

Assessment of compliance with the Code of Practice for Official Statistics

Statistics on Immigration

(produced by the Home Office)

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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 *Immigration Statistics*⁴, produced by the Home Office, which is comprised of the following ‘briefings’:

- ‘Summary of key facts’ (also reported in ‘Statistical News Release: Immigration Statistics’)
- ‘Before entry briefing’: entry clearance visas and passengers initially refused entry
- ‘Admissions briefing’: passengers allowed entry
- ‘Extensions briefing’: people given permission to extend their stay
- ‘Settlement briefing’: people given permission to stay permanently
- ‘Citizenship briefing’: people granted British citizenship
- ‘Asylum briefing’: people applying for asylum
- ‘Detention briefing’: people detained under Immigration Act powers
- ‘Removals and voluntary departures briefing’: people who leave the country after enforcement action is initiated against them and other departures
- ‘European Economic Area briefing’: information on nationals from the EEA
- ‘Work briefing’: immigration for the purpose of work
- ‘Study briefing’: immigration for study reasons
- ‘Family briefing’: immigration for family reasons

1.1.2 Section 3 of this report 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 materiality⁵. 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 <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.homeoffice.gov.uk/publications/science-research-statistics/research-statistics/immigration-asylum-research/immigration-q2-2011/>

⁵ <http://www.statisticsauthority.gov.uk/assessment/assessment/guidance-about-assessment/criteria-for-deciding-upon-the-format-of-an-assessment-report.pdf>

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 *Immigration Statistics* are designated as National Statistics, subject to the Home Office implementing the enhancements listed in section 1.5 and reporting them to the Authority by May 2012.

1.3 Summary of strengths and weaknesses

1.3.1 The Home Office has regular contact with users of *Immigration Statistics*, has consulted users about changing the format of its statistics on immigration and has published the outcome of this consultation. It has implemented changes aimed at providing users with the information they need and improving access to the statistics. However, the commentary in the release could more fully explain how government policy or immigration control procedures impact upon the statistics.

1.3.2 The Home Office publishes some information about the quality of the statistics but this lacks clarity about the accuracy, relevance and coherence of the statistics, as well as the strengths and limitations of statistics in relation to their uses. The Home Office could publish fuller information about how the statistics are compiled.

1.3.3 The Home Office publishes links to other statistics on immigration and some information about the extent to which the statistics are coherent with related statistics or can be compared with other statistics on immigration. However, this information could be made clearer.

1.4 Detailed recommendations

1.4.1 The Assessment team identified some areas where it felt that the Home Office 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 Publish further information about the data sources used to compile the statistics and improve the published information about the methods used to produce *Immigration Statistics* (para 3.3).

Requirement 2 Improve the published information about the quality of *Immigration Statistics*, taking into consideration the uses of the statistics (para 3.4).

- Requirement 3** Confirm that future releases will highlight more clearly the revisions which have been made to the statistics and the nature and extent of these revisions (para 3.6).
- Requirement 4** Improve the interpretability of *Immigration Statistics* (para 3.7).
- Requirement 5** Clarify the status of the statistics currently labelled as 'management information' (para 3.8).

2 Subject of the assessment

- 2.1 *Immigration Statistics* provides statistics on the UK Border Agency's (UKBA) operation of immigration control and related processes, such as acquisition of UK citizenship and UKBA's enforcement activities. The statistics present trends in the number of immigrants subject to immigration control activities based on a range of administrative data sources as well as data from the International Passenger Survey⁶ (IPS), for comparison purposes.
- 2.2 *Immigration Statistics* was introduced in August 2011 (with the first release covering April to June 2011) and is an amalgamation of the previous annual *Control of Immigration: Statistics United Kingdom*, quarterly *Control of Immigration: Quarterly Statistical Summary, United Kingdom*, and annual *British Citizenship Statistics United Kingdom*⁷ which were all published by the Home Office.
- 2.3 The Home Office publishes the statistics four times a year, in February, May, August and November. It also publishes detailed annual tables which are updated once a year.
- 2.4 The statistics help inform users such as the government, Parliament, the media and the wider public about immigration control activities, and support the development and monitoring of immigration policy. Charities such as Asylum Aid⁸ and Bid UK⁹ also use the statistics to inform decisions about the provision of services and resource allocation to certain immigrant groups. The statistics are also used by organisations such as Migration Watch UK¹⁰ which describes its purpose as being "to monitor developments, conduct research, and provide the public with full and accurate facts placed in their proper context ... we also make recommendations for policy".
- 2.5 The statistics only cover UK immigration control activities and related processes, but the Office for National Statistics (ONS) publishes statistics on international migration¹¹ which report on UK immigration, emigration and net migration. The UK Statistics Authority has assessed *Migration Statistics* and *Short-term Migration for England and Wales* and published reports on the outcome of the assessments¹². It has also published a Monitoring Review¹³ in July 2009 which reported on the progress of improvements to official statistics on migration, and a Monitoring Brief¹⁴ in July 2011 on the official statistics available on migration and how they could be improved.

