Assessment of compliance with the Code of Practice for Official Statistics

Maritime, Road Traffic, Bus, Taxi, Light Rail and Disabled Parking Badge Statistics

(produced by the Department for Transport)
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 reports prepared under the provisions of the Statistics and Registration Service Act 2007. The Act requires all statistics currently designated as National Statistics to be assessed against the Code of Practice for Official Statistics. The report covers the sets of statistics reported in the following products, produced by the Department for Transport (DfT):

- Quarterly, provisional annual and final annual Port Freight Statistics;
- Annual Sea Passenger Statistics, and monthly tables on international short sea (ferry) passengers;
- Seafarer Statistics;
- Port Employment and Accident Rates Survey;
- Waterborne Freight in the UK;
- Maritime Statistics Factsheet;
- Quarterly and annual Road Traffic Estimates;
- Free Flow Vehicle Sizes in Great Britain;
- Road Lengths;
- Quarterly and annual Bus Statistics;
- Light Rail and Tram Statistics;
- Taxi and Private Hire Vehicle Statistics; and
- Blue Badge Scheme Statistics.

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 Head of Assessment’s consideration of aspects of risk and materiality. The Assessment team nonetheless assessed compliance with all

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4 http://www.dft.gov.uk/statistics/series/ports/
5 http://www.dft.gov.uk/statistics/series/sea-passengers/
6 http://www.dft.gov.uk/statistics/series/seafarers/
10 http://www.dft.gov.uk/statistics/series/traffic/
11 http://www.dft.gov.uk/statistics/series/speeds/
12 http://www.dft.gov.uk/statistics/series/road-lengths/
14 http://www.dft.gov.uk/statistics/releases/annual-bus-statistics-201011/
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 Board of the Statistics Authority on the advice of the Head of Assessment.

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 confirms that the statistics published in paragraph 1.1.1 are designated as National Statistics, subject to DfT implementing the enhancements listed in section 1.5 and reporting them to the Authority by October 2012.

1.3 Summary of strengths and weaknesses

1.3.1 Many of these statistics are widely used inside and outside government. They are accompanied by clear and transparent metadata which explain coverage, definitions and classifications, and which provide an assessment of strengths and limitations. A few series do not appear to be used quite so extensively and rather less metadata are available for these products.

1.3.2 The statistical releases are clear, concise and factual, but they include very little background information about the policy and operational context in each topic area. Nor do they mention the uses of the statistics or provide possible reasons for trends and patterns in the data.

1.3.3 Some topic areas would benefit from more pro-active engagement with users and consideration of their feedback, although the users we contacted were very complimentary about the helpfulness of the statistical teams when approached. Some users complained that it was difficult and time consuming to find what they needed on DfT’s website.

1.4 Detailed recommendations

1.4.1 The Assessment team identified some areas where it felt that DfT could strengthen its compliance with the Code. Those which the Assessment team considers essential to enable designation as National Statistics are listed in section 1.5. Other suggestions, which would improve the statistics and the service provided to users, but which are not formally required for their designation, are listed at annex 1.
1.5 Requirements for designation as National Statistics

Requirement 1: Draw up a plan for obtaining feedback from users of the maritime, taxi, light rail and disabled parking scheme statistics and for publishing the results (para 3.3).

Requirement 2: Inform users of disabled parking statistics about the implications for the statistics of reforms to the operation of the Blue Badge Scheme, and consult where necessary as plans take shape (para 3.6).

Requirement 3: Publish an overview of the methods used by light rail and tram operators, and by Transport for London, to compile their figures, and provide an assessment of quality, including advice on the strengths and limitations of the statistics in relation to their uses (para 3.7).

Requirement 4: Alert users to discrepancies between the road freight statistics and road traffic estimates, describe the differences between the two methods of data collection and advise on their respective strengths and limitations in relation to use (para 3.9).

Requirement 5: Provide commercial data suppliers with adequate information about how the confidentiality of the information they provide will be protected (para 3.13).

Requirement 6: Report annually the estimated costs of responding to statistical surveys (para 3.14).

Requirement 7: Improve the commentary in the releases so that it aids user interpretation of the statistics (para 3.16).

Requirement 8: Extend the statement of administrative sources so that it covers all the elements required by the Code (para 3.20).
2 Subject of the assessment

The statistics in this assessment fall into three groups, each produced by a separate statistical team within DfT.

