

# **Proposal for Skills Development Scotland to become a provider of Official Statistics**

## **Consultation Document**

**17<sup>th</sup> February 2014**

## WHAT IS PROPOSED?

1. The [Scottish Government letter of guidance](#) proposed that Skills Development Scotland (SDS) should work toward becoming a provider of official statistics in terms of the Statistics and Registration Services Act 2007. Any final proposal will require approval by the Scottish Ministers and by the Scottish Parliament through a parliamentary order.
2. SDS is seeking views of stakeholders on how it should implement official statistics arrangements.

## WHAT ARE OFFICIAL STATISTICS?

3. Official statistics are defined by the Act as those produced by government departments and other statistics as specified by Ministers through a parliamentary order.
4. Official statistics are subject to scrutiny by the UK Statistics Authority and must be produced subject to the [Code of Practice for Official Statistics](#) and the [Pre-Release Access to Official Statistics \(Scotland\) Order](#) 2008.
5. The principles of the Code of Practice are that official statistics should:
  - Meet user needs for informed public decision making
  - Be impartial and objective
  - Have integrity - giving priority to public interest over organisational, political or personal interests
  - Be consistent with sound methods and assured quality
  - Maintain confidentiality of data about individuals
  - Not place an excessive burden on data providers relative to the benefits
  - Be produced with sufficient and proportionate resources
  - Be frank and accessible
6. The above principles translate into a series of practices that SDS will be required to adopt and maintain compliance with. These are set out in the Code of Practice, but will principally involve the following:

### MAIN REQUIREMENTS OF THE CODE OF PRACTICE

#### Range of official statistics published

- Must meet the needs of informed public decision making
- Must be based on transparent analysis of user needs (subject to resources)

#### Orderly release and pre-announcement

- Pre-announce month of release 12 months and day of release 4-6 weeks in advance
- Dates should be set to release statistics as soon as ready
- Dates should only be changed for technical reasons
- Revisions policy should be in place and errors corrected

### **Publication arrangements/ pre-release access**

- First publication of statistics must be through an official statistics publication, press-released consistently
- Statistics must be separate from policy comment
- Action must be taken to guard against leaks
- Pre-release access to final statistics only allowed for specific purposes (e.g. Briefing to ensure ministers make informed comment – 5 days in advance)

### **Unbiased commentary and presentation**

- Should include commentary and explanation
- Format/presentation should be unbiased and delegated to responsible person

### **Statistical quality**

- Quality assurance procedures should be in place and documented
- Information on quality should be published
- Information must be accessible - including time series, background data and methods

### **Consultation/engaging with users**

- User needs must be identified and feedback sought
- Changes in content, timing and methods should be subject of consultation

### **Management information**

- Management information used for official statistics must not be used publicly before publication as statistics
- Maximise opportunities for use of administrative data

### **Roles and responsibilities**

- SDS should appoint a “responsible person” who ensures compliance with requirements

### **Other requirements**

- Disclosure control must be in place
- Costs should be assessed
- Resources should be sufficient to ensure official statistics standards can be met
- Production should be efficient and effective
- Staff training and development should support standards

## WHICH STATISTICS ARE INVOLVED?

7. SDS collects a wide range of data for management and operational purposes. It currently publishes those that are considered to be of public interest, based on a regular review of information requests and areas of interest.
8. Those currently published in the [Statistics section](#) of the SDS website are:
  - School Leaver Destinations - initial results (in February). Final destinations are published by Scottish Government in June as part of another report but this could all be published by SDS
  - Modern Apprenticeships, the Employability Fund and other key programmes. Currently published quarterly
  - Community Planning Partnership reports published in January and July containing some additional breakdowns of the above. These may not need to official statistics – as all data could be published first.
  - Individual Learning Accounts – currently published monthly.
9. In addition work is currently in hand to develop a new measure of participation of all 16-19 year olds in connection with Opportunities for All.
10. Official statistics standards require that the range of statistics produced should meet needs, subject of course to resource considerations. The UK Statistics Authority suggests that statistics should be produced as official statistics where they are
  - data that are used publicly by the organisation in support of major decisions on policy, resource allocation or other topics of public interest
  - data that attract public controversy when published and public debate would be better informed if the figures were handled as official statistics.
11. The annex indicates the range of statistics SDS would plan to designate as official statistics based on the above definition. This would be supplemented by an annual statistic publication including key figures and analysis across all programmes allowing a more comprehensive and coherent view.
12. The annex also shows management data that will continue to be produced but would not be classed as official statistics as it falls outwith the UK Statistics Authority's definition. They are low profile and non controversial, mainly for use by SDS and partners, and do not inform major policy decisions or public debate on such matters.
13. The range of statistics produced and which are designated as official statistics can be adapted over time. Official statistics procedures would require this to be informed by user consultation.

## FREQUENCY OF PUBLICATION

14. Some data are produced quarterly but could be produced more or less frequently. Annual publication is necessary in some cases and an option in others.
15. There are issues concerning frequency:
  - Publishing data as official statistics too frequently is likely to divert resources from other activities and make it difficult to maintain quality.

- There can be spurious and temporary fluctuations in data and seasonal variations all of which would have to be explained to users to avoid misinterpretation.
- There requires to be a clear public and/or policy need for frequent data sufficient to justify its production. Reacting to short term changes may be inappropriate.
- Equally there may be a need for the very latest data – and different organisations require the latest data at differing times throughout the year.
- Only publishing data annually would add to the risk of data becoming public prior to publication as it would still be required and produced for management/perational purposes
- Annual publication would mean that SDS would be obliged to provide more frequent data if asked under Freedom of Information which would undermine the orderly publication proposal and be less efficient.

