From : [redacted]
Date Sent : 09/09/2014 19:10:33
Subject : RE: Statistics on Recorded Crime in Scotland, (Assessment Report 288)) - requirements 10- and 11

[redacted]

Re requirements 10 and 11 which relate to the SCJS and PRC

Your response in relation to requirement 11 is helpful and I note that '*The intention of the Requirement was not to hold the publication of either set of statistics up…*'

Does this mean that you would be content with an ***additional*** report which brings the analysis and commentary together (as opposed to combining RC and SCJS into one report)? It would be helpful if I could request that you sense check our following plans for addressing requirements 10 and 11.

Requirements 10 and 11

We have considered a range of ways to address these requirements, however having assessed options we are planning:

i. for requirement 11, given the different frequencies of publication involved (recorded crime - annual, SCJS - biennial) we will publish a summary report that brings the analysis and commentary of the two main sources of crime statistics together into a single published report. This report would be regularly updated (and published) upon the release of future statistics and highlighted/referenced/appended to (to be determined) future recorded crime and SCJS reports.

ii. requirements 10 and 11 cover similar territory so we will make things as user-friendly as possible by publishing one report to address both requirements together.

The new report will:

I. bring together summary data, analysis and commentary (from recorded crime and SCJS) on the:

· overall number of crimes

· trends in overall number crimes

· breakdown in the number of crime by main crime type

· trends in the number of crime by main crime type

I. include a range of material from the initial comparable crimes paper (and elsewhere, e.g. from existing SCJS reports) to:

· highlight the differences in the two products

· explain the strengths and weaknesses of each

· explain why making direct comparisons between the two products is difficult

· explain how we recommend doing this by looking at *Comparable crimes (*using *and extending* the analysis of comparable crimes in the attached paper).

Many thanks,

[redacted]

[redacted]
Justice Analytical Services
Scottish Government
[redacted]

From: [redacted]

Sent: 04 September 2014 20:26
To: [redacted]
Subject: RE: Statistics on Recorded Crime in Scotland, (Assessment Report 288)) - draft User Guide

[redacted]

Further to my recent email, please find attached a copy of the current draft of the User Guide. There are still further sections to be included, but this draft will show you the range and type of evidence which we are planning to publish in various sections within the Guide.

We have also prepared a skeleton as to what we believe the "framework of assurance" for Recorded Crime would look like. This is currently being reviewed internally but I would hope to be able to send you a draft early next week together with an update on progress across the requirements.

However it might be helpful to highlight one definitional/conceptual consideration – we see the framework of assurance as the sum of all things that are done to provide assurance about the quality of the data and statistics. The bulk of this proposal would be focussed on what we've termed the 'description of the framework of assurance' the purpose of which is to provide transparency and clarity to users about what is done to assure the quality of the statistics. The text within this description of the framework could be restricted to giving an overview of that particular section with links to other documents that contain the bulk of the information. In drawing up this framework, we consider there to be four key documents that should provide the assurance required, namely i) a document which brings together all the information relating to the administrative system for collecting the data and the context within which it operates within Police Scotland, ii) a document describing the relationship between Police Scotland and the SG in terms of statistics production, iii) Statement of Administrative Sources and iv) a document describing the SG's judgement of the quality of the data, including audit information, and the implications for the use of the statistics.

Kind regards,

[redacted]

[redacted]
Justice Analytical Services
Scottish Government
[redacted]

From: [redacted]
Sent: 03 September 2014 18:09
To: [redacted]
Subject: RE: Statistics on Recorded Crime in Scotland, (Assessment Report 288)) - draft action plan

[redacted]

Many thanks for your detailed reply. The general feedback which you provided on the whole of the Action Plan and the specific feedback on the proposed actions related to some of the requirements is very helpful. I note your reference to the fact that this wasn't a comprehensive list of feedback. However I do appreciate you giving us an initial quick steer based on what we had presented, as this will enable us to take on board your feedback at an earlier stage, as we further develop our actions and overall work plan.

I'll provide a more detailed update on progress to-morrow, but in the interim, it might be helpful just to follow up on a couple of specific points, as follows:

User Guide - re dates to address the Requirements - our aim was to include particular sets of evidence in the User Guide (which we would plan to publish ahead of publication of the bulletin) but also include a link to the relevant section of the User Guide, in the bulletin. I'll send the

current draft of the User Guide to you to-morrow which will show range and type of evidence which we are planning to publish in the various sections within the Guide.

Framework of Assurance – as noted in the overall action plan, we are developing a framework of assurance. As an initial step, we are considering the format and content of the framework. Once we have included the relevant evidence in the framework, we can then use this as a starting point from which this 'living document' can be updated/added to etc to reflect changing circumstances/new developments etc, as well as continuous improvement. I aim to send you a skeleton outline of the framework to-morrow.

