

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: False Documents Casework
Date: 15 February 2022 16:39:34
Attachments: [image003.png](#)
[image004.png](#)

Thanks [REDACTED], and I have passed that advice on.

Best wishes,

[REDACTED]

From: [REDACTED]@Statistics.gov.uk
Sent: 15 February 2022 16:24
To: [REDACTED]@homeoffice.gov.uk
Cc: [REDACTED]@Statistics.gov.uk
Subject: RE: False Documents Casework

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Hi [REDACTED]

Thank you for coming back to me and for following up on this.

We note your comments around updating older news releases and are pleased to hear that your colleagues appreciate the advice you have shared with them around data transparency and that they intend to take the advice on board for future releases. We hope that this will reduce the risk of this happening again. You may wish to share with them OSR's latest transparency guidance which can be found [here](#).

Thanks for the information about the inclusion of footnotes in news releases. To ensure relevant information about data and statistics used in press releases is available, other government departments often have a separate page behind the news release containing the relevant information about the data. A link to this page can be found in the news release text or the related content section. This could be a useful approach for HO in the future. We also note your concerns regarding providing too much information on the security processes in place and are sensitive to this when considering data transparency.

Many thanks for your response and for your comments on the draft response to our correspondent. We will feed this into our briefing and get back to you next week.

[REDACTED]

From: [REDACTED]@homeoffice.gov.uk
Sent: 15 February 2022 11:52
To: [REDACTED]@Statistics.gov.uk
Cc: [REDACTED]@Statistics.gov.uk
Subject: RE: False Documents Casework

Apologies, but you sent me a draft reply requesting my comments. I attach some tracked changes which I would ideally like, to reflect what I believe is a fair position.

As ever, very happy to discuss,

With best wishes,

[REDACTED]

From: [REDACTED]
Sent: 14 February 2022 17:53
To: [REDACTED]@Statistics.gov.uk
Cc: [REDACTED]@Statistics.gov.uk
Subject: RE: False Documents Casework

Dear [REDACTED]

Thanks for your email and your patience.

I have now been able to speak to comms colleagues who, working with Border Force experts, were responsible for producing the news story on the GOV.UK website relating to insecure ID cards.

The department's standard approach, and we believe that of Government Communications experts generally, is to avoid updating news releases on GOV.UK, as best practice is to keep them as they were at the time of issue. I know UKSA understands this principle as it adopted the same approach only recently in regard to my updated letter on NRPf.

Pages are occasionally updated, but only by exception, for example if things are incorrect or misleading, which we do not believe to be the case in this instance. When such updates are made – providing they're substantive i.e. not correcting formatting or typos – the .GOV.UK team require that a notice be included on the page, explaining that the press notice has been updated.

In this instance, we would not recommend updating this press notice. We are not seeking to correct a misleading item, and given that four and a half months have elapsed since publication, colleagues view is that this is only likely to result in further questions and given the policy decision is past, we do not feel this would be productive. Having said that, they appreciate the advice that we have been providing on how to cite data and have said that they intend to take the advice on board for future releases.

One thing to note, apparently footnotes can't be included in news releases, so in future any caveats would need integrating into the body of any text. For clarity of presentation that will limit the amount of information that can be provided – but we understand this is also a general rule that applies across GOV.UK as a whole. It is also worth noting that this department would have concerns over providing too much detail on the security processes in place to check for fraud and misuse of documents for immigration purposes and other aspects of the control due to the potential impact this could have on border security.

Hope this is helpful,

With best wishes,



[Redacted]
[Redacted]
Home Office Analysis and Insight (HOAI)
Science Technology Analysis and Research Group
[Redacted]
[@homeoffice.gov.uk](mailto:homeoffice.gov.uk)

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From: [Redacted] <[\[Redacted\]@statistics.gov.uk](mailto:[Redacted]@statistics.gov.uk)>
Sent: 31 January 2022 09:43
To: [Redacted] <[\[Redacted\]@homeoffice.gov.uk](mailto:[Redacted]@homeoffice.gov.uk)>
Cc: [Redacted] <[\[Redacted\]@statistics.gov.uk](mailto:[Redacted]@statistics.gov.uk)>
Subject: False Documents Casework

Hi [Redacted],

Thank you for meeting with us on Friday. We just wanted to clarify a couple of points with you about the false documents casework.