Maritime statistics

2.1 Statistics on port freight date from 1965, when they were produced by the National Ports Council. DfT took over responsibility in the early 1980s and the current system was introduced in 2000 in order to meet EU requirements (currently EU directive 2009/4219). Most of the data are collected from port authorities and shipping agents. Sea passenger statistics are collected from ferry and cruise operators and from the Scottish Government. They mostly date from the 1990s, but some tables on DfT’s website go back to 1950. Waterborne Freight in the UK covers goods carried on inland waterways, goods carried around the coastline and ‘one-port traffic’ (that is, goods carried to and from offshore installations and the products of dredging or dumping at sea). Most of this domestic traffic is also included in the port freight statistics, since the river and canal network accounts for only around 3 per cent of goods moved within the UK.

2.2 The remaining maritime statistics cover employment at sea or in jobs related to port activities. Seafarer Statistics estimates the number of UK nationals working regularly at sea and the number of other nationals who work on UK registered vessels. The former includes some breakdowns by age and qualifications. These statistics have been compiled since 1997 and mainly derive from the Maritime and Coastguard Agency’s administrative systems and from the UK Chamber of Shipping’s annual membership survey.

2.3 Two surveys of port employment and accident rates have been carried out to date (in 2004 and 2009) in order to estimate the number of jobs that depend directly or indirectly on port activities and to provide estimates of accident rates (in particular for active, cargo-handling jobs). Port authorities, port-related businesses and employment agencies were interviewed for these surveys. DfT told us that the surveys were largely carried out in response to interest in the topic from the Transport Select Committee, and it is not clear whether they will be repeated. The 2009 survey is published on DfT’s website as a short release written by DfT statisticians and a more detailed research report written by the contractor, published by DfT as a bulletin.

2.4 Maritime statistics are used by government agencies, consultancies and business as an evidence base in numerous areas:

- policy development and monitoring – for example in relation to a recent review of support for seafarer training;
- transport modelling and forecasting demand;
- environmental and climate change modelling – for example, as inputs to the National Atmospheric Emissions Inventories (NAEIs);

20 http://naei.defra.gov.uk/
• planning decisions relating to port developments;
• emergency planning – for example, responding to a tidal surge or to extreme weather conditions;
• impact assessments – for example, EU legislation on equal pay, passenger rights and security regulations;
• analysing the market for new freight services;
• managing the sample for the International Passenger Survey; and
• validating the international passenger profiles used by border staff.

2.5 A National Statistics Quality Review\textsuperscript{21} of maritime statistics was published in 2007. This found that ‘…in general, the system works well, providing statistics which are fit for purpose and which are used by a wide range of Government and industry bodies and academics and consultants’. However, it did highlight unmet user needs for data on the inland origins and destination of freight and the mode of transport for inland journeys.

Road traffic estimates

2.6 These statistics cover the total volume of traffic on roads and the total length of the road network. Traffic volumes have been published since 1949 and are currently estimated from a combination of automatic and manual counts. The estimates are presented as average annual daily flows (AADFs)\textsuperscript{22} and as total traffic in vehicle miles. Statistics are produced by vehicle type, road category (Motorway, ‘A’, ‘B’ and unclassified), for urban and rural areas and at national and regional level. DfT provides an online map\textsuperscript{23} showing the location of all the count points on major roads, and users can download AADF and traffic data.

2.7 Road lengths are obtained in the first instance from Ordnance Survey’s (OS) Integrated Transport Network\textsuperscript{24}, which provides information about the road network in Great Britain, including road type classifications, routing information, and urban paths. This is supplemented by information from local authorities, the devolved administrations and the Highways Agency.

2.8 As a by product of these data collections, it is also possible to derive estimates of average free-flow speeds (that is, the speed chosen by drivers on stretches of road that are not congested or affected by other factors such as speed cameras).

2.9 There is no legislative requirement for traffic statistics and there are currently no EU directives in this area, although data are supplied to the EU and the UN on a voluntary basis. However, the data are essential for the production of environmental statistics such as the National Atmospheric Emissions Inventory (which are required to meet various EU directives); for monitoring progress against international agreements such as the Kyoto Protocol; and for monitoring the UK’s own environmental targets. They also contribute to two DfT

\textsuperscript{21} \url{http://www.ons.gov.uk/ons/guide-method/method-quality/quality/nsqr/theme/travtrans/index.html}
\textsuperscript{22} AADF figures cover each junction to junction link on the major road network
\textsuperscript{23} \url{http://www.dft.gov.uk/traffic-counts/index.php}
\textsuperscript{24} \url{http://www.ordnancesurvey.co.uk/oswebsite/products/os-mastermap/itn-layer/index.html}
business plan indicators: reliability of journeys on the motorway and A road network; and total greenhouse gas emissions from transport.

