series data migrated and dynamic charting implemented. Ability to 'relate' pages developed, search improvements. |

| | |
|--|--|
| | <p>Sprint 4: Considerable performance enhancements, expert content publishing tool developed, enhancements to time series presentation and charting, ability to generate and place 'sparklines', capability to embed additional interactive charts added and investigation in to building an interactive chart comparison option.</p> <p>Sprint 5: Addition of 'Release Calendar' functionality. Consider minor improvements everywhere to ensure the product is ready for public release.</p> |
| The Alpha will pass a Service Assessment to move from Alpha to Beta by the end of January 2015. | A Service Assessment has been scheduled with GDS for the 15 January 2015 |
| We understand the skills we need for a permanent delivery team and the ways of working during the Alpha provide a blueprint for a recruitment strategy for this team. | A team structure has been designed and an action plan is in place for recruitment. We are also taking strategic action such as strengthening our association with regional skills partnerships and local Digital Leaders in other Government Departments. |
| The Continuous Delivery path to production used in the Alpha provides a blueprint for the processes, tools and technologies needed to sustainably deliver value early, safely and often throughout the Beta and live release phases. | We have hosted the Alpha on a cloud application platform, configured to provide development and live environments. Git has been used as a development tool with continuous integration of code from Git to Heroku managed by Travis. We have taken a test driven development approach, alongside other CI principles, to ensure quality or integration issues with any code are quickly and easily identifiable. This significantly reduces the possibility of failed deployments. We can ensure high performance even if the site attracts significant traffic, due to the use of a content delivery network. |
| We understand enough about both the value delivered by the Alpha and the Beta requirements to make sound estimates for the Final Business Case (and Spending Review) by the end of December 2014. | Our Alpha cost and time estimates have proved to be very close to the actuals. We have made estimates for the Final Business Case but these will need validation in February following the evaluation of the Alpha. |
| Critical friends are willing to publically endorse that the Alpha phase has added significant value in moving ONS towards a better quality digital service. | Following the stage of intensive user testing of the Alpha in mid November, two of our critical friends publically endorsed the approach taken by ONS. Chris Giles of the Financial Times stated on Twitter that he believed the ONS would succeed and Will Moy of FullFact agreed. Tom Loosemore of GDS has stated publically that we are doing good work. |

¹ 78% is a success benchmark for user testing that is recommended by usability expert and statistician Jeff Sauro.

Annex C High level roadmap and scope of Alpha-Beta-Live production phases

4.3

Roadmap: Alpha - Beta - Live

| What | Alpha Phase | Private Beta | Public Beta | Live |
|----------------------------------|---|---|--|------------------------|
| Start | Sept 2014 | Feb 2015 | July 2015 | Oct 2015 |
| Deliver | Jan 2015 | June 2015 | Sept 2015 | |
| High Level Goal | Working Front End Website with broad but shallow content coverage. Analysis of Backend Technical Requirements. | Working Publishing tool that meets security requirements and User needs (without compromising the frontend) | Fully functioning Website running in parallel with current site | Continuous improvement |
| Primary Artefacts | Fully responsive Website incl. Search and a Pattern Library Technical Story Cards for developing the Beta Site Content Migration Plan | A Secure Application that can: • Publish to the Website to meet PST requirements • Support continuous deployment and test driven development • Contains agreed content | 09.30 Publishing solution Trained staff Agreed KPIs | |
| Governance & Acceptance Criteria | Digital by default Service Assessment - GDS UKSA approval to move to Beta Beta contract procured and awarded | Digital by default Service Assessment - GDS Security Assurance from CESG Business case approved; future support model agreed | Digital by default Service Assessment - GDS UKSA approval to move to Live | |

