



Independent Custody Visiting Statistics



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Quality Assurance of
Administrative Data



NISRA

Northern Ireland
Statistics and Research Agency
Gníomhaireacht Thuaisceart Éireann
um Staitisticí agus Taighde



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1. Introduction

About this Report

The primary purpose of administrative data is for service delivery, including the generation of official records, documentation of processes and for informing decision making. Improvements in the systems and processes used to collect such data, have led to it being identified as a useful, affordable and efficient source of information for official statistics. While the UK Statistics Authority highlight the limitations, they also recognise that administrative data can be central to the production of official statistics. To enable statistics producers to assess data quality, the UK Statistics Authority introduced guidance (Quality Assurance for Administrative Data (QAAD)) in 2015. This report documents the findings of the assessment of the administrative data used in the production of the Northern Ireland Policing Board's (hereafter referred to as the Board) Official statistical publications.

The Northern Ireland Policing Board Statistical Function

The Board was established on 4 November 2001 and takes its powers from the Police (Northern Ireland) Act 2000 as amended by the Police (Northern Ireland) Act 2003. The Policing Board is an independent public body made up of 10 Political and 9 Independent Members, established to ensure an effective, efficient, impartial, representative and accountable police service which will secure the confidence of the whole community, by reducing crime and the fear of crime. Members of the Board are bound by a Code of Conduct and operate under agreed Standing Orders. The Board has a range of legislative duties to meet. Through meetings of the Board and the work of its committees, it holds the Chief Constable to account for the delivery of the policing service.

The statistical and research function within the Board comprises statistician/s, on loan from the Northern Ireland Statistics and Research Agency (NISRA) and Engagement Branch staff within the Partnership Directorate. Engagement Branch have responsibility for the Independent Custody Visiting Scheme (ICV) including recruitment, training and processing of expenses to custody visitors as well as the production of reports to the Board and its committees. Statisticians are a specialist grade within the Northern Ireland Civil Service and work to the standards of the Code of Practice for Statistics as published by the UK Statistics Authority. The combined team are responsible for providing official statistics for the ICV Scheme. The team have continually developed the systems and processes over the years to improve data quality while also ensuring the secure handling of sensitive and personal information.

Data Sources

The key administrative data sources used by the Board for the production of custody visiting official statistics are:

... Independent custody visiting returns (CV2 and CV4), paper forms detailing visits made by ICVs, the outcome of visits and PSNI Area Commander comments.

Data is sourced from CV2 and CV4 returns provided by Independent Custody Visitors (ICVs) who are volunteers from across the community, independent of the police and criminal justice system. The administrative data they provide relates to monitoring of rights, health and wellbeing of detainees and the facilities and conditions of detention.

The system is designed to support the operational function of the Partnership Directorate. A by-product of the system is a variety of management information and official statistics sourced from them. These are used to inform internal management and the wider public about the operation of the Board and the Independent Custody Visitors Scheme in particular.

The Independent Custody Visiting Scheme is the result of statutory legislation requiring the Board to make, and keep under review, arrangements for designated places of detention.

The systems however weren't designed for the production of official statistics and therefore validation and cleansing is required to ensure that meaningful and accurate statistics can be provided from them. Full details of the system can be found in chapter 3.

Statistical Outputs – Designation and Key Measures

In accordance with the Statistics and Registration Act 2007, statistical outputs can be assessed for compliance with the Code of Practice for Statistics and, if found compliant, are then designated as National Statistics. This means that they meet the highest standards of trustworthiness, quality and value. The process of determining compliance with the Code and designation as National Statistics is known as Assessment.

The Independent Custody Visiting statistical publication has not yet been assessed and so is currently deemed 'Official Statistics'.

Independent Custody Visiting Scheme

The Northern Ireland Independent Custody Visiting Scheme was first established in 1991 by the Police Authority. The importance of an independent scheme which ensured the rights, health and wellbeing of the detainee and the facilities and conditions of detention was also recognised in 1999 by the Report of the Independent Commission on Policing for Northern Ireland (the Patten Report). The Scheme was subsequently given a statutory footing by virtue of Section 73 of the Police (Northern Ireland) Act 2000 which requires the Policing Board to make and keep under review arrangements for designated places of detention to be visited by lay visitors (now referred to as custody visitors).