2.10 Within DfT, traffic estimates feed into the National Traffic Model, which is used in forecasting and scenario-testing; they inform policy reviews (for example, in relation to speed limits and road-charging for lorry users); and they input into the National Infrastructure Plan. AADFs are used to weight and gross estimates of the evasion of vehicle excise duty and road tax, and MoT non-compliance. At a local level, passenger transport executives and local authorities use the statistics for planning and monitoring purposes, including the regulation of buses and freight and the development of sustainable transport measures. Transport consultants, utility companies, residents’ groups, commercial enterprises and others use the data for a variety of purposes – for example, buying property, deciding on the location of a new business, planning road works or purchasing space on advertising billboards.

2.11 The estimates of road length are used by the Department for Communities and Local Government (DCLG) to distribute formula grant to local authorities. Within DfT they are used in weighting road condition data as well as in producing the traffic estimates.

2.12 A National Statistics Quality Review of road traffic and road length statistics was published in 2007. It concluded that the outputs broadly met user requirements and that they were based on sound methods, but that improvements could be made to quality measures and to the estimation of traffic on minor roads. The review also recommended that DfT seek to exploit alternative data sources and new technologies where feasible.

Bus, taxi, light rail and disabled parking scheme statistics

2.13 DfT statistics on the bus sector cover passenger journeys, vehicle miles, revenues, costs and government support, staff, vehicles, and indicators of reliability and punctuality. There is also a fares index, which measures the overall change in fares, but does not provide information on the absolute levels. The earliest bus tables on DfT’s website go back to the 1950s and 60s, pre-dating the deregulation of services in the 1980s. Most of the data are derived from an annual survey of bus and coach operators, with additional information from smaller surveys of the larger operators and from bodies such as Transport for London (TfL) and DCLG. Bus operators are required to provide data under the Statistics of Trade Act 1947.

2.14 DfT collects data on passenger journeys, vehicle miles, revenue and infrastructure from the operators of light rail and tram systems in eight areas (Blackpool, Croydon, London Docklands, Manchester, Nottingham, Sheffield, Tyne and Wear, and the line from Wolverhampton to Birmingham (Midland Metro)). The earliest data are for 1983/84 and cover the two systems in

26 This contains the Government’s aims to improve the UK’s broadband and transport networks: http://www.hm-treasury.gov.uk/national_infrastructure_plan2011.htm
27 See footnote 21
operation at that time, the Tyne and Wear Metro and Blackpool Tramway. The underground systems in London and Glasgow are not covered in the release and are outside the scope of National Statistics, although there is a table relating to each of these systems on DfT’s website.

2.15 The taxi statistics are derived from data supplied by local authorities and provide information on the number of licensed taxis and private hire vehicles (PHVs or ‘minicabs’) and drivers, and the number of vehicles that are wheelchair accessible. The earliest data on DfT’s website are for 1965, but these relate only to taxis in London. The collection of data on PHVs began in 2005. No information is available from this source about the use of taxis, fares, or employment in the sector, but the release indicates how some of this information can be obtained.

2.16 Data on the disabled parking (Blue Badge) scheme are also collected from local authorities, but a contract has recently been awarded for a new administrative system to handle parts of the application process. The new system is being introduced over a three year period from the beginning of 2012 and every local authority in England has agreed to participate. This means that most or all of the statistics will eventually be generated from a central database. The current release covers new and repeat applications, the number of badges issued with and without further assessment and the number issued to organisations concerned with the care of disabled people. Additional information about the number of badges lost and stolen or withdrawn for misuse, and the number of prosecutions for abuse of the scheme, is published in a table at local authority level marked ‘outside the scope of National Statistics’ and aggregate totals are not given. This is due to concerns about data quality and completeness.

2.17 Bus statistics are the most widely used of the four sets of statistics in this group and are used to monitor two of the Department’s business plan indicators: the proportion of bus services running on time, and subsidy per passenger journey. They are also used in the following areas:

- policy development – for example, in a recent document on bus subsidy and regulation – and impact assessments;
- monitoring progress toward regulatory requirements – for example, the provision of low floor accessible buses to meet the Public Service Vehicle Accessibility Regulations 2000;
- in economic and environmental modelling – for example, for the reform of bus subsidies and the calculation of fuel efficiency for Greenhouse Gas conversion factors;
- data on fares feed into in the calculation of price indices (CPI and RPI) and the National Accounts; and

30 http://www.dft.gov.uk/news/statements/baker-20120110/
31 Registered blind people and those in receipt of certain benefits are entitled to a Blue Badge without further assessment. Other applicants are assessed to see if they meet the scheme’s criteria
32 http://www.dft.gov.uk/statistics/tables/dis0301/
33 http://www.dft.gov.uk/publications/green-light-for-buses/
34 http://www.dft.gov.uk/publications/bus-coach-accessibility-faqs/
• background information for recent enquiries by the Competition Commission\(^{35}\) and the Transport Select Committee\(^{36}\).

