

Assessment of compliance with the Code of Practice for Official Statistics

Statistics on Access to Work

*(produced by the Department for Work and
Pensions)*

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About the UK Statistics Authority

The UK Statistics Authority is an independent body operating at arm's length from government as a non-ministerial department, directly accountable to Parliament. It was established on 1 April 2008 by the *Statistics and Registration Service Act 2007*.

The Authority's overall objective is to promote and safeguard the production and publication of official statistics that serve the public good. It is also required to promote and safeguard the quality and comprehensiveness of official statistics, and good practice in relation to official statistics.

The Statistics Authority has two main functions:

1. oversight of the Office for National Statistics (ONS) – the executive office of the Authority;
2. independent scrutiny (monitoring and assessment) of all official statistics produced in the UK.

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ASSESSMENT AND DESIGNATION

The *Statistics and Registration Service Act 2007* gives the UK Statistics Authority a statutory power to assess sets of statistics against the *Code of Practice for Official Statistics*.

Assessment will determine whether it is appropriate for the statistics to be designated as National Statistics.

Designation as National Statistics means that the statistics comply with the *Code of Practice*. The *Code* is wide-ranging. Designation can be interpreted to mean that the statistics: meet identified user needs; are produced, managed and disseminated to high standards; and are explained well.

Designation as National Statistics should not be interpreted to mean that the statistics are always correct. For example, whilst the *Code* requires statistics to be produced to a level of accuracy that meets users' needs, it also recognises that errors can occur – in which case it requires them to be corrected and publicised.

Assessment reports will not normally comment further on a set of statistics, for example on their validity as social or economic measures. However, reports may point to such questions if the Authority believes that further research would be desirable.

Assessment reports typically provide an overview of any noteworthy features of the methods used to produce the statistics, and will highlight substantial concerns about quality. Assessment reports also describe aspects of the ways in which the producer addresses the 'sound methods and assured quality' principle of the *Code*, but do not themselves constitute a review of the methods used to produce the statistics. However the *Code* requires producers to "seek to achieve continuous improvement in statistical processes by, for example, undertaking regular reviews".

The Authority may grant designation on condition that the producer body takes steps, within a stated timeframe, to fully meet the *Code's* requirements. This is to avoid public confusion and does not reduce the obligation to comply with the *Code*.

The Authority grants designation on the basis of three main sources of information:

- i. factual evidence and assurances by senior statisticians in the producer body;
- ii. the views of users who we contact, or who contact us, and;
- iii. our own review activity.

Should further information come to light subsequently which changes the Authority's analysis, it may withdraw the Assessment report and revise it as necessary.

It is a statutory requirement on the producer body to ensure that it continues to produce the set of statistics designated as National Statistics in compliance with the *Code of Practice*.

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1 Summary of findings

1.1 Introduction

- 1.1.1 This is one of a series of reports¹ prepared under the provisions of the *Statistics and Registration Service Act 2007*². The Act allows an appropriate authority³ to request an assessment of official statistics against the *Code of Practice for Official Statistics*⁴ in order for them to gain National Statistics status. This report is in response to such a request. The report covers the set of statistics reported in *Access to Work*⁵, produced by the Department for Work and Pensions (DWP).
- 1.1.2 Section 3 of this report adopts an ‘exception reporting’ approach – it includes text only to support the Requirements made to strengthen compliance with the *Code* and Suggestions made to improve confidence in the production, management and dissemination of these statistics. This abbreviated style of report reflects the Director General for Regulation’s consideration of aspects of risk and materiality⁶. The Assessment team nonetheless assessed compliance with all parts of the *Code of Practice* and has commented on all those in respect of which some remedial action is recommended.
- 1.1.3 This report was prepared by the Authority’s Assessment team, and approved by the Regulation Committee on behalf of the Board of the Statistics Authority, based on the advice of the Director General for Regulation.

1.2 Decision concerning designation as National Statistics

- 1.2.1 The Statistics Authority judges that the statistics covered by this report are readily accessible, produced according to sound methods and managed impartially and objectively in the public interest, subject to any points for action in this report. The Statistics Authority has determined that the statistics published in *Access to Work* can be designated as new National Statistics products subject to DWP implementing the Requirements listed in section 1.5 and reporting them to the Authority by March 2015.
- 1.2.2 The DWP has informed the Assessment team that it has started to implement the Requirements listed in section 1.5. The Statistics Authority welcomes this.