The ICV Scheme is linked to the PACE (NI) Order 1989 and its revised codes of practice, 2007 edition and in particular Code C, which deals with the detention, treatment and questioning of persons by police officers.

Independent Custody Visiting Statistical Report

This is an annual official statistical publication based on financial year data sourced from the ICV reports. It presents data on number of visits, disaggregated by station (custody suite), team, conditions of detention, day and time of visit. The key measures in the publication are –

- Number of custody visitors overall and by gender, changes to custody visitor numbers and length of tenure
- Number of visits undertaken, broken down by valid and invalid visits and by custody suite
- Reason for invalid visits
- Number of satisfactory and unsatisfactory visits by custody suite and by custody visit team
- Comments from ICVs regarding unsatisfactory visits in terms of treatment, rights and health and wellbeing of detainee
- Conditions of detention and reasons for concern
- Number of guideline visits and actual visits undertaken
- Time of day and day of week when visits were carried out
- Number of detainees interviewed, refused and not seen
- Reasons for detainees not being seen
- Number of detainees held and rate of refusal by team
- Number of custody records checked by team
- Number of delays in accessing detainees by team, station, including time delayed and reasons for delay
- Number of visits, detainees held, seen, not seen and refused in the Serious Crime Suites

2. Applying the Data Quality Assurance Toolkit

UK Statistics Authority Administrative Data Quality Assurance Toolkit

The UK Statistics Authority introduced QAAD guidance to help statistics producers review their quality assurance arrangements for the administrative data used to produce official statistics. The toolkit comprises -

- Quality Management Actions;
- Quality Assurance Matrix; and
- Risk/Profile Matrix.

This report aims to apply the requirements of the UK Statistic Authority's Quality Assurance toolkit to the administrative data used in producing the statistics for the Board. The aim being to provide reassurance and transparency regarding the quality of the data underpinning these statistics to give users a better understanding of their reliability and accuracy.

The QAAD states that the critical judgement about the suitability of the administrative data for use in producing official statistics should be pragmatic and proportionate, made in the light of an evaluation of the likelihood of quality issues arising in the data that may affect the quality of the statistics, and of the nature of the public interest served by the statistics.

They recommend that the matrix below is used by producers of statistics to assess the risk profile of the statistics they produce that are derived from administrative sources. The resultant rating then determines the level of assurance required for each of the 4 stages in the Quality Assurance framework.

Administrative Data Quality Assurance Toolkit – Risk of Quality Concerns/Public Interest Profile

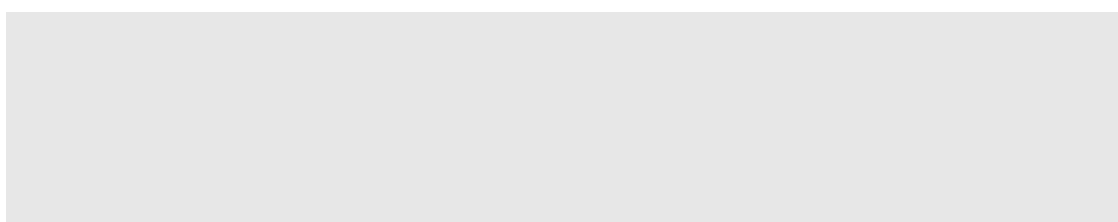
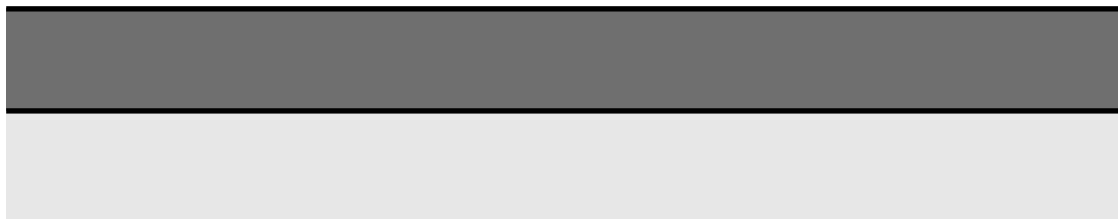
Level of risk of quality concerns	Public Interest Lower	Public Interest Medium	Public Interest Higher
Low	Statistics of lower quality concern and lower public interest [A1]	Statistics of low quality concern and medium public interest [A1/A2]	Statistics of low quality concern and higher public interest [A1/A2]
Medium	Statistics of medium quality concern and lower public interest [A1/A2]	Statistics of medium quality concern and medium public interest [A2]	Statistics of medium quality concern and higher public interest [A2/A3]
High	Statistics of higher quality concern and lower public interest [A1/A2/A3]	Statistics of higher quality concern and medium public interest [A3]	Statistics of higher quality concern and higher public interest [A3]

