

Assessment of compliance with the Code of Practice for Statistics

Statistics on Sickness Absence in the Northern Ireland Civil Service

*(produced by Northern Ireland Statistics and
Research Agency)*

Office for Statistics Regulation

We provide independent regulation of all official statistics produced in the UK. Statistics are an essential public asset. We aim to enhance public confidence in the trustworthiness, quality and value of statistics produced by government.

We do this by setting the standards they must meet in the [Code of Practice for Statistics](#). We ensure that producers of government statistics uphold these standards by conducting assessments against the *Code*. Those which meet the standards are given National Statistics status, indicating that they meet the highest standards of trustworthiness, quality and value. We also report publicly on system-wide issues and on the way statistics are being used, celebrating when the standards are upheld and challenging publicly when they are not.

Contents

| | |
|---|----|
| Office for Statistics Regulation..... | 2 |
| Executive Summary | 4 |
| Judgement on National Statistics Status..... | 4 |
| Key Findings | 4 |
| Public Value..... | 4 |
| Quality | 4 |
| Trustworthiness | 5 |
| Next Steps..... | 5 |
| Chapter 1: Public Value | 6 |
| Introduction | 6 |
| Overall judgement | 6 |
| Findings | 6 |
| Table 1: Value – Findings and Requirements..... | 8 |
| Chapter 2: Quality | 9 |
| Introduction | 9 |
| Overall judgement | 9 |
| Findings | 9 |
| Table 2: Quality – Findings and Requirements..... | 11 |
| Chapter 3: Trustworthiness | 12 |
| Introduction | 12 |
| Overall judgement | 12 |
| Findings | 12 |
| Table 3: Trustworthiness – Findings and Requirements..... | 13 |
| Annex 1: About the Statistics | 14 |
| The Statistics..... | 14 |
| Data Sources and Methods | 14 |
| Uses and Users..... | 14 |
| Annex 2: The Assessment Process | 15 |
| Key documents..... | 15 |
| Annex 3: Next Steps | 16 |
| Responding to the assessment report: what the Office for Statistics Regulation and NISRA should expect from each other | 16 |

Executive Summary

Judgement on National Statistics Status

ES.1 Users of Northern Ireland Civil Service Sickness Absence statistics (published annually [here](#)), recognise their value and the high data quality standards applied to their production. We have identified five actions for the Northern Ireland Statistics and Research Agency (NISRA) to take in order to ensure the statistics meet the highest standards of the [Code of Practice for Statistics](#) and can achieve National Statistics status. Once NISRA demonstrates that these steps have been undertaken OSR will recommend that the Statistics Authority designate them as National Statistics.

Key Findings

Public Value

- ES.2 The Human Resource Consultancy Services team (HRCS) of NISRA has produced sickness absence statistics since 2000, following demand from Northern Ireland government departments for insightful analysis of human resources (HR) data. The team continues to engage with users and is flexible to their needs, providing ad hoc analysis when required.
- ES.3 The team currently engages through a customer survey and conducted three face-to-face meetings in 2018, illustrating strong working relationships with many users. User feedback, obtained through OSR's engagement process for the assessment, highlighted that users would appreciate greater contact with the statisticians outside of the customer survey. Better engagement will help ensure the statistics remain relevant as the team seeks to enhance their value for users.
- ES.4 The statistical team recognises that many users would like the headline results and data tables to be released earlier and for the more detailed insight analysis to follow at a later stage. We support the team's efforts to improve the timeliness of the production and release of the statistics and see this as essential for improving public value. Communication of these plans is important and engaging with key stakeholders will result in them being more informed and involved in decisions around timely release.
- ES.5 HRCS is committed to improving comparability and coherence. As part of the team's engagement strategy, it will consult users on the viability and potential value of providing a comparison with the sickness absence rates produced by the Confederation of British Industry (CBI) and Chartered Institute of Personnel and Development (CIPD).