1.3 Summary of strengths and weaknesses

- 1.3.1 Some commentators describe the *Access to Work* programme as ‘the best kept secret in Government’⁷. DWP has largely restricted its user engagement about these statistics to its own staff. Consequently, some people we contacted for

¹ <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/index.html>

² http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf

³ Subsection 12(7) of the Act defines ‘appropriate authority’ as Ministers of the Crown, Scottish Ministers, Welsh Ministers, Northern Ireland departments or the National Statistician

⁴ <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/index.html>

⁵ <https://www.gov.uk/government/statistics/access-to-work-official-statistics-july-2014>

⁶ <http://www.statisticsauthority.gov.uk/assessment/assessment/guidance-about-assessment/criteria-for-deciding-upon-the-format-of-an-assessment-report.pdf>

⁷ <http://www.publications.parliament.uk/pa/cm200809/cmselect/cmworpen/158/15807.htm>

views about the published statistics were not aware of them, perhaps reinforcing the perception that people know little about the programme. Users reported that the statistics are too limited in scope for them and that more information and detailed information could help them to better support the programme. The primary medical condition categories in these statistics do not map easily to those used for other disability statistics.

1.3.2 Users reported that there is little published about the quality of the statistics or how DWP ensures the validity of the underlying data. DWP has not assessed the risks posed to the accuracy of the data underlying the statistics due to possible inconsistencies in the operation of the programme.

1.4 Detailed recommendations

1.4.1 The Assessment team identified some areas where it felt that the DWP should improve the production and presentation of these statistics. Those which are essential for DWP to address in order to strengthen its compliance with the *Code* and to enable designation as National Statistics are listed – as Requirements – in section 1.5, alongside a short summary of the key findings that led to each Requirement being made. Other recommended changes, which the Assessment team considers would improve the statistics and the service provided to users but which are not formally required for their designation as National Statistics, are listed – as Suggestions – in section 1.6.

1.5 Requirements for designation as National Statistics

1.5.1 This section includes those improvements that the DWP is required to make in respect of its Access to Work statistics in order to fully comply with the *Code of Practice for Official Statistics*, and to enable designation as National Statistics.

Finding	Requirement	
<p>DWP engages effectively with users within the department but has not investigated the needs of, or effectively engaged with, users outside DWP, or documented the needs and experiences of the users of these statistics and the types of decisions the statistics inform. DWP should:</p>	<p>1</p>	<p>a) develop a greater understanding of the use made of these statistics, particularly by engaging effectively with users outside DWP, taking into account the information collected as part of this Assessment, and document the types of decision the statistics inform</p> <p>b) publish information about user experiences of these statistics and explain how it intends to respond to what it has learned (para 3.1)</p>

<p>The coverage of the statistics is too limited, which constrains their usefulness. DWP should:</p>	<p>2</p>	<p>a) Publish as many of the tables of statistics related to Access to Work as is practicable, subject to legal and confidentiality constraints</p> <p>b) investigate whether these statistics could be included in one of its online data interrogation tools – the Tabulation tool or Stat-Xplore (para 3.3)</p>
<p>DWP has not published a revisions policy for these statistics or fully explained the nature of the revisions to the statistics at the same time as the statistics are released. DWP should:</p>	<p>3</p>	<p>a) Publish a revisions policy for these statistics</p> <p>b) improve the explanation of the nature of revisions alongside the statistics (para 3.4)</p>
<p>The statistics in Tables 1 to 3 of <i>Access to Work</i> are not easily understood being a mix of claims and claimants and new and existing recipients. The lack of clarity causes confusion and risks inappropriate interpretation. DWP should:</p>	<p>4</p>	<p>Improve explanations of how the statistics are presented to distinguish between totally new claimants, as opposed to new claims, and previous recipients (para 3.5)</p>
<p>The category labels used in Tables 4 and 5 of <i>Access to Work</i> are not as useful as they need to be to maximise beneficial use of the statistics. DWP should:</p>	<p>5</p>	<p>a) Consult with users about the categories of primary medical conditions that they would find useful and make appropriate changes to <i>Access to Work</i> and its time series</p> <p>b) investigate whether primary medical conditions in different sets of statistics about disability could be better aligned (para 3.6)</p>
<p>The statistics are not accompanied by full and frank commentary or by charts to aid their interpretation and are not available in open formats thus constraining re-use.</p>	<p>6</p>	<p>a) Develop and publish a framework describing the recipients' journey and how this relates to these statistics and to other statistics relating to disability</p> <p>b) enhance the commentary and presentation of these statistics so that it aids user interpretation of the statistics, by providing relevant contextual information</p>