- Referring to the statistics published [here](#), can you confirm that this information was compiled from management information and there are no published statistics available? Just wanted to check our understanding following our earlier discussion.
- Can you share any background information on the processes used to compile statistics generated from management information which would give users more confidence in the quality of these data or is there a document we can link too? One of the issues raised with us is about the quality of the data used, without any sources of background information the user and we can't tell this.

Many thanks and I look forward to your update on this.

[Redacted] | Statistics Regulator | Office for Statistics Regulation
Tel: [Redacted] | [@statistics.gov.uk](mailto:[Redacted]@statistics.gov.uk) | Website: [Office for Statistics Regulation](#)
UK Statistics Authority | Awdurdod Ystadegau'r Deyrnas Unedig | [@UKStatsAuth](#)

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Catch-up January 28 2022

[REDACTED] Mary G (OSR)

Notes.

- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Any updates on false documents/ when they are likely to have one for us

[REDACTED] said that it was most likely an operational team trying to be helpful by providing data about their work without any analytical input.

OSR noted that where data were published and used publicly there needs to be info on the source, underlying data etc as an ad-hoc type thing. We noted that other Departments do this, e.g. MOJ.

OSR made the point that we are not asking HO to publish all MI it holds just where it uses MI publicly or there is a notable public interest (e.g. from parliament)

[REDACTED] to provide an update to OSR

- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Annex A: Draft letter to the Home Office

Dear [REDACTED]

I am writing about the public use of statistics on small boat crossings which are not already included as part of an existing publication or ad-hoc release.

There have been reports in the media, including [the BBC](#), [the Times](#) and [the Daily Mail](#), about the number of crossing made across the channel in recent days, quoting the Home Office as the source of figures. The release of figures on migrant crossings does not meet our expectations, as set out in our statement on [data transparency](#). These figures should be published in an accessible form, with context and sources clearly explained. Making the statistics equally accessible to all supports the public's confidence in the data and decisions made by government.

I have [previously written](#) to the Home Office about this issue. It is good that the Department has begun to publish official statistics on this topic, with the [first of these having been published](#) in February 2022. Further releases of these data have also been [pre-announced](#) by the Home Office for May 2022, August 2022 and November 2022. However, it is disappointing that outside of this regular release, migrant crossing data also continues to be released in a way that is not equally accessible to all.

Given the continued interest in and use of these data, we would urge the Home Office to consider whether a more frequent release of data on this topic would better meet user need. Additionally, where unpublished data are referred to unexpectedly, this information should be published as soon as possible after any statement has been made with any limitations clearly set out. This is an issue that has also arisen in relation to the use of unpublished data on false documents in a [Home Office news statement](#), which we understand you are looking into.

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

Yours sincerely

[REDACTED]

From: [REDACTED]
Sent: 05 April 2022 12:37
To: [REDACTED]@homeoffice.gov.uk
Subject: FW: [REDACTED] - OSR/HO correspondence
Attachments: Letter from Ed Humpherson, Director General for Regulation; RE: False documents and Code support follow-up; 20220401_Draft letter_shared with HO.docx

Hi [REDACTED]

Many thanks for your emails. In terms of the letter, our content team have the letter's publication scheduled for tomorrow, Wednesday 6 April, early afternoon. If there are any further updates before then just let us know and we can consider how best to proceed.

[REDACTED] - On the false documents point, we are concerned when we see the release of data, from any part of any Department, in a way which is not in line with our [expectations on transparency](#). This happened with the quoting of Home Office figures on the number of small boats crossing and with the use of data on false documents in a Home Office news item to support a change in policy. In Ed's email to [REDACTED] following correspondence we have received related to the false documents data (attached and dated 3 March) we urged the Department to rethink whether a one-off ad-hoc release would be possible to explain the data which has already been referenced. I then followed up on progress with this in emails dated 11 March and 23 March (emails attached). We have not yet had a response to this. The decision to reference the false documents work in the letter we plan to publish on small boats was due to the similarities of issues relating to transparency and release of data.

[REDACTED] - I have attached the letter again for information as you are also on the copy list.

I hope this helps. If you have questions just get in touch.