Quality

- ES.6 We are assured that the data used for these statistics are of good quality. Our investigation of the quality assurance and methods documents published by HRCS highlighted that there are strong measures in place assuring data quality. Speaking with the data suppliers has provided further assurance that HRCS is proactive in minimising data quality issues. The team is transparent about previous data quality issues and has documented extensively the fixes that were implemented to remedy them. HRCS has good working relationships and communication channels with data suppliers, which ensures that the team continues to be well informed about any issues that arise.
- ES.7 There is a planned migration of prison staff data in 2019/20, which will result in all civil servants being on the same HR system. Given the strong historical commitment to data quality during previous migrations, we consider that HRCS is in a good position to manage

this effectively. As part of enhancing its assurance of data quality, the team has committed to publish a plan for the migration on NISRA's website.

- ES.8 The methods used to calculate sickness absence are based on Cabinet Office guidelines (see page 23 of [user guide](#)), allowing for greater comparability across the UK and Europe.

Trustworthiness

- ES.9 The statisticians responsible for the statistics demonstrate sound judgement and considerable expertise. They have published a range of material which covers many of the processes and the rationale for statistical decisions that have been made. Over the course of the assessment, the statistical team proposes to update the pre-release access list on the NISRA website to provide greater detail about who gets pre-release access, and to publish information about future developments to the statistics on the NISRA website.

Next Steps

- ES.10 To achieve National Statistics status, NISRA should meet the requirements set out in this report. The statistical team responsible for producing Sickness Absence in the Northern Ireland Civil Service statistics is encouraged to:
- a. Develop an action plan to meet the requirements;
 - b. Agree an action plan with NISRA senior management, and confirm that it is appropriately resourced;
 - c. Report back to OSR by July 2019 on how it has addressed the requirements in this report.

Chapter 1: Public Value

Introduction

- 1.1 [Value](#) means that the statistics and other numerical information are accessible, remain relevant and benefit society; helping the public to understand important issues and answer key questions.
- 1.2 Value is a product of the interface between the statistics or other numerical information and those who use them as a basis for forming judgements.

Overall judgement

- 1.3 The sickness absence statistics provide considerable value to decision and policy makers in Northern Ireland. HRCS has committed to take on feedback from its user survey and the findings from our engagement to increase the value further by repackaging the report to release headline results and data tables earlier, with the more detailed insights to follow later. As part of its communication strategy, HRCS should engage with users around the value of a comparator chart between the HRCS absence rate, CBI and CIPD absence rate statistics, like that provided in the [user guide \(page 5\)](#). This would ensure greater coherence and comparability.

Findings

Engagement

- 1.4 The statistical team has strong positive links with users of the sickness absence statistics, who feel that HRCS is flexible to their needs. Northern Ireland civil service departments use the sickness absence statistics, to monitor absence levels and inform decisions on performance outcomes around sickness absence. Many of the questions users ask, focus on why people are absent and the differences between grades and departments.
- 1.5 HRCS engages with users through a [customer survey](#) which is published on its website. Users appreciate being able to contribute their views through the survey but would like it to have greater focus on the absence statistics. In light of the recent survey results the team is seeking to engage with key stakeholders on areas to improve. The previous survey looked at all HR areas that HRCS provides statistics on, for example pay, employment, recruitment and equality. The next iteration will split these areas up, resulting in a greater focus on each area and consequently on absence statistics. The team has conducted face-to-face interviews. These should continue and the team should seek to engage in different ways and publish its strategy for doing so, communicating the findings to users. This will ensure the needs of different audiences are heard and will increase the public value of the statistics.
- 1.6 The team has sought to collaborate with equivalent teams in the rest of the UK but found that they produce management information which is not published. Where statistics are produced they are not at the same level of detail as those for Northern Ireland. The lack of comparative data was confirmed during our engagement with other national administrations.
- 1.7 HRCS provides a coherent picture of available statistics in the UK. It signposts users to other relevant statistics in the user guide, including those for: UK civil service, local councils in Northern Ireland, Republic of Ireland civil service, and the Welsh and Scottish Governments. Our engagement with users highlighted that they would prefer this analysis within the annual publication rather than the user guide. Users also had considerable

appetite for HRCS to collaborate with other public bodies who produce similar statistics to ensure the sharing of best practice and enhance comparability.