DWP should:		c) improve the way in which it publishes these statistics by adopting formats for presentation that enhance the clarity of the statistics (para 3.7)
DWP has published no supporting information about the quality of the statistics or about how it assures the quality of the data that are collected and recorded in its administrative systems. There is little contact between statistical and operational staff and more could be done to promote the statistical potential of the administrative systems. DWP should:	7	<p>a) Determine the appropriate scale of assurance required for the administrative data used to produce Access to Work statistics based on pragmatic and proportionate judgement about the quality of the data and the public interest profile of the statistics and agree appropriate assurance arrangements with the data suppliers</p> <p>b) promote statistical purposes actively in the redesign of the administrative system used to produce these statistics in order to enhance their statistical potential</p> <p>c) publish an Access to Work statistics quality statement summarising the audit and assurance arrangements of the Operational Support Units and make clear the implications for the quality of the Access to Work statistics</p> <p>d) consider the Authority's Report <i>Quality Assurance and Audit Arrangements for Administrative Data</i> and the National Statistician's <i>Interim Guidance</i> in implementing part a) above (para 3.12)</p>

1.6 Suggestions for extracting maximum value from the statistics

1.6.1 This section includes some suggestions for improvement to the DWP's Access to Work statistics, in the interest of the public good. These are not formally required for designation, but the Assessment team considers that their implementation will improve public confidence in the production, management and dissemination of official statistics.

We suggest that DWP:

1	Refer to the types of use put forward in the Statistics Authority's Monitoring Brief, <i>The Use Made of Official Statistics</i> (para 3.1)
2	Consider the points detailed in Annex 1 and Annex 2 when taking action to implement Requirement 6 (para 3.7)
3	Publish its protocol for the checking and approval of government statements published alongside DWP official statistics (para 3.8)
4	Publish a telephone number for enquiries alongside existing contact details in <i>Access to Work</i> (para 3.9)

2 Subject of the assessment

- 2.1 The Access to Work⁸ programme is a government programme available in Great Britain to assist disabled people who are in paid employment and those with an offer of work or in training, by providing support for them to overcome obstacles to their access to work or training. The Department for Work and Pensions (DWP) launched the programme through Jobcentre Plus in April 1994. Financial awards can be given to help pay for practical support if an individual has a disability, or health (including mental health) condition. The award can be a one-off payment, or ongoing, depending on the individual's needs. Access to Work will pay up to the full, approved costs for special aids and equipment, adaptations to premises and equipment, support workers, travel to work and communication support at interview. Since April 2010, some cases have involved employer cost sharing. Government spending on the programme was £95.3 million in 2012/13.
- 2.2 DWP publishes *Access to Work* each quarter in January, April, July and October. It first published these statistics in 2007; no statistics are available for prior periods because only management information was collected and DWP told us that this was not quality assured or consistent. *Access to Work* presents data on counts of new and existing recipients, and a breakdown of new starts to the programme by financial year (and the latest quarter for headline figures), primary medical condition and types of support, special aids and equipment. In addition, DWP published in 2011 and 2012, two ad hoc statistical reports based on Access to Work administrative data, on regional programme performance⁹ and on annual spend on the programme per region¹⁰.
- 2.3 The data used to produce these statistics come from an administrative system known as the Disability Computer System (DiSC). Individuals who may need support first contact an operational support unit (OSU). If, after discussion with the OSU, DWP decision-makers proceed with the application for assistance, data are input to DiSC and a paper-based application form (ATW1) generated and sent to the applicant. From this point onwards, the DWP advisers continue to update the DiSC system as the application progresses. In addition to the applicant details, the administrative system holds information about costs for the support required and whether any cost-sharing arrangements are in place with the applicant's employer.
- 2.4 In 2011, Liz Sayce of the Royal Association of Disability and Rehabilitation (RADAR) was commissioned by the Secretary of State for Work and Pensions to conduct an independent review of all employment support given to disabled people, including access to work¹¹. The report made 16 recommendations in relation to access to work which included increased spending and greater public visibility. Following this, the Parliamentary Select Committee on Work and Pensions launched an inquiry focusing on the application and assessment

⁸ <https://www.gov.uk/access-to-work/overview>

⁹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/223140/atw_helped_spend_disability_gor.pdf

¹⁰ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/223084/20120126_GG_AtW_Customer_Spend_Bands_GOR.xls

¹¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/49779/sayce-report.pdf

process and the outcomes of the programme¹². Some of the written evidence to the Committee's enquiry makes recommendations about the Access to Work statistics. Oral evidence sessions are underway at the time of writing and Parliament has published written evidence. The Committee has not yet announced when it will report.