A1 to A3 = Levels of assurance required in the UK Statistics Authority's QA matrix (A1 = Basic assurance, A2 = Enhanced assurance, A3 = Comprehensive assurance)

Administrative Data Quality Assurance Toolkit - Risk of Data Quality Concerns

Level of Risk	
Low Risk	The data may have a low risk of data quality concerns in situations in which there is a clear agreement about what data will be provided, when, how, and by whom; when there is a good appreciation of the context in which the data are collected, and the producer accepts that the quality standards being applied meet the statistical needs.
Medium Risk	The data may be regarded as having a medium risk of data quality concerns when high risk factors have been moderated through the use of safeguards for example, integrated financial audit and operational checks, and effective communication arrangements. It is also appropriate to consider the extent of the contribution of the administrative data to the official statistics, for example, in cases where the statistics are produced in combination with other data types, such as survey or census data.
High Risk	The data may have a high risk of data quality issues when there are many different data collection bodies, intermediary data supplier bodies, and complex data collection processes with limited independent verification or oversight.

Administrative Data Quality Assurance Toolkit – Public Interest Profile



Risk profile of statistics when QAAD Quality Assurance Toolkit applied

Statistic	Data Quality Concern	Public Interest	Risk Profile Rating
Custody Visiting Statistical Report	Low	Low	A1

A1 = Basic assurance, A2 = Enhanced assurance, A3 = Comprehensive assurance

The reasoning behind the risk profile rating associated with the Custody Visiting statistical output -

In terms of data quality, the Independent Custody Visiting Report statistics are deemed to be of **low risk** as there is a clear formal process in place to provide the required data to the Board on a regular basis covering an agreed time period. The data are sourced from the Board's ICV Management System, the main source of information used to manage day to day business of custody visits and therefore needs to be highly accurate.

Processes and systems have been developed and refined over the years to address any quality concerns that emerged, and statisticians have developed a complex and detailed series of validation checks which are applied to the data to ensure any anomalies are corrected.

In terms of public interest, the statistics inform the public of the work undertaken by the ICVs. There is a public interest regarding the health and wellbeing of detained persons while in custody and the conditions of detention. This report provides useful information that assists the general public in forming a view on this.

Published annually and covering the position for the previous financial year, the statistics don't generally receive much media attention or coverage. In light of this, the statistics are considered as being of a **low profile**.

The overall risk profile rating associated with Custody Visiting statistics is **A1 - Basic Assurance**.

3. Operational Context and Administrative Data Collection

About This Chapter

This chapter provides a description of the administrative systems involved in the production of the Board’s custody visiting statistics. Table 1 provides an overview of the data sources used for the official statistics produced.

The statistical output covered in this report are sourced from one system and this chapter provides information on the data quality procedures applied to the output. Further details of additional checks and balances applied to the statistical output are covered in later sections of the report.

Administrative Data Sources Used for Official Statistical Publications

Custody Visiting Report	Sources
ICV Management System	✓
CV2 and CV4 Forms	✓
Exit Forms	✓

ICV Management System

Data from the ICV Management System is used in the production of the custody visiting report.

Environment and processes for compiling administrative data

The Board's ICV Management System is a recording system used for the day-to-day management of custody visits. The key principle underlying its operation is that it relies on a small team of staff within Partnership Directorate (Engagement Branch) of the Northern Ireland Policing Board, to input and update information about the visitors and custody visits made. Key aspects of the information recorded on the system are required for the successful day to day operation of the ICV Scheme and needs to be highly accurate to enable the effective monitoring of visits and in accordance with the Board's statutory function to administer the scheme.

In terms of governance, the ICV Management System is overseen by senior staff within Engagement Branch and with technical support from the Board's NISRA statistician/s if required. Requests for any relatively small changes to the system are considered by the team on a case-by-case basis.

