

# Assessment of compliance with the Code of Practice for Official Statistics

## Statistics on Deaths During or Following Police Contact

*(produced by the Independent Police Complaints  
Commission)*

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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 of compliance with the Code of Practice for Official Statistics**

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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 reports<sup>1</sup> prepared under the provisions of the *Statistics and Registration Service Act 2007*<sup>2</sup>. The Act allows an appropriate authority<sup>3</sup> to request an assessment of official statistics against the *Code of Practice for Official Statistics*<sup>4</sup> in order for them to gain National Statistics status. This report is in response to such a request. The report covers the set of statistics reported in *Deaths during or following police contact: Statistics for England and Wales*<sup>5</sup> (*Deaths during or following police contact*), produced by the Independent Police Complaints Commission (IPCC).

1.1.2 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 *Deaths during or following police contact* can be designated as a new National Statistics product, subject to IPCC implementing the enhancements listed in section 1.5 and reporting them to the Authority by July 2013.

1.2.2 IPCC has informed the Assessment team that it has started to implement the Requirements listed in section 1.5. The Statistics Authority welcomes this.

## 1.3 Summary of strengths and weaknesses

1.3.1 Following public criticism in January 2012 of statistics about deaths during or following police contact, the National Statistician carried out an independent review<sup>6</sup> (*NS Review*) and concluded that the annual statistics 'have been collated conscientiously with a consistent process that is followed routinely'. The review made a series of recommendations, which IPCC has implemented.

1.3.2 *Deaths during or following police contact* is the first IPCC statistical report to be assessed to gain National Statistics status and the producer team has worked to ensure that its policies and processes comply with the *Code*. IPCC has also reviewed *Deaths during or following police contact* against the Authority's

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

<sup>2</sup> [http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga\\_20070018\\_en.pdf](http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf)

<sup>3</sup> Subsection 12(7) of the Act defines 'appropriate authority' as Ministers of the Crown, Scottish Ministers, Welsh Ministers, Northern Ireland departments or the National Statistician

<sup>4</sup> <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/index.html>

<sup>5</sup> [http://www.ipcc.gov.uk/en/Pages/reports\\_polcustody.aspx](http://www.ipcc.gov.uk/en/Pages/reports_polcustody.aspx)

<sup>6</sup> <http://www.statisticsauthority.gov.uk/national-statistician/ns-reports--reviews-and-guidance/national-statistician-s-reviews/national-statistician-s-review-of-ipcc-statistics.html>

statement on *Standards for Statistical Reports*<sup>7</sup> and has provided the Assessment team with a reworked mock-up of the 2011/12 report in order to illustrate planned improvements for 2012/13. The Assessment team has used the mock-up as the basis for this assessment.

1.3.3 IPCC acknowledges that more could be done to widen user engagement and is taking steps to address this.

#### **1.4 Detailed recommendations**

1.4.1 The Assessment team identified some areas where it felt that the Independent Police Complaints Commission 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**

<b>Requirement 1</b>	Improve the commentary in <i>Deaths during or following police contact</i> so that it aids user interpretation of the statistics (para 3.18).
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<sup>7</sup> <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-reports.html>

