



Police Service of Northern Ireland Statistics Branch

Code of Practice for Official Statistics

The pillars and principles underpinning the <u>Code of Practice for Official</u> <u>Statistics</u> are trustworthiness, quality and value. This document provides information on PSNI practices and policies relevant to each of the pillars, as follows:

Trustworthiness

- 1. Publication of statistics
- 2. Pre-release access
- 3. Data protection and confidentiality

Quality

- 4. PSNI Administrative Sources
- 5. Revisions

Value

- 6. Customer service and user engagement
- 7. Accessibility

PSNI Exemptions from the Code of Practice

PSNI Statistics Branch Complaints policy

Last updated June 2019

<u>1. Publication of statistics</u>

PSNI will publish timely, high quality statistics in an open and transparent way in order to meet user needs and promote confidence, in compliance with Pillar 1 () of the Code of Practice for Official Statistics which ensures Trustworthiness and specifically Principal T3 on orderly release.

PSNI will achieve orderly release by ensuring that we:

- provide an annual <u>publication schedule</u> on the <u>PSNI statistics website</u>, with the month of publication included for the year and the exact date specified at least four weeks in advance of publication
- pre-announce publication of all our statistics in the Branch publication schedule and the UK National Statistics <u>publication hub</u>
- publish our statistics at the time and date pre-announced
- publish all statistics in line with the Code of Practice for Official Statistics
- are transparent when we are unable to meet any of these commitments.

2. Pre-release access

Pre-release access to official statistics refers to the period of time (a maximum of 24 hours) prior to publication when specified persons are given early access to the official statistics that will be published.

According to <u>The Pre-release Access To Official Statistics Order (Northern Ireland) 2009</u> prerelease access can only be granted to an official statistic and to specific eligible persons, when to deny such access would impede:

- 1. the provision of responses to questions or the making of statements about an official statistic at or shortly after the time of publication of that statistic; or
- 2. the taking of action before, at the time of or shortly after publication of that statistic.

Recent developments

On 15th June 2017 the National Statistician, supported by the Chair of the UK Statistics Authority Board, announced that Pre-Release Access to Official Statistics produced by ONS would come to an end. The bank of England subsequently also removed pre-release access to their statistics.

As a result, the decision was taken by the NISRA Chief Executive (who is also the Senior Statistician for the Department of Finance) to remove pre-release access to all NI official statistics where the ONS (or Bank of England) produce the equivalent UK statistics, and where these UK statistics are released at the same time as the NI statistics. This predominantly affected economic and demographic statistics.

NISRA then reviewed its pre-release access arrangements for all other official statistics by consulting with producers and existing pre-release recipients to understand better the action taken during the pre-release access period and the impact of removing such access. The outcome of the review was that there was a continued need for pre-release access among various users therefore NISRA decided to continue to provide it on the condition that it must be minimised and only granted for the reasons specified in the legislation. The decision making process for pre-release access remains with the senior statistician.

The review of pre-release access within PSNI found evidence of user need for such access and as a result, PSNI Statistics Branch continue to provide pre-release access to eligible persons only, for key National Statistics such as the crime and security financial year publications.

A separate <u>Statement of Compliance</u> sets out the principles, criteria and conditions under which the PSNI grants pre-release access to specific outputs.

3. Data protection and confidentiality

This section outlines conformance with the requirements set out in Principle T6 of the Code of Practice for Official Statistics. It details the arrangements the PSNI's Statistics Branch has put in place to:

- maintain the trust and co-operation of those who own and manage administrative data sources used by us and respondents to our surveys
- comply with the relevant legislation, including the <u>General Data Protection Regulation</u> (<u>GDPR</u>) and the <u>Data Protection Act 2018</u>
- maintain the confidentiality of the data we receive, store, process and disseminate.

Arrangements for maintaining the confidentiality of statistical data

The PSNI informs individuals about how their personal data is handled by the organisation through the publication of an <u>Adult Privacy Notice</u> and a <u>Children's Privacy Notice</u>. The PSNI has its own internal Data Protection and Information Security policies and all staff and systems are subject to regular internal audit in relation to the following:

Physical Security

Data on PSNI systems comply with the high security standards required of all police services in the UK. The Statistics Branch is located within a secure PSNI site with access restricted to one main entrance which is staffed by security guards 24 hours a day. The Statistics Branch's offices within that site all comply with PSNI data protection requirements and operate a 'clear desk' policy with all restricted or confidential documents stored in secure cabinets.

