

# Assessment of compliance with the Code of Practice for Official Statistics

## Statistics on Adults with Learning Disabilities known to Local Authorities in Scotland

*(produced by the Scottish Consortium for Learning Disability)*

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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 reports<sup>1</sup> prepared under the provisions of the *Statistics and Registration Service Act 2007*<sup>2</sup>. The Act allows an appropriate authority<sup>3</sup> to request an assessment of official statistics against the *Code of Practice for Official Statistics*<sup>4</sup> 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 *Adults with learning disabilities – implementation of ‘The same as you? Scotland’*<sup>5</sup> (*Learning Disabilities*), produced by the Scottish Consortium for Learning Disability (SCLD).

1.1.2 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 *Learning Disabilities* are designated as National Statistics, subject to SCLD implementing the enhancements listed in section 1.5 and reporting them to the Authority by July 2013.

1.2.2 SCLD 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 SCLD engages effectively with its data suppliers, most of which are also users, through meetings with its Data Group, comprising representatives of local authorities.

1.3.2 SCLD has a small statistics team that includes the Director of SCLD, who is responsible for whole of SCLD. SCLD does not have a formal arrangement for dealing with statistical matters with the Head of Profession in the Scottish Government.

1.3.3 SCLD has sought to reduce the amount of incomplete data provided by local authorities; moving from the provision of aggregated information to individual-level records for adults with learning disabilities since 2008 was intended to

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

<sup>2</sup> [http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga\\_20070018\\_en.pdf](http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf)

<sup>3</sup> 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

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

<sup>5</sup> <http://www.sclد.org.uk/sclد-projects/esay/publications-and-resources/statistics-releases>

improve data quality. However, SCLD provides no information in the report about the impact of incomplete or duplicate data on the uses of the statistics, or about any other aspects of data quality such as accuracy and comparability. The Assessment team considers that SCLD needs access to statistical expertise in order to address some aspects of the statistical production process, such as imputation and weighting.

- 1.3.4 *Learning Disabilities* contains commentary that is clear and accessible to users. However, SCLD does not present these statistics clearly on its website; *Learning Disabilities* is published in the 'SCLD Projects' area of the website and it might not be clear to all users that this is where the report is stored. The use of the term 'eSAY' (electronic '*The same as you? A review of services for people with learning disabilities*' ('*The same as you?*')) to refer to the statistics on the website could also be confusing for some users who are not familiar with the term.

## 1.4 Detailed recommendations

- 1.4.1 The Assessment team identified some areas where it felt that SCLD 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

<b>Requirement 1</b>	Investigate and document the uses of these statistics beyond local and central government, and take account of these uses in statistical planning (para 3.1).
<b>Requirement 2</b>	Publish a revisions policy for these statistics and explain the nature and extent of revisions at the time they are released (para 3.5).
<b>Requirement 3</b>	Document how those who produce the statistics are protected from any political pressures that might influence the production or presentation of the statistics (para 3.8).
<b>Requirement 4</b>	Promote a culture within which statistical experts can comment publicly on statistical issues (para 3.9).
<b>Requirement 5</b>	Develop methodology to minimise the impact of incomplete data on the statistics; publish this information; and provide links to all methods documents in <i>Learning Disabilities</i> (para 3.10).

<b>Requirement 6</b>	Publish information about the quality and reliability of the statistics presented in <i>Learning Disabilities</i> ; make clear their strengths and limitations in relation to use; and ensure that users are informed of all main sources of error and bias (para 3.11).
<b>Requirement 7</b>	Publish information, or links to information, about the comparability of these statistics with those produced by other UK administrations (para 3.13).
<b>Requirement 8</b>	Investigate the user need for historical data and take steps to meet any identified need (para 3.14).
<b>Requirement 9</b>	a) publish annually the estimated compliance cost to suppliers of data for these statistics and b) investigate ways to assess and reduce the burden on local authority data suppliers (para 3.17).
<b>Requirement 10</b>	Review the resources assigned to the production of the statistics to ensure that they are sufficient to meet the standards of the <i>Code</i> (para 3.18).
<b>Requirement 11</b>	Improve the commentary in the report so that it aids user interpretation of the statistics (para 3.20).
<b>Requirement 12</b>	Make all the statistics available in a format which encourages re-use, and make clear to users how they can access information relevant to their needs (para 3.21).
<b>Requirement 13</b>	Ensure that <i>Learning Disabilities</i> is made available through the National Statistics Publication Hub (para 3.24).
<b>Requirement 14</b>	Review the arrangements for granting early access to the statistics and ensure that all those with access understand their obligations under the <i>Pre-release Access to Official Statistics (Scotland) Order</i> (para 3.27).
<b>Requirement 15</b>	Finalise and publish SCLDs Statement of Administrative Sources and include details in the Statement about the arrangements for auditing the quality of the data (para 3.28).