- 2.5 DWP told us that the cost of producing *Access to Work* is around 0.04 FTE of staff time – two days a quarter.
- 2.6 *Access to Work* presents statistics which cover Great Britain only. The Department of Employment and Learning in Northern Ireland (DELNI) runs an Access to Work Programme¹³ but DELNI does not publish statistics about this programme.
- 2.7 DWP publishes Access to Work statistics in PDF, and, from 21 October 2014, publishes the tables in Excel format. This equates to a level of two stars under the Five Star Scheme that forms part of the Open Standards Principles proposed in the *Open Data White Paper: Unleashing the Potential*¹⁴ and adopted as government policy in November 2012¹⁵. Five stars represent the highest star rating within the Scheme.

¹² See footnote 8

¹³ <http://www.nidirect.gov.uk/access-to-work-practical-help-at-work>

¹⁴ http://data.gov.uk/sites/default/files/Open_data_White_Paper.pdf

¹⁵ <https://www.gov.uk/government/publications/open-standards-principles/open-standards-principles>

3 Assessment findings

User engagement and meeting user needs

- 3.1 Some users of Access to Work statistics have engaged effectively with DWP about other sets of statistics but told us that DWP has not engaged with them about these statistics. Those responsible for producing *Access to Work* demonstrate a good understanding of the needs of users within the department. Indeed, the current content of the statistical report reflects discussions between statisticians and other DWP staff working in policy, the press office, and private offices. DWP carried out a survey at the end of May 2014 to investigate users' needs but received no responses. DWP sent the user consultation to those on its contact list but did not investigate the needs of potential users beyond that list. As part of this assessment, the Assessment team easily identified a range of users and potential users of the statistics, particularly from the third sector. Some of those who we contacted during this assessment were either unaware of these statistics or did not use them. As part of the designation as National Statistics, DWP should: a) develop a greater understanding of the use made of these statistics, particularly by engaging effectively with users outside DWP, taking into account the information collected as part of this Assessment, and document the types of decision the statistics inform; and b) publish information about users' experiences of these statistics and explain how it intends to respond to what it has learned¹⁶ (Requirement 1). We suggest that in meeting this Requirement, DWP refer to the types of use put forward in the Statistics Authority's Monitoring Brief, *The Use Made of Official Statistics*¹⁷.
- 3.2 Users and potential users suggest that these statistics, once improved, have the potential to better inform their decisions. One user told us that 'the window on society and the economy they [these statistics] provide is very small and in need of a good clean'. Most of those from whom we recorded views suggested ways that the statistics could better meet their needs through more, and more detailed, information. The main issue that users reported was the poor coverage of the statistics and that they would like:
- a wider range of statistics
 - a more comprehensive breakdown in terms of the specific type of support that people are accessing through the programme. More comprehensive and specific data capture would enable a better assessment of demand for specific support services through the programme and improved awareness of how programme funds are being distributed
 - more statistics about the characteristics of employers employing those needing support, for example, sector, size
 - more regional and local authority-level statistics
 - statistics about those accessing grants on supported internships, and apprenticeships
 - more information on the times between identifying support needs and first provision of support

¹⁶ In relation to Principle 1, Practices 2 and 5 of the *Code of Practice*

¹⁷ <http://www.statisticsauthority.gov.uk/assessment/monitoring/monitoring-reviews/monitoring-brief-6-2010---the-use-made-of-official-statistics.pdf>

- detailed numbers of complaints that DWP receives about the programme
 - applications broken down by the number turned down before and after assessments
- 3.3 DWP produces many tables related to the Access to Work programme for use within the department by policy teams. DWP publishes only a few of these tables but users could benefit greatly if more of these tables were published, especially through the online facilities provided to interrogate its statistics (for example, Tabulation Tool¹⁸ or Stat-Xplore¹⁹). As part of the designation as National Statistics DWP should: a) publish as many of the tables of statistics related to Access to Work as is practicable, subject to legal and confidentiality constraints; and b) investigate whether these statistics could be included in one of its online data interrogation tools – the Tabulation tool or Stat-Xplore²⁰ (Requirement 2).