- 1.8 The team highlights where it is appropriate to make comparisons with other statistics and states that comparing their statistics with those of CBI or CIPD is not reliable, because both report on self-selecting and self-reporting surveys, and are then reported on a per-person basis, which returns lower figures than the HRCS method which reports on a per-staff year basis. Our user engagement highlighted that a comparator with the CIPD and CBI rates would be of value to expert users of the statistics. During the assessment, the team committed to explore the option of moving the private sector comparison chart from the user guide to the annual publication. This would provide a comparator between the HRCS, CIPD and CBI absence rates and increase the relevance of the statistics for users.

Output and Accessibility

- 1.9 The team ensures that Absence statistics are accessible by producing a range of material to accompany the publication, such as a user [guide](#). The commentary is engaging and doesn't use jargon despite the subject being complicated for non-expert users. Users find the [infographic](#) of key findings valuable; it helps them understand the main messages immediately and they use it to relay information back to senior colleagues in their organisations.
- 1.10 The links to data tables next to each chart allow users to easily access data to produce their own charts. There is a separate [Open Document Spreadsheet](#) – which can be opened easily in different software packages – giving direct access to the data tables. Some users told us they use the publication to copy and paste charts directly, which illustrates the range of uses the publication affords users.
- 1.11 The statistical team recognises the need to provide greater context and information to users by publishing a range of supporting metadata. The report itself includes: information about seasonal variations in absence rates; the calculations that form the basis for the analysis; and a list of abbreviations, which makes the publication more accessible to a wider audience.
- 1.12 Within the publication itself, commentary around the charts is clear and explains the methods for measuring sickness absence succinctly. There are annotations in the charts which clearly label the reasons for changes in trends; users highlighted this as a positive feature that allows them to quickly digest information.

Improving Value

- 1.13 The team is committed to developing the user survey, which will be split into the five HR areas that the team produces statistics on. This will result in a greater focus on the absence statistics, enabling better feedback and allowing HRCS to form more-specialised stakeholder groups to consult. User feedback on HRCS's engagement highlighted that there should be a long-term approach, which maintains an open dialogue with current users and encompasses the needs of different audiences. The team should engage collaboratively with users. This will ensure stakeholders views are represented and that there is transparency around user requests that can and can't be met.
- 1.14 Users told us that they appreciate the absence statistics' quality, as they use them to inform their long-term business planning and conduct contract negotiations. They value the insight in the commentary, particularly the focussed topical research looking at the effects of mental health and the flu, on sickness absence. However, during our engagement we identified that users felt the statistics were released too late in the year for them to use the validated numbers in business plans for the coming year.

- 1.15 HRCS is developing a plan to ensure that the statistics are more timely and repackage the way they are delivered. The team recognises the need for comparators with other absence statistics and will consult key stakeholders to get a better idea of how the statistics might be developed. The team highlighted that progress on this will be dependent on resource given the amount of time dedicated to processing the monthly Management Information.
- 1.16 HRCS is committed to releasing a set of headline results and data tables earlier in the year, followed later by a more detailed insight report, containing comparator data and current topical research. This will enhance the value of the statistics for users and ensure the value remains. The team has informed us that it will publish the proposed plans for the publication and the user engagement strategy on its website, once it is formulated.

Table 1: Value – Findings and Requirements

| Findings | Examples | Requirement |
|--|---|--|
| Users emphasised that the timeliness of the absence statistics release is not currently meeting their needs and detracts from its relevance, but also value the additional insight analyses. | <ul style="list-style-type: none"> Users are unable to include year-end absence figures in business plans for the coming financial year. | 1 Bring forward the publication of headline figures to June and publish the insight report and more detailed data tables in September. |
| Users felt that after the completion of the user survey there had been little engagement around the issues they raised about the annual publication. | <ul style="list-style-type: none"> Users need the insight report annual publication to enhance their own board reports and understand the variation in the data more clearly. | 2 Ensure that there is collaborative engagement with key stakeholders on the annual publication. Publish a development plan for the annual statistics, so that users are aware of changes to the annual publication. |
| CIPD and CBI both provide sickness absence rate analysis | <ul style="list-style-type: none"> User feedback highlights that a comparison with CBI and CIPD would highlight the differences between available statistics, related data and the limitations of each method. | 3 Fulfil commitment to engage with users about the inclusion of a comparator with CIPD and CBI absence rates in the publication. |

Chapter 2: Quality

Introduction

- 2.1 [Quality](#) means that the statistics and numerical information represent the best available estimate of what they aim to measure at a particular point in time and are not materially misleading.
- 2.2 Quality is analytical in nature and is a product of the professional judgements made in the specification, collection, aggregation, processing, analysis, and dissemination of data.