Best wishes,
[REDACTED]

[REDACTED] | Office for Statistics Regulation |
[REDACTED]@statistics.gov.uk
Website: [Office for Statistics Regulation](#) | Twitter: [@StatsRegulation](#) | [OSR LinkedIn](#)

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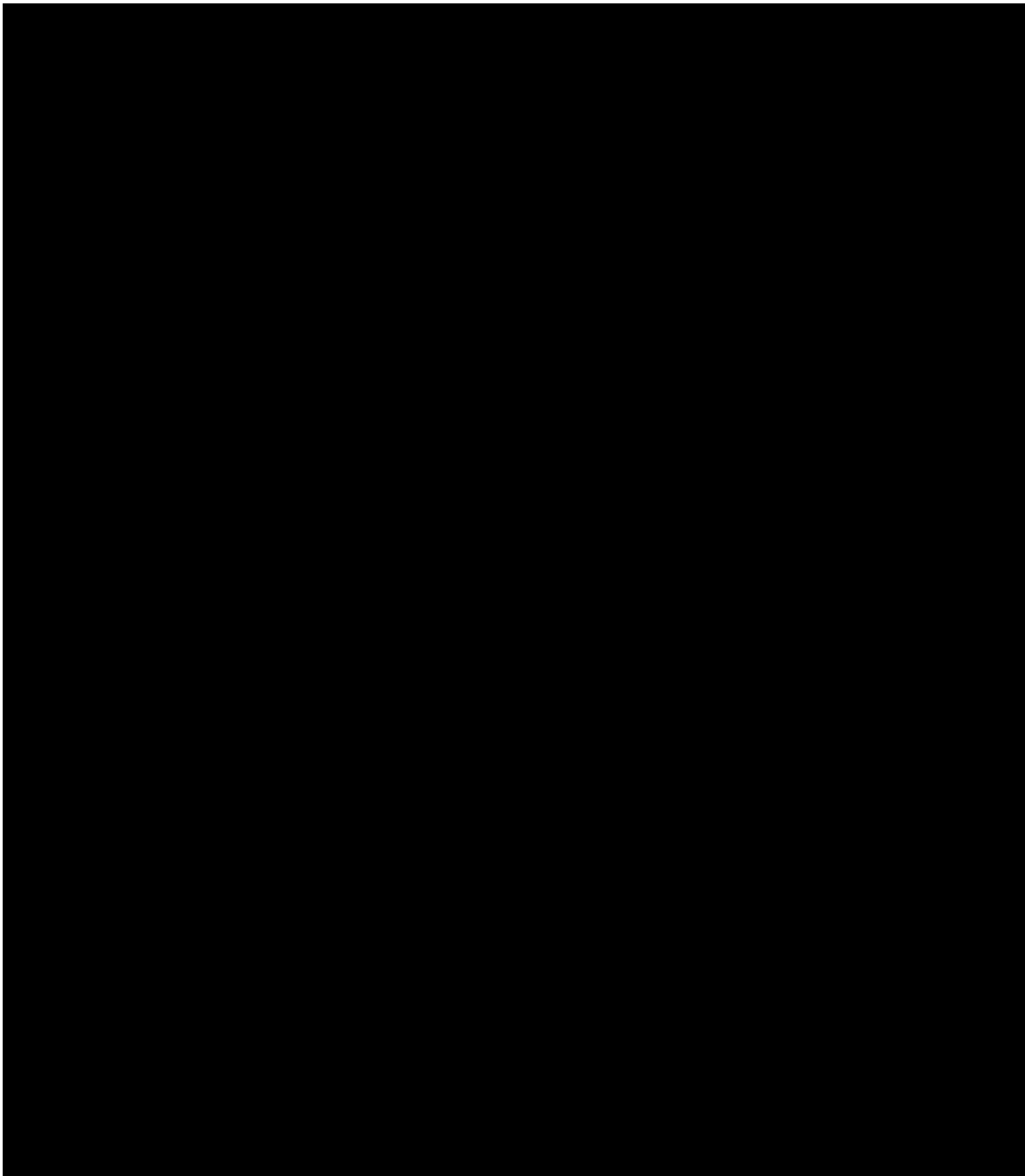
[REDACTED]

From: [REDACTED]@homeoffice.gov.uk>
Sent: 04 April 2022 10:52
To: [REDACTED]@homeoffice.gov.uk>; [REDACTED]
[REDACTED]@Statistics.gov.uk>
[REDACTED]@statistics.gov.uk>
Subject: RE: [REDACTED]

██████ has replied. Hopefully the issue will be resolved shortly (I was told to expect operational changes last week which I do not think occurred – although nothing to do with statistics).