Technical security

Access to the various PSNI IT systems is through terminals located within secure PSNI sites. All staff have their own unique password which only allows them access to the systems that they have been authorised to use and where they have received appropriate training. The PSNI terminals have no disk/CD Rom access and cannot be connected to mobile devices or memory sticks. Lap top computers or other portable devices are not used by Statistics Branch staff for PSNI business.

Staff Training

All staff have received training relating to their obligations under the GDPR and Data Protection Act. This outlines the key principles behind data protection and their obligations under the legislation.

Statisticians within the PSNI's Statistics Branch are seconded from the Northern Ireland Statistics & Research Agency (NISRA) and have been made aware of the contents of the National Statistician's Guidance 'Confidentiality of Official Statistics'. They have also completed the relevant data protection training both within the Department of Finance and also within PSNI.

Surveys

Respondents to surveys carried out on behalf of the Department will be informed how their confidentiality will be protected.

Freedom of Information (FOI)

All responses to Freedom of Information requests are compiled and released by the PSNI FOI team. Statistics Branch complete a harm form with each response which outlines any concerns in relation to data protection or disclosure. These are returned to the FOI team who will decide if the information can be released or an exemption applied.

Statistical Disclosure Control

When reporting figures or tabular results derived from datasets that could potentially result in the identification of an individual or private information about them, we will adopt disclosure control methods as appropriate. In doing so, we consider three types of disclosure risk in relation to the data about individual persons, or the statistics derived from the data:

- **Identity**: If a person or persons can be identified (by either the persons themselves or someone else) then there is an identity disclosure risk.
- Attribute: If confidential information about a person or group of persons is revealed and can be attributed to the person, or each person in the group, then there is an attribute disclosure risk.
- **Residual**: If outputs from the same source, or different sources/databases, can be combined to reveal information about a person or group of persons, then there is a residual disclosure risk.

For each of our statistical and data releases, we will assess the risk of disclosure based on the following:

- Level of aggregation of the data;
- Number of tables produced from each dataset;
- Likelihood of an identification attempt;
- Size of the population; and
- Consequences of disclosure.

To minimise the risk of disclosure and maximise the utility of the statistics in our statistical releases, the PSNI's Statistics Branch use an appropriate combination of statistical disclosure control methodologies including: table design; rounding, primary suppression, and secondary suppression if appropriate. Where relevant, statistical publications will provide details of the statistical disclosure control method adopted.

Information Security

Information Security is the confidence that information systems will protect the information they handle and will function as they need to, when they need to, under the control of legitimate users. The PSNI's Information Security team is responsible for evidencing compliance with HMG Security Policy Framework and the ACPO/ACPOS (Association of Chief Police Officers in England, Wales, Scotland and Northern Ireland) Information Systems Community Security Policy.

The PSNI has a series of information assurance standards which provide detailed guidance on the specific information assurance controls and practices that must be adhered to in order to provide the assurance that PSNI information assets are protected and that PSNI information systems are operated and secured in a consistent manner and in compliance with national standards.

Sharing of data with a third party

When we share detailed or confidential information for statistical or research purposes with a third party, we will only do so when appropriate written confidentiality protection arrangements are in place covering the requirements of the GDPR, Data Protection Act and the Code of Practice for Official Statistics. These will be in the form of an information sharing agreement and each such agreement will be approved by the PSNI's Corporate Information team before any confidential data is shared.

Any transfer of confidential data (once an information sharing agreement is in place) will only take place under the guidance and authorisation of the PSNI's Information Security team to ensure that all such data transfers are conducted by secure means.

4. PSNI Administrative Sources

The following table describes the administrative/management sources which the Police Service of Northern Ireland currently uses to produce its National Statistics and Official Statistics.

Name/Title of Administrative Data Source	Main administrative purpose of this source/system	Geospatial Coverage	Title(s) of all Statistical Products derived from this Source
NICHE (a product specifically designed for police services to record and manage occurrences)	Custody processing, occurrence and case management Management of incidents reported to/dealt with by	Northern Ireland Northern Ireland	 Recorded Crime Domestic Abuse Incidents and Crimes Hate Incidents and Crimes Anti-Social Behaviour Incidents Drug Seizures and Arrests Injury Road Traffic Collisions and Casualties Referrals for prosecution for motoring offences Statistics on the security situation PACE Detentions Statistics on the security situation
Cha i Dia ina a	police		
StarDome	Processing of police issued and RSP fixed penalty notices and speed awareness courses	Northern Ireland	 Fixed Penalty Notices / Speed awareness courses for traffic offences
Use of Force Management Information System	Recording of use of force by police	Northern Ireland	- Statistics on Use of Force
STOPS	Recording of usage of police stop and search powers	Northern Ireland	 Statistics on Stop and Search incidents.