Data Input Process Summary

1. Administrative staff within the Board's Engagement Team input/update records.
2. Information held on secure servers located within NICS premises.
3. Data routinely validated/checked by an individual and manager within the Engagement Team.
4. Statisticians and administrative staff within Engagement Branch, obtain selected data extracts from this source.
5. The data are used to compile related statistical outputs which are published on the Board's website.

Factors affecting data quality or causing bias and safeguards to minimise risk

The Boards Independent Custody Visitors management system has a small number of users to input information. The users are very familiar with the custody visitors, with the approach of visits undertaken and with the process for concerns raised. Therefore, the resultant statistics are not considered prone to error. They are also timely, with regular updating of information to the system.

Risks to data quality and mitigating actions are detailed below.

Risk - Inaccurate details recorded by visitors when logging information

- Induction and regular training is carried out by Engagement Branch. Refresher training every 3 years and an Annual Conference (subject to budget) which includes training for ICVs
- Email reminders – ‘How to...’ guides are issued in relation to process/procedural changes or amendments (as required)

Risk - Inaccurate details recorded by staff on ICV Management System when logging information

- Monthly validation checks carried out by a senior member of the team to flag up and ensure anomalies are corrected.
- Regular in-house checks on data are conducted by the team and a statistician. Any anomalies are corrected.

Risk - Data Protection & Information Security requirements not complied with

- The Board stores data on a secure server and holds files in accordance with their retention and disposal policy.

Risk - Insufficient levels of internal and external auditing of data and processes

- Regular audits conducted by the Board's Internal Audit.
- The Board oversees audit findings and any significant issues arising.

Risk – staff and statisticians not aware of their Data Protection & Information Security responsibilities

- Staff and statisticians must complete annual mandatory data protection and information security training. NISRA staff also receive training in statistical disclosure control.
- Each report is checked by a statistician within the Board before publication.

Potential Sources of Bias/Error in Independent Custody Visiting Statistical Publication

While there is always a chance of human error with data entry, the information feeding into the report is used to manage day to day business within and across the organisation, its accuracy and completeness is therefore critical.

Additionally, a period of 4 weeks after the reporting period is left before data is extracted to allow for completion of the relevant outcome and for outstanding forms to be received and updated. Significant errors or missing data therefore are highly unlikely.

4. Communication with Data Suppliers

About This Chapter

This section documents communication with the data suppliers involved in the production of custody visiting statistics.

Collaborative relationships and engagement with data collectors, suppliers, IT specialists, and operational officials

The data requirement from the ICV Management System is long established, with amendments made over the years to ensure that changes to the processes or systems can be included/allowed for in the statistics.

NISRA Statisticians have a shared role in monitoring the data, with access to the live data, extracting data as needed. The Board's IT Manager and IT Assist maintain the software used for this data. If any issues arise, communication can range from informal telephone/email queries to resolve data or system problems, to staff attending formal meetings.

Staff are in regular contact regarding their data needs. The vast majority of these are covered by the variables included in the administrative data on the system. Any additional variables or ad hoc data requirements would be arranged via discussions with colleagues in Engagement Branch and Senior Management.

Formal agreements detailing arrangements

In terms of the legal basis for data supply, the Board is deemed the data controller with regard to the data held on the ICV Management System. The information is collected in order to meet its legal obligations and public functions and to enable it to deliver its services, maintain its records, to support and manage the ICV Scheme, and for the purposes of litigation and legal advice.

Data Protection

Engagement Branch acts as data processors to the Board's data controller. All data files are stored on secure servers within NICS with access restricted solely to those staff within the branch/team who need it.

The Director of Partnership acts as the Information Asset Owner for the branch and is required to ensure that branch procedures are in place and staff are adequately trained in data protection requirements. All staff must complete mandatory on-line data protection and information security training on joining the branch and complete further annual refresher training.

Procedures are updated and/or reviewed on a six-monthly basis and local systems operating procedures are in place to protect the confidentiality, integrity and availability of data by outlining the data handling and security procedures that staff must comply with.

NISRA staff apply statistical disclosure control to all data sourced from the ICV Management System to ensure that no one is identifiable from the data or any sensitive information relating to them.

Engagement with Users

Opportunity exists for users to provide feedback on statistical publications through an online survey/comment form on the Board's website. In addition to this, a biennial survey of users is planned from 2024 to ascertain views on the statistics produced, how well they meet users' needs and whether there are any suggested improvements. Whilst most of the analytical work is undertaken for key users of statistics within the Board and its committees, a range of other users of the statistics, both within the wider public sector and the general public will also be included in the survey. Survey results will be summarised on the Board's website.