Data revisions

- 3.4 After this assessment started, DWP included a brief explanation of revisions alongside the tables in *Access to Work*, including information that ‘revisions are generally less than + or -1 per cent’. However, there is no clear link in *Access to Work* to DWP’s revisions policy in respect of these statistics and it is not clear which statistics DWP is likely to revise in future. Some of the recent revisions have been to statistics for 2008/09 and 2009/10. While revisions have been less than + or -1 per cent which DWP has stated, it is not clear whether revisions are downwards or upwards and what the reasons for the revisions are. As part of the designation as National Statistics, DWP should a) publish a revisions policy for these statistics, and b) improve the explanation of the nature of revisions alongside these statistics²¹ (Requirement 3).

Quality, Consistency and Coherence

- 3.5 The definitions of classifications used for these statistics are not always clear. For example, due to the need for some recipients to make a new claim to maintain their support (such as those who need a support worker or signer for the deaf), a proportion counted as ‘existing customers’ in one table will also be counted as ‘new starts’ in another table. The year in which DWP counts individuals is the year in which they first registered for the Access to Work programme and not the year in which they made the new claim. While DWP has published a technical note in an annex to *Access to Work*, with some useful explanations of what the statistics count and when, the distinctions between those in different categories can be quite difficult to interpret. The responsible statistician in DWP told us about instances where users had inappropriately double-counted due to misunderstanding the difference between total new claims and total new claimants. Simpler explanations and better signposting between tables of statistics and the explanations in the annex might assist interpretation of the data, as may a visual framework to guide users. As part of

¹⁸ <http://tabulation-tool.dwp.gov.uk/WorkProg/tabtool.html>

¹⁹ <https://stat-xplore.dwp.gov.uk/>

²⁰ In relation to Principle 8, Practice 3 of the *Code of Practice*

²¹ In relation to Principle 2, Practice 6 of the *Code of Practice*

the designation as National Statistics, DWP should improve explanations of how the statistics are presented to distinguish between totally new claimants, as opposed to new claims made by previous recipients²² (Requirement 4).

- 3.6 Users also alerted us to issues around the definitions of primary medical conditions, which are not consistent across different DWP statistics. Primary medical conditions are self-described by applicants (or by their advisers based on the applicant's information), whereas, for some other statistics related to disability, primary medical conditions are categorised based on a clinical assessment. Consequently, there are different taxonomies of primary medical conditions in use. Applicants describe their condition as the category 'other conditions' for approximately 15 per cent of all medical conditions recorded in *Access to Work*. A similar category of 'other conditions' for Disability Living Allowance statistics²³ represents a much smaller proportion of the data. Some of the primary condition category labels in *Access to Work* are 'arms and hands' and 'legs or feet' which do not describe the primary medical condition. DWP told us that *Access to Work* recipients have previously provided medical condition information to DWP. DWP might find that linking the *Access to Work* data with other data that it holds could provide a useful cross-check of the information provided about recipients' primary medical conditions. Such linkage could benefit users by allowing DWP to present more detailed information about condition categories. As part of the designation as National Statistics, DWP should: a) consult with users about the categories of primary medical conditions that they would find useful and make appropriate changes to *Access to Work* and its time series; and b) investigate whether primary medical conditions in different sets of statistics about disability could be better aligned²⁴ (Requirement 5).

Commentary and Accessibility

- 3.7 Users expressed a mix of views about the adequacy of the commentary presented in *Access to Work*, with some looking only for the data, without aids to interpretation such as charts or commentary. (The publication does not use charts to aid interpretation.) During the course of the Assessment, DWP added some useful links and information which has helped to provide further context. However, DWP does not include any information about, or links to, relevant contextual information to help users interpret the statistics, for example:
- information about the population of disabled people
 - numbers of disabled people in the 16 to 64 age group (in employment and not in employment) to help contextualise the scale of the programme
 - information about the proportions of disabled people who may need adjustments to their place of work or training or who may need adjustments to accommodate treatment for their health condition
 - programme costs
 - programme evaluation reports

²² In relation to Principle 4, Practice 2 and Principle 8, Practice 1 of the *Code of Practice*

²³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/222948/DLA_AA_onflos_ws_2011_2012.pdf

²⁴ In relation to Principle 8, Practice 1 of the *Code of Practice*

Prior to this assessment the tables in *Access to Work* were only available in PDF format and some users expressed their need for statistics in spreadsheet format. The latest *Access to Work* report, published on 21 October 2014, now includes tables in Excel format and DWP told us that they will produce Excel tables for all future publications of *Access to Work*. As part of the designation as National Statistics, DWP should: a) develop and publish a framework describing the recipients' journey to aid users to locate the particular statistics in which they have an interest; b) enhance the commentary and presentation of these statistics so that it aids user interpretation of the statistics, by providing relevant contextual information; c) improve the way in which it publishes these statistics by adopting formats for presentation that enhance the clarity of the statistics²⁵ (Requirement 6). As part of meeting this Requirement, DWP should consider the points detailed in Annex 1 and Annex 2.

