

# Statement of Compliance with the Code of Practice for Statistics

Department for Digital, Culture, Media and Sport

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### Introduction

The Department for Digital, Culture, Media and Sport (DCMS) employs statisticians and social researchers to produce statistics relating to its sectors<sup>1</sup>, including:

- Civil society
- Culture and sport
- Creative industries
- Cyber security
- Digital
- Digital infrastructure
- Gambling
- Tourism

Official statistics are fundamental to good government, to the delivery of public services and to decision-making. The Code of Practice for Statistics<sup>2</sup> (henceforth referred to as 'the Code'), was first published in 2007 and then updated in 2018 to reflect the changing environment of statistics and data.

The Code states that "...statistics published by government serve the public. When producers of official statistics comply with the Code, it gives users of statistics and citizens confidence that published government statistics are of **public value**, are **high quality** and are produced by people and organisations that are **worthy of trust**."

DCMS is committed to the principles underlying the Code. This statement sets out how DCMS complies with the Code and the relevant policies in place within the department. It will be reviewed regularly to ensure it is up to date and relevant.

All DCMS official statistics are prepared by or overseen by DCMS statisticians, who are accountable to the DCMS head of profession for statistics and ultimately to the National Statistician. All DCMS statistical outputs and accompanying documentation are published on gov.uk.<sup>4</sup>

General enquiries about the statistical work of DCMS can be emailed to: <a href="mailto:evidence@culture.gov.uk">evidence@culture.gov.uk</a>.

A list of the official statistics published in the UK is available from www.gov.uk/government/statistics.

<sup>&</sup>lt;sup>1</sup> Seven arm's length bodies of DCMS are also producers of official statistics: Arts Council England; British Film Institute; Historic England; Gambling Commission; Ofcom; Sport England; and Visit Britian / Visit England.

<sup>&</sup>lt;sup>2</sup> https://www.statisticsauthority.gov.uk/code-of-practice/the-code/

<sup>&</sup>lt;sup>3</sup> Ibid.

<sup>&</sup>lt;sup>4</sup> https://www.gov.uk/government/organisations/department-for-digital-culture-media-sport/about/statistics

### Confidentiality and access

DCMS aims to protect data held by the department in order to fulfil legal obligations (GDPR, the Code of Practice for Statistics) and to serve the public good. Private information about individual persons (including bodies corporate) compiled in the production of official statistics is confidential, and is used for statistical or research purposes only. However, the Code also requires producers to maximise value from the data available. This section sets out DCMS policies to support these requirements.

#### **GDPR 2018**

The introduction of the General Data Protection Regulation, and the Data Protection Act 2018, in May 2018 brought about major changes to the way that government departments can process personal data, encouraging greater transparency and accountability<sup>5</sup>.

DCMS has reviewed all processing of personal data for production of statistics. Where necessary, changes have been implemented to increase transparency of this processing to data subjects and to ensure GDPR compliance.

#### **Physical security**

All staff working in the DCMS building require security clearance and a pass to access the premises. Passes must be worn at all times. Any visitors must be accompanied by a member of staff at all times.

Any hard copies of information classified as "Official Sensitive" or above are kept in locked cabinets only accessible to authorised staff. Security reviews and inspections are regularly conducted to ensure that security procedures are followed.

#### **Technical security**

Confidential statistical data are not held directly on laptops or other portable devices, but are stored on secure network drives. Access to these drives is restricted and regularly reviewed.

Transmission of micro-data is conducted either within a secure network, using a secure file transfer (e.g. File Transfer Protocol) or using encrypted (password protected) media.

#### Organisational security

Responsibility for the security and protection of data sits with the analytical lead for datasets that are owned by DCMS. For datasets originating or owned by other bodies, responsibility for ensuring that staff understand and guarantee to maintain the confidentiality requirements of the dataset, and

<sup>&</sup>lt;sup>5</sup> UKSA (2018) UK Statistics Authority Guidance on the General Data Protection Regulation (GDPR) [Online] <a href="https://gss.civilservice.gov.uk/policy-store/uk-statistics-authority-guidance-on-the-general-data-protection-regulation-gdpr/">https://gss.civilservice.gov.uk/policy-store/uk-statistics-authority-guidance-on-the-general-data-protection-regulation-gdpr/</a> [Accessed online 13/02/2019]

are aware of the penalties of wrongful disclosure, rests with the DCMS employee listed as the main statistical contact in the relevant data access agreement, memorandum of understanding, or other formal record of the data provided and processing conditions.