Overall judgement

- 2.3 HRCS has robust measures in place to ensure data quality. It clearly sets out potential issues in the data and the steps in place to mitigate them. Robust processes and good working relationships with data suppliers exist to ensure data quality is scrupulously maintained. These strong relationships will help ensure future data migrations and transitions run smoothly. Transparent documentation of future data migration plans, and any resulting impact on data quality, are required to ensure National Statistics standards are met.

Findings

Quality

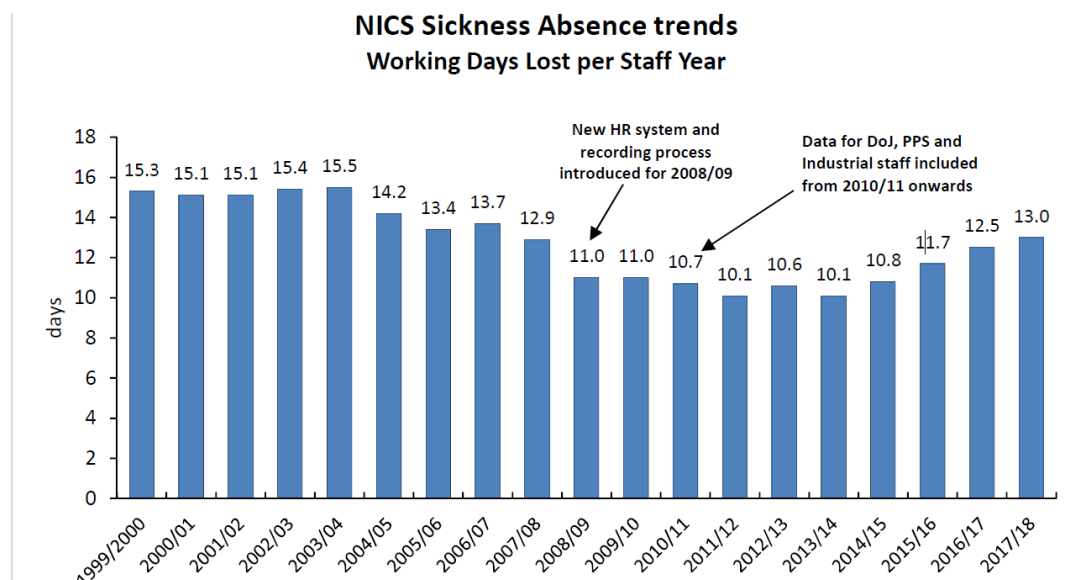
- 2.4 The team seeks to ensure data quality through the application of the Code. The team highlighted during our first meeting that they had previously sought comment from OSR on its [HRCS Quality Assurance of Administrative Data Report](#) (QAAD Report).
- 2.5 The absence statistics are based on management information, so ensuring the data are of good quality is fundamental to their production. The data are gathered using two separate databases: HRConnect, which is operated by Fujitsu and Capita on behalf of the Northern Ireland Civil Service; and COMPASS, which is operated by the Department Of Justice in Northern Ireland. Civil servants oversee the service delivery with Fujitsu and Capita to help ensure the safe collection of data and to support close working relationships between the suppliers and HRCS.
- 2.6 HRConnect was set up in 2006/07; previously a data input team populated the HR database. HRConnect is populated by line managers; there are noted risks to this which HRCS/NISRA highlights extensively in its QAAD Report for HR data and in the user guide. There are robust mitigations in place, for example there is a check from HRCS statisticians at each stage of data cleaning after the data has been sent to HRCS. The communication between the two organisations helps safeguard the quality of the data used to produce the statistics. COMPASS is populated by a data input team, this system is felt to be more reliable and accurate as there is an operational need for it to be so, given that it is used to ensure correct staffing levels in prisons. Our engagement with suppliers highlighted that this difference in quality has minimal effect, as the number of employees on COMPASS is a small percentage compared to those on HRConnect. Additionally, there are measures in place ensuring quality in HRConnect, such as training for employees and line managers.
- 2.7 In its QAAD Report, HRCS considers the data to be of medium quality risk. The team is transparent about the data quality and where it might suffer, such as timeliness from employees and line managers or the correct information not being inputted. These risks have been minimised by Northern Ireland Civil Service, providing alerts to line managers and tying data input into performance management. Our conversations with the suppliers confirm that the level of communication between the groups is strong and that HRCS is involved sufficiently in key phases of data processing.