2.18 Light rail, taxi and Blue Badge statistics are primarily used to monitor industry trends and provide background information for the policy area. The taxi statistics are being used in a forthcoming review of taxi legislation by the Law Commission\(^{37}\).

**Frequency and geographical coverage**

2.19 The maritime factsheet and port employment survey are published on an ad hoc basis, while taxi statistics are released every two years. The remaining statistics are annual or more frequent (see paragraph 1.1.1). Geographical coverage varies as follows:

- UK – all the maritime series
- Great Britain – road traffic series and quarterly bus statistics
- England and Wales – taxi statistics
- England – annual bus statistics, light rail and Blue Badge Scheme.

**Costs of data collection and production of outputs**

2.20 DfT spends several million pounds each year collecting data to produce the statistics covered by this assessment, with contract costs for the traffic estimates accounting for the largest element. DfT also contributes £2 million to the funding of OS’s Public Sector Mapping Agreement\(^{38}\), but this is used for a variety of operational and statistical purposes within the department, in addition to the production of road length and traffic estimates.

2.21 Other aspects of data collection that are contracted out include the initial stages of port freight, and the port employment and accident survey. Seafarer statistics, domestic waterborne freight and the online data and map service for the traffic counts have recently been brought fully in-house. DfT told us that this consolidation has resulted in modest savings.

2.22 DfT estimates staff time on the various outputs as follows (full time equivalent, for 2011/12, or for the most recent year in the case of less frequent statistics):

- Maritime 3.3 (port freight 2.0, sea passengers 0.4, domestic waterborne freight 0.4, seafarers 0.2, port employment and accident rates 0.3).
- Road traffic 6.7 (traffic estimates 6.0 and road lengths 0.7).
- Buses, taxis, light rail and disabled parking scheme: 1.5 in total.

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3 Assessment findings

Meeting user needs

3.1 The Transport Statistics User Group (TSUG) meets to discuss a wide range of transport statistics, including those covered by this assessment. Membership is open to all, but there is a small subscription to cover costs (the group is independent of DfT and runs its own website39). Around 9 to 12 seminars are held each year on topical issues. There is a quarterly newsletter which often includes information items about statistics covered by this assessment, but this is restricted to subscribers until six months have elapsed.

3.2 We were told that maritime statistics have not been discussed at TSUG recently, but that they are supported by a Maritime Statistics Advisory Group (MSAG). This was established following a recommendation in the National Statistics Quality Review. The group provides a forum in which DfT can discuss data requirements with the industry. Membership is by invitation only and little information about the work of the group is publicly available. DfT told us that much of its business is conducted by sub groups or by email: the last sub group completed work in 2010. A couple of major stakeholders told us they thought the group had been rather inactive of late and that they would welcome more contact. We suggest that DfT review the way in which MSAG operates and publish more information about its programme of work.

3.3 DfT’s website invites feedback on all releases and the department keeps records of enquiries. Information about users’ experience of the maritime and traffic statistics has not been published since the quality reviews in 2007, and nothing has been published in respect of light rail, taxis, or the Blue Badge Scheme40. The traffic statistics team is currently reviewing the requirements of regular customers: this is being done through telephone and face to face contact and we were told that DfT plans to publish the results later this year. As part of the designation as National Statistics, DfT should draw up a plan for obtaining feedback from users of the maritime, taxi, light rail and disabled parking scheme statistics, and for publishing the results41 (Requirement 1). We suggest that in meeting this requirement it investigate the uses being made of the seafarers, waterborne freight, taxi, light rail and disabled parking badge statistics, referring to the types of use put forward in the Statistics Authority’s Monitoring Brief, The Use Made of Official Statistics42.

3.4 DfT provided us with a clear description of the many uses of the port freight, road traffic and bus statistics. We suggest that it publish this information on its website, preferably in the statistical releases. The uses of the bus statistics are already described in a report43 on user and supplier feedback on DfT’s website, but we think that they should also be reflected in the release, where they are more likely to be noticed.

39 http://www.tsug.org.uk/
40 DfT referred us to the user service statement on its website. This sets out the standards the department adheres to, but does not include information about users’ experience http://www.dft.gov.uk/statistics/corporate/standards/
41 In relation to Principle 1, Practice 5 of the Code of Practice
43 http://www.dft.gov.uk/statistics/series/buses/
3.5 Although the exact procedure can vary slightly for different releases, it would appear that the Excel tables on DfT’s website are over-written when scheduled revisions are made, or when errors are corrected. The changed figures are marked with an ‘R’ and a note is added to the table. We suggest that DfT make it possible to retrieve the original versions of such tables from the website, so that users can trace the exact changes should they need to do so. If this is not possible, users should at least be informed that original versions can be obtained from the relevant statistics team.