All staff are required to complete an Information Security Training Package for the purposes of handling confidential data.

#### **Disclosure security**

Where necessary DCMS uses data manipulation and/or statistical disclosure-control techniques to ensure confidentiality. For example, publications usually have a minimum cell count below which results are not reported.

#### Arrangements for providing controlled access to micro-data

Where micro-data are owned by a department or organisation other than DCMS, arrangements for access are in accordance with Service Level Agreements, contracts or other confidentiality agreements between DCMS and the data owners.

Where data are owned by DCMS and are part of a regular collection e.g., the Taking Part survey, the Community Life survey, the Cyber Breaches survey, the usual practice is to make the data available via the UK Data Service<sup>6</sup>. These data are pseudonymised prior to being submitted to the UK Data Service. In order to access the data, users need to sign up to the end user agreement, which has certain conditions for accessing the data such as not attempting to identify someone or claiming to have identified someone from the data.

Access to micro data owned by DCMS that has been collected as a 'one-off' is decided on a case by case basis, determined by the guarantees given to the data suppliers or contributors, statistical legislation, and the appropriate principles for the collection and use of administrative or other data.

<sup>6</sup> http://ukdataservice.ac.uk/

# Quality strategy, principles and process

#### **Principles**

The Code aims to provide a framework to ensure that statistics are trustworthy, good quality and are valuable – that they measure the things that are most needed to be measured. The Code is based on a number of key principles, which DCMS adheres to<sup>7</sup>:

- 1. Those producing statistics must demonstrate their integrity and professionalism. Behaviours and actions should reflect the public interest as shown in public commitments, attitudes and processes.
- Statistics have to be based on the right data sources, with transparent judgements about definitions and methods, and judgements about the strengths and limitations of the statistics. Producers should demonstrate how they assure themselves that their statistics are robust and reliable.
- 3. Statistics must be equally available to all, and not to be released partially or to selected audiences. They should be aimed at society's important questions and be produced efficiently. Producers need to constantly connect to users so their needs can be anticipated and statistics kept up to date.

The definition and key components of statistical quality in DCMS are contained in Table 1 below.

Table 1: The pillars and principles of the Code of Practice for Statistics

Definition	Key components	Users can expect:
Trustworthiness Confidence in the people and organisations that produce statistics and data	<ul> <li>Honesty and integrity</li> <li>Independent decision making and leadership</li> <li>Orderly release</li> <li>Professional capability</li> <li>Data governance</li> </ul>	<ul> <li>The statistics, data and any explanatory material that DCMS produces to be presented impartially and objectively.</li> <li>The head of profession for statistics to uphold and advocate for the standards of the Code, and to strive to improve DCMS statistics and data for the public good.</li> </ul>
Quality Data and methods that produce assured statistics.	<ul><li>Suitable data sources</li><li>Sound methods</li><li>Assured quality</li></ul>	Quality assurance reports to be published alongside statistical publications, detailing how quality is built in to the data collection, analysis and dissemination of the data.

<sup>&</sup>lt;sup>7</sup> Code of Practice for Statistics: https://www.statisticsauthority.gov.uk/code-of-practice/

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		<ul> <li>Any scheduled revisions or unscheduled corrections that result from errors, to be explained alongside the statistical publications, being clear on the scale, nature, cause and impact.</li> </ul>
Value Statistics that support society's needs for information.	<ul> <li>Relevance to users</li> <li>Accessibility</li> <li>Clarity and insight</li> <li>Innovation and improvement</li> <li>Efficiency and proportionality</li> </ul>	<ul> <li>A routine review to be carried out of the user satisfaction with the relevance and usefulness of DCMS statistics and data.</li> <li>Statistical publications to be made available in Word/Excel, pdf and HTML formats. All publications to contain the contact details of the lead statistician alongside any advice about the appropriate use of the statistics and data.</li> </ul>

### Pre-release access

The phrase 'pre-release access' refers to the practice of making official statistics in their final form, and any accompanying written commentary, available to an eligible person in advance of their publication.

The rules and principles that govern pre-release access are specified within the Pre-release Access to Official Statistics Order 2008<sup>8</sup>, which were reviewed in 2010 and 2012<sup>9</sup>.

Where pre-release access to DCMS statistics has been granted, a list of those individuals who receive access will be provided within the 'statistical release' page for that particular release.

#### Introduction

This statement is published in compliance with the Pre-Release Access to Official Statistics Order 2008, which was approved by Parliament under Section 11 of the Statistics and Registration Service Act 2007 and which came into effect on 1 December 2008.

