

Statistical policy guidelines

The Service Complaints Ombudsman for the Armed Forces (SCO) has a statutory role defined within the Armed Forces Act 2006 (c.52) Part 14 to provide independent assurance on the fairness, effectiveness and efficiency of the Service complaints system to the Secretary of State for Defence by way of an Annual Report which is laid before Parliament.

The SCO Annual Report aims to:

- provide an evidence-based assessment of the Service complaints process;
- hold the Services to account for fairness, effectiveness and efficiency in their operation of the complaints system;
- provide recommendations on complaint-handling to the Services and the Ministry of Defence and see that lessons are implemented swiftly and effectively;
- summarise the activity of the SCO, including referrals, visits and budgetary statements.

Although the report is not primarily released as a standalone statistical bulletin, it does contain largely statistical content and uses official statistics to inform readers.

The report is produced following the principles and spirit of the UK Statistics Authority (UKSA) Code of Practice for Official Statistics and follows professional statistics best practice wherever possible. All reports produced are available on the SCO website.

This policy document sets out the processes which statistics will be used to:

- 1. Communicate and engage with users of our statistics;**
- 2. Ensure appropriate pre-release access to statistics in their final form prior to publication;**
- 3. Act ethically and safeguard the confidentiality of individuals;**
- 4. Revise or correct our official statistics publications.**

These processes have been developed in line with the requirements of the UK Statistics Authority's (UKSA) Official Statistics Code of Practice.

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1. Statement on statistical engagement

This section sets out how we will communicate and engage with users of our statistics. It covers how we will communicate with users, the processes by which we will consult with users regarding proposed changes to our statistics and the processes by which users can feed back to us on our statistics.

Engagement policy	<p>SCO customers can be categorised as being from the following groups:</p> <ul style="list-style-type: none">• Armed Forces personnel;• Ministers and officials within Ministry of Defence;• policy makers within Government;• special interest and pressure groups;• media and commentators;• the public. <p>It is recognised that these customers will have different needs and different means of contact. Our statistical 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 balancing these differing needs.</p>
Access to statistics: (routine publication)	<p>Routinely produced statistics are available free of charge on the SCO website. In accordance with the Code of Practice for Official Statistics, we will announce the month of release of these statistics at least 12 months in advance and the exact date at least 4 weeks in advance.</p> <p>Publications will comply with government accessibility policies and will primarily be made available in:</p> <ul style="list-style-type: none">• Adobe Acrobat (pdf);• Microsoft Excel (xls, csv). <p>Requests for information in different formats may be made via: StatisticsManager@servicecomplaintsombudsman.gsi.gov.uk</p>
Access to statistics: (information not in routine publications)	<p>All statistical publications will include a contact email address and telephone number.</p> <p>Media enquiries about the content of a specific release should be directed to the press office contact given in the release. For non-media enquiries, use StatisticsManager@servicecomplaintsombudsman.gsi.gov.uk</p> <p>Requests for statistics not contained in existing statistical publications will be treated in the spirit of the Freedom of Information Act (FOIA). Requests for information may be made via: StatisticsManager@servicecomplaintsombudsman.gsi.gov.uk</p>
Consultation on statistical developments	<p>We will consult on all major developments to our statistics. These consultations will be communicated via the statistics section of the SCO website.</p> <p>Our consultations will last for a minimum of six weeks and a maximum of 13 weeks, depending on the nature of the consultation. We will</p>

undertake consultations when:

- we intend to make significant changes to the content of our publications;
- we wish to make significant changes to the method of publication;
- 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;
- deciding on the contents of our annual statistical work plan.

Through the year, we will remain in contact with expert users and suppliers through local working groups.

Consulting on the annual statistics work plan

In line with the Code of Practice for Official Statistics, we will consult annually with customers about our statistical business plan. Under the Code of Practice, the SCO will take into account the following considerations:

- to ensure that where practicable the work plan reflects the needs of customers both internal and external to the SCO;
- to balance the needs of customers with the cost and burden on suppliers.