However, I note the letter still refers to false docs, but I provided you with advice on that and as far as I am concerned that particular issue is resolved so wondered why you would include that now?

██████



[REDACTED]

From: [REDACTED]
Sent: 23 March 2022 10:15
To: [REDACTED]
Cc: Humpherson, Edward; DG Regulation; [REDACTED]
Subject: RE: False documents and Code support follow-up

Hi [REDACTED]

[REDACTED] Just to let you know that we are continuing to have correspondence about the false documents data so it will be good to stay in the loop with any progress updates here.

Best wishes,
[REDACTED]

From: [REDACTED] <[REDACTED]@homeoffice.gov.uk>
Sent: 14 March 2022 13:35
To: [REDACTED] <[REDACTED]@statistics.gov.uk>
Cc: Humpherson, Edward <[REDACTED]@statistics.gov.uk>; DG Regulation <DG.Regulation@Statistics.gov.uk>; [REDACTED] <[REDACTED]@statistics.gov.uk>
Subject: RE: False documents [REDACTED]

Hi [REDACTED]

[REDACTED] did a good job of playing back the concerns to the data owners and explaining how an ad-hoc release could work. It is unclear how far forward that has got with all the Russia/Ukraine work right now. For us in HOAI, we have been rather concentrating our capital on appropriate release of visa numbers (which, you will hopefully have seen, we made a good step forward on this morning!)

Cheers

[REDACTED]

[REDACTED]
Home Office Analysis and Insight
[REDACTED]

Informing decisions through evidence

From: [REDACTED] <[REDACTED]@statistics.gov.uk>
Sent: 11 March 2022 17:20
To: [REDACTED] <[REDACTED]@homeoffice.gov.uk>
Cc: Humpherson, Edward <[REDACTED]@statistics.gov.uk>; DG Regulation <DG.Regulation@Statistics.gov.uk>; [REDACTED] <[REDACTED]@statistics.gov.uk>
Subject: False documents [REDACTED]

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Dear [REDACTED]

I hope you are well,

Following Ed's letter last week (see attached), are there any updates on the Department's progress in rethinking the publication of an one-off ad-hoc publication of data on false documents so this can help to inform our decision on next steps?

Additionally, as mentioned before following the meeting on 2 February 2022, do get in touch if we can help in way with supporting promotion of the Code to members of the Department's press team. You mentioned this could be helpful as many of them are new and not from civil service roles. We're very happy to help with this.

Many thanks,

[REDACTED] | Office for Statistics Regulation |
[REDACTED] | [REDACTED] @statistics.gov.uk
Website: [Office for Statistics Regulation](#) | Twitter: [@StatsRegulation](#) | [OSR LinkedIn](#)

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[REDACTED]

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Draft Response

Dear Mr *****,

Thank you for contacting the Office for Statistics Regulation with your concerns about the quality assurance of [statistics on false documents](#) reported on the Home Office website. We have looked into the concerns you raised.

In conversations with the Home Office, it was established that the statistic you refer to was compiled using management information from the operational team within the department. This management information is not an official statistic, but Home Office officials have told us that it was prepared in line with best practice and the Home Office has a range of internal processes in place to ensure the accuracy of these data. It is common practice within the UK Government to use management information to direct policy, particularly when dealing with time sensitive issues. We have published guidance setting out our expectations for the [Production and use of management information by government and other official bodies](#).

However, we do feel that there is an issue around the transparency of the data used on this occasion, and we have raised this with the Home Office. In accordance with OSR's latest guidance on [transparency](#), data quoted publicly should be made available to all in a transparent way. This includes providing sources and appropriate explanation of context, including strengths and limitations. The Home Office has committed to adding a clearly signposted footnote to this article, providing more information around the source and methods used. The Department has also assured us that, going forward, if they are reporting statistics compiled from management information, it will be reported in a more transparent way.

We will continue to monitor and work with the Home Office, and other government departments and official bodies, to ensure our expectations around the use of management information are met.