This statement sets out the operational arrangements for giving eligible persons access to DCMS official statistics in their final form prior to publication. These arrangements are designed to ensure that such access is justified, limited, controlled, publicised and complies with statutory requirements. Their purpose is to balance the public interest in trust in official statistics with that of enabling those with policy responsibility to answer questions and provide responses at the time statistics are published.

#### **Exclusion**

Different arrangements apply to Ministers' and officials' access to the organisation's own administrative or management data where those data subsequently form the basis for published official statistics.

#### **Authority**

These arrangements were drawn up by the DCMS head of profession for statistics, in consultation with the Permanent Secretary at DCMS. The head of profession is also responsible for ensuring the day-to-day implementation of these arrangements.

#### General principle

DCMS operates under the general principle that pre-release access to official statistics must be:

<sup>8</sup> https://www.statisticsauthority.gov.uk/about-the-authority/uk-statistical-system/legislation/pre-release-access/

<sup>9</sup> Ibid.

- allowed in circumstances where the public benefit likely to result from such access outweighs the detriment to public trust in official statistics likely to result from doing so
- limited to the minimum number of persons deemed necessary to allow the Minister to either:
  - provide responses to questions, or make statements about those statistics at, or shortly after, their time of publication;
  - take action just before, at, or shortly after the time of publication.

Pre-release access is limited to those who meet the eligibility criteria. They include:

- Officials with responsibility for developing, maintaining, monitoring or implementing a policy area covered by the statistical release, and for providing ministerial briefing on that area.
- Other officials who have been assigned the responsibility to brief ministers or chief executives about the statistics in question, such as special advisers, policy advisers or analysts
- Departmental press officers responsible for managing communications with the media about the policy or statistics in question (including any immediate supporting staff)

#### Grant of advance access

The arrangements set out in this statement are confined to those persons who meet the eligibility criteria set out in **Annex A** (i). Recipients can, in addition, share their access with their immediate administrative support staff even though those staff may not directly engage with the statistics in question. Their advance access is limited to statistics which meet the eligibility criteria set out in **Annex A** (ii), and which are in their final form prior to being published for the first time.

#### **Documentation and publication**

In the interests of openness and transparency, DCMS publishes a pre-release access list alongside all national and official statistics publications. This list contains the names of all people who have been granted pre-release access to the release, along with the organisation to which they belong. The immediate administrative support staff of recipients are not typically included in this list.

#### Period of access

Pre-release access to the organisation's official statistics is restricted to a maximum of 24 hours before their public release on the following day – usually at 09.30.

In exceptional circumstances only, and in accordance with Principle 5 of the Pre-release Access to Official Statistics Order 2008, the head of profession for statistics may grant pre-release access in excess of 24 hours. They will only do this if, in their opinion, the public benefit outweighs the detriment to public trust which is likely to result from such extended access. When this happens, the head of profession will publish on the DCMS website their reasons for granting extended access, and will also inform the Chair of the UK Statistics Authority and the National Statistician in advance of publication of the statistics in question.

#### Conditions of access

Those persons who are given access to DCMS's official statistics ahead of their release must keep the statistics secure and under embargo, and they must abide by certain conditions of access. They must avoid:

- disclosing the statistics or any part of a publication containing those statistics to any person not listed as a pre-release recipient;
- providing any indication of the size or direction of any trend revealed by the statistics;
- using such access for personal gain, or taking any action for political advantage;
- exploiting such access to change or compromise the content, presentation, or timing of publication of official statistics.

#### Special circumstances

Aside from the circumstances described above, the head of profession may also allow access to statistics ahead of their release to a limited number of persons in a limited number of special circumstances, sometimes for more than 24 hours. In each case, such access will be documented in the relevant release. For example:

- access may be given to the compilers of complementary reports due to be published at the same time as, or shortly after the statistics so that they can incorporate the latest available figures. Such access may also be longer than 24 hours;
- international organisations may gain access in order to compile supra-national statistics;
- journalists may be given access to complex or compendia releases in order to give them time to absorb and understand the significance of a given release. Such access, however, will never exceed 24 hours.

#### Breach of conditions of release

A breach is caused when an organisation producing official statistics fails to meet the standards outlined in the Code of Practice for Statistics.

In the event of a breach of the principles and rules set out in the legislation and described in this statement, the head of profession will notify the National Statistician as well as the Authority's Head of Assessment; via the reporting template <sup>10</sup> available on the GSS Policy Store.