5. Quality Assurance Principles and Checks Applied by Data Suppliers

About This Chapter

This section documents the quality assurance procedures applied by data suppliers.

Data assurance arrangements in data collection and supply

A number of measures have been included in the ICV Management System to help reduce the chance of errors. These have included, input where possible restricted to drop down menus, guideline options within boxes, and the introduction of a series of validation prompts including alerts for missing or mismatched information.

Monthly validation checks are also included by the team for key pieces of information with the team alerting individuals supplying the data to ensure issues are resolved quickly.

The co-location of statistician/s within the Board and the links forged with those inputting data, has been invaluable at improving data quality and understanding of how the data is being used.

Role of operational inspection and internal audit

In addition to the above, Internal Audit unit would regularly inspect and check aspects of the policy and practice regarding the ICV Management System. This includes checking whether data recorded on the system is accurate and correct. These internal audit reports are presented to senior management for consideration and appropriate action.

6. Producer's Quality Assurance Investigations and Documentation

About This Chapter

This section documents the additional series of quality assurance checks that are applied to the data received from the ICV Management System.

Quality Assurance checks and quality indicators for input data

Validation exercises are conducted on the data, to ensure that the data are accurate and up to date with manual checks undertaken and data corrected to ensure that -

- important date and time markers follow logical sequences
- information is complete with regard to personal and visiting information
- delays exceeding 10 minutes have a reason provided
- comments and observations of concern are noted down
- Area Commanders' responses are received and noted
- the number of detained persons match with the detail on adult/juvenile and gender
- a check of the data as a whole suggests no other anomalies.

Identified discrepancies are investigated and resolved on an individual basis.

Strengths

- There is an operational need to have accurate and up-to-date information to ensure the effective handling of day-to-day operations. The system therefore is accurate and kept up to date.
- The information recorded on the ICV Management System is manageable with approximately 550 visits recorded each year.
- The system works well and is trusted by the staff who use it. It is reliable and needs minimal maintenance.
- A small number of key personnel are involved in managing the data records and have developed a high level of competence and experience of the system.
- The data are sourced from an administrative data system and therefore are a complete record of all cases (i.e., are not based on a sample of cases).

Weaknesses/Limitations

- The system depends on paper forms being received by post. However duplicate forms with the relevant statistical data are received directly from PSNI on a regular basis.
- The system depends on staff inputting details and updating records manually. Problems could potentially occur if staff don't update the details on a timely basis or if input errors are made.

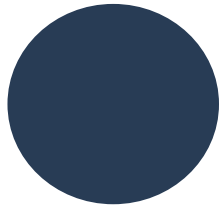
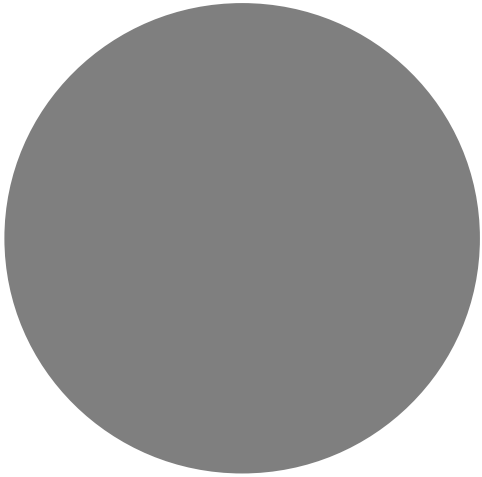
Quality Assurance Measures Specific to Individual Statistical Outputs

In addition to the visual checks that are carried out when the CV2 and CV4 forms are received from Custody Visitors and PSNI, additional individual quality assurance measures are also undertaken when producing the statistical output for the publication.

Quality assurance checks undertaken using SPSS syntax include –

Specific Checks

1. Checking data for key fields such as team, station, and dates are complete and missing information obtained from further requests by Engagement Branch
2. Logic checks completed for times, to ensure time markers follow a logical sequence
3. Checks on duration of visit and time delay
4. Logic checks completed in relation to numbers of detained persons and persons visited
5. Logic check on dates associated with the reporting period
6. Checks for duplicate entries
7. Checks for Area Commander responses where issues have been raised



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