Statistical usage of other organisations' administrative or management sources

All of PSNI's National Statistics and Official Statistics are currently sourced solely from PSNI systems.

Table 2 Detailed information about the Police Service of Northern Ireland's governancearrangements for its own administrative or management sources

Requirement	PSNI position	
Arrangements for providing statistical staff (whether inside or outside the organisation) with access to administrative or management sources for statistical purposes	Staff within the PSNI's Statistics Branch are given access to the NICHE and ControlWorks systems after being appropriately vetted and trained. Access to these systems is controlled and auditable to ensure compliance with relevant legislation. Staff are also given access to data files which are extracted from these systems on a daily basis. Individual staff member's access to these systems is monitored and periodically checked by the PSNI's Data Protection Unit.	
Arrangements for auditing the quality of the original source data	to the StarDome, Use of Force and STOPS systems. Statistics Branch has detailed and clear processes for validation and quality assurance in place for each output, with the detail of these included in the user guide and internal procedures manuals. Multiple data quality checks are completed at record level to ensure the completeness, internal validity and accuracy of the source data. Where necessary individual officers are contacted in order to complete validations of specific incidents. The majority of all quality improvements are made to the original source data on the systems.	
Procedures for handling changes, and possible discontinuities, in the underlying source data	As the data suppliers are within the same organisation, any change in police procedures or IT system is governed by internal PSNI processes. PSNI Statistics Branch is informed of any forthcoming IT changes that may affect our processes. Similarly, any changes in IT requirements originating from Statistics Branch are submitted to the IT department for consideration and implementation where possible.	
Procedures for ensuring the security of the statistical processes which use administrative or management sources	The data source and any associated data files are held on secure servers within the organisation. These can only be accessed by relevant staff and are not transmitted outside the organisation.	

5. Revisions

This section sets out PSNI Statistics Branch's intention to be open and transparent about any revisions it makes to Official or National Statistics and to ensure that users of statistics produced by PSNI Statistics Branch have easy access to comprehensive information about those revisions.

Revisions to statistical data can be required for a variety of reasons, especially when working with large administrative databases that are constantly changing on a daily basis. Any such revisions are usually minor in nature with minimal implications for the interpretation of the data. The PSNI's Statistics Branch continually strives to produce the most accurate and reliable figures it can, in light of the available information and resources. However, improvements and consequential revisions can result from ongoing developments and improvements to our processes and data sources.

Some statistical outputs are more subject to revisions than others. In general, our regular inyear official statistics updates are provisional and will be superseded by the next update of the same statistic as we progress through the financial or calendar year reporting period (e.g. when the statistics for April & May are updated with the figures for the next month – June – the revised figures for April & May will also be included in that next update). The publication of the finalised statistics at the end of the financial or calendar year contain the complete official statistics for the year in question and for the various intervening periods that provisional statistics may have been provided for. These are not subject to planned revision.

Statistics Branch makes it clear which Official or National Statistics are provisional and subject to a scheduled pattern of revision. Our in-year statistical reports on crime, injury road traffic collisions, security situation and motoring offences contain a section highlighting the extent and scale of revisions made to previously reported figures within the current financial year (i.e. if the figures published for a previous month are revised later in the year). All previously published monthly reports within the current financial or calendar year are also available from our website so that users can access the original reports if required.

Errors

Many of the revisions made by the PSNI's Statistics Branch are a normal and inevitable feature of statistical life and users are able to absorb and plan for those revisions accordingly. They reflect the conflicting demands of having to provide timely information which is also accurate, reliable and meaningful. However, occasionally figures may need to be corrected as a result of errors or weaknesses in procedures or systems or in source material. Regardless of whether the responsibility is the PSNI's Statistics Branch or others, we will follow the procedures described below.

Announcement of impending corrections

The PSNI's Statistics Branch will be open and transparent about the need for any unscheduled corrections. Once the need for a correction that warrants customer notification is ascertained, PSNI Statistics Branch will announce its intention to issue corrections and the planned date of issue on the PSNI's website.

Dissemination of corrections

Decisions relating to the dissemination of unscheduled corrections will be made by the senior statistician within the PSNI. In general terms:

• Web versions of releases/publications/tables/articles/etc

As soon as possible after the PSNI's Statistics Branch ascertain that a correction is necessary and warranted, it will amend all current electronic versions of any release, publication, table, article, etc which contains the affected statistics or text, and re-populate the website as soon as possible with those amended versions. If the correction is minor, or insignificant, in the sense of being inconsequential and hardly noticeable, the PSNI's Statistics Branch will insert the necessary changes without alerting anyone. Alternatively, the Branch may accumulate minor corrections and make an update at the time of the next scheduled web publication to avoid making too many frequent but minor changes.