Release Practices

- 3.8 There has been occasional criticism of DWP press statements quoting official statistics, and once in respect to *Access to Work* statistics. In a press statement accompanying the publication of *Access to Work* in October 2013²⁶, the DWP Minister said that the latest statistics showed the highest level of new applications for access to work since 2007. However, statistics in that release of *Access to Work* contradicted the press statement showing that in four out of the five previous financial years the figures for new recipients (new starts) had been higher than the latest statistics. DWP statisticians confirmed that the statement was incorrect and that they have been in touch with the Press Office to remove the erroneous section. DWP also told the Assessment team that it now had procedures in place with the Press Office to prevent the release of information such as this without an analyst checking and approving it first. We welcome these developments. The Authority continues to monitor whether government statements issued alongside official statistics, and which refer to them, meet basic professional standards. We suggest that DWP publish its protocol for the checking and approval of such government statements.
- 3.9 DWP publishes the responsible statistician's name in *Access to Work* alongside a generic email address. However, while DWP's practice was to provide a telephone number, more recently it has not continued that practice. The view of the Assessment team is that users should have the facility to address their urgent enquiries. We suggest that DWP include a telephone number for enquiries alongside existing contact details in the statistical report.

The use of administrative sources for statistical purposes

- 3.10 DWP contracts with number of companies to provide the assessment services within the *Access to Work* programme, some of whom sub-contract that service. Evidence provided to the House of Commons Select Committee on Work and Pensions²⁷ in the summer of 2014 indicates that there are inconsistencies in the practices of programme assessors and advisers which

²⁵ In relation to Principle 8, Practices 1, 2, 3 of the *Code of Practice*

²⁶ <https://www.gov.uk/government/news/boost-for-disabled-people-to-fulfil-their-career-aspirations>

²⁷ <http://www.parliament.uk/accesstowork>

affect programme applicants²⁸. Concerns about the consistency of approach by DWP advisors and assessors in the operation of the Access to Work programme were also expressed to the Assessment team. The responsible statistician told us that he had little direct contact with the operational staff who advise applicants or those who collect and input programme data into the administrative system. We were also told that when the DiSC system was being upgraded, the design staff consulted the responsible statistician about statistical needs. After the upgrade no feedback was provided to the statistician about the reasons for some of the suggestions not being implemented.

- 3.11 In light of the de-designation of police recorded crime statistics in January 2014 (in Assessment report 268²⁹) and emerging advice from the Authority in relation to the use by statisticians of administrative data for statistical purposes³⁰, the Assessment team shared the Authority's advice with the responsible statistician for these statistics. Users told us that DWP had not explained the strengths and limitations of the statistics. DWP has not published supporting information about the quality of the statistics or about how it assures the quality of the data it collects and records about this programme. Consequently there are no explanations about the likely degree of risk posed to the quality of the administrative data or the results of any checks which its operations staff conduct to ensure consistency of approach across Great Britain.
- 3.12 The Authority regards the statistics in *Access to Work* as being of public interest, reflecting their importance in monitoring the government's performance in helping disabled people to access work. It also considers that there is an un-assessed risk to the accuracy of the data underlying the statistics; there is no information currently published about the levels of consistency between assessors and advisors involved in the applications and assessments, or whether this might have affected the recording of the administrative data. As part of the designation as National Statistics, DWP should: a) determine the appropriate scale of assurance required for the administrative data used to produce Access to Work statistics based on pragmatic and proportionate judgement about the quality of the data and the public interest profile of the statistics and agree appropriate assurance arrangements with the data suppliers; b) promote statistical purposes actively in the redesign of the administrative system used to produce these statistics in order to enhance their statistical potential; c) publish an Access to Work statistics quality statement summarising the audit and assurance arrangements of the Operational Support Units and make clear the implications for the quality of the Access to Work statistics; and d) consider the Authority's Report *Quality Assurance and Audit Arrangements for Administrative Data* and the National Statistician's *Interim Guidance* in implementing part a) above³¹ (Requirement 7).