## 2 Subject of the assessment

- 2.1 The Independent Police Complaints Commission (IPCC) was established by the *Police Reform Act 2002*<sup>8</sup> and became operational in April 2004, replacing the Police Complaints Authority (PCA). IPCC is an executive non-departmental public body of the Home Office and its primary statutory purpose is to increase public confidence in the police complaints system in England and Wales. It is responsible for serious complaints and conduct matters relating to staff at the Serious Organised Crime Agency (SOCA), HM Revenue and Customs (HMRC), and the UK Border Agency (UKBA). The IPCC is independent of government and the police, and produces regular official statistics about police complaints and deaths during and following police contact. It also publishes an annual public confidence survey and research studies on topics such as road traffic incidents and mental health and police custody<sup>9</sup>. The subject of this report is *Deaths during and following police contact*.
- 2.2 Following public criticism<sup>10</sup> in January 2012, which suggested misclassification of some specific high profile cases, the National Statistician carried out an independent review<sup>11</sup> (*NS Review*) of statistics about deaths during or following police contact at the request of the Chief Executive of the IPCC<sup>12</sup>. The review concluded that the annual statistics ‘have been collated conscientiously with a consistent process that is followed routinely’ and that the specific cases had been correctly classified. However, it also made a series of recommendations to help ‘avoid any misunderstanding on the part of users and enhance public confidence’. One of the recommendations was to consider putting the annual statistics forward for an assessment by the UK Statistics Authority against the *Code* in time for the publication of the 2012/13 statistics in July 2013.
- 2.3 Under the *Police Reform Act 2002*, police forces in England and Wales have a statutory duty to refer to the IPCC any complaint or incident involving a death which has occurred during or following police contact and where there is an allegation or indication that the police contact, be it direct or indirect, contributed to the death<sup>13</sup>. HMRC, SOCA and the UKBA<sup>14</sup> are subject to the same statutory duty; HMRC and SOCA since April 2006 and UKBA since April 2007.
- 2.4 *Deaths during or following police contact* reports on deaths occurring within the financial year to which each report relates, and IPCC publishes the statistics approximately 16 weeks after the end of the relevant year. IPCC examines the

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<sup>8</sup> <http://www.legislation.gov.uk/ukpga/2002/30>

<sup>9</sup> <http://www.ipcc.gov.uk/en/Pages/research.aspx>

<sup>10</sup> A File on Four programme, *Police restraint*, broadcast on BBC Radio 4 on 31 January 2012, criticised the IPCC’s statistic on restraint related deaths in police custody

<sup>11</sup> See footnote 6

<sup>12</sup> <http://www.statisticsauthority.gov.uk/national-statistician/ns-reports--reviews-and-guidance/national-statistician-s-reviews/letter-from-jane-furniss--chief-executive-of-ipcc--to-jil-matheson--national-statistician.pdf>

<sup>13</sup> Paragraph 4(1)(a), 13(1)(a), 14c(1). Schedule 3, Part 1, Police Reform Act 2002 as amended by the Serious Organised Crime and Police Act 2005, Schedule 12

<sup>14</sup> Following the Home Secretary’s recent announcement about the future of the UKBA, IPCC told us that it is working with the Home Office to understand how and when the changes will impact <https://www.gov.uk/government/speeches/home-secretary-uk-border-agency-oral-statement>

circumstances of all deaths referred to it and presents statistics about those which meet the statutory criteria, classified to five categories: road traffic fatalities; fatal shootings; deaths in or following police custody; other deaths following police contact; and apparent suicides following police custody. In addition to summary statistics – by type of death; sex; age group; ethnicity and police force – IPCC provides an overview of the nature and circumstances in which the deaths occurred. IPCC has published annual statistics since the 2004/5 report published in 2005. Analyses about deaths during and following police contact were previously published as part of PCA’s annual reports and accounts<sup>15</sup>.

2.5 *Deaths during or following police contact* presents statistics about an important and sensitive topic. IPCC Commissioners and Investigators use the statistics to inform policy and promote public debate around deaths during or following police contact and more specifically, deaths in police custody. IPCC also uses *Deaths during or following police contact* to determine priorities for its research programme. For example, IPCC told us that based on findings from the annual statistics, it went on to produce a research report<sup>16</sup> that examined in detail fatal and serious injury cases following road traffic incidents involving the police. This report informed IPCC recommendations to the Association of Chief Police Officers (ACPO) that ultimately resulted in a statutory code of practice on the management of police pursuits<sup>17</sup>.