Kind regards,

[redacted]
Justice Analytical Services
Scottish Government
[redacted]

From: [redacted]
Sent: 02 September 2014 15:22
To: [redacted]
Subject: Re: Statistics on Recorded Crime in Scotland, (Assessment Report 288)) - draft action plan

[redacted]

Many thanks for sending this early draft of your Action Plan. You asked for feedback for you to consider when developing the Action Plan further. In this email I have provided general feedback on the whole of the Action Plan; and then specific feedback against the proposed actions related to some of the Requirements.

General feedback:

· We were pleased to see the early draft, and it is clear from this and from the substance of Richard's conversations with Nicola that the Scottish Government is addressing the findings of the Assessment Report seriously and systematically. As you will appreciate it is difficult to make a firm judgement yet about whether some of the suggested actions will be sufficient to address the Requirements, because your draft Action plan was understandably quite high level in places, and I'm sure that you will refine and 'deepen' it over the coming weeks.

· Although the Requirement relating to the HMICS audit and assurance framework is indeed a key Requirement, evidence must be presented for all the Requirements set out in the Assessment Report before the NS designation of *Recorded Crime in Scotland* can be confirmed.

· From an audit perspective, and to be in a position to inform the Assessment Committee's considerations, we will need to see appropriate evidence (either documents published, or drafts of documentation where timing dictates) in order to determine whether each particular Requirement has been met.

· Most of the dates to address the Requirements relate to the publication of the bulletin, but you might consider whether any of this evidence could be published ahead of the bulletin's publication date (for example information about roles and responsibilities relating to police recorded crime, as per Requirement 7).

· In the Assessment Report, several of the Requirements also had related Suggestions against them; it would be useful if you consider these in your specific actions against the Requirements (Requirement 8 is one example, where Suggestion 6 includes specific suggested actions, such as publishing "the nature of discussions and meetings with key stakeholders.... and decisions that are taken at these meetings". Requirement 17 is another example).

· The actions that relate to Requirement 13, and that are also set out explicitly at the start of the Action Planning document, need to reflect that the Scottish Government will take account of the evidence of the HMICS audit, and consider the evidence in the way that you produce these statistics. It won't be adequate to simply report the outcome of the audit and comment upon it in the statistical bulletin. In addition, you have included an action to 'complete' and publish an assurance framework – it's important to note that an assurance framework isn't a one-off exercise that only needs to be done once, as it would need to be regularly monitored to ensure it remains fit for purpose. 'Establish, use and develop' might better reflect the sense of continuous improvement that Nicola has discussed with Richard.

Specific feedback for individual Requirements:

Requirement 1: There still seems to be something missing in how the Scottish Government plans to engage with a wider range of users, who aren't captured by the existing ScotStat group (this applies to other Requirements too – see below). It is also unclear how this engagement will be sustained. It would also be helpful if you could make clearer the groups of people who are attending the 'Crime Statistics User Event'.

Requirement 3: The options for 'when SG could meet this requirement by' are a little confusing. We would expect that a statistical work plan would be published in advance of the financial year to which it relates, not during or towards the end of a year. While the 2014/15 work plan has now been published, the new financial year starts in 6 months, therefore we would expect the work planning to commence before March 2015, so we consider that you should reflect this in your milestones in future iterations of the Action plan.

Requirement 5: There's possibly something missing about how SG plans to inform users other than through the Scotstat mailing group about any classification changes, and ensuring that this information about classification changes will be maintained and updated on a regular basis.

Requirement 6: It is important to reflect an action to understand what users want, and an emphasis on both the nature and extent of changes made to police records.

Requirement 11: Although we acknowledge the different timings of data collections of the survey and police recorded crime data, it isn't clear why this is perceived as a barrier. The intention of the Requirement was not to hold the publication of either set of statistics up, but acknowledges that a richer picture can be painted about crime in Scotland by drawing together information from both sources of crime statistics.

Requirement 12: There is scope to add more detail here, to reflect the wider quality concerns set out in paragraph 3.22 of the Assessment Report.

Requirement 13: We consider that you could publish something immediately to inform users that HMICS is planning the timetable of its audit, in the spirit of openness and transparency with users, rather than waiting for a decision about the timetable before you publish anything. This could be followed by further updates. In addition, the suggested actions rely on the Scotstat mailing list, and consideration should be given on how to inform a wider user base.