3.6 The reforms being introduced to the administration of the Blue Badge Scheme will change the data source and methods used to compile these statistics, and may make it possible to obtain more complete and consistent information in areas such as fraudulent use, where aggregate estimates are not published at present. The statisticians told us that their data requirements have been conveyed to the contractor for the new scheme through the relevant DfT policy team, and that they will shortly be receiving pilot data. The first release of statistics derived from the new system is expected in November 2013. Neither the most recent release (November 2011) nor the web page for the statistics include information about the impending changes to the scheme. As part of the designation as National Statistics, DfT should inform users about the implications of reforms for the statistics, and consult where necessary as plans take shape (Requirement 2).

Methods and quality

3.7 Nearly all the statistical releases include a brief summary of the methods used to produce the statistics and of any particular issues with quality, and separate notes on DfT’s website provide more details. The ‘strengths and weaknesses’ section in each release provides helpful advice about which aspects of the data may need to be treated with caution. There is, however, relatively little information about the quality of the light rail and tram statistics, other than a note to the effect that DfT receives a 100 per cent response to its questionnaire from the 8 operators. Similarly, DfT provides little information about the data supplied by TfL for the bus statistics, although journeys made in London account for around half the England total. As part of the designation as National Statistics, DfT should publish an overview of the methods used by light rail and tram operators and by TfL to compile their figures, and an assessment of quality, including advice on the strengths and limitations of the statistics in relation to their uses (Requirement 3).

3.8 Statistics on maritime freight are presented by port of origin or destination, but the definition of a ‘port’ is not straightforward. The Port of London, for example, is controlled by a single authority, but covers numerous terminals, including Tilbury in Essex. DfT publishes a list of the ports that are recognised for statistical purposes, but this is in a separate technical note. We suggest that DfT include a paragraph in the release to alert users to the definitional issues and to describe the approach it has taken.

44 In relation to Principle 2, Practice 4 of the Code of Practice
45 In relation to Principle 4, Practices 1 and 2 of the Code of Practice
3.9 DfT publishes statistics on road freight which include a measure of goods transported, derived from driver and operator records. The trends in these figures often differ from the trends in heavy goods traffic derived from traffic counts. Several factors are thought to contribute to this, but DfT told us that although they have investigated the discrepancies on several occasions, they have been unable to reach a definitive conclusion. As part of the designation as National Statistics, DfT should alert users to discrepancies between the road freight statistics and road traffic estimates, describe the differences between the two methods of data collection and advise on their respective strengths and limitations in relation to uses (Requirement 4).

3.10 We received comments from users who were interested in road capacity as well as road lengths. Data on the number of lanes currently exist for strategic roads (those controlled by the Highways Agency), but not for other roads. The statisticians told us that they have had some preliminary discussions with OS and the National Street Gazetteer with a view to these organisations adding the information to their datasets. DfT confirmed that it will consult users of road traffic statistics about their requirements if the proposal is taken forward.

3.11 A question is included in the public service vehicle survey to gauge the degree of under-recording due to multi-journey tickets and non-electronic season tickets and passes, and bus operators are asked how they make this estimate. DfT has stated that the overall adjustment for under-recording was around two per cent in 2010/11, but that some operators reported under-recording without making any adjustment. It warns users of the statistics to ‘be aware’ of the potential impact on trends as the proportion and nature of ticketless journeys changes. We suggest that DfT provide more information in the supporting notes to the bus statistics about the extent of under-recording of ticketless journeys and the methods used where estimates are made.

3.12 Bus operators told us it was difficult to provide passenger journey data for local authority areas and some were concerned about the quality of their estimates. These data are needed so that DfT can produce a range of aggregated figures used in publications and modelling; for example, comparing regional and urban and rural differences. We suggest that DfT obtain more information about how bus operators derive their local authority level estimates, and include this in the supporting notes to the bus statistics.