2.6 The statistics are used by police forces to inform custody training, to brief Police Authorities and, in conjunction with the *Learning the Lessons*<sup>18</sup> bulletin, to examine the suitability of risk assessments. Written evidence submitted by INQUEST<sup>19</sup> and Black Mental Health UK<sup>20</sup> to the Home Affairs Committee for its *Report on the Independent Police Complaints Commission*<sup>21</sup> drew on IPCC statistics about deaths in police custody as they relate to mental health services users and ethnic minorities. The Independent Advisory Panel (IAP) on Deaths in Custody<sup>22</sup> provides independent advice to Ministers on measures to reduce the number and rate of deaths in custody. IAP publishes an annual report<sup>23</sup> analysing all recorded deaths in state custody, using the demographic breakdowns in the IPCC statistics about deaths in police custody together with statistics about deaths in other custodial sectors including prisons. Other users include ACPO, the Home Office, Her Majesty’s Inspectorate of Constabulary and a range of interest groups.

2.7 IPCC estimates that the total annual cost of producing *Deaths during or following police contact* is approximately £23,500.

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<sup>15</sup> <http://www.official-documents.gov.uk/document/hc0506/hc03/0370/0370.pdf>

<sup>16</sup> [http://www.ipcc.gov.uk/en/Pages/reports\\_rti.aspx](http://www.ipcc.gov.uk/en/Pages/reports_rti.aspx)

<sup>17</sup> <https://www.gov.uk/government/speeches/management-of-police-pursuits-code-of-practice>

<sup>18</sup> <http://www.learningthelessons.org.uk/Pages/default.aspx>

<sup>19</sup> INQUEST is a charity that provides advice on contentious deaths and their investigation, <http://www.inquest.org.uk/>

<sup>20</sup> Black Mental Health UK was established in 2006 to raise awareness and address the stigma associated with mental illness, <http://www.blackmentalhealth.org.uk/>

<sup>21</sup> <http://www.publications.parliament.uk/pa/cm201213/cmselect/cmhaff/494/49402.htm>

<sup>22</sup> <http://iapdeathsincustody.independent.gov.uk/>

<sup>23</sup> <http://iapdeathsincustody.independent.gov.uk/news/iap-publishes-statistical-analysis-of-deaths-between-2000-and-2011/>

### 3 Assessment findings

#### Principle 1: Meeting user needs

**The production, management and dissemination of official statistics should meet the requirements of informed decision-making by government, public services, business, researchers and the public.**

- 3.1 IPCC has published a user engagement strategy for these statistics as part of *Deaths during or following police contact annual report: Policies and statements*<sup>24</sup> (*Policies and statements*). IPCC presents the statistics at regular meetings with key users, including the IAP and INQUEST, and at an annual national conference on preventing deaths in police care. At the point of publication, IPCC sends a link to the latest statistics to all individuals and organisations with a recorded interest in deaths in custody on its internal Customer Relations Management (CRM) system. IPCC invites feedback from users through this route and also through its website.
- 3.2 IPCC told us that it is seeking to widen its user engagement, in a proportionate way, and has been pursuing new opportunities. For example, the producer team told us that it has made arrangements to gather feedback about these statistics from a wider IPCC review of the way that deaths following police contact are investigated<sup>25</sup>. This review will report in 2013. IPCC is also exploring using StatsUserNet<sup>26</sup> and the Crime and Justice Statistics Network<sup>27</sup> to engage with a wider range of potential users.
- 3.3 IPCC has published *Deaths during or following police contact annual report: User Engagement Feedback*<sup>28</sup> which summarises the users and uses of the statistics, and provides some information about users' experiences together with examples of how IPCC has responded to identified user needs. IPCC has pre-announced in its user engagement strategy that it will launch a user questionnaire alongside the 2012/13 statistics in July 2013 and will routinely update *User Engagement Feedback* with the findings and any resulting actions.