Requirement 14: It isn't clear why the Scottish Government needs to wait until the publication of the next bulletin to publish something about the relationship between the different sources of crime statistics – there is scope to publish a standalone piece on the website, that could be incorporated into the bulletin and user guide in time for the next publication.

Requirement 18: An alternative way to approach this could be to ask users first about their requirements, then engage with the data holders to determine the extent to which users' needs can be met. Adopting this approach means that you could make more progress more quickly than waiting for a review of what data are currently available. It would also be helpful if you reflected the latest timetable for implementation of the i6 system.

Requirement 21: Can you clarify whether you have published the updated Statement of Admin sources? When I look at the website, the Statement (http://www.scotland.gov.uk/Resource/0045/00457278.pdf) now reflects the fact that police recorded crime data is supplied by Police Scotland, but does not yet reflect full information about the arrangements for auditing the quality of the data – this will obviously be dependent on the HMICS work.

I realise that this is a draft Action plan, and that some of this feedback may relate to things that you are already considering but have not yet reflected in the Plan. It's also important to note that this isn't a comprehensive list of feedback, but thought you would appreciate an initial quick steer based on what you have presented. In order to make a final decision on Code compliance we would need to see the relevant material relating to each Requirement. Please let me know if you have any questions, speak to you soon

[redacted]

[redacted] | UK Statistics Authority | Government Buildings, Cardiff Road, Newport , NP10 8XG
[redacted]

From: [redacted]
Date: 28/08/2014 18:19
Subject: RE: Statistics on Recorded Crime in Scotland, (Assessment Report 288)) - draft action plan

[redacted]

Please find attached an early draft of the Action Plan. More detailed information on each action is being developed and will be provided to you in a subsequent version of this Action Plan.

Please note that we are also developing a more detailed document which looks at the individual actions in relation to specific timelines (i. e. How many days and date of completion). This would be an internal working document showing progress/key milestones/completion dates etc.

For information, I have been in correspondence with [redacted] from the NSO Statistical Advice and Support team. We have arranged to meet on 16 September to discuss some of the particular areas in which they can offer support.

I aim to provide you with regular updates on progress and to submit evidence, as it becomes available, for you to consider the quality of the evidence submitted and offer feedback/comments.

Kind regards,

[redacted]
Justice Analytical Services
Scottish Government
[redacted]

From: [redacted]
Sent: 14 August 2014 18:01
To: [redacted]
Subject: RE: Statistics on Recorded Crime in Scotland, (Assessment Report 288)) - framework of assurance

[redacted]

Many thanks for your reply and for providing answers to my specific questions.

Thank you also for letting me know that you have spoken with the Good Practice Team and to [redacted]. It is helpful to know that this support is available. I shall contact them on Monday (as I am not in the office to-morrow).

Kind regards,

[redacted]
Justice Analytical Services
Scottish Government
[redacted]

From: [redacted]
Sent: 14 August 2014 15:30
To: [redacted]
Subject: Re: Statistics on Recorded Crime in Scotland, (Assessment Report 288)) - framework of assurance

[redacted]

While you work to meet the Requirements there's quite a bit of support that you could find helpful. I've spoken to the Good Practice Team who can assist with aspects of the statistics (goodpracticeteam@statistics.gsi.gov.uk). Also I think you have spoken before to [redacted] from the NSO Statistical Advice and Support team, I've spoken to [redacted] and she is also happy to offer support [redacted]

To answer your specific questions;

- the recorded crime in Scotland statistics have been de-designated as National Statistics. In order for them to be considered for re-designation as NS we will need to submit evidence to the Assessment Committee that all the Requirements are met. Until this time, the recorded crime in Scotland statistics cannot be published as National Statistics.

- where meeting a Requirement depends on evidence that can only be supplied in your publication, for example improving commentary, we will consider a draft of the proposed commentary. For info, you might find it useful to know that the Assessment Committee has taken a firm view on this, and recently told another producer that in order to meet the commentary Requirement prior to publication they must completely re-do their previous year's report to demonstrate the improvements.

- the Assessment Committee is clear that meeting the Requirements is not simply a tick-box exercise. When implementing the Requirements the Scottish Government needs to demonstrate that in meeting the Requirements and Suggestions there have been considered improvements in the approach and practices of compiling these statistics.

- the matter of the timing of the report is for the Scottish Government and is ultimately the responsibility of the Chief Statistician. The Code of Practice requires that statistical reports are released as soon as they as judged ready. It is difficult to give you an exact timing on how long before you publish a report that you would have to submit evidence that you consider meets the Requirements. It depends for example on if you submit all the evidence at once, if it is this first time we have see the evidence, our views about the quality of the evidence submitted, and the number and complexity of the Requirements and Suggestions. The submission of evidence is generally an iterative process until we are sure that it meets the standard of the Code of Practice, this can take some time to complete.