2.8 HRConnect data suppliers see no areas where there are current quality issues. When they have arisen, such as unexpected changes in the absence rate, these have been resolved in tandem with HRCS. There are clear procedures in place on both sides, which cover the risks from collection to the final publication and these are explained fully to users within the QAAD Report. Fujitsu and Capita produce supplementary learning material and run workshops to help new employees and line managers with using the system. These are being continuously updated to maintain quality.

Data Migration

2.9 During the implementation of HRConnect there was a drop in the absence rate, HRCS/NISRA attributed this drop to a dip in data quality, due to the change of input, see figure 1. Our conversations with both HRCS and the suppliers highlight there was positive cooperation and learning around this issue, leading to a reciprocal process where new mitigations are put in place immediately to ensure ongoing data quality.

Figure 1:



2.10 The experience from the 2006/07 data migration has been well documented in page 21 of the QAAD Report and those involved remain in close contact with each other. In the [user guide](#) there is a time series analysis showing the period where the changes have taken place. The 2010/11 report was the first to include industrial staff. Previously, industrial staff had been reported separately because HRCS didn't have access to sickness absence data for industrial staff.

2.11 There is further planned migration of data for around 1,000 prison staff from the COMPASS system to HRConnect, expected to take place in 2019/20. Our conversations with users illustrate that the quality of absence statistics is of great value because they use the statistics for future business planning and to inform absence management responses. HRCS told us that it is going to publish the plans and mitigations that will be in place to safeguard data quality during the migration of prison staff in 2019/20 so that users continue to feel assured that they are receiving reliable and accurate information.

Methods

- 2.12 The team uses the Cabinet Office guidelines to calculate sickness absence. This allows for comparisons across UK departments and devolved administrations, the Republic of Ireland and other European countries. HRCS describes clearly how the absence rate is calculated in the user guide and states the reasons why the statistics cover hours instead of days – to provide greater accuracy for those with variable work patterns.
- 2.13 As part of its commitment to data quality HRCS is in discussions with HR policy officials to update the definitions used for long-term sickness. Currently it is set as more than 20 working days, HRCS wants to change this to more than 28 calendar days. This would enhance the data accuracy for part-time workers on long-term sick leave. Using 28 calendar days will enable HRCS to treat part-time and full-time staff the same when analysing long-term sickness absence.

Table 2: Quality – Findings and Requirements

| Findings | Examples | Requirement |
|--|---|--|
| The Northern Ireland prison staff will be migrated over to HRConnect in 2019/20. This will be just over 1,000 employees. | <ul style="list-style-type: none">There was a previous drop in quality due to a change of data input in 2007 and 2009/10. | 4 Fulfil commitments to publishing a plan for managing data quality during the migration of prison staff on the NISRA website by July 2019. Ensure any effect of the migration is published on the website and highlighted in the analysis with suitable guidance to aid appropriate interpretation. |

Chapter 3: Trustworthiness

Introduction

- 3.1 [Trustworthiness](#) means that the statistics and other numerical information are produced free from vested interest, based on the best professional judgement of statisticians and other analysts.
- 3.2 Trustworthiness is a product of the people, systems and processes within organisations that enable and support the production of statistics and other numerical information.

Overall judgement

- 3.3 HRCS demonstrates good expertise and strong professional judgement. HRCS has published a range of material on key processes and a revisions policy. Improvements are planned to update the detail on the published pre-release access list, to include the roles of those granted access and to provide details of future developments for the statistics on their website.