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<sup>24</sup> [http://www.ipcc.gov.uk/Documents/research\\_stats/policies\\_and\\_statements.pdf](http://www.ipcc.gov.uk/Documents/research_stats/policies_and_statements.pdf)

<sup>25</sup> [http://www.ipcc.gov.uk/en/Pages/deaths\\_review.aspx](http://www.ipcc.gov.uk/en/Pages/deaths_review.aspx)

<sup>26</sup> <http://www.statsusernet.org.uk/Home/>

<sup>27</sup> <https://www.jiscmail.ac.uk/cgi-bin/webadmin?A0=CRIM-BCS-USERS>

<sup>28</sup> [http://www.ipcc.gov.uk/Documents/research\\_stats/user\\_engagement\\_feedback.pdf](http://www.ipcc.gov.uk/Documents/research_stats/user_engagement_feedback.pdf)

## Principle 2: Impartiality and objectivity

**Official statistics, and information about statistical processes, should be managed impartially and objectively.**

- 3.4 IPCC publishes these statistics in an orderly and timely manner on its website, free of charge to users. The statistics are presented impartially and objectively.
- 3.5 IPCC told us that, when introducing a change to the classification of ‘other deaths in or following police contact’ for the 2010/11 statistics, it sought feedback from key users but did not engage more widely about the proposals, nor did it pre-announce the change to users. Recognising the requirements for compliance with the *Code*, including the need to announce changes to methods in advance, IPCC published *Policies and statements* in April 2013. This document presents a series of policies for these statistics, including a:
- revisions policy;
  - policy for correcting errors;
  - policy for pre-announcing changes to methods or classifications;
  - pre-release access policy; and a
  - pricing policy.

### Principle 3: Integrity

**At all stages in the production, management and dissemination of official statistics, the public interest should prevail over organisational, political or personal interests.**

- 3.6 No incidents of political pressures, abuses of trust or complaints relating to professional integrity, quality or standards were reported to or identified by the Assessment team.
- 3.7 Compliance with the *Code* requires that the relevant statistical Head of Profession has the sole responsibility for deciding on statistical methods and procedures, and on the content and timing of statistical reports. In the case of arm's length bodies like IPCC, the appointed Lead Official for Statistics assumes this role and is the 'person responsible' referred to in the *Statistics and Registration Service Act 2007*, and the Pre-release Access to Statistics Orders. The Head of Analytical Services at IPCC is the Lead Official for these statistics and her responsibilities are clearly outlined in *Policies and statements*.
- 3.8 As part of the standard model for engagement with the UK statistical system, the Home Office's statistical Head of Profession (HoP), who is professionally accountable to the National Statistician, should provide advice, guidance and support to the Lead Official at IPCC on statistical matters, including their responsibilities under the *Code* and statistical legislation. The *NS Review* recommended that the producer team should 'further develop its working relationship with the Home Office Head of Profession for Statistics, whilst being mindful of the IPCC's independence from the Home Office'. The Lead Official told us that on her appointment in July 2012, she met with the Home Office HoP for guidance about the *Code* and other matters relating to National Statistics. She said that the Home Office HoP continues to provide advice to IPCC and shares examples of best practice from across the Government Statistical Service.

## Principle 4: Sound methods and assured quality

**Statistical methods should be consistent with scientific principles and internationally recognised best practices, and be fully documented. Quality should be monitored and assured taking account of internationally agreed practices.**

- 3.9 The *NS Review* concluded that the annual statistics about deaths during or following police contact 'have been collated conscientiously with a consistent process that is followed routinely'. However, the National Statistician recommended that IPCC should provide users with more information about the methods for producing the statistics, including information about how cases are classified and how cause of death is determined. IPCC has published a guidance document<sup>29</sup> alongside the 2011/12 statistics that addresses these points.
- 3.10 IPCC has shared with the Assessment team planned updates to the guidance document for publication alongside the 2012/13 statistics. In the latest draft, IPCC has extended the guidance to provide details of further studies and other information of relevance to deaths during or following police contact. This additional information provides users with an insight in to the policy and operational context for the statistics and advises users about the availability of comparable statistics for Scotland and Northern Ireland, and internationally. IPCC now also provides a link to the IAP annual report analysing all recorded deaths in state custody.
- 3.11 In the mock-up of *Deaths during or following police contact* (see paragraph 1.3.2), IPCC has extended the background notes to include information about changes to the latest publication; the nature and extent of revisions; and information about users and uses of the statistics. A link is provided to the detailed guidance document and to information presented about the quality of the statistics in *Policies and statements*.
- 3.12 IPCC told us that it is not always practical to rework historical time series for any changes to methods or classifications as this would involve revisiting each individual investigation. Instead, IPCC clearly marks the break in the time series and presents figures for the previous year on both bases to provide users with some illustration of the impact of the change.