- when we are content that the evidence meets the standards of the Code we will present it to the Assessment Committee for consideration. The Assessment Committee meets every two months, with a meeting in late Sept, Nov, Jan, March etc. In very exceptional circumstances we may work slightly outside of that timetable but that cannot be guaranteed.

I hope that helps, let me know if there is anything you need further clarity on.

Best wishes,

[redacted] | UK Statistics Authority | 23 Walker Street, Edinburgh, EH3 7HX
[redacted]

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From: [redacted]
Date: 13/08/2014 16:32
Subject: RE: Statistics on Recorded Crime in Scotland, (Assessment Report 288)) - framework of assurance

[redacted]

Many thanks for your reply.

Yes, we are developing an action plan to take forward the requirements from the Assessment Report which would include the proposed actions and the associated timescales. We would wish to share an early draft of the action plan with you. As you say, this would be helpful, in terms of providing a joint understanding of the work to be undertaken and the relevant timescales. Thank you for offering to review the action plan for us. We will send you a copy of the draft action plan before the end of the month.

On a related matter, papa 1.2.8 in the Assessment report states the following:

"The Scottish Government should:

- working with HMICS or other appropriate bodies, combine existing and new work into a coherent framework of assurance. Most of this material exists, or will be available once HMICS publish their next report examining the integrity of crime recording in Scotland, but it has not been incorporated into a coherent framework,
- publish demonstrable evidence that the outputs from the forthcoming independent HMICS audit have been integrated into the processes and practices of the compilation, analysis and publication of these statistics and of the supporting documentation.
- Implement all the Requirements covering the wide range of Principles of the Code of Practice listed in section 1.5."

It would be helpful if you could let me know the following:

· Do all the requirements have to completed by the forthcoming publication or does evidence of progress on all the requirements need to be available?
· Similarly, what does it mean to "implement" the requirements? Are there key requirements that we have to have completed prior to publication?

- How long prior to the publication date would we need to have submitted all the evidence to the Assessment team?

Happy to discuss.

Kind regards

[redacted]
Justice Analytical Services
Scottish Government
[redacted]

From: [redacted]
Sent: 12 August 2014 09:58
To: [redacted]
Subject: Re: Statistics on Recorded Crime in Scotland, (Assessment Report 288)) - framework of assurance

[redacted]

There is no template, it is up to the statisticians to consider, for each set of statistics, how best to bring together and publish the range of actions and evidence that you use to assure yourselves of the quality of the underlying data. I would encourage you to consider the range of material presented in the Exposure Draft Report.

It is good to hear that you are thinking about how to address the Requirements in the Assessment Report. Now that the Report has been published, we usually suggest that the producer develop an action plan for how you are planning to take the work forward, and share that plan with the Assessment team. This is helpful as there will then be a joint understanding of the work and the relevant timetables, it also avoids a situation of producers sending a lot of information late in the day which turns out to be insufficient to meet the Requirements. The plan is usually a simple table of the Requirements listed down one side together with the proposed actions and deadlines. If you can send that over by the end of the month we would be happy to review it for you.

Best wishes,
[redacted]

[redacted] | UK Statistics Authority | 23 Walker Street, Edinburgh, EH3 7HX
[redacted]

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From: [redacted]
Date: 11/08/2014 17:54
Subject: Statistics on Recorded Crime in Scotland, (Assessment Report 288)) - framework of assurance

[redacted]

Statistics on Recorded Crime in Scotland, (Assessment Report 288)

Within the above Assessment Report, there are a number of references made to a "**framework of assurance**". There are two references made to the "framework of assessment" in the Statement by the Head of Assessment and further references are made to a "framework"/"framework of assurance" in sections 1.2.3 and 1.2.8 of the report.

It would be helpful if you could provide us with some information/guidance as to what constitutes a "framework of assurance", please? This would be beneficial so that we can provide all the relevant information required to meet the requirements of such a framework. For example, is there a standard template available which can be used to consider and collate all the information which is relevant to a specific administrative data source?

I note the publication (on 31 July 2014) by the Authority of an 'Exposure Draft Report *Quality Assurance and Audit Arrangements for Administrative Data'*, and the references made to a "conceptual framework" and to the ESS Quality Assurance Framework.

I also note the NSO's Interim Guidance (published in April 2014) entitled "Using Administrative Data: Good Practice Guidance for Statisticians". However I am not aware of any reference to a framework of assurance in this guidance.

Happy to discuss.

Regards,

[redacted]
Justice Analytical Services
Scottish Government
[redacted]

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