²⁸ <http://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/inquiries/parliament-2010/access-to-work/?type=Written#pnlPublicationFilter>

²⁹ <http://www.statisticsauthority.gov.uk/assessment/assessment/assessment-reports/assessment-report-268---statistics-on-crime-in-england-and-wales.pdf>

³⁰ <http://www.statisticsauthority.gov.uk/assessment/monitoring/administrative-data-and-official-statistics/quality-assurance-and-audit-arrangements-for-administrative-data---exposure-draft.pdf>

³¹ In relation to Principle 4, Practice 2 and Principle 8, Practice 1 of the *Code of Practice*

Annex 1: Compliance with Standards for Statistical Reports

- A1.1 In November 2012, the Authority issued a statement on *Standards for Statistical Reports*³². While this is not part of the *Code of Practice for Official Statistics*, the Authority regards it as advice that will promote both understanding and compliance with the *Code*. In relation to DWP's Access to Work Statistics, this Annex comments on compliance with the statement on standards. The comments included in this Annex are based on a review of *Access to Work* published in July 2014³³.
- A1.2 In implementing any Requirements of this report (at paragraph 1.5) which relate to the content of statistical reports, we encourage DWP to apply the standards as fully as possible.

Include an impartial narrative in plain English that draws out the main messages from the statistics

- A1.3 The main points arising from the statistics are clear and set out in a short executive summary followed by some background information about the programme. The report presents little commentary around trends and changes to the scope of those who can claim assistance through the Access to Work programme.
- A1.4 *Access to Work* provides a useful explanation of the impact of changes to the scale of contributions to costs from large employers, where the number of recipients dropped in 2011/12. The report states that numbers increased again after 2011/12 but does not explore plausible reasons for this increase. DWP could enhance the interpretation of the statistics by including graphs and charts in *Access to Work* to illustrate the year-on-year comparisons.

Include information about the context and likely uses of the statistics

- A1.5 *Access to Work* includes some useful links to policy and strategy documents; however, it includes very few links to relevant contextual information, without which it is difficult for users to make any interpretation of the effectiveness of *the programme*. DWP gives a good description of the processes involved in the programme, although, the description of what it measures is brief.
- A1.6 The report does not draw any comparisons with other countries or within different areas of Great Britain (or make any mention that an ad hoc release exists which provides some indicative data). No links to research findings are included, for instance on the likely proportions of disabled people who might require aids and adaptations in the workplace, or health-related treatment that would affect their work or learning. There is no explanation of how the statistics in *Access to Work* relate to other relevant statistics.

³² <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-reports.html>

³³ <https://www.gov.uk/government/statistics/access-to-work-official-statistics-july-2014>

Include information about the strengths and limitations of the statistics in relation to their potential use

- A1.7 *Access to Work* does not present information, or links to information, about data collection, methods, quality or level of uncertainty about the data. DWP uses data from one of its administrative system to produce the statistics but DWP does not detail its quality assurance and audit arrangements for this system.
- A1.8 Information is given that data from some of the recent months may be subject to revision and that these have been marked with an 'R', but DWP does not detail how it will communicate revisions or when it will do so. Additionally, DWP had changed some of the numbers included in the tables in Annex A in *Access to Work*, referring to the same years, since the previous publication but had not been marked them as revised. There is brief comment regarding the possibility that some figures might be revised and that revisions 'are generally less than + or -1 per cent'.

Be professionally sound

- A1.9 The language used is straightforward but some of the explanations given, particularly for Table 2, about the year when it counts individuals, are confusing. Paragraph 1 in Annex A misdirects users to the relevant section for commentary around trends. The terminology is unclear between Tables 4 and 5 – Table 4 lists the numbers helped, and Table 5 lists the number of awards granted. Table 4 is person-based counts as DWP records only one primary medical condition, whereas Table 5 is award-based and one person may receive multiple awards. The terminology appears synonymous but the difference between the two might lead to mis-interpretation of the data and the responsible statistician has corrected double-counting by users in the past. It is not clear how DWP calculates the statistics in Table 1 on the total numbers helped since April 2007 from any other statistics in Table 1.

