

Assessment of compliance with the Code of Practice for Official Statistics

Statistics on Scottish Sea Fisheries

(produced by the Scottish Government)

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About the UK Statistics Authority

The UK Statistics Authority is an independent body operating at arm's length from government as a non-ministerial department, directly accountable to Parliament. It was established on 1 April 2008 by the *Statistics and Registration Service Act 2007*.

The Authority's overall objective is to promote and safeguard the production and publication of official statistics that serve the public good. It is also required to promote and safeguard the quality and comprehensiveness of official statistics, and good practice in relation to official statistics.

The Statistics Authority has two main functions:

1. oversight of the Office for National Statistics (ONS) – the executive office of the Authority;
2. independent scrutiny (monitoring and assessment) of all official statistics produced in the UK.

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ASSESSMENT AND DESIGNATION

The *Statistics and Registration Service Act 2007* gives the UK Statistics Authority a statutory power to assess sets of statistics against the *Code of Practice for Official Statistics*.

Assessment will determine whether it is appropriate for the statistics to be designated as National Statistics.

Designation as National Statistics means that the statistics comply with the *Code of Practice*. The *Code* is wide-ranging. Designation can be interpreted to mean that the statistics: meet identified user needs; are produced, managed and disseminated to high standards; and are explained well.

Designation as National Statistics should not be interpreted to mean that the statistics are always correct. For example, whilst the *Code* requires statistics to be produced to a level of accuracy that meets users' needs, it also recognises that errors can occur – in which case it requires them to be corrected and publicised.

Assessment Reports will not normally comment further on a set of statistics, for example on their validity as social or economic measures. However, Reports may point to such questions if the Authority believes that further research would be desirable.

Assessment Reports typically provide an overview of any noteworthy features of the methods used to produce the statistics, and will highlight substantial concerns about quality. Assessment Reports also describe aspects of the ways in which the producer addresses the 'sound methods and assured quality' principle of the *Code*, but do not themselves constitute a review of the methods used to produce the statistics. However the *Code* requires producers to "seek to achieve continuous improvement in statistical processes by, for example, undertaking regular reviews".

The Authority may grant designation on condition that the producer body takes steps, within a stated timeframe, to fully meet the *Code's* requirements. This is to avoid public confusion and does not reduce the obligation to comply with the *Code*.

The Authority grants designation on the basis of three main sources of information:

- i. factual evidence and assurances by senior statisticians in the producer body;
- ii. the views of users who we contact, or who contact us, and;
- iii. our own review activity.

Should further information come to light subsequently which changes the Authority's analysis, it may withdraw the Assessment Report and revise it as necessary.

It is a statutory requirement on the producer body to ensure that it continues to produce the set of statistics designated as National Statistics in compliance with the *Code of Practice*.

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1 Summary of findings

1.1 Introduction

- 1.1.1 This is one of a series of reports¹ prepared under the provisions of the *Statistics and Registration Service Act 2007*². The Act requires all statistics currently designated as National Statistics to be assessed against the *Code of Practice for Official Statistics*³. The report covers the set of statistics reported in *Provisional Sea Fisheries Statistics*⁴ and *Scottish Sea Fisheries Statistics*⁵, produced by the Scottish Government.
- 1.1.2 This report is shorter than normal. In particular, section 3 adopts an ‘exception reporting’ approach - it includes text only to support the Requirements made to strengthen compliance with the *Code* and Suggestions made to improve confidence in the production, management and dissemination of these statistics. This abbreviated style of report reflects the Head of Assessment’s consideration of aspects of risk and materiality⁶. The Assessment team nonetheless assessed compliance with all parts of the *Code of Practice* and has commented on all those in respect of which some remedial action is recommended.
- 1.1.3 This report was prepared by the Authority’s Assessment team, and approved by the Board of the Statistics Authority on the advice of the Head of Assessment.