The consultation will seek to run to the following timetable:

November	Review feedback during year; demands from internal and external customers. Prepare proposals and/or options for consultation.
January	Publication of proposals and options.
February	Consultation closes.
March	Preparation of responses to consultation – response scrutinised by statistical working group.
April	Publish the finalised annual statistical work plan.

Responding on consultations

We will report on every consultation, providing a summary of all responses, the chosen way forward and the rationale for decisions made. Reports concerning consultations will be published on the statistics pages of the SCO website and all respondents to the consultation will be notified.

Customer service

If for any reason you feel that the service you received from the statistics team has fallen below the standards you expect or has not lived up to the statements made in our policies and procedures, please let us know via the contact details below so that we can investigate.

You will receive confirmation of receipt of your enquiry within five working days and we will aim to provide a full response within 20 working days. If you are still not satisfied and the issues relate to the Code of Practice for Official Statistics, you can refer your complaint to the UK Statistics Authority.

If it is not possible to provide a full response within these time periods, you will be advised accordingly. On receipt of a complaint, we will:

- treat it seriously;
- treat it in confidence;
- deal with it independently and without favour;
- resolve it promptly.

Complaints can be made in writing or email to:

To: SCO statistics
 Service Complaints Ombudsman for the Armed Forces,
 PO Box 72252,
 SW1P 9ZZ

Email: StatisticsManager@servicecomplaintsombudsman.gsi.gov.uk

Please provide as much relevant information as possible to ensure that your concern is dealt with promptly and accurately.

2. Release protocols

The following statement is published in conformance 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.

Introduction

The statement sets out the operational arrangements for giving ministers and their close officials pre-release access to the organisation's own official statistics once they are 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 maintain public confidence in the integrity of official statistics while also allowing ministers to account immediately for the implications of statistics covering policy or operational areas for which they are responsible.

Exclusion	Different arrangements apply to ministers and officials' access to the organisation's own administrative or management information where those data subsequently form the basis for published official statistics.
General principle	<p>The SCO operates under the general principle that pre-release access to official statistics must be:</p> <ul style="list-style-type: none">• limited to the minimum number of persons deemed necessary to:<ul style="list-style-type: none">○ provide responses to questions or make statements about these statistics at, or shortly after, their time of publication;○ take action just before, at, or shortly after the time of publication;• 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.
Grant of advance access	<p>The arrangements set out in this statement are confined to individuals who meet the eligibility criteria set out in Annex A(i) attached.</p> <p>Recipients can, in addition, share their access with their immediate administrative support staff. 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.</p>
Documentation and publication	In the interest of openness and transparency, the SCO maintains a public record on its website listing the job titles of all individuals to whom pre-release access has been granted and the organisation to which they belong.
Period of access	In line with legislation, where a publication has pre-release access arrangements, the pre-agreed list of

individuals will be emailed a copy of the report no more than 24 hours prior to the release of the publication before public release of the publication the next day.

Conditions of access

Individuals who are given pre-release access to statistics must keep the statistics secure and in a state of embargo and they must abide by certain conditions of access.

They must not:

- forward or disclose the statistics or any part of the publication containing those statistics;
- provide any indication of the direction or size of any trend revealed by the statistics;
- use pre-release access for personal gain or take any action for political advantage;
- exploit this access to change or otherwise compromise the content, timing or presentation of the publication of official statistics.

Breach of conditions of release

In the event of a breach of the principles and rules set out in Protocol 2 of the Code of Practice, in legislation and in the conditions of access in this statement, the SCO will notify the UK Statistics Authority's Chief Executive (the National Statistician) of the breach and corrective actions to be taken; and provide the Authority with a written explanation using the Authority's standard reporting form. 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 SCO may, for a period, withdraw pre-release access from any person judged to have breached the conditions of their access.

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 official statistics comply with pre-release access arrangements 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 to an Official Statistic is not justified or where an organisation is failing to conform to these arrangements. In the event of any such challenge or withdrawal, SCO will publish a response or reaction on its website along with its plans for achieving conformance.