Include, or link to, appropriate metadata

- A1.10 DWP does not clearly explain some of the differences that exist between the tables, leading to a lack of clarity about what DWP counts in particular tables. The cover page states the date of release as being July 2014 but the statistics published include figures from April 2013 to March 2014, and though explained later, this is not clear from the front cover. The report details national coverage (Great Britain) inside but not on the cover. There is no link to the list of those given privileged early access to these statistics.
- A1.11 The technical information in Annex B of the report presents short explanations about each table. The explanation for Table 4 does not make it clear how the process operates for the self-definition of the primary medical condition and how DWP validates such judgements. Users told us that the difference in the taxonomy of primary medical conditions used for these statistics compared with other disability statistics makes for a lack of coherence which reduces their usefulness.

Annex 2: Summary of assessment process and users' views

A2.1 This assessment was conducted from June to November 2014.

A2.2 The Assessment team – Donna Hosie, Iain Russell and Jo Mulligan – agreed the scope of and timetable for this assessment with representatives of DWP in June. The Written Evidence for Assessment was provided on 31 July 2014. The Assessment team subsequently met DWP during September to review compliance with the *Code of Practice*, taking account of the written evidence provided and other relevant sources of evidence.

Summary of users contacted, and issues raised

A2.3 Part of the assessment process involves our consideration of the views of users. We approach some known and potential users of the set of statistics, and we invite comments via an open note on the Authority's website. This process is not a statistical survey, but it enables us to gain some insights about the extent to which the statistics meet users' needs and the extent to which users feel that the producers of those statistics engage with them. We are aware that responses from users may not be representative of wider views, and we take account of this in the way that we prepare Assessment reports.

A2.4 The Assessment team received 19 responses from the user consultation. The respondents were grouped as follows:

Charities and other third sector organisations	11
Academic and Research	3
DWP	2
Other Government Departments	1
Local Authorities	1
Commercial	1

A2.5 Users expressed the view that the statistics need to develop significantly to better meet a more complete range of users' needs. The two users within DWP are satisfied, albeit with scope for improvement. There is little evidence of wider use of the statistics in other parts of Central Government. A local authority contributor told us that Local Authorities are unlikely to use the statistics, as DWP does not produce them at this level. Few users had engaged with DWP regarding these statistics.

A2.6 A particular example of a need not met by these statistics was a third sector body helping organisations across the hearing loss sector to challenge recent changes to the Access to Work programme which have reduced flexibility for programme applicants. This had included a particular change in policy which had an impact on deaf people who use British Sign Language (BSL) as their first or preferred language and who engage Registered, Qualified Sign Language Interpreters (RSLI) through Access to Work to enable effective communication in the workplace. In undertaking activities to try to challenge these changes, the third sector user sought to establish evidence of need and the number of people who make use of RSLIs through the scheme. The statistics do not give this level of detail, providing statistics only at the broader

category of 'Support Worker', documented in the table on 'support by element type'. The level of detail currently presented in *Access to Work* therefore made it difficult to assess the impact of policy and implementation changes on programme applicants. More comprehensive and specific data capture would have allowed for a better assessment of demand for specific support services and improved users' awareness of how DWP distributes the programme funds.

- A2.7 Users expressed no particular criticism of the accuracy of the statistics, although, there was comment that DWP had not explained other aspects of the quality of the statistics such as timeliness and punctuality, accessibility and clarity, and comparability and coherence. One user expressed concerns that DWP had not documented their statistical needs or given information about the quality of the statistics. The user queried whether DWP makes sufficient resources available to produce these statistics, although the Assessment team was assured by DWP that staff resources could be flexed to meet user's needs and that it keeps this under review. Some users thought that some definitions were unclear and expressed a preference for different terminology.
- A2.8 There was some feedback that the application process disadvantaged some disabled people particularly after DWP moved from face to face support to call centres. The Assessment team also received comment about the call centre handling of those enquiring about *Access to Work*. A particular criticism was the lack of face-to-face help as well as the appropriateness of the language used particularly when dealing with those with dyslexia. There were queries about who is assessing the assessors for their appropriateness to assess and what qualifications they had.
- A2.9 The other significant issue raised was about amenability of the statistics to reuse as, until October 2014, DWP published them only in a PDF format, not in re-usable formats such as Excel and CSV. Following feedback from this assessment, DWP now publishes the tables of *Access to Work* statistics in Excel format and have told us that they will do this for all future *Access to Work* reports. One respondent commented that DWP was less willing than other departments to make detailed datasets available to groups under a licence. There was a mix of views around the adequacy of the commentary. Some respondents described the current commentary as helpful and useful and others said that DWP could improve it; others do not use the commentary at all. Users told us that the publication would benefit from some visualisation of the data.

Key documents/links provided

Written Evidence for Assessment document