1.2 Decision concerning designation as National Statistics

- 1.2.1 The Statistics Authority judges that the statistics covered by this report are readily accessible, produced according to sound methods and managed impartially and objectively in the public interest, subject to any points for action in this report. The Statistics Authority confirms that the statistics published in *Provisional Sea Fisheries Statistics* and *Scottish Sea Fisheries Statistics* can be designated as National Statistics, subject to the Scottish Government implementing the enhancements listed in section 1.5 and reporting them to the Authority by October 2011.
- 1.2.2 The Scottish Government has informed the Assessment team that it has started to implement the Requirements listed in section 1.5. The Statistics Authority welcomes this.

¹ <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/index.html>

² http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf

³ <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/index.html>

⁴ <http://www.scotland.gov.uk/News/Releases/2011/03/17094627>

⁵ <http://www.scotland.gov.uk/Publications/2010/09/15155811/0>

⁶ <http://www.statisticsauthority.gov.uk/assessment/assessment/guidance-about-assessment/criteria-for-deciding-upon-the-format-of-an-assessment-report.pdf>

1.3 Summary of strengths and weaknesses

- 1.3.1 The Scottish Government requests feedback from users of its Scottish sea fisheries statistics each year. It also uses the ScotStat⁷ network to reach out to users of the statistics and is responsive to individual users' requests for data. The Scottish Government's Marine Analytical Unit Data Team publishes the feedback although little has been received. The team has effective links with known users of the statistics who request additional data aggregations. However, the team has not published any information about the use made of the statistics.
- 1.3.2 The statistics make extensive use of existing administrative data sources and the extra burden on data providers is therefore minimal. The data collected are regulated by EU legislation and the statistics are comparable across the UK and the EU.
- 1.3.3 The Scottish Government presents the statistics in a comprehensive annual report and also publishes provisional statistics to ensure users' receive timely statistics. However the statistical releases do not provide sufficient information about the quality of the data used to produce the statistics, and about the quality of the published statistics themselves. The presentation of the statistics could also be made more accessible for users.

1.4 Detailed recommendations

- 1.4.1 The Assessment team identified some areas where it felt that the Scottish Government could strengthen its compliance with the *Code*. Those which the Assessment team considers essential to enable designation as National Statistics are listed in section 1.5. Other suggestions, which would improve the statistics and the service provided to users but which are not formally required for their designation, are listed at Annex 1.

1.5 Requirements for designation as National Statistics

Requirement 1	Take steps to develop a greater understanding of the use made of these statistics, publish the relevant information and assumptions and use them to better support the use of these statistics (para 3.1)
Requirement 2	Publish a comprehensive revisions policy for these statistics, explaining the nature and extent of the revisions made, in particular to the provisional statistics (para 3.3)
Requirement 3	Publish information about the quality of the sea fisheries statistics (para 3.5)

⁷ ScotStat is a network for users and providers of Scottish Official Statistics, <http://www.scotland.gov.uk/Topics/Statistics/scotstat>

- Requirement 4** Document how sea fisheries statistics compare with (or differ from) those for the other UK countries (para 3.6)
- Requirement 5** Report annually the estimated costs to the Marine Scotland port offices of providing the aggregate return of the number of fishermen employed (para 3.7)
- Requirement 6** Improve the commentary in *Scottish Sea Fisheries Statistics*, including providing main findings, information on trends, and factual information about the operational context of the statistics (para 3.8)
- Requirement 7** Release the statistics in formats that enable analysis and re-use (para 3.10)