The National Statistician may decide to conduct an inquiry on behalf of the Authority, the results of which will be posted on the Authority's website.

#### Sanctions against non-compliance

The head of profession may, permanently or temporarily, withdraw pre-release access from any person judged to have breached the conditions of their access.

<sup>&</sup>lt;sup>10</sup> Reporting breaches of the Code of Practice for Statistics: https://gss.civilservice.gov.uk/policy-store/reporting-breaches-of-the-code-of-practice-for-official-statistics/

In addition, a heavier sanction can be imposed by the UK Statistics Authority, which has a statutory duty to assess the extent to which any organisation's National Statistics comply with the Pre-release Access to Official Statistics Order 2008 and with the associated obligations set out in this statement. The Authority can, for instance, challenge an organisation where it considers that pre-release access is not justified or where an organisation is failing to conform with these arrangements. It can also withdraw, or consider withdrawing, National Statistics designation from the statistics in question.

In the event of any such challenge or any such withdrawal the head of profession will publish the Department's response on the GOV.UK website:

https://www.gov.uk/government/organisations/department-for-digital-culture-media-sport/about/statistics.

#### **Notes**

#### (a) Pre-release access

In the context described above, the phrase 'pre-release access' covers privileged access to statistical releases in their final form prior to being placed in the public domain. It does not cover pre-release access available to:

- those staff intimately engaged in the process of producing and disseminating the statistics in question (including those responsible for overseeing this process);
- those persons requested by the producers to quality assure the statistics before their public release.

#### (b) Heads of profession

Organisations which employ a large number of statisticians, or produce a large number of national or official statistics will normally appoint a head of profession for statistics, in consultation with the National Statistician. As well as being accountable to the Department's Secretary of State, heads of profession for statistics are responsible to the National Statistician for the professional integrity of the statisticians they manage, and for the quality of the statistics which those statisticians produce. In particular they are responsible for observing the UK Statistics Authority's Code of Practice for Statistics as well as any professional standards set by the National Statistician.

The DCMS head of profession for statistics also has a responsibility to provide advice and guidance on statistical issues to the following official statistics producers in DCMS arm's length bodies:

- Arts Council England
- British Film Institute
- Historic England
- Gambling Commission
- Ofcom
- Sport England
- VisitBritain/VisitEngland

### Statement of data sources

#### **Background**

The Code of Practice for Statistics states that statistics should be based on the most appropriate data to meet intended uses. The data sources should be based on definitions and concepts that are suitable approximations of what the statistics aim to measure, or that can be processed to become suitable for producing the statistics.

Official statistics published by DCMS are based on two main sources: data gathered from surveys, and from administrative sources. The accompanying spreadsheet<sup>11</sup> describes these data sources alongside a brief description of each data collection process.

Where possible, DCMS uses data from its ALBs and from other government departments (OGDs) to produce official statistics. By exploiting these sources DCMS is able to limit the overall burden placed on data providers, and also reduce the costs of dedicated data collection processes. When new data collections are proposed, any data that are available within DCMS, and data available from ALBs and OGDs are considered first.

#### Common procedures and policies

For all data sources used to produce DCMS official statistics there are several common procedures and policies. These are summarised below.

#### Access to data

DCMS receives data from ALBs, OGDs and survey contractors for producing official statistics. Data are made publicly available in statistical releases published on gov.uk, and where appropriate, on the UK Data Service.

#### Involvement in changes to systems

Partners (including ALBs) who supply DCMS with administrative data are aware and understand how DCMS uses their data in the production of official statistics. DCMS is also notified of any proposed changes to the data collection systems that would affect the production of these statistics.

Survey contractors who collect data for the Taking Part survey and Community Life survey are also aware and understand how DCMS uses the data in the production of official statistics.

In the event of a change in survey methodology DCMS uses the following procedure, which was applied to the Community Life survey when the survey moved from face to face methodology to a mixed mode self completion method in 2016/17.

<sup>&</sup>lt;sup>11</sup> DCMS Statement of Administrative and Survey Data Sources

- Initial test findings from the new methodology are published by DCMS to ensure users are aware of how the change in methodology could impact statistics and data
- In order to minimise the break in the time series, statistics from both the old and the new methodology are published alongside each other to allow users to make comparisons between modes.
- The accompanying statistical bulletin reports on the changes to methodology and any charts include statistics for both the old and new methodologies to aid the visualisation of the trends.
- Finally, information about the stages of development of the new methodology, including any further testing and validation, are described in technical reports.