Findings

- 3.4 The statisticians' expertise and sound judgement is demonstrated by the approach they take to methods (see 2.10) and the high regard in which they are held by the users and data suppliers that we spoke to. The team provided examples of regular training for statisticians, which highlighted a willingness to comply with the principles and practices of the Code as professional statisticians.
- 3.5 HRCS supports transparency by publishing a wide range of information about the processes that it employs to ensure data quality, and the results from customer surveys which are used to inform future developments. Providing prior notification of release dates increases public confidence and helps users to plan work that relies on the statistics. Confirmed release dates for sickness absence statistics are found on NISRA's website and gov.uk. The 2017/18 [press statement](#) regarding the absence statistics is clearly linked on the NISRA landing page. The statement provides a link to the statistics and covers the high-level details of the publication. There are clear definitions provided on any language that might be misleading.
- 3.6 Relevant [guidance around data governance and confidentiality](#) of the data is also available. Our conversations with suppliers confirmed that all data transferred to HRCS include personal details. To ensure anonymity HRCS applies standard disclosure control methodology to any data that it subsequently releases or publishes. The outputs are also only seen by authorised staff prior to their publication. HRCS has also published a clear [corrections and revisions policy](#).
- 3.7 HRCS informed us that it had significantly reduced its [pre-release access list](#) over the last year. However, the current version does not specify the number of NI Permanent Secretaries granted access. The team informed us that it proposes to update the current version on the website and has committed to reviewing the list regularly to ensure that it is kept to a minimum of recipients.
- 3.8 Our conversations with users highlighted that HRCS didn't publish details about what the next steps were in the development of absence statistics after the results of the user [survey](#) were published. HRCS confirmed that it is working on a new user survey, producers should be transparent about future plans and the team committed to addressing this during the assessment. During the course of the assessment HRCS committed to publishing details about future planned developments for absence statistics transparently on its website, meaning that users will be informed and can feed into the plans. To facilitate this further,

HRCS has committed to publish a summary of its overall user engagement approach the absence statistics, by June 2019.

Table 3: Trustworthiness – Findings and Requirements

| Findings | Examples | Requirement |
|---|--|---|
| The pre-release access list doesn't contain full details of who received the publication. | <ul style="list-style-type: none">It is difficult to determine how many people are on the pre-release access and who they are. | 5 The job title of those granted pre-release access should be recorded. The list should be reviewed on a regular basis to ensure it is kept to a minimum. |

Annex 1: About the Statistics

The Statistics

- A1.1 The [statistics](#) are an annual version of the management information that HRCS produces monthly for Northern Ireland government departments, published in a variety of forms such as an infographic and data tables. They provide an overview of the Northern Ireland civil service sickness absence going back to 1999/2000.
- A1.2 The Cabinet Office publishes aggregate sickness absence statistics for civil servants throughout the UK. There are also statistics published by Republic of Ireland civil service, Northern Ireland local authorities and the Scottish and Welsh governments but not in the same level of detail as those published by NISRA.

Data Sources and Methods

- A1.3 There are detailed instructions given to any statistician who works on the sickness absence statistics. Most of civil service absence is recorded on HRConnect, Northern Ireland Prison Service (NIPS) absence is recorded on an admin system called COMPASS.
- A1.4 HRConnect is managed by Capita and Fujitsu, and COMPASS is managed by Northern Ireland Prison Service. A small number of civil servants don't have HRConnect as they are seconded to public bodies; these civil servants have their absence recorded through email. Key parts of the process are monitored by Northern Ireland Civil Service and departments throughout the year, to ensure absences are recorded promptly.

Uses and Users

- A1.5 Users are primarily within the Northern Ireland Executive's departments, such as: Department of Finance, Department of Health, Department of Justice, and Department of Agriculture, Environment and Rural Affairs. They use the monthly management information for HR and policy purposes, to keep track of what resources they have, produce board reports highlighting resource needs and to manage sickness absence.
- A1.6 The annual publication is then used to confirm and verify the numbers from the monthly management information. For example, a user producing a report prior to the release of the annual publication would use provisional numbers from the management information. They would then update them when the annual publication comes out because the monthly management information has not been quality assured to the same standard.
- A1.7 Other users include policy analysts and negotiators from trade unions in Northern Ireland. They do not receive the monthly management information and therefore use the annual publication to highlight areas of strain for employees. They will use the statistics as part of the information they have for negotiation and collective bargaining.