Confidentiality

3.13 We received a comment from a respondent to the light rail and tram survey pointing out that although the statistical returns are marked ‘Protect: Commercial’ there is no further information about how the data are stored and who has access. This also appears to be true of the maritime and bus statistics. DfT assures respondents that the confidentiality of their individual data will be respected when the statistics are disseminated, but provides little or no

47 In relation to Principle 4, Practice 2 and Principle 8, Practice 1 of the Code of Practice
48 http://www.thensg.org.uk/iansg/welcome.htm
49 Bus passenger journeys used to be estimated by local authorities and DfT provided them with the following advice, based on research it had commissioned into driver under-recording: http://www.clip.local.gov.uk/lgv/aio/36655
information about how the raw data are protected. As part of the designation as National Statistics, DfT should provide commercial data suppliers with adequate information about how the confidentiality of the information they provide will be protected\(^{50}\) (Requirement 5).

**Proportionate burden**

3.14 The maritime statistics team provided us with up to date estimates of the cost to respondents of completing its surveys, and the bus statistics team has published some information about respondent burden in its user and supplier feedback document. DfT reports the total cost to business and local authorities of complying with its surveys in a document on its website\(^{51}\), but the latest information is for 2008/09. As part of the designation as National Statistics, DfT should report annually the estimated costs of responding to statistical surveys\(^{52}\) (Requirement 6).

3.15 In some areas (for example road lengths) the local authorities supplying data found the task quite burdensome, but the need for agreed estimates in order to allocate formula grant was understood and accepted. Other data suppliers were clearly unhappy about the burden and told us they were very unclear how DfT used the information. These views were mostly expressed by bus operators, although echoed by a light rail operator and a couple of local authorities responsible for administering the Blue Badge Scheme. We suggest that DfT consider what further steps it can take to engage with data suppliers in these areas. This might include explaining the various ways in which the data are, or could be, used; providing more explicit assurances about confidentiality (paragraph 3.13) and reviewing ways of keeping the data requirement to a minimum.

**Frankness and accessibility**

3.16 The commentary in the releases for all three groups of statistics is clear, concise and factual, but includes little information on the policy or operational context and rarely suggests possible reasons for trends or patterns in the data. As part of the designation as National Statistics, DfT should improve the commentary in the releases so that it aids user interpretation of the statistics\(^{53}\) (Requirement 7). We suggest that in meeting this requirement DfT should consider the points detailed in annex 2.

3.17 DfT has created a web page for each statistical series and a user guide for its statistics website\(^{54}\), but these pages do not always come up in searches. Some users said they found the website difficult to use and that it was hard to find the statistics and other information they needed. This was partly because commentary, tables and metadata that used to be in a single document now have to be accessed through separate links, and partly because the tables do

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\(^{50}\) In relation to Principle 5, Practice 3 of the *Code of Practice*


\(^{52}\) In relation to Principle 6, Practice 1 of the *Code of Practice*

\(^{53}\) In relation to Principle 8, Practice 2 of the *Code of Practice*

not always have meaningful file names. DfT confirmed that it is aiming to improve the user guide and to create look-up tables on each series page so that users will find it easier to identify the data they need.

Release practices

3.18 Annual Road Traffic Estimates and Road Lengths do not include a named statistician or contact details. DfT have confirmed that this will be rectified.

3.19 Where applicable, DfT publishes a list of post-holders who are given pre-release access to each product. In some cases these lists refer to ‘Ministers’, ‘special advisers’ or ‘newsroom officials’ without specifying the number. Around half a dozen policy officials have access to the disabled parking badge statistics. We suggest DfT review these lists with the aim of minimising pre-release access and specifying the number of recipients more precisely.

Use of administrative sources

3.20 DfT has published a general statement of administrative sources supplemented by individual statements on the Maritime and Coastguard Agency’s Seafarer Documentation System and its Training Database, both of which feed into Seafarer Statistics. The Code of Practice requires that the statement should include information about other administrative sources that are not currently used in the production of official statistics, but have potential to be so used. The bus statistics team already uses DfT’s administrative database for Bus Service Operator Grants and the National Public Transport Data Repository for imputation purposes, and it is considering the use of data from the Vehicle and Operator Services Agency and Traveline in order to replace some of the current data collection. As part of the designation as National Statistics, DfT should extend its statement of administrative sources so that it covers all the elements required by the Code (Requirement 8).

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56 NPTDR provides a snapshot of every public transport journey in Great Britain for a selected week in October each year: http://data.gov.uk/dataset/nptdr
57 http://traveline.info/about.html
58 In relation to Protocol 3, Practice 5c of the Code of Practice
Annex 1: Suggestions for improvement

A1.1 This annex includes some suggestions for improvement to DfT, 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.

Suggestion 1  Review the operation of the Maritime Statistics Advisory Group and publish more information about its programme of work (para 3.2).

Suggestion 2  Investigate the uses being made of the seafarers, waterborne freight, taxi, light rail and disabled parking statistics, referring to the types of use put forward in the Statistics Authority’s Monitoring Brief, The Use Made of Official Statistics (para 3.3).