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<sup>29</sup> [http://www.ipcc.gov.uk/Documents/research\\_stats/death\\_report\\_guidance.pdf](http://www.ipcc.gov.uk/Documents/research_stats/death_report_guidance.pdf)

## Principle 5: Confidentiality

**Private information about individual persons (including bodies corporate) compiled in the production of official statistics is confidential, and should be used for statistical purposes only.**

- 3.13 IPCC has assured us that it takes all necessary steps to protect the confidentiality of the data used in *Deaths during or following police contact*. IPCC has published its policy on confidentiality and security of data in *Policies and statements*. IPCC provides details of how it complies with UK Government policies with respect to Information and Communications Technology (ICT) and information security, and presents its related risk management policies.
- 3.14 *Policies and statements* describes additional steps that IPCC takes to ensure that statistics about deaths during or following police contact do not reveal any information about individual cases that are not already in the public domain.

## **Principle 6: Proportionate burden**

**The cost burden on data suppliers should not be excessive and should be assessed relative to the benefits arising from the use of the statistics.**

- 3.15 Data used to produce the statistics on deaths during or following police contact are sourced from IPCC's administrative systems. IPCC told us that as part of an IT transformation programme, the producer team has influenced the design for a new case management, data warehouse and reporting system in order to improve the quality and usefulness of the data reported. This programme is due to be implemented during 2013.

## Principle 7: Resources

**The resources made available for statistical activities should be sufficient to meet the requirements of this Code and should be used efficiently and effectively.**

- 3.16 IPCC told us that it is resourced to produce these statistics to the standards required by the *Code of Practice*.
- 3.17 The Lead Official told us that the producer team are members of the Government Social Research (GSR) network. As well as developing stronger links with the Home Office statistical HoP, the Lead Official has committed to attending future meetings of the GSR Leadership Board to network with peers and keep abreast of latest developments. The producer team is subject to IPCC learning and development policies and competency framework and annually reviews individuals' professional development needs, supporting training and attendance at conferences. We suggest that, in addition to its own framework, IPCC use the GSR competency framework to inform the design of research posts and support professional development.

## Principle 8: Frankness and accessibility

**Official statistics, accompanied by full and frank commentary, should be readily accessible to all users.**

- 3.18 The mock-up of *Deaths during or following police contact* is a well-structured report that provides a helpful narrative for users, supported by summary tables. IPCC does not present any charts in the report but told us that it will review the user need for this as part of its user feedback exercise in 2013. IPCC publishes a range of information about the statistics including a guidance document, *Policies and Statements*, and *User Engagement Feedback*. However, the main report would benefit from a brief summary of why the statistics are important, to whom, and for what they are used. Also, there is no information within the narrative about the strengths and limitations of the statistics in relation to their potential uses. As part of the designation as National Statistics, IPCC should improve the commentary in *Deaths during or following police contact* so that it aids user interpretation of the statistics<sup>30</sup> (Requirement 1). We suggest that in meeting this requirement IPCC should consider the points detailed in annex 2.
- 3.19 IPCC releases *Deaths during or following police contact* through its website. A single webpage<sup>31</sup> includes links to the latest and historical reports, and supporting metadata is presented alongside the statistics. IPCC also provides details of the next publication and invites users to contact the producer team with any questions or feedback.
- 3.20 The *NS Review* recommended that IPCC should clearly distinguish between the regular annual statistics and one-off research studies, and ensure that the different publications cannot be confused. We suggest that IPCC take advice from the National Statistician's Office (NSO) about appropriate use of the National Statistics logo to aid user interpretation.
- 3.21 Data tables are provided in OpenDocument Spreadsheet format but would benefit from a list of contents, and links to supporting metadata. Time series are only presented in some of the spreadsheets. For example, there is no time series presented for type of death by police force, age group or ethnicity. While users could construct time series by combining data from historical publications, we suggest that IPCC review the data tables presented in spreadsheets to see how they might better support the re-use of the statistics.
- 3.22 IPCC's internal Information Strategy document states that its 'records management strategy and processes are aligned with government compliance as directed by the National Archives and government legislation'. The producer team told us that the headline statistics are presented as part of IPCC's Annual Report<sup>32</sup>.