Kind Regards,

Ed Humpherson
Director General for Regulation

[REDACTED]

From: [REDACTED]@homeoffice.gov.uk>
Sent: 10 February 2022 16:32
To: [REDACTED]
Subject: RE: [REDACTED]

I did not say we would change the article already published and I am not sure if that is possible, but I'll check and look to get back to you early next week

Thanks

From: [REDACTED]@Statistics.gov.uk>
Sent: 10 February 2022 15:30
To: [REDACTED]@homeoffice.gov.uk>
Cc: [REDACTED]@Statistics.gov.uk>
Subject: [REDACTED]

Hi [REDACTED]

Thank you for your email on Monday. We have drafted a response to the correspondent and we are hoping to send this out on Monday. We just wanted to run it past you to ensure we have accurately reflected to situation. Could you have a quick look and come back to me over the next couple of days please?

Many thanks,

[REDACTED]
[REDACTED] | Website: [Office for Statistics Regulation](#)
UK Statistics Authority | Awdurdod Ystadegau'r Deyrnas Unedig | [@UKStatsAuth](#)

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From: [REDACTED]
Sent: 08 February 2022 17:39
To: [REDACTED]@Statistics.gov.uk>
Cc: [REDACTED]@Statistics.gov.uk>
Subject: RE: [REDACTED]

[Redacted]

I have now been provided with further details on the false documents statistics, which is much as I had anticipated. In short, this is operational data based on checks carried out by trained professional border officers – and so whilst likely to be of very high quality in terms of the question it has been used to address it is, like any data drawn from an operational system, it is only able to represent those cases which come to the attention of that system or the officials involved.

In a bit more detail,

- This data is derived from Border Force Officers' examination of a document at an airport (or other place of entry). A suspicious document is referred to Border Force Forgery-trained Officers who complete a report stating their conclusion, and the details added to our casework system.
- Each month, the Immigration Intelligence team (comprising professional Intelligence analysts) extract this information from the case database and compile it into a spreadsheet which is sent to the National Document Fraud Unit (NDFU) providing information on the forgeries identified in the preceding month – but excluding cases where there are no documents, genuine, inconclusive, or where documents are lost and stolen). This raw operational data is then checked by NDFU who cross-check the data with the case record and correct or if necessary remove any obvious errors. Only once these checks are complete are statistics produced and provided to internal Home Office data users.
- The data is held by NDFU and only NDFU have access to it, and as I explained, this data is not a part of our national statistics and my team are not involved. Like a lot of data from the system it would not normally or routinely be published. The main users of the data are primarily Border Force and Enforcement Intelligence teams who use this data to contribute to the assessment of border security risks. They would naturally highlight particular types of forgery or misuse, whether by nationality or other factors (such as particular routes used or types of document), in order to inform Border Force operations and assist them in identifying other such cases in order to prevent illegal entry.

Hopefully this explains the process, but if you have any questions please let me know.

You have already seen the advice I have provided internally with regard to making the origin source and reliability of any operational data clearly if/when the department intends to use this in the public domain, which I hope will act to remind Home Office senior managers of best practice in this regard.

With best wishes,

[Redacted]



[Redacted signature block]

Home Office Analysis and Insight (HOAI)
Science Technology Analysis and Research Group

[Redacted]
homeoffice.gov.uk

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[Redacted footer line]

[REDACTED]

I wanted to make you aware of some correspondence with the UK Statistics Authority and to ask for yours and other colleagues' help in reassuring them with regard to the department's use of data in official statements. The issue relates to a recent ministerial statement announcing the phasing out of our acceptance of European ID cards at the border.

False documents

The UKSA's Officer for Statistical Regulation (OSR) wrote to me regarding some casework where an individual has queried the data behind the statement used in a press notice issued on 1st October, which said: 'last year, almost half of all false documents detected at the border were EU, EEA or Swiss ID cards.' This statement was included in this [news item](#) which I have pasted below for ease of reference. The OSR noted that they had looked but could not find the statistics that sit behind his statement (**highlighted below**) and so asked for my advice, [REDACTED]

After speaking with your team and PRAU, I understand that the statistics in this statement originated from source data received from Border Force, which is cleansed and checked by the National Document Fraud Unit (NDFU). Border Force/PRAU are the data owners of the statistics, which NDFU held and who supplied the information for the media following a request from Home Office Communications Directorate. I informed the OSR of this and they accept that the department was acting with good intentions in providing evidence that underpinned the statement and policy change, and we should not step back from this in future. We also noted that there could be some security issues if we were to publish this sort of data more routinely (which OSR also accept is a judgement for the department to make).