#### Audit of data quality

The statistics team in DCMS provides support to producers of official statistics within DCMS to ensure processes are in place to check the quality of data received. The DCMS statistics team works in partnership with data suppliers external to DCMS (for example, ALBs) to ensure data quality is maintained to the standards required for the production of Official and, where appropriate, National Statistics.

#### Confidentiality and security

The Code mandates certain standards of confidentiality and security that producers of official statistics must meet. Details of how DCMS meets these standards are provided below.

DCMS statistical publications suppress data where information is not already in the public domain and there is evidence that small numbers could lead to the identification of an individual or business. The minimum cell count is usually 30 unless specified otherwise (e.g. by data providers).

Statistical data are maintained in line with DCMS data security policies. In particular, micro-data held by DCMS has access limited to named individuals. See the data management policy for more details.

### Revisions

The 'Trustworthiness' pillar of the Code of Practice for Statistics requires DCMS to publish transparent guidance on its policy for revisions. Scheduled revisions or unscheduled corrections to the statistics and data should be released as soon as practicable.

DCMS aims to avoid revisions to publications unless they are absolutely necessary, and puts systems and processes in place to minimise the number of revisions. These are discussed below.

Within our statistical publications revisions will only occur when there are strong statistical grounds for them. There are three main reasons for statistics revisions:

- changes in statistical methodology to improve accuracy and measurement;
- receipt of further data which alters our understanding of previous periods;
- errors in statistical systems, processes or data collection.

#### Handling of revisions

DCMS aims to be transparent with its users about revisions including when they have occurred and their impacts.

#### Changes in statistical methodology

For changes in statistical methodology DCMS will, where possible, consult with users before making changes that affect the statistics. DCMS will also consult users on options for maintaining a consistent time series where relevant, even if this involves revising previously held data.

When revisions are made, these will be made as part of a regular publication and details of any revisions and their impact on estimates will be published alongside the publication.

#### Receipt of further data

All administrative and non-administrative data can be updated when new information becomes available that relates to a period already published. Each relevant publication will set out how publications will be revised in these circumstances. Revisions would normally be made in the next planned publication following receipt of any further data.

#### Errors in statistical systems and processes

Occasionally, errors will occur in our statistical processes. DCMS makes every effort to avoid these and continually reviews processes and procedures to minimise this risk.

In some cases (e.g. the DCMS sector Economic Estimates series) information on how quality is built in to data collection processes, analysis and dissemination of our statistics is published in

quality assurance reports<sup>12</sup> alongside the standard statistical releases. For the Taking Part survey and the Community Life survey this information is available in the relevant technical reports<sup>13</sup>

When errors occur necessary revisions are made to the data. For a monthly data collection DCMS will normally revise the data in the following month's publication. For an annual data collection DCMS will normally revise statistics as soon as practicable.

All major revisions will be stated in a revisions history or technical note on the relevant release webpage. The revision history will state each of the changes, why the revision has been made, and the date the revised version was published. It will also list the impact of the changes, and to what extent they have affected the results. Web versions of any current publications affected will be revised.

Where an error occurs, generally only the current release or the previous release will be revised, and all longer time series data will remain unchanged, unless specifically stated.

#### First releases

Unless stated, all releases are treated as final releases, not provisional data. There are no planned revisions to national and official statistics released by DCMS. Detailed below is the policy on revisions for each DCMS major National and official statistics release<sup>14</sup>.

#### Taking Part: England's Survey of Culture, Leisure and Sport (National Statistic) -

Any revisions that occur as a result of errors in statistical processes (including human error) will be made as soon as possible after the release if major errors are found. Any necessary revisions will be clearly stated in the release.

Few major revisions are generally necessary for the Taking Part releases, because to ensure the comparability of the results from different years, the methodology and framework remain very similar over time. Any revisions that are made are clearly communicated to users as part of the report for each release.

#### **DCMS Sector Economic Estimates**

As far as possible National Statistics sources are used as the basis for these estimates to ensure consistency and comparability between sectors. The estimates are calculated using the latest available data and therefore follow the revisions policy of these (normally ONS) data sources. This

<sup>&</sup>lt;sup>12</sup> <u>DCMS Sector Economic Estimates 2017 Regional GVA - Quality Assurance Report</u> <u>DCMS Sector Economic Estimates 2017: Business Demographics - Quality Assurance Report</u>

<sup>&</sup>lt;sup>13</sup> Taking Part survey technical report: <a href="https://www.gov.uk/government/collections/taking-part-technical-reports">https://www.gov.uk/government/collections/taking-part-technical-reports</a>
Community Life survey technical report:
<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/770554/Community\_Life\_Online\_and\_Paper\_Survey\_Technical\_Report\_2017-18.pdf</a>

<sup>&</sup>lt;sup>14</sup> Not all DCMS official statistics are noted here. For the revisions policies of other official statistics please see each individual publication release for full details.

usually means that a new annual release of the estimates not only updates the series with data for a new reference year from ONS, but also incorporates any revisions to the data from the previous year. However, because maintaining a consistent time-series is a key element of the publication, any necessary revisions to the longer-term historical series are always incorporated.