2 Subject of the assessment

- 2.1 *Scottish Sea Fisheries Statistics* is an annual publication which presents statistics on landings of sea fish by type; the number and type of vessels in the Scottish fishing fleet; and the number of sea fishermen employed in Scotland. The Scottish Government also publishes *Provisional Sea Fisheries Statistics* four months earlier, although in 2011 the publication was brought forward to six months earlier to provide more timely data to users. The statistics are produced by the Marine Analytical Unit Data Team within the Scottish Government. The Scottish Government has published historic versions of *Scottish Sea Fisheries Statistics* back to September 1996, with data tables for the Scottish sea fisheries statistics made available from 1927⁸ on its website.
- 2.2 The main source of data used to produce the Scottish sea fisheries statistics is the Fisheries Information Network (FIN) administrative database. This database contains information on sea fishing activity and catch details, input at the port offices by Marine Scotland⁹ from information supplied by fishing crews from logbooks and buyers and sellers from landing declarations for vessels over 10 metres long. For vessels less than 10 metres long, data are collected using the SHELL1 and NEP1 returns. FIN also includes information on fish sales and values taken from Registered Buyers and Sellers¹⁰ (RBS). The RBS holds information on the first sale of fish made directly from vessels and designated auction sites operating in Scotland.
- 2.3 The Scottish Government also uses data from the IFISH data warehouse, which is a combined database of Scottish data from FIN and data from the other UK countries. The statistics on employment in the fishing industry are based on aggregate returns from Marine Scotland port offices on the numbers of fishermen employed on all vessels administered by port offices and on data from the Labour Force Survey (produced by the Office for National Statistics).
- 2.4 The sea fisheries data from FIN form the majority of the Scottish contribution to UK returns sent to EuroStat, in accordance with Council Regulation (EC) 199/2008¹¹. The Marine Management Organisation (MMO) compiles and sends these data on behalf of the UK. MMO also publishes Scottish statistics in its annual publication *UK Sea Fisheries Statistics*¹². The statistics produced by MMO were assessed at the same time as this assessment and the report is available on the Authority's website¹³. The sea fisheries statistics are used by the Scottish Government to monitor quotas and to set local and national priorities for sustainable fish stocks, such as the Scotland Performs National Indicator on fish stock sustainability¹⁴. The statistics are also used by employee

⁸ <http://www.scotland.gov.uk/Topics/Statistics/Browse/Agriculture-Fisheries/PubFisheries>

⁹ Marine Scotland Compliance is an agency within Scottish Government focusing on the monitoring and enforcement of marine and fishing laws. See <http://www.scotland.gov.uk/About/Directorates/Wealthier-and-Fairer/marine-scotland>

¹⁰ <http://www.scotland.gov.uk/Topics/marine/Sea-Fisheries/fish-register/introduction>

¹¹ <http://eur-lex.europa.eu/JOHtml.do?uri=OJ:L:2008:060:SOM:en:HTML>

¹² <http://www.marinemanagement.org.uk/fisheries/statistics/annual.htm>

¹³ <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/index.html>

¹⁴ <http://www.scotland.gov.uk/About/scotPerforms/indicators/fishStocks>

organisations, such as the Scottish Fishermen's Federation¹⁵, fish producer organisations and environmental consultants, for carrying out environmental impact assessments, for example. Other users include Inshore Fisheries Groups¹⁶ (IFGs), which are local commercial partnerships assisting in local area fisheries management. The team also provides regular management information for internal policy users and other stakeholders, such as the scientists in Marine Scotland involved in the assessment of the size of fish stocks.

- 2.5 The estimated staff cost in producing these statistics is £46k per year. In addition, the Data Team pays £2k–3k annually for the printing of the paper copies of the bulletin and putting it into a web accessible format. There is no cost for obtaining the data as these are extracted from existing administrative sources maintained for the provision of management information.

¹⁵ <http://www.sff.co.uk>

¹⁶ <http://www.scotland.gov.uk/Topics/marine/Sea-Fisheries/InshoreFisheries/IFGsMap>