Statistical best practice

OSR accept that in an operational department there is a large volume of management information and not all of it can be published. They are however concerned that where data is used by Government to support public statements it should be presented in a way that gives the public and other statistics users confidence in the evidence. That requires data to be made available equally to all (as we did in this instance, by publishing it) but also when using data that we be clear on the source of the statistics, e.g. who has produced them and if they are available elsewhere. This could be as simple as adding a footnote or single sentence to press statements, with a link to existing published statistics where applicable. If the statistics relate to an issue of significant public interest or are supported by more detailed data and analysis, then OSR would advise departments publish an ad hoc statistical note or release of some kind, either at the same time or ahead of the announcement, making that background information available to the wider public. We have used a variety of approaches in the past. The OSR accept that the former approach would probably have been appropriate in this instance and in this instance we could have simply added a sentence or footnote clarifying the source for the data being used.

I said to the OSR that I would write to you to alert you to the concerns being raised with them and advise the department on how to address these points in future (as I am hereby doing). Given that this is an issue which will be relevant to all areas of the department, I am also copying this email to EXCO colleagues. Our statisticians stand ready to advise on the presentation and use of statistical data at any time.

With best wishes,

[REDACTED]



[REDACTED]
Home Office Analysis and Insight
Science Technology Analysis Research and Strategy
[REDACTED]
[REDACTED]@homeoffice.gov.uk

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News story

Insecure ID cards phased out as travel document to strengthen UK borders

From 1 October, UK Border Force will stop accepting insecure ID cards from most EU, EEA and Swiss citizens, in a move that will strengthen UK borders.

From: [Home Office](#), [Border Force](#), and [The Rt Hon Priti Patel MP](#) Published 1 October 2021

From today (Friday 1 October 2021), most EU, EEA and Swiss citizens will need a valid passport to enter the UK as the government stops accepting national identity (ID) cards as a travel document.

These ID cards are some of the most abused documents seen by Border Force officers and, **last year, almost half of all false**

documents detected at the border were EU, EEA or Swiss ID cards.

They can be easily abused by people attempting to come into the country illegally and by stopping accepting these forms of ID, the government can prevent organised criminal gangs and illegal migrants using them to enter the UK unlawfully.

Home Secretary Priti Patel said:

The UK has a proud history of being open to the world, and Global Britain will continue in that tradition. But we must clamp down on the criminals that seek to enter our country illegally using forged documents.

By ending the use of insecure ID cards we are strengthening our border and delivering on the people's priority to take back control of our immigration system.

We are doing this as part of our New Plan for Immigration, which will be firm on those who seek to abuse the system, and fair on those who play by the rules.

ID cards are a notoriously insecure form of travel document, because:

- some cards do not have biometric data, making it easier to falsify the data recorded
- they are more difficult to cross-reference with criminal record databases than passports
- although a new ID card security standard is being introduced across the EU, cards will still be in circulation for the next 5 to 10 years which do not conform to these standards
- inconsistencies in the design and security features of the cards make them easier to counterfeit than passports

The move was first announced in October 2020.

This change fulfils our commitment to take back control of our borders and means EU, EEA and Swiss citizens now follow the same rules for entering the UK as travellers from the rest of the world. However, the government remains committed to protecting the rights of EU citizens who have made their lives in the UK, and as we agreed when we left the EU, those in the EU Settlement Scheme or with equivalent rights will be able to continue using ID cards until at least 2025.

The move also marks an important step in the government's long-term strategy to deliver a fully digitised border, providing a more streamlined and seamless customer experience for travellers entering the UK.

Those without a passport from 1 October are liable to be refused entry to the UK – although Border Force officers will retain the right to exercise discretion on individual cases.

ENDS

Source: <https://www.gov.uk/government/news/insecure-id-cards-phased-out-as-travel-document-to-strengthen-uk-borders>

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From: [REDACTED]@Statistics.gov.uk>
Sent: 07 February 2022 16:21
To: [REDACTED]@homeoffice.gov.uk>
Cc: [REDACTED]@Statistics.gov.uk>
Subject: RE: [REDACTED]

Hi [REDACTED]

[REDACTED]

Also thanks for the update on False documents and for sharing the email. We will take a look and if you are able to get back to us early this week that would be helpful and then we can look to respond soon. At the moment it is looking likely that it will be a private response from Ed direct to the individual who approached us. Will keep you posted on this though.