Annex D Stakeholder engagement

1. We have engaged stakeholders from the following organisations in reviewing the Alpha website throughout the development phase:
 - i. FullFact
 - ii. Bank of England
 - iii. Open Data Institute
 - iv. Government Digital Service
 - v. mySociety
 - vi. House of Commons Library
 - vii. National Archives
 - viii. Financial Times
 - ix. Trinity Mirror
 - x. Local Government Association
2. We have engaged the Government Digital Service and other government department staff in assessing the Alpha against the service standard.
3. User testing is involving users from HM Treasury, Department for Work and Pensions, Home Office, Ministry of Justice, Bank of England, HSBC, Credit Suisse, Scotiabank, Confederation of British Industry, Morgan Stanley and PA Consulting. Representatives from the Office for Budget Responsibility are scheduled to carry out testing in December 2014.
4. We have engaged large groups of ONS staff at four demonstrations, and smaller groups at a number of other demonstrations. We have presented the Alpha prototype to the Welsh Government, the Permanent Secretary of HM Treasury and staff from the Irish National Statistical Office.
5. There is a provisional date in February 2015 to present the Alpha prototype to statistical Heads of Profession at a Senior Civil Service event.
6. Feedback to date has been constructive and positive, with critical friends voicing their support publicly via social media.

Annex E Costs in the Outline Business Case

| Component | 2014/15 £000s | 2015/16 £000s | 2016/17 £000s | 2017/18 £000s | 2018/19 £000s | Total £000 |
|--|------------------|------------------|------------------|------------------|------------------|---------------|
| Additional Digital Publishing Division staff | 1,095 | 1,095 | 1,095 | 1,095 | 1,095 | 5,475 |
| IDP Programme Office | 295 | 110 | | | | 405 |
| Contractors / agency staff | 160 | | | | | 160 |
| WDA release 6 and ODI project delivery costs | 650 | | | | | 650 |
| WDA / ODI post-release 6 support costs | 500 | | | | | 500 |
| Open datasets project | 450 | | | | | 450 |
| New website alpha build | 600 | | | | | 600 |
| New website beta build | 350 | 300 | | | | 650 |
| New website transition to live service | | 550 | | | | 550 |
| New website infrastructure | 200 | | | | | 200 |
| WDP decommissioning | | | 200 | | | 200 |
| Enhancements to new website | | | 200 | 200 | 200 | 600 |
| Sub total excl. contingency | 4,300 | 2,055 | 1,495 | 1,295 | 1,295 | 10,440 |
| Contingency | 100 | 100 | | | | 200 |
| TOTAL | 4,400 | 2,155 | 1,495 | 1,295 | 1,295 | 10,640 |

Annex F High scoring risks/ dependencies and mitigation plans

| Risk/ dependency | Mitigation |
|--|--|
| Insufficient staff with the necessary skills in place/ recruited/ retained to successfully create and sustain a centre of excellence | <ul style="list-style-type: none"> i. Invest in training for existing staff who show potential and interest in gaining more specialist skills. ii. Engage with the Smart Working Pilot to outline the requirements for an improved working environment, including access to online tools. iii. Develop the new website using best practice tools and processes to ensure we meet the expectations of new staff, enable them to do their jobs to the best of their ability and ensure their skills can be maintained in line with industry standards. iv. Use the GDS recruitment hub team to support us for key roles. v. Explore a premium uplift for skilled Digital publishing staff with HR. vi. Develop focussed advertisements promoting the benefits of the role and ONS vii. Use of agency staff. viii. Use split site working and offers posts in Titchfield and Newport. ix. Invest in suitable on-line and social media for recruitment (e.g. help set up an ONS LinkedIn presence to aid recruitment via digital channels). x. Submit an application for Faststreamers for 2015/16 coming out of the new GDS scheme. xi. Early recruitment of the 'Live release' team, working closely with Terry Cook (IT recruitment), drawing on our Alpha/Beta team to help us recruit. xii. Work with OCP to identify digital capability across the whole of ONS/Authority in line with Cabinet Office Skills review (Sept 2014). xiii. Organisational digital capability will be monitored and assessed on an ongoing basis and will help to identify a broader pool to draw digital (and IT) skills from. xiv. Work with OCP to benchmark with OGDs in South Wales to explore their Digital Recruitment and Retention strategies. |
| The changes needed to ensure ONS can become producers of quality digital-first products may face challenge due to pressures in business areas and reluctance to share ownership of outputs with a new Digital Publishing Division | <ul style="list-style-type: none"> i. Review following Gartner review in April 2013. ii. Provide evidence that the current method of publishing is not effective, and recommend changes to Executive Leadership Team (ELT). iii. Increase support for business areas, while we transition to more efficient ways of working, to make quick improvements to the dissemination quality of outputs (e.g. HealthCheck clinics, proofreading service). iv. Communicate the importance and urgency of creating user driven products, and coordinate user insights from across the user facing functions of ONS and the Authority. v. Provide analytics data and analysis of user research to enable the business areas to make informed decisions on where to prioritise their resource in relation to product development. vi. Set up commissioning and production processes between IDP and business areas. vii. Agree priorities for product developments with business areas, following the steer of the Director for Analysis and Dissemination. Shape internal communications plan to mitigate risk by communicating the benefits, clarifying new processes and strategic aims. |