3 Assessment findings

- 3.1 The Scottish Government engages with the main users of sea fisheries statistics by sending consultations and requests for feedback to registered users via ScotStat. The team told us that these consultations generally result in a very low number of responses. The team also requests feedback online when it publishes *Scottish Sea Fisheries Statistics*; it publishes the results of these consultations¹⁷ on its website. It publishes no information on the uses made of the statistics. As part of the designation as National Statistics, the Scottish Government should take steps to develop a greater understanding of the use made of these statistics, publish the relevant information and assumptions and use them to better support the use of these statistics¹⁸ (Requirement 1). As part of documenting the use of these statistics, we suggest the Scottish Government refer to the types of use put forward in the Statistics Authority's Monitoring Brief, *The Use Made of Official Statistics*¹⁹.
- 3.2 The Data Team has also attended meetings of the FIN database user group, although this group has now been discontinued. Formerly, it consisted of representatives from the port offices responsible for inputting data into FIN, and discussed data collection issues as well as how the statistics were meeting users' needs. We suggest that the Scottish Government discuss with Marine Scotland the possibilities of re-establishing the FIN database user group, or a suitable alternative.
- 3.3 The Scottish Government publishes provisional statistics to provide more timely data to users. The Scottish Government has published a short statement on revisions²⁰ for these statistics although this does not mention the relationship between the provisional and final statistics. As part of the designation as National Statistics, the Scottish Government should publish a comprehensive revisions policy for these statistics, explaining the nature and extent of the revisions made, in particular to the provisional statistics²¹ (Requirement 2).
- 3.4 The Scottish Government also publishes weekly and monthly management information²² on sea fisheries. These tables are available on the Scottish Government's website. This information is not part of this assessment. We suggest that the Scottish Government review whether the published management information tables should be re-classified as official statistics. Official statistics should be supported by suitable commentary and explanation and provide information to users about the quality and reliability of the statistics.
- 3.5 The team told us that the port offices check the data when they are entered into FIN and that it assures the quality of the data during the production of the statistics. However the Scottish Government does not publish any details of this quality assurance or of the quality and reliability of the sea fisheries statistics. As part of the designation as National Statistics, the Scottish Government should publish information about the quality of these sea fisheries statistics²³

¹⁷ <http://www.scotland.gov.uk/Topics/Statistics/Browse/Agriculture-Fisheries/scotstat/SeaFishConsult>

¹⁸ In relation to Principle 1, Practices 1, 2 and 5 of the *Code of Practice*

¹⁹ <http://www.statisticsauthority.gov.uk/assessment/monitoring/monitoring-briefs/index.html>

²⁰ <http://www.scotland.gov.uk/Topics/Statistics/Browse/Agriculture-Fisheries/SeaFishStatsDisclosure>

²¹ In relation to Principle 2, Practice 6 of the *Code of Practice*

²² <http://www.scotland.gov.uk/Topics/Statistics/Browse/Agriculture-Fisheries/Seafisheriesdata>

²³ In relation to Principle 4, Practice 2 and Principle 8 Practice 1 of the *Code of Practice*

- (Requirement 3). In meeting this Requirement, the Scottish Government should include an indication of the accuracy of the administrative data sources.
- 3.6 *Scottish Sea Fisheries Statistics* presents some UK-level statistics taken from the IFISH data warehouse. The publication provides little information about the comparability of the Scottish statistics with those for the other UK countries. As part of the designation as National Statistics, the Scottish Government should document how these statistics compare with (and differ from) those for the other UK countries²⁴ (Requirement 4). In meeting this requirement, we suggest that the Scottish Government include links to the UK statistics in *Scottish Sea Fisheries Statistics*.
- 3.7 Statistics on employment in fisheries are based on aggregate returns from port offices to the Scottish Government. The Scottish Government has recently consulted the port offices about the possibility of collecting data for individual vessels. The Scottish Government decided that the additional cost would outweigh the likely benefits and that the port offices should continue to provide the data in aggregate. The Scottish Government has not published the estimated costs of providing data on employment although the team told us that the consultation found that the average cost for the port offices providing the aggregate return was £1k per year. As part of the designation as National Statistics, the Scottish Government should report annually the estimated costs to the Marine Scotland port offices of providing the aggregate return of the number of fishermen employed²⁵ (Requirement 5).
- 3.8 *Scottish Sea Fisheries Statistics* provides some factual information about the operational context of the statistics, such as the EU Common Fisheries Policy²⁶. This contextual information could be improved by explaining how recent developments, such as the introduction of the Conservation Credits Scheme²⁷, relate to the statistics. The commentary could be expanded to include some main findings at the beginning, more analysis of trends, and links to related statistics. As part of the designation as National Statistics, the Scottish Government should improve the commentary in *Scottish Sea Fisheries Statistics*, including providing main findings, information on trends and factual information about the operational context of the statistics²⁸ (Requirement 6). In meeting this Requirement, the Scottish Government should consider the points raised in Annex 2.
- 3.9 The team told us that it is currently reviewing the format and presentation of *Scottish Sea Fisheries Statistics*. The Assessment team suggests that as part of this, the Scottish Government review its presentation of graphs, tables and maps in *Scottish Sea Fisheries Statistics* to ensure that these are clear and consistent; it should involve users in this review.