The framework for measuring the each DCMS sector is described in the methodological note. These are predominantly based on standard industry classification (SIC) codes, and any changes to the Standard Industrial Classification (SIC) structure will be incorporated into the sector definitions. Major revisions are noted within each year's report, and on the release page a date is provided for when the latest revision took place.

https://www.gov.uk/government/collections/creative-industries-economic-estimates

As part of the assessment of the Economic Estimates series for National Statistics status, DCMS is reviewing its sector definitions and will update this document accordingly.

#### DCMS-sponsored museums and galleries monthly/annual visitor numbers

The sponsored museums and galleries provide DCMS with their provisional statistics on the number of monthly visits they receive. Monthly visitor data are published on the <u>museums and galleries monthly visits</u> page once per quarter. Data are published at least one month in arrears to allow time for the museums and galleries to collect the data. Any revisions that occur are a result of:

- The museum or gallery accidentally including visitor figures from the commercial events they host, as these are to be excluded from the visitor figures published by DCMS.
- Errors identified by the individual museums and galleries in their data collection systems which can result in the under-reporting of visitor figures.
- Human error which occurs during the production process either on the part of data producers in the museums and galleries or the responsible statistician in DCMS.

Monthly visitor figures are labelled as 'provisional' as they are subject to revision each month when new statistics are made available. Annual visitor figures are published as part of the Sponsored Museums and Galleries Annual Performance Indicators series and at that point the monthly visitor statistics are amended to ensure consistency in the statistics.

#### **Community Life survey**

Any revisions that occur as a result of errors in statistical processes or reporting (including human error) will be made as soon as possible after the error is detected. Any necessary revisions will be clearly stated in the release and an update notice will be included on the release page briefly outlining the revision. This will provide an automatic notification to those who are subscribed to the page.

#### Revisions policies for other individual releases

For further details of the revisions policies for other individual publications, please refer to the publications themselves.

### Customer service and engagement

#### **Customer service commitment**

DCMS will publish timely, relevant, high quality statistics in line with the Code of Practice for Statistics. Our commitment to customers of our statistics is:

- To publish our statistics on time according to pre-announced dates;
- To publish all statistics in line with the Code of Practice for Statistics;
- To be transparent when we are unable to meet any of these commitments;
- To give open and easy-to-use routes to allow customers to supply us with their views and opinions;
- To respond quickly and accurately to questions and enquiries from our customers;
- To consult with customers on developments and changes to our statistics methodologies, publications or publication processes;
- To consult with both internal and external customers on our statistical work plan;
- To respond in a timely manner to any complaints from customers.

#### **Customer engagement policy**

Customers for DCMS statistics can be categorised as being from the following groups:

- Ministers and policy makers within DCMS;
- Policy makers within government;
- Academics:
- Expert external special interest and pressure groups;
- Media and commentators:
- the general public

Our engagement policy recognises that these customers will have different needs:

- some users simply require quick and easy access to the latest statistics;
- for some users, their requirement is to be informed of the publication of the latest statistics and developments relevant to them;
- other users wish to be fully consulted on developments in our statistics either in terms of methodology, publication or use;
- finally some users wish to be **fully involved** in steering the statistical work programme and ensuring their needs are met by the programme of work.

Our engagement strategy is set out to ensure that on key developments to our statistics, there are transparent and clear processes allowing for views from both internal and external customers.

In the case of internal customers within the department engagement is usually through direct contact. Access to our statistics and engagement with our external users is usually through the statistical pages of the DCMS section of the GOV.UK website.

Our customer engagement policy recognises different user requirements and seeks to establish ways of engaging users which reflect all their different needs. The main forum for providing information to customers will continue to be the DCMS section of the GOV.UK website.

The main method for users to contact DCMS is by e-mail to <a href="evidence@culture.gov.uk">evidence@culture.gov.uk</a>. Contact telephone numbers for specific releases are provided on each statistical release.