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<sup>30</sup> In relation to Principle 8, Practice 2 of the *Code of Practice*

<sup>31</sup> [http://www.ipcc.gov.uk/en/Pages/reports\\_polcustody.aspx](http://www.ipcc.gov.uk/en/Pages/reports_polcustody.aspx)

<sup>32</sup> [http://www.ipcc.gov.uk/en/Pages/corp\\_reports-plans.aspx](http://www.ipcc.gov.uk/en/Pages/corp_reports-plans.aspx)

## **Protocol 1: User engagement**

**Effective user engagement is fundamental both to trust in statistics and securing maximum public value. This Protocol draws together the relevant practices set out elsewhere in the Code and expands on the requirements in relation to consultation.**

3.23 The requirements for this Protocol are covered elsewhere in this report.

## Protocol 2: Release practices

**Statistical reports should be released into the public domain in an orderly manner that promotes public confidence and gives equal access to all, subject to relevant legislation.**

- 3.24 *Deaths during or following police contact* is not currently available through the National Statistics Publication Hub<sup>33</sup>. IPCC has published a commitment in *Policies and Statements* to publish via the Publication Hub at the standard time of 9.30am and has confirmed that it understands that the Lead Official must report any breach of the *Code* to the NSO. IPCC has liaised with the Office for National Statistics in readiness for the 2012/13 publication and is now a listed statistics producer on the Publication Hub. IPCC has pre-announced on its website that the 2012/13 statistics will be published in July 2013. We suggest that IPCC publish a timetable of statistical reports for twelve months ahead on the Publication Hub.
- 3.25 IPCC did not list the responsible statistician in *Deaths during or following police contact 2011/12*. The producer team has addressed this in the mock-up of the publication template.
- 3.26 IPCC has published a pre-release access policy in *Policies and Statements*, and states that pre-release access to the report, and data not in its final form, is limited to those essential for production and publication. *Policies and Statements* presents a list of those with access prior to release.

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<sup>33</sup> <http://www.statistics.gov.uk/hub/statistics-producers/index.html>

### **Protocol 3: The use of administrative sources for statistical purposes**

**Administrative sources should be fully exploited for statistical purposes, subject to adherence to appropriate safeguards.**

3.27 IPCC has published its Statement of Administrative Sources in *Policies and Statements*.

## Annex 1: Suggestions for improvement

A1.1 This annex includes some suggestions for improvement to the Independent Police Complaints Commission's *Deaths during or following police contact*, 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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|---------------------|---|
| <b>Suggestion 1</b> | Use the GSR competency framework to inform the design of research posts and support professional development (para 3.17).       |
| <b>Suggestion 2</b> | Consider the points detailed in annex 2, in seeking to improve the statistical reports (para 3.18).                             |
| <b>Suggestion 3</b> | Take advice from the NSO about appropriate use of the National Statistics logo to aid user interpretation (para 3.20).          |
| <b>Suggestion 4</b> | Review the data tables presented in spreadsheets to see how they might better support the re-use of the statistics (para 3.21). |
| <b>Suggestion 5</b> | Publish a timetable of statistical reports for twelve months ahead on the Publication Hub (para 3.24).                          |

## **Annex 2: Compliance with Standards for Statistical Reports**

- A2.1 In November 2012, the Statistics Authority issued a statement on *Standards for Statistical Reports*<sup>34</sup>. While this is not part of the *Code of Practice for Official Statistics*, the Authority regards it as advice that will promote both understanding and compliance with the *Code*. In relation to *Deaths during or following police contact*, and using the mock-up of the report provided to the Assessment team by IPCC, 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 reports, we encourage the producer body to apply the standards as fully as possible.