## **WHAT ARE THE IMPLICATIONS OF SDS ADOPTING OFFICIAL STATISTICS STATUS?**

16. Adopting official statistics will have a number of benefits for all users:

- The range of statistics published by SDS will be more accessible and coherent.
- Unbiased commentary and explanation will considerably aid interpretation and correct use.
- SDS official statistics will be based on consistent processes and contain clear advice on quality and methodology. Where provisional data is released or revisions occur this will be clearly indicated.

17. The main cost to users is that ad hoc enquiries made to SDS will, if possible, be dealt with using published statistics. This will be as provided for under Freedom of Information legislation including exemption where data are due to be published within 12 weeks, subject to a public interest test. Where an exceptional case can be made (or when the data requested is not published) alternative arrangements will be put in place.

18. This may mean that what users are provided with is less up to date. However because most SDS statistics are based on live systems, snapshots taken at any one time may be revised subsequently – for example as more records get updated. There is a high risk of inconsistent data being used incorrectly. Official statistics arrangements will minimise this risk. Furthermore meeting ad hoc enquiries can be extremely inefficient and those resources will be better used ensuring that all users are provided with consistent, quality assured data. Statistics should be published sufficiently frequently to meet user needs.

## **FURTHER SPECIFIC IMPLICATIONS FOR SDS PARTNERS**

19. SDS works with a large number of stakeholders in delivering its own and partnership programmes. Effective delivery of programmes requires effective monitoring.

20. It is important that adoption of official statistics status does not have an adverse effect on such monitoring and indeed that it enhances it. Official statistics procedures make specific provision for the continued use of data for management purposes. However the key principles are that such information should be used for internal purposes only – this includes partner organisations – and that it should should only be put in the public

domain through an official statistics release, which will be orderly and subject to a pre-announced timetable.

21. Contingency arrangements can be made in exceptional cases.
22. In practice this means that partner organisations must agree not to make management information provided to them public until the official statistics are released. Clear guidance will be provided.

## **FURTHER SPECIFIC IMPLICATIONS FOR MEDIA ORGANISATIONS**

23. Official Statistics standards will ensure that advice is provided on the quality and usability of SDS statistics. There will be a published timetable of future statistics.
24. All official statistics will be published through a statistical publication notice and placed on the internet at 9.30 a.m. Media organisations and indeed all other users will have access to the statistics and commentary.
25. Any policy comment made by SDS or by Scottish Ministers will be clearly separated from the official statistics release.

## **IMPLEMENTATION**

26. SDS is in the process of implementing a range of official statistics procedures on a trial basis. A final decision on whether to proceed with official statistics status will be made over the coming months but SDS will continue to develop its approach in response to user views and other requirements. SDS statistics will not be designated as official statistics until a parliamentary order is approved.

## **CONSULTATION QUESTIONS**

*(A separate Word document for consultation responses is available)*

**Please explain your reasons in each reply.**

Q1 Do you have any comments on Annex 1 on which statistics SDS plans to publish as official statistics and with what frequency?

Q2 Do you have any views on lower profile statistics that could be published but not as official statistics, or would you propose any changes to those which are suggested in Annex 1 (column 3)?

Q3 Which of the official statistics requirements in paragraph 6 do you consider will be of most benefit to you or others?

Q4 Which requirements do you consider will be of least benefit?

Q5 Which requirements do you think will cause you or others most difficulty?

Q6 Are there any other ways in which these difficulties could be overcome?

Q7 Do you have any other comments?

Responses should be sent to [user\\_feedback@sds.co.uk](mailto:user_feedback@sds.co.uk) or Lesley Miller, The Adelphi Centre, 12 Commercial Road, Glasgow, G5 0PQ by 9th May 2014.

Requests for information or clarification should be sent to the same contact points.

## Annex - Proposed approach to publication of official statistics

|  | <b>Annual official statistics publication</b> | <b>Planned regular official statistics</b>  | <b>Facts and figures (not official statistics)</b> |
|--|---|---|--|
| School leaver destinations   | Key statistics from each                      | Currently published by SG as part of range of National Statistics – in future could be published by SDS (June)<br>Initial destinations – annual (Feb) | Local authority/CPP reports                        |
| Opportunity for all participation measure                                      |   | Currently being considered following consultation   |  |
| Key programmes<br>- Modern apprenticeships<br>- Employability fund<br>- Others |   | Quarterly analysis  |  |
| Career Information, Advice and Guidance (CIAG)                                 |   |   | Quarterly updates                                  |
| My World of Work   |   |   | Quarterly updates                                  |
| Other National Training Programmes (NTPs)                                      |   |   | Quarterly updates                                  |
| Flexible Training Opportunities  |   |   | Quarterly updates                                  |
| Individual Learning Accounts (ILAs)  |   |   | Quarterly updates                                  |
| Partnership Action for Continuing Employment (PACE)                            |   |   | To be reviewed with other partners                 |

Note reports produced for Community Planning Partnerships contain some official statistics but would not be so classified as the results have already been published as official statistics – they are not the first release.

Official statistics do not include research surveys such as SDS Customer Research Surveys, reports that re-use already published data and most financial data.