## 2 Subject of the assessment

- 2.1 The Scottish Consortium for Learning Disability (SCLD) is a charity, made up of 12 Partner Organisations with funding from the Scottish Government to help make the changes set out in '*The same as you? A review of services for people with learning disabilities*'<sup>6</sup> ('*The same as you?*') published by the Scottish Government in May 2000.
- 2.2 '*The same as you?*' made 29 recommendations intended to improve services for people with learning disabilities in Scotland, including the recommendation that local authorities, health boards and primary care trusts set up and maintain registers of people with learning disabilities in their areas. *Learning Disabilities* brings together this information in an annual publication that presents statistics on the numbers of adults with learning disabilities known to local authorities in Scotland.
- 2.3 Until 2007 these statistics were released by Scottish Government based on summary data provided by local authorities. SCLD became responsible for these statistics in 2008, and started to collect data from local authorities about the numbers of adults with learning disabilities or diagnoses on the autism spectrum in Scotland, and the services that they use. SCLD collects separate anonymised records about individual people from local authorities. The collated data are referred to as the electronic '*The same as you?*' (eSAY) dataset. SCLD developed a set of data standards<sup>7</sup> that are used by local authorities and health boards to ensure that consistent information is provided to SCLD. SCLD also publishes eSAY Data Collection Guidance<sup>8</sup> each year to provide an update to local authorities about the data that they should collect.
- 2.4 The statistics are used by the Scottish Government to monitor the effectiveness of the decisions it makes for adults with learning disabilities and their carers, as part of '*The same as you?*' policy. The statistics are also used by health care professionals and policy makers in local authorities to help them plan services at a local level for people with learning disabilities and autism spectrum disorders.
- 2.5 The Scottish Government commissioned an evaluation of '*The same as you?*' in 2010; the consultation for this evaluation gathered information about the progress of the policy and the Scottish Government published a summary of the responses<sup>9</sup>. The Scottish Government will use the information it has collected from this consultation, as well as the statistics produced by SCLD, to help develop a new '*The same as you?*' policy due to be announced in 2013. This might have implications for the statistics presented in *Learning Disabilities*.
- 2.6 SCLD told us that it costs around £90,000 per year to produce these statistics.

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<sup>6</sup> <http://www.scotland.gov.uk/Resource/Doc/159140/0043285.pdf>

<sup>7</sup> <http://www.sclد.org.uk/sclد-projects/esay/publications-and-resources/esay-guidance>

<sup>8</sup> See footnote 7

<sup>9</sup> <http://www.scotland.gov.uk/Publications/2012/05/6945>

### 3 Assessment findings

#### Principle 1: Meeting user needs

**The production, management and dissemination of official statistics should meet the requirements of informed decision-making by government, public services, business, researchers and the public.**

- 3.1 SCLD engages with its data suppliers, most of which are also users, through meetings of a Data Group. This group comprises representatives from all local authorities in Scotland and meets five times a year. SCLD publishes the minutes of the meetings<sup>10</sup>. SCLD told us that it takes steps to engage with other users through wider SCLD initiatives run by other teams in the organisation, for example by including information about the statistics at SCLD events. Until 2010, a National Reference Group comprising people with learning disabilities worked alongside SCLD's statistics team in an advisory capacity. SCLD plans to resume the work that this group was previously undertaking. In doing so, SCLD plans to include the development of these statistics as a standing agenda item for a larger SCLD working group of people with learning disabilities. SCLD also responds to ad hoc requests for analysis and other queries, but this engagement and information about these users needs is not documented. As part of the designation as National Statistics, SCLD should investigate and document the uses of these statistics beyond local and central government, and take account of these uses in statistical planning<sup>11</sup> (Requirement 1). We suggest that in meeting this Requirement SCLD should refer to the types of use put forward in the Statistics Authority's Monitoring Brief, *The Use Made of Official Statistics*<sup>12</sup> when documenting use.
- 3.2 In February 2011, SCLD conducted a user survey to help identify how the statistics are used. The survey was sent to those users who were actively engaged with the statistics team and those who had registered interest in the statistics. However, SCLD did not administer or publicise the survey more widely for other users to access. There were 82 respondents, with almost half (48 per cent) working in a local authority. SCLD published the results of the survey<sup>13</sup>. SCLD made some changes to *Learning Disabilities* after reviewing the survey results, such as adding more information about adults with an autism spectrum diagnosis; but it has not developed or published an action plan to say how it will implement improvements based on the consultation. We suggest that SCLD publish a plan detailing the actions it proposes to take as a result of responses to the user survey.
- 3.3 SCLD told us that the statistics are sufficiently timely to meet the needs of local authorities who use the statistics as a service planning tool. SCLD publishes a timetable for the data collection process, including the release date for *Learning*

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<sup>10</sup> <http://www.sclد.org.uk/sclد-projects/esay/publications-and-resources/meeting-minutes/data-group>

<sup>11</sup> In relation to Principle 1, Practices 1 and 2 of the *Code of Practice*

<sup>12</sup> <http://www.statisticsauthority.gov.uk/assessment/monitoring/monitoring-reviews/monitoring-brief-6-2010---the-use-made-of-official-statistics.pdf>

<sup>13</sup> [http://www.sclد.org.uk/sites/default/files/esay\\_user\\_survey\\_results.pdf](http://www.sclد.org.uk/sites/default/files/esay_user_survey_results.pdf)

*Disabilities* in the eSAY Data Collection Guidance document<sup>14</sup> which is updated each year.