Any major revisions/corrections to web versions of statistical outputs will be made as soon as possible and an appropriate notification will be placed on the website to ensure that users are aware of the revision.

• Paper versions of releases/publications/tables

PSNI Statistics Branch does not provide hard copies of publications as standard.

However, if the error is substantial or significant, the PSNI's Statistics Branch will, where practicable, notify the recipients of electronic/paper versions and point them to the revised version available on the web.

Planned changes

Where a methodological or classification change is planned, PSNI will inform users of the change prior to it being introduced and provide an accompanying explanation of any changes. This will usually be included in the publication prior to the change, however if the change is substantial it may require wider consultation and more detailed statements and impact analysis.

6. Customer service and user engagement

The Police Service of Northern Ireland will publish timely, relevant, high quality statistics in line with the Code of Practice for Official Statistics. This section outlines how we will maintain a high level of service to our suppliers and users.

Data suppliers

We will minimise the burden on data providers by efficient use of the administrative systems and efficient processes for the production of our statistics. We will ensure confidentiality and compliance with data protection as outlined in Section 3 of this document.

Requests for information

All requests for information will be dealt with in a timely manner, treated fairly and without prejudice, taking into account the public interest and data protection requirements. Guidance on the GDPR, Data Protection and Freedom of Information Acts can be found at the Information Commissioners website at <u>www.ico.gov.uk</u>, as can a copy of the Department's Notification to the Information Commissioner under "Register of Data Controllers".

Service to users

PSNI Statistics Branch will endeavour to meet the needs of users by ensuring that staff will be polite, approachable and helpful. Confirmation of the receipt of information requests will be issued within five working days with the aim of providing a full response within twenty working days. If it is not possible to provide a response, or if the aforementioned time periods are not attainable, users will be advised accordingly. The relevant statistician will advise and liaise with the requestor directly where possible to ensure that the information provided is timely, relevant and accurate. Where the information may be available from another part of the organisation, Statistics Branch will forward to the relevant section directly for response and inform the requestor of the course of action.

User engagement

Key users of our statistics include police officers, the NI Policing Board, members of District Policing Partnerships, Ministers and policy makers within the Department of Justice and other government departments; academics and schools, expert external special interest and pressure groups, media and commentators and the wider public in general.

Our engagement policy recognises that these customers will have different needs, ranging from quick and easy access to the latest statistics, to involvement in steering the statistical work programme. However, our engagement strategy is set out to ensure that on key

developments to our statistics, there are transparent and clear processes encouraging views from both internal and external customers.

PSNI Statistics Branch will endeavour to maximise user engagement by ensuring that we:

- provide easy and equal access to statistics (see Section 8)
- provide contact details on all statistical releases and on the statistics section of the <u>PSNI website</u>
- welcome feedback from users on all publications and provide details should they wish to do so
- issue the requested publications to mailing list participants as soon as they are published and invite comments or suggestions from users
- conduct a PSNI Statistics Branch customer satisfaction survey every two years to obtain feedback from users at individual output level
- consult with internal and external customers on developments and changes to our statistics methodologies, publications or publication processes, both formally and informally as required
- respond to consultation responses, providing a summary of the outcomes and way forward as appropriate
- publish the response to all consultations on statistics on the statistics pages of the PSNI website
- are represented in the relevant strategic and operational working groups within the organisation
- investigate and document the needs of users of official statistics, the use made of existing statistics and the types of decision they inform
- balance the needs of customers with the cost and burden on suppliers.

7. Accessibility

PSNI Statistics Branch strives to maximise the use of its statistics by improving accessibility to the information in the most efficient and equitable manner. Much of the dissemination is web based via the statistics section of the <u>PSNI website</u> however we actively promote accessibility and usage by:

- publishing as much information as possible to meet identified user needs, subject to quality, legislative and practical limitations
- orderly publication of statistics in line with the publication schedule (see Section 1)
- publishing information in a range of formats including Excel and Open Document Spreadsheet in order to maximise access and promote reuse
- employing user friendly methods of presenting information including commentary, tables and charts
- using a wide range of dissemination methods including web publication, email distribution lists, social media and internal systems within PSNI
- populating data websites with disaggregated datasets where possible, for example the <u>NI Open Data portal</u> and the <u>Northern Ireland Neighbourhood Information</u> <u>Service (NINIS)</u>
- publishing supporting documentation such as user guides alongside the statistics to promote understanding and appropriate usage
- responding to requests for additional information as fully as possible and applying no charges for the production of bespoke information.