²⁴ In relation to Principle 4, Practice 6 of the *Code of Practice*

²⁵ In relation to Principle 6, Practice 1 of the *Code of Practice*

²⁶ <http://www.scotland.gov.uk/Topics/marine/Sea-Fisheries/common-fisheries-policy>

²⁷ The Conservation Credits Scheme (CCS) is the Scottish Government's scheme for managing fishing effort, namely the time that vessels spend at sea to make sure that valuable whitefish stocks, particularly Cod, are able to recover to sustainable levels in Scottish waters.

<http://www.scotland.gov.uk/Topics/marine/Sea-Fisheries/17681>

²⁸ In relation to Principle 8, Practice 2 of the *Code of Practice*

- 3.10 The statistical data tables in the release are only made available in the PDF report. This limits the accessibility of the data and the potential analysis and re-use of the statistics. As part of the designation as National Statistics, the Scottish Government should release these statistics in formats that enable analysis and re-use²⁹ (Requirement 7).
- 3.11 The team provided us with a list of those granted pre-release access to *Scottish Sea Fisheries Statistics*. We suggest that the Scottish Government publish lists of those given pre-release access to these statistics in their final form.

²⁹ In relation to Principle 8, Practice 6 of the *Code of Practice*

Annex 1: Suggestions for improvement

A1.1 This annex includes some suggestions for improvement to the Scottish Sea Fisheries statistics, in the interest of the public good. These are not formally required for designation, but the Assessment team considers that their implementation will improve public confidence in the production, management and dissemination of official statistics.

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|---------------------|--|
| Suggestion 1 | Refer to the types of use put forward in the Statistics Authority's Monitoring Brief, <i>The Use Made of Official Statistics</i> when documenting use (para 3.1). |
| Suggestion 2 | Discuss with Marine Scotland the possibilities of re-establishing the FIN database user group, or a suitable alternative (para 3.2). |
| Suggestion 3 | Review whether the published management information tables should be re-classified as official statistics (para 3.4). |
| Suggestion 4 | Include links to the UK statistics in <i>Scottish Sea Fisheries Statistics</i> (para 3.6). |
| Suggestion 5 | Review the presentation of graphs, tables and maps in <i>Scottish Sea Fisheries Statistics</i> to ensure that these are clear and consistent; it should involve users in this review (para 3.9). |
| Suggestion 6 | Publish the lists of those given pre-release access to these statistics in their final form (para 3.11). |

Annex 2: Compliance with standards for Statistical Releases

- A2.1 In October 2010, the Statistics Authority issued a statement on *Standards for Statistical Releases*³⁰. Whilst this is not part of the *Code of Practice for Official Statistics*, the Authority regards it as advice that will promote both understanding and observation of the Code. In relation to the statistical releases associated with Scottish Sea Fisheries Statistics, this annex comments on compliance with the statement on standards.
- A2.2 In implementing any Requirements of this report (at paragraph 1.5) which relate to the content of statistical releases, we encourage the producer body to apply the standards as fully as possible.

Appropriate identification of the statistics being released

- A2.3 The titles of the releases include the period to which the statistics relate. The geographical coverage of the statistics is included in the title. All of the releases use appropriate headings and logos for a National Statistics product. The releases clearly identify the producer organisation, and include the name and contact details of the responsible statistician. *Scottish Sea Fisheries Statistics* includes a contents page at the start, but it would be helpful to include also a brief account, or summary, of what is included.