⁶ <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/travel-and-transport-methodology/international-passenger-survey/index.html>

⁷ <http://webarchive.nationalarchives.gov.uk/20110218135832/http://rds.homeoffice.gov.uk/rds/stats-release.html>

⁸ <http://www.asylumaid.org.uk/>

⁹ <http://www.biduk.org/>

¹⁰ <http://www.migrationwatchuk.org/>

¹¹ <http://www.ons.gov.uk/ons/taxonomy/index.html?nscl=International+Migration>

¹² <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/index.html>

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

¹⁴ <http://www.statisticsauthority.gov.uk/assessment/monitoring/monitoring-briefs/index.html>

2.6 The Home Office is legally required to publish statistics on immigration control activities¹⁵. It costs the Home Office approximately £600,000 per year¹⁶ to produce these statistics.

¹⁵ The statistics are produced under Regulation (EC) No 862/2007 of the European Parliament and of the Council of 11 July 2007 on Community statistics on migration and international protection and repealing Council Regulation and EEC No 311/76 on the compilation of statistics on foreign workers and the provision of data on asylum.

¹⁶ This estimate includes: production of the quarterly Immigration Statistics output; associated advice to both internal and external stakeholders about the data (for example including draft answers to Parliamentary questions, Freedom of Information requests); data development work including liaison with ONS as part of the Migration Statistics Improvement Programme; some data supply to Eurostat and other international bodies. It excludes: work carried out for the European Migration Network; the contributions of data suppliers (primarily the UKBA) to data quality assurance and data supply; central Home Office functions relating to website production; and provision of training, HR and finance, accommodation and IT.

3 Assessment findings

- 3.1 The Home Office maintains regular contact with users of the statistics within and outside the department via the Migration Statistics User Forum, formal consultations, informal feedback gathering, and via ad hoc queries. It consulted users about proposed changes to the way in which it presented and disseminated its immigration statistics. It published the outcome of the consultation¹⁷ along with the changes that it planned to make as a result. The Home Office also announces changes to methods and classifications in advance within the 'Summary of key facts'¹⁸ which is part of *Immigration Statistics* (see 1.1.1). The document contains a 'What's new' section relating to the current statistics as well as a section detailing future changes.
- 3.2 The user consultation assisted the Home Office in developing its understanding of the full range of uses and users of *Immigration Statistics*. It has published a *User Guide to Home Office Immigration Statistics*¹⁹ (*User Guide*) to accompany the release of *Immigration Statistics* which refers briefly to the use of the statistics. We suggest that the Home Office publish a fuller description of the use of the statistics.
- 3.3 The *User Guide* states the data source for each immigration topic but the exact source is not always clear (for example, [data are sourced from] 'Civil Aviation Authority, Department for Transport and Eurotunnel'²⁰). Although the Home Office provides information about procedures such as rounding and revisions to data, it does not provide links to the data sources or explain (or link to information about) how the statistics are compiled. As part of the designation as National Statistics, the Home Office should publish further information about the data sources used to compile the statistics and improve the published information about the methods used to produce *Immigration Statistics*²¹ (Requirement 1).
- 3.4 The *User Guide* includes detailed information about changes that may have affected the statistics, but insufficient information about the impact of the changes on the quality of the statistics. The Home Office has published some information about the extent to which the statistics on some immigration topics (e.g. 'Admissions', 'Settlement' and 'Asylum') are coherent and therefore can be used to make comparisons, but this could be made clearer. The published information about the quality of the statistics does not enable users to have a clear understanding of the accuracy and relevance of the statistics. It also does not comment on the strengths and limitations of the statistics in relation to the range of potential uses. As part of the designation as National Statistics, the Home Office should improve the published information about the quality of

¹⁷ <http://www.homeoffice.gov.uk/publications/science-research-statistics/research-statistics/immigration-asylum-research/immig-consult-responses-2011>

¹⁸ <http://www.homeoffice.gov.uk/publications/science-research-statistics/research-statistics/immigration-asylum-research/immigration-q2-2011/immigration-q2-summary>

¹⁹ <http://www.homeoffice.gov.uk/publications/science-research-statistics/research-statistics/immigration-asylum-research/user-guide-immig-statistics>

²⁰ See page 18 of the User Guide (section 5 'Admissions')

²¹ In relation to Principle 4, Practice 1 of the *Code of Practice*

Immigration Statistics, taking into consideration the uses of the statistics²² (Requirement 2). In meeting this requirement, we suggest that the Home Office consider whether changes in the implementation of border controls – such as those widely reported in the media in late 2011²³ – have impacted on trends in the statistics, and publish its findings.