3. Disclosure and confidentiality

The SCO hold identifiable personal data collected from Ministry of Defence Armed Forces employees. We have an obligation to act ethically and safeguard the confidentiality of individuals. We must also be fully compliant with the Data Protection Act 1998 and follow the principles of the Freedom of Information Act 2000.

We must, where possible, act in accordance with the UKSA Code of Practice for Official Statistics (Principle 5: Confidentiality) and with MOD JSP 440: The Defence Manual of Security.

We must ensure that we do not inadvertently disclose the identities of people in our published statistics and thus potentially infringe their right to privacy. In this context, data includes photographs, videos and sound recordings as well as words and numbers and it may be held in paper form such as forms and letters or their electronic counterparts.

Policy	<p>We need to obey the law by protecting the privacy of the people and enterprises whose data we hold.</p> <p>We obtain, hold and use personal data on the Armed Forces and civilian workforce and this is covered by the Ministry of Defence in the Data Protection Register. We must not use the data for any purpose other than those stated in the Register.</p>
Purpose of Data	<p>The Ombudsman and her staff will treat information provided to her in confidence unless she believes that there is an urgent need to alert someone in authority, for example to prevent serious harm. Even in these rare cases, every effort will be made to get consent from the person the information is about before any information is disclosed. The Ombudsman cannot refer any concerns to the chain of command without the explicit consent of the Service person raising the matter.</p>
Confidentiality	<p>Individuals contacting the SCO must be made aware of how confidentiality will be maintained. According to Principle 5 of the Official Statistics Code of Practice, arrangements should be sufficient to protect the privacy of individuals but not so restrictive that the practical utility of the statistics is unduly limited. Any variations to these arrangements (including for legal or public interest purposes) must be authorised in advance by the National Statistician. All authorisations for such variations must be published.</p>
Storage, Analysis and Transmission of Identifiable Data	<p>Identifiable data must only be held and analysed on the SCO network or on officially-provided laptops with encrypted hard disk drives.</p> <p>All identifiable data must be treated as “OFFICIAL SENSITIVE” and managed accordingly. Data transfer must be over secure GSI networks or by means of encrypted USB storage devices.</p>

Publication of Data	<p>While identifiable data may be held, confidentiality must be maintained in all published results (including drafts released to customers). Where there is a risk of potential identification, this will be resolved by:-</p> <ol style="list-style-type: none"> a. suppressing cells with fewer than five responses; b. suppressing percentages where the numerator is fewer than five; c. carrying out secondary suppression of totals if necessary to prevent the value being derived from the other entries in the table.
Requests for Data	<p>Section 33 of the Data Protection Act 1998 permits the passing of anonymised data to a third party for research purposes. Where datasets are requested for research purposes, anonymised datasets will be made available subject to consent by the data owner.</p> <p>Datasets must be anonymised by the removal of any unique identifier and by ensuring that it is not possible to identify any individual via cross-tabulation of demographic data items in the dataset.</p> <p>Prior to the release of any dataset, a signed Data Access Agreement must be returned listing the data to be provided, the purpose for which it will be used and the names of all persons with access to the data. Data provided must only be used by the persons listed in the Data Access Agreement for the purpose listed in the agreement. For student research projects, the Data Access Agreement must also be signed by the academic tutor supervising the research. Any breach of the agreement must be reported to the National Statistician.</p>
Data Owner and Custodians	<p>The Head of Office is responsible for ensuring that this policy is complied with and that the confidentiality of responses is maintained. This responsibility takes precedence over requests and instructions from the data owner (e.g. MOD).</p> <p>The Head of Office is the Information Asset Owner (IAO) responsible for the security and safe-keeping of all of SCO data, including the data held on behalf of the data owner. Any queries regarding the Information Assurance of the data held should be directed to the IAO.</p>
Implementation	<p>This policy takes immediate effect. Every person working with identifiable data in SCO is expected to adhere to this policy.</p>
List of sensitive personal information items	<p>Data items listed in this section are deemed ‘sensitive’ and particular care should be taken not to reveal details of this type about any individual. Items marked with an asterisk (*) are defined as sensitive personal data relating to the data subject (individual) by section 2 of the DPA98. The list of sensitive personal information</p>

comprises:

- any data collected where a guarantee of confidentiality was given;
 - the name and contact details of the Serviceman or woman;
 - Service number;
 - unit where they are based ;
 - unit where the wrong occurred;
 - outline of their concerns:
 - when the incident/s took place
 - who is/was involved;
 - photographs, videos or sound recordings in which individuals can be identified;
 - any other data whose disclosure would cause the data subject embarrassment or distress and which they could reasonably have expected to remain private.
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4. Revisions

Principle 2 of the Code of Practice for Official Statistics requires all producers of official statistics to publish transparent guidance regarding revisions.

Where possible, the SCO aims to avoid revisions to published statistics unless they are absolutely necessary and put systems in place to minimise the number of revisions required.

Revisions policy	<p>The SCO policy in handling revisions is to be transparent with users about:</p> <ul style="list-style-type: none">• the need for revisions;• how and when to expect revisions as part of our standard process;• the processes by which other revisions will be communicated and published. <p>In order to meet these commitments, all our statistical publications will:</p> <ul style="list-style-type: none">• ensure the need for revisions to any series are pre-announced on the SCO website;• include a revisions policy within every release;• detail how users will be informed of the need for revisions;• give detailed and full explanations as to why the revisions were necessary.
Changes in source systems or statistical methodology:	<p>Where major changes to source administrative systems are pre-planned and for changes in statistical methods, we will where possible consult with users on the changes and treat these as a change of methodology. We will consult on how best to record in the future and the options for maintaining a consistent time-series, including any revisions of previously held data.</p>
Receipt of subsequent information:	<p>All administrative systems by their nature can update information previously held; by nature of the business process this means that on some occasions, information relating to a period already published may need to be entered as a revision.</p> <p>The timing of each publication is designed to minimise risk of the need for significant revisions for this reason. However, each release will set out how the data held within this series will be revised in these circumstances.</p>
Errors in statistical systems and processes:	<p>Occasionally, errors will occur in our statistical processes. We do everything we can to minimise these errors and continually review our processes and procedures.</p>

Annex A: Criteria for granted pre-release access

(i) - Categories of persons within government to whom the Ministry of Defence would normally grant pre-release access to its statistical releases:

The Order describes a recipient of pre-release access as an “eligible person” and sets out three main definitions of an “eligible person”.

- A Minister or Secretary of State
- A person who, in the opinion of the Head of Profession, is otherwise accountable to the public for the formulation or development of government policy or for the delivery of public services to which the statistic has direct relevance, for example the Chief Executive of an agency or other arm’s length body, or a senior official with direct policy responsibility
- An adviser to a Minister or accountable person

Therefore an “eligible person” may be:

- Those 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;
- Departmental officials with ultimate responsibility for formulating, developing, maintaining, monitoring or implementing that policy;
- Other Departmental officials who have been assigned the specific responsibility to brief Ministers about the statistics in question (e.g. Special Advisers, Policy Advisers, Analysts);
- Departmental Press Officers responsible for managing Ministers' interface with the media with respect to policy or statistics in question.

(plus any immediate ancillary staff who support the above)

(ii) - Categories of statistical release to which the Ministry of Defence would normally grant pre-release access:

Statistics will need to be of a profile or importance which may require a response or action when they are published, in order to justify pre-release access. The Order describes this as “the public benefit likely to result from such access outweighs the detriment to public trust in official statistics likely to result from such access.

Therefore criteria which apply in deciding to which statistics pre-release access might be given include:

- releases categorised as 'market-sensitive' (i.e. releases which embody statistics which, when disclosed, would be reasonably likely to have a significant effect on the value or traded volume of any investment).

- 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 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.

Email:

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Service Complaints Ombudsman

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