Any feedback or requests for PSNI statistics can be addressed to:

PSNI Statistics Branch Police Service of Northern Ireland Lisnasharragh 42 Montgomery Road BELFAST BT6 9LD Tel 028 90650222 ext. 24135 Email: <u>statistics@psni.police.uk</u>

PSNI Exemptions from the Code of Practice

The Code of Practice for Official Statistics states that under some circumstances it may be appropriate for the UK Statistics Authority to agree exemptions or exceptions to the practices contained within it. The PSNI has currently been granted 2 exemptions by the Statistics Authority, as follows:

1) Requirement to provide the name of the responsible statistician for publications

Protocol 2.6 in the 2009 Code of Practice required producers of official statistics to include the name and contact details of the responsible statistician in statistical reports. This protocol remains in the updated <u>Code of Practice for Official Statistics</u> – see T3.7.

As a result of the ongoing security threat against police officers and staff within the Police Service of Northern Ireland (PSNI), the Head of their Statistics Branch requested an exemption from this practice and proposed that instead of naming the statistician responsible for a given report, we would use a generic title such as 'crime statistician' along with contact details that didn't contain the name of the statistician concerned.

This request for an exemption to protocol 2.6 of the 2009 Code of Practice (now T3.7 in the 2018 update) was approved by the UK Statistics Authority in August 2011 (see link below):

https://www.statisticsauthority.gov.uk/publication/contact-details-in-statistical-reports-4/

2) Status of the PSNI's daily road traffic collision fatality report

The PSNI issues a daily update on the number of deaths on the roads in Northern Ireland and this is in the form of a spreadsheet which presents the figures for the current calendar and financial year in tabular form. The statistics are used on an ongoing basis to monitor Government policy and in particular the Road Casualty Reduction target in the Northern Ireland Road Safety Strategy. The information is derived from management information but resembles Official Statistics in many respects; including the fact that it is made publically available; it is produced by NISRA statisticians, it is published on a regular basis and it forms the basis of a National Statistics output produced by PSNI. However, the daily fatal report has no commentary, as it would be impractical to provide this on a daily basis throughout the year, and has no background information and so doesn't comply with the requirements of the Code of Practice for Official Statistics.

The PSNI therefore sought an exemption to these requirements given the unique circumstances of this statistic and the widespread use of the information by government and the media. This exemption was approved by the Statistics Authority on 25th March 2013. As a result the PSNI's daily road traffic collision fatality update/spreadsheet is now considered an Official Statistic.

PSNI Statistics Branch Complaints policy

This section outlines how you can make a complaint about the service you have received from PSNI Statistics Branch.

If for any reason you feel that the service you receive from the PSNI has fallen below the standards you expect, or has not lived up to the statements made in our policies and procedures, then please contact us so we can investigate. We will do our best to put things right and will:

- listen to your complaint
- treat it seriously and in confidence
- investigate it thoroughly and fairly
- resolve it promptly and informally if possible
- implement lessons learned to improve our services.

Where the nature of the complaint relates to information provided under the Freedom of Information Act, the PSNI will review and respond in line with the internal review process set out under the Freedom of Information Act.

How to make a complaint

Complaints should be addressed initially to the Principal Statistician in the PSNI and can be submitted in writing, by email, telephone or in person (by appointment please). As much detail as possible should be provided in relation to the nature of the complaint, to allow it to be addressed promptly. The relevant contact details are:

The Principal Statistician Police Service of Northern Ireland Lisnasharragh 42 Montgomery Road BELFAST BT6 9LD Tel 0845 600 8000 ext. 24135 Fax: 028 90922998 Email: <u>statistics@psni.police.uk</u>

Where applicable, the Principal Statistician will send confirmation of the receipt of your complaint within five working days and aim to provide a full response within twenty working

days. If it is not possible to provide a full response within these time periods you will be advised accordingly.

If you are not satisfied with the initial response you receive, or the way in which your complaint has been handled by the Head of Statistics Branch, you can ask for your complaint to be referred to the Assistant Chief Constable Operational Support Department, as follows:

ACC Operational Support Department PSNI Police Headquarters Brooklyn 65 Knock Road BELFAST BT5 6LE

If you are not satisfied with the response, and the issue is of a statistical nature, you can then refer your complaint to the Head of Profession for Government Statistics in Northern Ireland:

Chief Executive & Registrar General for Northern Ireland NISRA Colby House Stranmillis Court Belfast BT9 5RR

If you are still not satisfied, and the issues relates to the Code of Practice for Official Statistics, then you can refer your complaint to the <u>UK Statistics Authority</u>.