- 3.5 The Home Office publishes within the *User Guide* a detailed list of other sources of information about migration and also provides links to related publications for each immigration topic it covers. However, it could provide clearer information about the extent to which the statistics it publishes can be compared to other statistics on immigration. We suggest that the Home Office improve the published information about the extent to which its immigration statistics can be compared to other statistics on immigration and which statistics are most appropriate for which uses.
- 3.6 The data tables which present the statistics on immigration include a ‘Notes’ section which reports any statistics that have been subject to revision. The ‘Summary of key facts’ section of the release also reports revisions. In some cases, the nature and extent of the revisions are explained, but not in all cases. As part of the designation as National Statistics, the Home Office should confirm that future releases will highlight more clearly the revisions which have been made to the statistics and the nature and extent of these revisions²⁴ (Requirement 3).
- 3.7 The Home Office has recently changed the format in which it disseminates statistics on immigration, focusing now on disseminating the statistics via the web rather than in paper publications. These changes were supported by the results of a user consultation (see para 3.1 above). However, the interpretability of the statistics should be improved. The Home Office provides insufficient information about how the immigration control system operates, the policy and operational context of the statistics, and how Government targets or immigration control procedures impact upon the statistics. Also, the individual immigration control topics covered within the ‘briefings’ (see list at 1.1.1) should be more clearly linked to one another. As part of the designation as National Statistics, the Home Office should improve the interpretability of *Immigration Statistics*²⁵ (Requirement 4). We suggest that in meeting this requirement the Home Office should consider the points detailed in annex 2.
- 3.8 The status of some of the statistics is not clear. In particular some statistics (those taken from a UKBA data extract) are labelled as ‘management information’. In the *User Guide*, the Home Office describes management information in the following terms: “data drawn from administrative systems, which are collected for the purpose of supporting government business. In the Immigration Statistics releases, all data designated as ‘Management information’ are provisional, may be subject to change, have not been subject to as thorough detailed verification as National Statistics (NS), and are

²² In relation to Principle 4, Practice 2 and Principle 8, Practice 1 of the *Code of Practice*

²³ <http://www.bbc.co.uk/news/uk-politics-15728513>

²⁴ In relation to Principle 2, Practices 6 and 7 of the *Code of Practice*

²⁵ In relation to Principle 8, Practice 2 of the *Code of Practice*

therefore considered to be official statistics rather than National Statistics”. However, it is widely accepted that many official statistics are ‘provisional’ at the time of their release; moreover, the fact that these statistics have not been verified as thoroughly as others does not preclude their designation as National Statistics – providing that information is published about the likely impact on the statistics, and hence for users, of the provisional status and the incomplete verification. As part of the designation as National Statistics, the Home Office should clarify the status of the statistics currently labelled as ‘management information’,²⁶ (Requirement 5).

- 3.9 The Home Office invites feedback on its immigration statistics on an ongoing basis. We suggest that the Home Office collate feedback from users about the new format of disseminating and presenting statistics on immigration, review the new format based on this feedback and publish the outcome.
- 3.10 The Home Office is involved in the ‘Entry and Exit’ working group of the cross-government ‘Migration Statistics Improvement Programme’ which is coordinated by ONS. ONS is investigating the potential to use data obtained by airlines and other carriers on individuals entering and leaving the UK (‘e-borders’ data) to improve the quality of statistics on international migration. The Home Office told us that it may also use e-borders data to improve the statistics it produces on immigration control. We suggest that the Home Office inform users of *Immigration Statistics* about plans to improve the statistics by using e-borders data.

²⁶ In relation to Principle 8 Practice 4 of the *Code of Practice*

Annex 1: Suggestions for improvement

A1.1 This annex includes some suggestions for improvement to the Home Office's immigration 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.