#### Access to statistics – routine publications

Routinely produced statistics are available free of charge on the DCMS website at <a href="https://www.gov.uk/government/organisations/department-for-digital-culture-media-sport/about/statistics">https://www.gov.uk/government/organisations/department-for-digital-culture-media-sport/about/statistics</a>.

In accordance with the Code of Practice for Statistics the release of both regular and ad hoc official statistics is pre-announced through a 12-month release calendar, giving a specific release date at least four weeks in advance where practicable.

DCMS Statistics are published in a timely manner and in line with the UK Statistics Authority guidance on quality, pre-release access and revisions policy.

#### Format of releases

Publications will primarily be made available in the following formats:

- Adobe Acrobat (pdf file) and Microsoft Word
- HTML
- Microsoft Excel
- Comma Separated Variables (CSV)
- Interactive web reports

Our publications must comply with the GOV.UK website aims on accessibility, i.e. to be as accessible and usable as possible for every user, as stated at: <a href="www.gov.uk/help/accessibility">www.gov.uk/help/accessibility</a>.

Publications include details of how users can obtain statistics in alternative formats such as audio, braille or large print. A charge may apply for formats not routinely used; individuals will be made aware of any charges.

#### Access to information not in scheduled publications

All statistical publications will contain a contact email address and telephone numbers to enable the users of our statistics to communicate with the DCMS statistics teams. Media enquiries regarding the contents of a specific release should be directed to the DCMS Press Office.

The principles of release of additional, ad hoc analysis (based on data for which the headline results have already been published) is set out in the Office for Statistics Regulation's regulatory guidance on publishing official statistics and National Statistics. DCMS has a set process on dealing with ad-hoc requests, informed by principles from the Code of Practice for Statistics, in particular that of fair and equal access to official statistics.

The approach taken to publishing ad hoc analysis is broadly dependent on whether or not DCMS own the underlying data and any restrictions imposed by non-DCMS owners. Ad hoc analyses, requested after the main publication, can fall into two categories:

- Ad hoc releases: detailed analysis on a particular topic or of a particular dataset which is
  presented as a standalone report with associated commentary. Where significant analysis
  of an official statistics dataset is requested, this will be published as an ad hoc release. This
  often takes the form of a 'focus' report. The release date will be pre-announced on the
  DCMS website and 24 hour pre-release access may apply.
- Supplementary tables: additional tables based on a dataset for which the headline results have been released. This might cover more detailed breakdowns (e.g. a published result broken down by region or ethnicity) or additional results (e.g. results for survey questions which were not covered in the main release). In most cases, requests for additional results from a dataset will not warrant a full ad hoc release and will instead be handled as follows:
  - External requests (including from other government departments and DCMS' ALBs): If sufficient resources are available and a reliable response can be provided (e.g. the sample sizes are sufficient to provide robust results) a response will be provided to the customer and published online (on the DCMS ad hoc statistics page) at the same time.
  - Standard and incidental internal requests (e.g. DCMS policy colleagues) for internal
    use only: if a reliable response can be provided from the data available the additional
    analysis will be provided to the requester under instruction that the figures are for
    internal use only and must not be shared or used in any public documentation or
    ministerial speeches.
  - Standard and incidental internal requests required to feed into public documentation or to be shared with other government departments or organisations: Initial approach as above, however if either at the time of request, or at a later date, there is a need to include figures from the request in any public documentation (e.g. strategy documents) then the data must be published online (on the DCMS ad hoc statistics page) either beforehand or at the same time.

Requests can also be made under the Freedom of Information (FoI) Act. Our service in this will be fully compliant with the FoI Act, and where information cannot be disclosed, individuals will be advised of this fact in accordance with the FoI Act. More information on Freedom of Information enquiries can be found on our website: <a href="https://www.example.com/www

gov.uk/government/organisations/department-for-culture-media-sport/about/publication-scheme. Emails can be sent to foi@culture.gsi.gov.uk.

#### Information on and developments to statistics

Information on and development to our statistics are made publicly available on the <u>Statistics at DCMS</u> GOV.UK webpage. Users of our statistics are notified of any consultations, updates to publication schedules and any changes to the department's policies and procedures.

Users of our statistics can also be notified of any developments via the Mailchimp newsletters which they can sign up to depending on their topic of interest.

- For the Taking Part survey users can sign up to the mailing list <u>here</u>.
- For the DCMS Economic Estimates statistics users can sign up <u>here</u>.
- For all other statistical publications users can sign up <u>here</u>.