Suggestion 3  Publish information about the uses of the port freight, road traffic and bus statistics – preferably in the statistical releases (para 3.4).

Suggestion 4  Make it possible for users to retrieve the original versions of tables that have been updated or corrected (para 3.5).

Suggestion 5  Include a paragraph in the port and waterborne freight releases in order to alert users to the issues involved in defining a ‘port’ and to describe the approach taken (para 3.8).

Suggestion 6  Provide more information in the supporting notes to bus statistics about the extent of under-recording of ticketless journeys and the methods used where estimates are made (para 3.11).

Suggestion 7  Obtain more information about how bus operators derive their local authority level estimates, and include this in the supporting notes to bus statistics (para 3.12).

Suggestion 8  Consider what further steps could be taken to engage with suppliers of bus, light rail and Blue Badge scheme data (para 3.15).

Suggestion 9  Consider the points detailed in annex 2 when improving the statistical releases in order to meet Requirement 7 (para 3.16).
| Suggestion 10 | Review the list of post-holders given pre-release access to each release with the aim of minimising such access, and specify the number of recipients more precisely (para 3.19). |
Annex 2: Compliance with Standards for Statistical Releases

A2.1 In October 2010, the Statistics Authority issued a statement on Standards for Statistical Releases. 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 the statistical releases associated with maritime, road traffic, bus, taxi, light rail and disabled parking badge statistics, this annex comments on compliance with the statement on standards.

A2.2 In implementing any Requirements of this report (at paragraph 1.5) which relate to the content of statistical releases, we encourage the producer body to apply the standards as fully as possible.

Appropriate identification of the statistics being released

A2.3 All the releases use the correct logos and standard formatting and each includes a summary and key findings at the start. The titles of the releases do not all mention the geographical coverage of the statistics. The labelling of tables on DfT’s website is not consistent as to whether the statistics are National Statistics or outside the scope of National Statistics, and in some areas there is just a general statement to the effect that some tables are outside scope. We suggest that tables be individually labelled.

A2.4 The coverage of Quarterly Bus Statistics is described as Great Britain; however the data for Wales and Scotland are not presented alongside England on the graph that forms the main presentation of data in the release. Annual Bus Statistics describes the coverage as being England. It is not made clear why data for passenger journeys in Wales and Scotland are not carried through into the annual release. Statistics for passenger journeys are seasonally adjusted – this is noted in the quarterly release, but not when quarterly data are presented in the annual release. Annual Bus Statistics published in October 2011 was updated in January 2012 – a note on the front page highlights the topics affected, but it is not clear which specific figures have been affected and by how much. The previous edition of the release is no longer available to users on the website.

Include commentary that is helpful to the non-expert and presents the main messages in plain English

A2.5 Generally, the commentary within the releases takes the form of short, simple, factual statements with no broader context and little discussion of the factors that may contribute to trends and patterns in the data.

A2.6 Light Rail and Tram Statistics states that it does not include figures for the London or Glasgow Underground systems, but does not signpost users to where statistics about these systems can be found. Unlike the other releases, there is no ‘strengths and weaknesses’ section for the statistics in this release.

A2.7 Some of the releases do not provide a definition of the terms being used – for example; in Bus Statistics, ‘Metropolitan areas’ and ‘ITSO’ smart-card readers are not defined or explained; Road Lengths would benefit from an early description of the major and minor road categories.

A2.8 In Annual Bus Statistics, there is the occasional use of bold in mid sentence to highlight a word, but the purpose of this is not obvious.

A2.9 Blue Badge Scheme Statistics leads with the number of valid badges and a graph presenting the longer term trend in this number. However, the proportion of the population holding a badge is described only for the most recent periods, but is not presented for the longer term to put the number of badges into a proper context.

A2.10 Analysis within Road Traffic Estimates focusses on the national level with little analysis of regional information.

A2.11 The commentary in the port freight statistics does not compare activity in UK ports with those in other EU countries, although such data are available in tables on DfT’s website, and from Eurostat.

Use language that is impartial, objective and professionally sound

A2.12 The text is impartial and evidence based. Descriptive statements are consistent with the statistics.

Include information about the context and likely uses

A2.13 The releases contain very little information about the uses made of the statistics or about the policy context. For example, changes in the percentage of buses with low floor access and the level of government subsidy are not explained in relation to targets or policies that may be driving these changes. Annual Road Traffic Estimates does not present the data in a wider context – for example, in terms of economic effects. Quarterly Road Traffic Estimates does not suggest possible explanations for some of the notable trends – for example, the large increase in light van traffic – and lacks quarter on quarter comparisons and sub-national breakdowns.