- | | |
|---------------------|--|
| Suggestion 1 | Publish a fuller description of the use of the statistics (para 3.2). |
| Suggestion 2 | Consider whether changes in the implementation of border controls – such as those widely reported in the media in late 2011- have impacted on trends in the statistics, and publish its findings (para 3.4). |
| Suggestion 3 | Improve the published information about the extent to which the statistics can be compared to other statistics on immigration and which statistics are most appropriate for which uses (para 3.5). |
| Suggestion 4 | Consider the points detailed in annex 2, in seeking to improve the statistical releases (para 3.7). |
| Suggestion 5 | Collate feedback from users about the new format of disseminating and presenting statistics on immigration, review the new format based on this feedback and publish the outcome (para 3.9). |
| Suggestion 6 | Inform users about progress on the e-borders project (para 3.10). |

Annex 2: Compliance with Standards for Statistical Releases

- A2.1 In October 2010, the Statistics Authority issued a statement on *Standards for Statistical Releases*²⁷. 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 compliance with the *Code*. In relation to *Immigration 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 full title for each release includes the period to which the statistics relate. The releases include a statement about the frequency of the release, presented as a period for which the statistics are 'valid'; this would be more clearly presented as a date of publication and a date for the next publication. The releases do not contain a statement about the frequency with which the data are compiled or updated.
- A2.4 The statistics are presented in the form of a webpage list of contents, which links to a summary of key facts, and 12 topic-based 'briefings'. The briefings do not carry the National Statistics logo or provide adequate sign posting to the supporting information available from the contents page.
- A2.5 The status of some statistics is not clear. In particular, some statistics are labelled as 'management information', implying that they are not official statistics.
- A2.6 The release includes the name of the originating department and the name and contact details for the responsible statistician.
- A2.7 The release includes a brief account of the tables and subjects which it covers. It identifies what is new within the 'What's new' section.

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

- A2.8 The Home Office publishes an overall summary of key facts as well as a summary of key facts for each immigration category/topic on web pages. It publishes graphs within these web pages to present long term trends and comments usefully on these trends. The language used is straightforward and easy to understand. It does not include graphs for the quarterly statistics on immigration, but does comment on these statistics and provides a link for users to access the statistics within data tables. Some of the commentary which describes trends, such as the fourth paragraph of the 'key facts' brief, might be better presented as a chart.

²⁷ <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-releases.html>

Use language that is impartial, objective and professionally sound

A2.9 The text that accompanies the release of the statistics is impartial and does not give an impression that it endorses or criticises current or past government policy. Descriptive statements are consistent with the statistics. Non-sampling variability is referred to within the *User Guide* but is not discussed within the text. Sampling variability relating to the survey data used is not discussed at all.

Include information about the context and likely uses

A2.10 The release does not state clearly the policy and operational context in which the statistics have been collected and will be used.

A2.11 The Home Office publishes some quality information for each immigration topic within the *User Guide*, such as to state possible sources of non-sampling error or bias. However, this does not provide sufficient information for users about the accuracy, reliability, relevance and coherence of the statistics. Also, the Home Office does not publish, or link to, any quality information about the data sources it uses (a combination of administrative and survey data).

Include, or link to, appropriate metadata

A2.12 The User Guide and the data tables include definitions of terms and classifications. The Home Office does not publish information about the data sources, nor how the methods and definitions used relate to European Union or international concepts and classifications.

A2.13 The Home Office provides links to other similar data but does not provide an indication of comparability with this data.

A2.14 The Home Office has published details of changes to data definitions and methodology. It does not publish sufficient information about the impact of these changes on the data.

A2.15 The Home Office publishes a statement of compliance with the Code of Practice²⁸ which covers how it deals with revisions. It also publishes information about revisions to data used for *Immigration Statistics* within the *User Guide*. It states within the notes section of the data tables which statistics have been revised. However, it does not mark clearly the statistics which are likely to be subject to revision and does not provide clear information about the nature and extent of revisions.

²⁸ <http://www.homeoffice.gov.uk/publications/science-research-statistics/research-statistics/home-office-science/ho-compliance-state-11>

Annex 3: Summary of assessment process and users' views

A3.1 This assessment was conducted from October 2011 to December 2011.

A3.2 The Assessment team – Emma Bowditch and Joe Cuddeford – agreed the scope of and timetable for this assessment with representatives of the Home Office in October. The Written Evidence for Assessment was provided on 11 October. The Assessment team subsequently liaised with the Home Office during November 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 12 responses from the user consultation. The respondents were grouped as follows:

Government departments	4
Charities	3
International organisations	2
Academic	1
Media	1
Independent think tank	1

A3.5 Many users commented that they found the new format in which the statistics are presented easier to use, and some noted in particular that the introduction of the statistics in accompanying tables and additional breakdowns has been very useful. However, we also received feedback that the new briefings on each topic are difficult to navigate and that it is difficult to build up a proper overview of the figures from the briefings. User requests included: the briefing on asylum figures to comment on the top ten countries from which asylum seekers come; easier access to historical datasets; and for the statistics to be presented in a time series. Some users also requested further breakdowns for certain topics, though others were content with the level of detail. One user commented that they found the explanation of methods helpful. Users reported good communication with the producer team and that they had received useful responses to queries from the team.

Key documents/links provided

Written Evidence for Assessment document