SA(14)50 – ONS Website: Task & Finish Group

UK STATISTICS AUTHORITY

SA(14)50

ONS Website: Task & Finish Group

A report of the findings from this Task and Finish Group will be published on the UK Statistics Authority website in due course.

UK STATISTICS AUTHORITY

SA(14)51

***Proposed Monitoring Review:
‘The use of official statistics in the 2015 General Election’***

Purpose

1. This paper seeks the views of the Authority Board on a proposed Monitoring Review.

Recommendations

2. Members of the Authority Board are invited to agree that the Monitoring and Assessment team and the Office of the Board and Chief Executive (OBC) should continue to develop thinking about this proposed Monitoring Review.

Discussion

3. In July 2014 the Assessment Committee discussed a paper [SA(AC)(14)28] about scrutiny issues that might arise in the run up to the General Election. Since then, senior members of the Monitoring and Assessment team and OBC have met regularly to monitor progress on some of the strands (such as the publication of ad hoc statistical releases during the purdah period). Most recently we have started to discuss the concept of a Monitoring Review which would describe the way in which statistics are used during the election campaign. This was discussed at the November 2014 meeting of the Regulation Committee, which endorsed the proposal and suggested that it be brought to the Authority Board (alongside ONS’ plans to provide an evidence base to support the election debate).
4. The general benefit of such a Monitoring Review is that it would provide an opportunity to enhance the Authority’s impact – across the statistical service and in the political/public sphere – by reporting independently on statistical activity during a period in which statistics are likely to be used intensely and in relation to particularly significant decision making. More specifically, it would help the Authority to:
 - i. explore the extent to which the use of official statistics ‘to support and inform democratic debate’ was realised;
 - ii. identify gaps in the suite of official statistics – at national and local (e.g. Parliamentary Constituency) levels;
 - iii. review whether good statistical practice was followed;
 - iv. document the rationale for any Authority interventions during the Election period; and
 - v. learn lessons and make recommendations.
5. In taking the proposed Review forward, we would:
 - i. ensure that the report was demonstrably focused on quality, good practice and comprehensiveness – indeed, the suggested Chair’s Foreword might usefully emphasise these themes – consistent with section 8 of the *Statistics and Registration Service Act 2007*;
 - ii. draw on our wider approach to casework, much of which involves presenting our views about Parliamentarians’ public use of statistics;
 - iii. distinguish between election activity and subsequent Government activity;
 - iv. ensure that the report is demonstrably evidence-based, and underpinned by strong quality assurance arrangements focusing on objectivity and fairness; and

- v. design the associated work in such a way as to make the most of existing processes (e.g. media monitoring), and start to prepare as much material as we can well in advance, to spread the work out.
- 6. We have now started to crystallise our thinking about what the review might cover, and formalise our approach to how we should take it forward. It is work in progress – for example, once we have agreement about what the review should cover, we will want to consider the implications for gathering the evidence that we will need – but we think that the upfront investment in detailed planning is particularly important if we are to produce a well-informed and timely piece of work.
- 7. Initial feedback on the idea, from Sir Jeremy Heywood at a meeting on 25 November, was positive.

Ed Humpherson, Director General for Regulation, 9 December 2014