Include, or link to, appropriate metadata

A2.14 Information is included on the strengths and weaknesses of the data used to compile the statistics across the majority of the releases.

A2.15 The Notes and Definitions document accompanying Light Rail and Tram Statistics provides a useful history of the light rail and tram systems in England. It does not, however, provide any information about the quality, strengths and weaknesses of the statistics, or how they are compiled.

A2.16 The full report of the 2009 port employment survey includes a detailed explanation of methodological changes since the 2004 survey and the implications of these changes for comparability. DfT told us that because the
two sets of results are not directly comparable, it does not keep the 2004 survey report on its website. The earlier report has been placed in the National Archives\textsuperscript{60}, but its availability is not signposted to users.

\textsuperscript{60}http://tna.europarchive.org/20070207003009/http://www.dft.gov.uk/pgr/statistics/datatablespublication/s/maritime/earates/portemploymentandaccidentsra5175
Annex 3: Summary of assessment process and users’ views

A3.1 This assessment was conducted from January to April 2012.

A3.2 The Assessment team – Jill Barelli and Neil Wilson – agreed the scope of and timetable for this assessment with representatives of the Department for Transport in February. The three sets of Written Evidence for Assessment were provided between 13 and 15 March. The Assessment team subsequently met the Department for Transport during April 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

A3.3 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.

A3.4 The Assessment team received 78 responses from the user consultation – 38 users and 40 data suppliers. The respondents were grouped as follows:

<table>
<thead>
<tr>
<th>Category</th>
<th>Users</th>
<th>Data suppliers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central government/ public bodies</td>
<td>22</td>
<td>2</td>
</tr>
<tr>
<td>Local government</td>
<td>2</td>
<td>9</td>
</tr>
<tr>
<td>Consultants</td>
<td>4</td>
<td>1</td>
</tr>
<tr>
<td>Academics</td>
<td>3</td>
<td>-</td>
</tr>
<tr>
<td>Trade bodies</td>
<td>5</td>
<td>-</td>
</tr>
<tr>
<td>Transport operators/shipping companies</td>
<td>-</td>
<td>22</td>
</tr>
<tr>
<td>Port authorities</td>
<td>-</td>
<td>6</td>
</tr>
<tr>
<td>Charities</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>International</td>
<td>1</td>
<td>-</td>
</tr>
</tbody>
</table>

A3.5 The comments from respondents suggested a high level of engagement with each group of statistics. Users were generally satisfied with frequency and timeliness. A few said they would like to see the maritime statistics published sooner (although Eurostat rated both the timeliness and quality of the freight and passenger statistics as good).

A3.6 Respondents described additional data needs in most areas. For maritime, this included origin and final destination; port to port information; and more detail about cargos. In addition to more detailed breakdowns, a couple of users of the traffic estimates pointed to the desirability of adjusting for the number of lanes
when calculating road length. Users of the bus, light rail and taxi statistics pointed to gaps in some areas (for example, non-local bus and coach travel, costs of light rail, bus operating costs in London, taxi fares and vehicle and passenger mileage). A few users pointed to inconsistencies with other data sources such as the National Travel Survey or the road freight series, or were concerned about errors and inaccuracies (traffic, taxis, light rail).

A3.7 Some respondents expressed frustration with the redesign of DfT’s website. They thought it was now harder to find what they needed and time-consuming to open each table individually, especially as tables did not always have meaningful file labels. Respondents who had approached DfT with queries, however, were full of praise for the helpfulness and professionalism of the statistical teams.

A3.8 Although most collected similar data for their own purposes, many bus operators found it difficult and time-consuming to provide information in the format required by DfT and some were concerned about the quality of the estimates they were providing (this particularly applied to journeys that cross local authority boundaries). Some were clearly alienated from the whole process, declaring that they had no use for the statistics themselves and had no idea how DfT used them. However, others were appreciative of the efforts that had been made by DfT to streamline data collection.

A3.9 The local authorities, transport operators and port authorities who respond to bus, taxi, light rail and freight data requests were a little less negative overall, but some of these also claimed to be ‘completely in the dark’ as to how the data are used by DfT. One supplier of freight data - whose comments were otherwise positive - drew attention to potential duplication in the data collected by DfT and several other government agencies.

A3.10 Local authorities supply data on road lengths for comparison with estimates derived by DfT from OS’s system. The two authorities who provided comments were very clear about the underlying purpose of this exercise and agreed that they would need to collect the data anyway. Both reported that the dialogue with DfT to resolve discrepancies was quite demanding.

Key documents/links provided

Written Evidence for Assessment document