Best wishes,
[REDACTED]

From: [REDACTED]@homeoffice.gov.uk>
Sent: 07 February 2022 14:47
To: [REDACTED]@Statistics.gov.uk>
Cc: [REDACTED]@Statistics.gov.uk>
Subject: [REDACTED]

Hi [REDACTED]

[REDACTED]

On False docs, I have made enquiries and expect to hear back shortly. I've seen no indication that the issue is any other than as we discussed, but hopefully I'll be able to provide you with more information.

Nonetheless, on the back of our conversation, [REDACTED]

[REDACTED] thanks

[REDACTED]



[REDACTED]

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Science Technology Analysis Research and Strategy

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[REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>

Sent: 04 February 2022 13:11

[REDACTED] [@homeoffice.gov.uk](mailto:[REDACTED]@homeoffice.gov.uk)>

[REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>

Subject: [REDACTED]

Hi [REDACTED]

[REDACTED]

Also we just wanted to check where you are with the false documents queries attached and the plan to possibly add more info about the underlying data to the press release – we're just in the process of drafting a response so want to ensure we accurately reflect the situation?

Many thanks,

[REDACTED]

[REDACTED] | Office for Statistics Regulation |
[@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)
Website: [Office for Statistics Regulation](#) | Twitter: [@StatsRegulation](#) | [OSR LinkedIn](#)

[Redacted]

[Redacted]

For information on the work of the UK Statistics Authority, visit: <http://www.statisticsauthority.gov.uk>

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Draft Response

Dear Mr *****,

Thank you for contacting the Office for Statistics Regulation with your concerns about the quality assurance of [statistics on false documents](#) reported on the Home Office website. We have looked into the concerns you raised.

In conversations with the Home Office, it was established that the statistic you refer to was compiled using management information from the ~~operational specialist~~ team within the department ~~who have been trained to identify false documents~~. This management information is not an official statistic, but Home Office officials have told us that it was prepared in line with best practice and the Home Office has a range of internal processes in place to ensure the accuracy of these data. It is, ~~we agree, good common~~ practice within the UK Government to use management information to ~~direct-inform~~ policy, particularly when dealing with time sensitive issues. We have published guidance setting out our expectations for the [Production and use of management information by government and other official bodies](#).

Commented [1]: Not sure what this phrase refers to here? Time does not feel relevant

However, we do feel that there is an issue around the transparency of the data used on this occasion, and we have raised this with the Home Office. In accordance with OSR's latest guidance on [transparency](#), data quoted publicly should be made available to all in a transparent way. This includes providing sources and appropriate explanation of context, including strengths and limitations. The Home Office ~~already adopts this approach on many occasions but agrees that it could have made the source of this data clearer in this press release. Although government policy is not to update pages on GOV.Uk unless there were a significant error or misrepresentation, which we do not believe is the case in this instance, the has committed to adding a clearly signposted footnote to this article, providing more information around the source and methods used. The~~ Department has ~~also~~ assured us that, ~~going forward~~, if they are reporting statistics compiled from management information, it will be reported ~~with a clearer indication of its origin and appropriate use in a more transparent way.~~

We will continue to monitor and work with the Home Office, and other government departments and official bodies, to ensure our expectations around the use of management information are met.

Kind Regards,

Ed Humpherson
Director General for Regulation

Cc: [REDACTED]@Statistics.gov.uk>

Subject: RE: False Documents Casework

[REDACTED]

Apologies, but you sent me a draft reply requesting my comments. I attach some tracked changes which I would ideally like, to reflect what I believe is a fair position.

As ever, very happy to discuss,

With best wishes,

From: [REDACTED]

Sent: 14 February 2022 17:53

To: [REDACTED]@Statistics.gov.uk>

Cc: [REDACTED]@Statistics.gov.uk>

Subject: RE: False Documents Casework

Dear [REDACTED]

Thanks for your email and your patience.

I have now been able to speak to comms colleagues who, working with Border Force experts, were responsible for producing the news story on the GOV.UK website relating to insecure ID cards.

The department's standard approach, and we believe that of Government Communications experts generally, is to avoid updating news releases on GOV.UK, as best practice is to keep them as they were at the time of issue. I know UKSA understands this principle as it adopted the same approach only recently in regard to my updated letter on NRPF.

Pages are occasionally updated, but only by exception, for example if things are incorrect or misleading, which we do not believe to be the case in this instance. When such updates are made – providing they're substantive i.e. not correcting formatting or typos – the .GOV.UK team require that a notice be included on the page, explaining that the press notice has been updated.