The Department consults on all major developments to our statistics. These consultations are published alongside the relevant statistical releases. The decision to consult with users of our statistics is solely on the authority of the DCMS head of profession for statistics. DCMS will undertake consultations when:

- we wish to make significant changes to the content of our publications
- we wish to make significant changes to the method of publication or frequency;
- we wish to make major methodological changes to the production of our statistics;
- we wish to make significant changes to how we publish our statistics (for example merging of several-related publications into a single publication on one day).

DCMS also publishes an annual statistics <u>work plan</u> that outlines the work and priorities for statistics. Priorities are determined based on user feedback and departmental priorities are aligned with the Code of Practice for Statistics.

#### **Complaints**

If for any reason you feel that the service you receive from DCMS has fallen below the standards you expect; or has not lived up to the statements made in our policies and procedures, then please contact us so we can investigate. Complaints should be addressed initially to the head of profession for statistics at DCMS.

Where the nature of the complaint relates to information provided under the Freedom of Information Act, the Department will review and respond in line with the internal review process set out under the Freedom of Information Act.

If however, your complaint relates to any other aspect of service, then the Head of Profession will send confirmation of the receipt of your complaint within five working days and aim to provide a full response within twenty working days. If it is not possible to provide a full response within these time periods you will be advised accordingly.

### Department for Digital, Culture, Media and Sport Statement of Compliance with the Code of Practice for Statistics

On receipt of a complaint we will:-

- Regard it seriously;
- Treat it in confidence;
- Deal with it independently and without favour;
- Resolve it promptly;

Complaints can be made either in writing or by email. Please provide as much relevant information as possible to ensure that it is dealt with promptly and accurately. Complaints can be made online at: <a href="mailto:enquiries@culture.gov.uk">enquiries@culture.gov.uk</a> or addressed to:

Jackie Orme
Head of Profession for Statistics
4th Floor
100 Parliament Street
London SW1A 2BQ

Email: jackie.orme@culture.gov.uk.

If you are still not satisfied, and the issues relates to the Code of Practice for Statistics, then you can refer your complaint to the UK Statistics Authority. The Authority can be contacted at:

UK Statistics Authority
1 Drummond Gate
London SW1V 2QQ

E-mail: <u>authority.enquiries@statistics.gsi.gov.uk</u> Website: <u>http://www.statisticsauthority.gov.uk/</u>

### Annex A: Criteria for granting pre-release access

# (i) - Categories of persons within government to whom DCMS would normally grant pre-release access to its statistical release:

- Ministers who have policy or operational responsibility for a particular subject-matter covered by a statistical release; who are accountable to Parliament and the electorate for their stewardship of that policy; and who may need to respond to questions about the statistics, or take appropriate action, at the time of release of those statistics;
- Chief Executives who have operational responsibility for a particular activity covered by a release, and who are accountable for their stewardship of that activity to Ministers, and through them to Parliament; and who are in a similar position to those Ministers described above:
- Top Departmental or Agency officials with ultimate responsibility for formulating, developing, maintaining, monitoring or implementing that policy;
- Other Departmental or Agency officials who have been assigned the specific responsibility to assist with the briefing to Ministers or Chief Executives about the statistics in question (e.g. Special Advisers, Policy Advisers, Analysts);
- Departmental Press Officers responsible for managing Ministers' and the Department's interface with the media with respect to the policy or statistics in question.

(plus any immediate ancillary staff who support the above)

# (ii) - Categories of statistical release to which DCMS would normally grant pre-release access:

- Releases which incorporate statistics which are used to monitor or measure the government's performance (either generally, or against formal targets);
- Releases which have the potential to impinge substantially on the formulation, implementation, or monitoring of government policy;
- Releases which have the potential to inform, or impact on, decisions about the allocation of public funds;
- Releases which have, demonstrably and historically, had a high public profile (i.e. regularly generate column inches in the print media or regularly attract the attention of the broadcast media) and on which Ministers or Chief Executives with responsibility for the subject-matter might reasonably be expected to comment at the time of release;
- Releases which incorporate statistics derived from other departments' or agencies' administrative or management systems, and for which Ministers or Chief Executives in those other departments have ownership and operational responsibility.
- Compendia publications (e.g. Social Trends, Regional Trends, etc which often include data
  which has already been released) or complex publications which have been made available
  to the media in advance of their public release, and under embargo, in order to give
  journalists time to absorb and understand their contents.
- Releases which cover matters of wide public interest.



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