### **Include an impartial narrative in plain English that draws out the main messages from the statistics**

- A2.3 *Deaths during or following police contact* begins with a table of contents, a short introduction and a summary of the key messages, including a brief narrative that places the latest estimates in their long-term context.
- A2.4 The report is then presented in two parts. The first part focuses on the latest financial year and presents a narrative that provides detailed demographic information about those who died, together with details of the nature of their death. The second part of the report presents trends over an eight year period. The narrative is generally descriptive. IPCC provides some contextual information about factors which might have influenced trends – for example, new ACPO guidance on police pursuits – but the producer team told us that it would not be appropriate to speculate further without a strong evidence base.
- A2.5 The text is impartial. Tables are used to illustrate the main points but IPCC does not provide any charts. Time series are only presented for some of the spreadsheet tables. For example, there is no time series presented for type of death by police force, age group or ethnicity.
- A2.6 Key technical terms are presented at the start of the report and IPCC provides a supplementary guidance document that explains the terminology and classifications in some detail.

### **Include information about the context and likely uses of the statistics**

- A2.7 IPCC provides links to documents that present information about the context and uses of the statistics but the report does not include any summary description of why the statistics are important, to whom, and for what they are used.

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<sup>34</sup> <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-reports.html>

### **Include information about the strengths and limitations of the statistics in relation to their potential use**

- A2.8 IPCC cautions users that some of the investigations are ongoing and so the details are based on information available at the time of analysis. The nature and extent of any revisions is reported and a link is provided to the revisions policy. Where there have been changes in classifications, these are highlighted and IPCC explains how it has managed the change.
- A2.9 The report includes a link to information about the quality of the statistics presented in *Policies and statements* but there is no further information within the narrative about the strengths and limitations of the statistics in relation to their potential uses.

### **Be professionally sound**

- A2.10 Descriptive statements are consistent with the statistics and professionally sound. Tables are clearly presented.

### **Include, or link to, appropriate metadata**

- A2.11 The title describes the coverage of the statistics and the period to which the latest statistics relate. An introductory statement describes the frequency of the statistics and which statistics are new.
- A2.12 The IPCC logo is presented on the front cover of the report and the report includes the name and contact details for the responsible statistician on its first page.
- A2.13 Summary information about definitions is provided at the front of the publication and the report includes a link to more detailed guidance about classifications, data sources and methods.
- A2.14 Links are provided within the guidance document to similar statistics for Scotland and Northern Ireland, and to some international statistics, and users are cautioned about making any direct comparisons.
- A2.15 Supplementary spreadsheet tables are presented alongside the report on the website but the report does not contain a link to the tables. Also, the spreadsheets could be improved by the inclusion of a contents page and a link to the main report and supporting metadata.

## Annex 3: Summary of assessment process and users' views

A3.1 This assessment was conducted from January to April 2013.

A3.2 The Assessment team – Donna Livesey and Caroline Jones – agreed the scope of and timetable for this assessment with representatives of IPCC in November 2012 so that the producer team could prepare in advance. The Written Evidence for Assessment was provided on 11 February. The Assessment team subsequently met IPCC during February 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:

Police forces	3
Voluntary organisation	1

A3.5 Only a small number of users responded to this consultation. Of those who responded, one said that their interest is only in the individual cases. Police forces said that they use the statistics for custody training, to review custody Adverse Incidents and for briefing Police Authorities. The statistics are also used in conjunction with the *Learning the Lessons* bulletin to examine the suitability of risk assessments. Users would like to have more information about individual cases in order to optimise opportunities to learn lessons but generally recognised the need for anonymity and the restrictions this places on the statistics. One user said that they would like to view the statistics within the context of all deaths in state custody, or at least have a link to these statistics, and another user said they would welcome more detailed regional data. None of the users who responded had been in contact with IPCC about these statistics.

### Key documents/links provided

Written Evidence for Assessment document

Mock-up of *Deaths during or following police contact 2011/12* (provided to illustrate planned improvements for the 2012/13 report)