In this instance, we would not recommend updating this press notice. We are not seeking to correct a misleading item, and given that four and a half months have elapsed since publication, colleagues view is that this is only likely to result in further questions and given the policy decision is past, we do not feel this would be productive. Having said that, they appreciate the advice that we have been providing on how to cite data and have said that they intend to take the advice on board for future releases.


One thing to note, apparently footnotes can't be included in news releases, so in future any caveats would need integrating into the body of any text. For clarity of presentation that will limit the amount of information that can be provided – but we understand this is also a general rule that applies across GOV.UK as a whole. It is also worth noting that this department would have concerns over providing too much detail on the security processes in place to check for fraud and misuse of documents for immigration purposes and other aspects of the control due to the potential impact this could have on border security.

Hope this is helpful,

With best wishes,



Home Office Analysis and Insight (HOAI)
Science Technology Analysis and Research Group

 [@homeoffice.gov.uk](mailto:homeoffice@homeoffice.gov.uk)

"Informing decisions through evidence"

To access **Home Office research and statistics on migration**, please visit [our web page on GOV.UK](#)

For a summary of **latest evidence on integration**, support in using an **evidence-based approach to developing integration strategies and intervention collection**, follow the link for the [2019 Home Office Indicators of Integration](#)



 [@Statistics.gov.uk](mailto:homeoffice@statistics.gov.uk)>

Sent: 31 January 2022 09:43

 [@homeoffice.gov.uk](mailto:homeoffice@homeoffice.gov.uk)>

 [@Statistics.gov.uk](mailto:homeoffice@statistics.gov.uk)>

Subject: False Documents Casework

Hi 

Thank you for meeting with us on Friday. We just wanted to clarify a couple of points with you about the false documents casework.

- Referring to the statistics published [here](#), can you confirm that this information was compiled from management information and there are no published statistics available? Just wanted to check our understanding following our earlier discussion.
- Can you share any background information on the processes used to compile statistics generated from management information which would give users more confidence in the quality of these data or is there a document we can link too? One of the issues raised with us is about the quality of the data used, without any sources of background information the user and we can't tell this.

Many thanks and I look forward to your update on this.

 |Office for Statistics Regulation

[Redacted]

From: DG Regulation
Sent: 03 March 2022 16:06
To: [Redacted]@homeoffice.gov.uk
[Redacted]@homeoffice.gov.uk
Subject: Letter from Ed Humpherson, Director General for Regulation
Attachments: Letter from Ed Humpherson to [Redacted].pdf

Dear [Redacted]

Please find attached a letter from Ed Humpherson, Director General for Regulation at the Office for Statistics Regulation in response to a statement made about the number of false documents in a Home Office news story.

This letter will not be published on our website.

Kind regards

[Redacted]

[Redacted]

Website: [Office for Statistics Regulation](#) | UK Statistics Authority | [@UKStatsAuth](#)

You can access the interactive **Code of Practice for Statistics** [here](#).

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We take great care to protect your personal information. To reflect changes to data protection law (GDPR), we have updated our [Privacy Policy](#) and would encourage you to take a moment to read it. Our Privacy Policy explains how we handle and protect your personal information, your legal rights and who to contact if you have any questions about how your personal information is being used.

Director General for Regulation

██████████
██
██████████
(By email)

03 March 2022

Dear ██████████

Following our recent letter to ██████████ we are looking into another example of the Department using unpublished data in a public statements.

Specifically, we have been contacted about a statement made about the number of False Document in a Home Office News story. In this News story it was stated that *'almost half of all false documents detected at the border were EU, EEA or Swiss ID cards'*. These data were used as the basis for a policy decision to phase out the use of most EU, EEA and Swiss national identity (ID) cards as a travel document for entry to the UK. However, the breakdown of these data or more detailed information on its strengths or limitations are not publicly available.

As discussed, and outlined in our transparency guidance, we expect a transparent and accessible approach to communicating statistics, data and wider research. We understand that there may be resource and security issues with providing these data routinely, but we would urge the Department to rethink whether a one-off ad-hoc release would be possible to explain the data which has already been referenced. This would help to support public trust in statistics and data used to inform government decision-making.

I trust this sounds reasonable and would appreciate an update on the Department's progress with this.

I am copying this letter to the Chief Scientific Adviser to the Home Office, ██████████

Yours sincerely



Ed Humpherson
Director General for Regulation