Annex 2: The Assessment Process

- A2.1 The assessment was conducted from November 2018 to April 2019.
- A2.2 This report was prepared by the Office for Statistics Regulation and approved by the Regulation Committee on behalf of the Board of the UK Statistics Authority, based on the advice of the Director General for Regulation.
- A2.3 The regulatory team – Lewis Jack and Oliver Fox-Tatum – agreed the scope and timetable for this assessment with representatives from HRCS in November 2018. Documentary evidence for the assessment was provided by the HRCS statistical team. The regulatory team met with HRCS statisticians to review compliance of the [Code of Practice for Statistics](#).
- A2.4 Part of the assessment process involves our consideration of the views of users. We approached some known and potential users of the statistics. This 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 these 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.

Key documents

- A2.5 Evidence provided by HRCS included the following material.
- NI Civil service sickness absence statistics
 - Customer survey report
 - Sickness absence statistics user guide
 - HRCS Quality assurance administrative data report

Annex 3: Next Steps

Responding to the assessment report: what the Office for Statistics Regulation and NISRA should expect from each other

A3.1 The publication of this Assessment Report represents a key milestone in the assessment process, but should not be viewed as the end point. The next phase, to meet the Requirements set out in this report, is critical to delivering the value, quality and trustworthiness to achieve and maintain National Statistics status. The next steps are as follows:

- immediately following the publication of the report, the Office for Statistics Regulation will arrange a meeting with the statistics team to talk through the detail of the Requirements and to ensure a common understanding
- the Chief Statistician can follow up with the Assessment Programme Manager about the Director General for Regulation's letter that accompanies this Assessment Report. The letter: draws out the key findings; provides advice about where the statistics team is likely to need senior management support and direction and conveys any findings that have wider implications for the producer body and statistical system
- the Head of Profession is encouraged to:
 - i) develop an action plan to meet the Requirements to the timetable set out in paragraph [ES.10](#) of this report
 - ii) agree the action plan with their senior management, and confirm that it is appropriately resourced
 - iii) share the action plan with the Office for Statistics Regulation, publish it alongside the statistics, and explain to users and suppliers how it will engage with them in delivering the plan
 - iv) seek out peers and support services that can help in delivering the plan – for example, [the GSS Good Practice Team](#)
 - v) agree with the regulatory team, how often, and in what form, the statistics team would like to engage about progress against the action plan – for example, some teams choose to meet with the regulatory team once a month
- the HRCS statistics team should provide full formal written evidence to the Office for Statistics Regulation by the deadline of July 2019 as set out in paragraph [ES.10](#) of this report. There is no set format for reporting, except that HRCS should demonstrate that it has addressed the findings given in Tables 1 to 3 and provide links to any published or internal documents as support
- the regulatory team will review the evidence within 10 working days and arrange to provide feedback to the statistics team. As part of this process, the regulatory team will talk again to users to establish how their experience of the statistics has changed. When the regulatory team is satisfied that the Requirements have been fully met, their conclusions will be quality assured by Office for Statistics Regulation's senior management and then presented to the Authority's Regulation Committee to confirm designation. The Director General will then write publicly to the lead statistician to confirm the decision

- in the event that Requirements are not fully met within the agreed timetable, the Authority will implement [escalation procedures](#).

A3.2 Based on experience, the Office for Statistics Regulation strongly encourages statistics teams to:

- engage with the detailed thinking of the Assessment Report, and revisit it regularly. The regulation team will be seeking evidence that the statisticians are demonstrating curiosity and are challenging their own thinking around delivering value, quality and trustworthiness. The Requirements in this report should not be viewed as a simple checklist
- view the responsibility for meeting the Requirements as falling to the organisation as a whole, not just the team that produces the statistics.
- engage users early, not just to keep them updated as users can often offer valuable insight and expertise
- contact the regulatory team at any time if there are any questions or concerns

A3.3 Responsibility for complying with the Code of Practice does not end with the award of the National Statistics designation. It is the statistics producers' responsibility to maintain compliance and also to improve the statistics on a continuous basis. The Office for Statistics Regulation encourages statistics producers to discuss promptly with the regulatory team any concerns about whether its statistics are meeting the appropriate standards. National Statistics status can be removed at any point when the highest standards are not maintained, and reinstated only when standards are restored.