Include commentary that is helpful to the non-expert and presents the main messages in plain English

- A2.4 *Scottish Sea Fisheries Statistics* does not include a summary that identifies the main messages. A summary of the *Provisional Scottish Sea Fisheries Statistics* is provided in the supporting news release, which is linked from the publications webpage. The language used in *Scottish Sea Fisheries Statistics* is mostly straightforward, with some explanation of technical terms within the main text. The release presents some useful commentary by making suitable comparisons between areas of the country and over time. The use of graphs, tables and maps within the release could be improved to aid user interpretation. The ordering of charts and tables, and the mixed use of roman numerals could be made more consistent. There are no supporting explanations of why these statistics are important, to whom, and for what they are likely to be used.

³⁰ <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-releases.html>

Use language that is impartial, objective and professionally sound

A2.5 The text used in the releases is impartial and evidence based. The descriptions of proportions, changes and trends in the releases are appropriate. However, the release does not provide enough information on the quality of the statistics used to make these statements.

Include information about the context and likely uses

A2.6 *Scottish Sea Fisheries Statistics* includes limited information about the operational context of the statistics, such as the regulation of the UK fleet, but it does not include information about how these statistics are used. The releases do not provide much information on the policy and operational context of these statistics; including whether the statistics are used to monitor government targets and what they show in the context of those targets. The releases could be improved by including information on the reliability of the statistics, and on other aspects of quality or potential uses. It would be appropriate to comment on the uses to which people are likely to put the statistics.

Include, or link to, appropriate metadata

A2.7 The releases do not include information about the sources and the methods used to compile these statistics. *Scottish Sea Fisheries Statistics* does not provide enough information on how methods and definitions relate to European/international concepts and classifications. *Scottish Sea Fisheries Statistics* presents limited statistics for the UK in some tables and charts. The release does not include information on how the statistics compare (and differ) from those for the other UK countries. The release could be improved by including a methods section that includes information on any changes to definitions and methods. There should be adequate description of these changes, including numerical comparisons that allow users to see the extent of differences with the previous data series. *Provisional Scottish Sea Fisheries Statistics* indicates that the data is provisional but it does not provide information on when, and how, the data are likely to be revised.

Annex 3: Summary of assessment process and users' views

A3.1 This assessment was conducted from February to June 2011.

A3.2 The Assessment team – David Duncan-Fraser, Kim Reimann and Cathy Kruger – agreed the scope of and timetable for this assessment with representatives of the Scottish Government in February. The Written Evidence for Assessment was provided on 9 March. The Assessment team subsequently met the Scottish Government during March to review compliance with the *Code of Practice*, taking account of the written evidence provided and other relevant sources of evidence.

Summary of users contacted, and issues raised

A3.3 Part of the assessment process involves our consideration of the views of users. We approach some known and potential users of the set of statistics, and we invite comments via an open note on the Authority's website. This process is not a statistical survey, but it enables us to gain some insights about the extent to which the statistics meet users' needs and the extent to which users feel that the producers of those statistics engage with them. We are aware that responses from users may not be representative of wider views, and we take account of this in the way that we prepare assessment reports.

A3.4 The Assessment team received 4 responses from the user consultation. The respondents were grouped as follows:

Scottish Government	1
Environmental impact consultants	2
Industry association	1

A3.5 The main users of the statistics are Scottish Government policy officials. Based on the responses to our consultation, users were generally satisfied with the statistics. Some suggestions were presented to us in favour of having access to more detailed and geo-referenced data. However, it was understood that there are currently legal issues governing the provision of vessel monitoring system data, limiting access to this level of detail. One user also suggested that as part of reviewing these statistics the Scottish Government should consult with wider industry users to ensure that the statistics better meet the needs of users outside of the Scottish Government.

Key documents/links provided

Written Evidence for Assessment document