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<sup>14</sup> See footnote 7

## Principle 2: Impartiality and objectivity

**Official statistics, and information about statistical processes, should be managed impartially and objectively.**

- 3.4 The statistics in *Learning Disabilities* are presented impartially and objectively.
- 3.5 SCLD does not have a statistical revisions policy. In 2012 SCLD identified that an incorrect draft of *Learning Disabilities 2010* had been released on its website on the publication date. The statistics team removed the draft report from the website and published the correct finalised version of *Learning Disabilities 2010*. SCLD posted a revisions notice<sup>15</sup> and emailed notification of the revised figures to known users. The revisions notice did not document the scale of the revisions. SCLD told us that it has put in place more stringent quality assurance processes to ensure that such a draft report could not be published in the future. As part of the designation as National Statistics, SCLD should publish a revisions policy for these statistics and explain the nature and extent of revisions at the time they are released<sup>16</sup> (Requirement 2).
- 3.6 SCLD publishes *Learning Disabilities* free of charge on its website. SCLD also provides some supplementary statistical services in relation to these statistics and does not currently charge for these services.

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<sup>15</sup> See footnote 5

<sup>16</sup> In relation to Principle 2, Practices 6 and 7 of the *Code of Practice*

### Principle 3: Integrity

**At all stages in the production, management and dissemination of official statistics, the public interest should prevail over organisational, political or personal interests.**

- 3.7 No incidents of political pressures, abuses of trust or complaints relating to professional integrity, quality or standards were reported to or identified by the Assessment team.
- 3.8 SCLD has a small statistics team that includes the Director of SCLD, who has overall responsibility for the organisation. The Assessment team considered that the presence of the Director as part of the statistics team could represent a conflict of interest as the Director has responsibility for policy and the overall development of SCLD. This could be a risk to the perception of integrity of SCLD's statistics. As part of the designation as National Statistics, SCLD should document how those who produce the statistics are protected from any political pressures that might influence the production or presentation of the statistics<sup>17</sup> (Requirement 3).
- 3.9 In August 2012, The Glasgow Herald published an article<sup>18</sup> stating that cuts to council budgets had affected 'hundreds with learning disabilities'. SCLD told us that the article was largely taken from a press release<sup>19</sup> issued by the Learning Disability Alliance Scotland<sup>20</sup> (LDAS). SCLD considers that the LDAS press release misrepresents the data and draws a conclusion that is not supported by statistics presented in *Learning Disabilities*. SCLD considered issuing a statement correcting the article but is instead planning to deal with the issue through its partner organisations and the SCLD Board. As part of the designation as National Statistics, SCLD should promote a culture within which statistical experts can comment publicly on statistical issues<sup>21</sup> (Requirement 4). We suggest that in meeting this Requirement SCLD consider the timeliness of its response when addressing the potential misuse of official statistics.

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<sup>17</sup> In relation to Principle 3, Practice 2 of the *Code of Practice*

<sup>18</sup> <http://www.heraldscotland.com/news/home-news/council-cuts-hit-hundreds-with-learning-disabilities.18620082>

<sup>19</sup> <http://www.ldascotland.org/index.php/campaigns/other-campaigns/23-campaigns/272-hundreds-lose-out-on-support-and-services>

<sup>20</sup> LDAS is an umbrella group representing the views of 37 different organisations that support adults with learning disabilities, such as *Downs Syndrome Scotland* and *Enable Scotland*. Some of these member organisations are also partnered with SCLD

<sup>21</sup> In relation to Principle 3, Practice 7 of the *Code of Practice*

## Principle 4: Sound methods and assured quality

**Statistical methods should be consistent with scientific principles and internationally recognised best practices, and be fully documented. Quality should be monitored and assured taking account of internationally agreed practices.**

- 3.10 SCLD provides some information about the methods used to compile the statistics in *eSAY Statistical Return & Data Confidentiality 2012*<sup>22</sup>. *Learning Disabilities* does not contain information about the methods used to compile the statistics, or links to relevant documents about methods. SCLD provides an indication of the completeness of the statistics in a table in *Learning Disabilities*. The statistics team told us that missing data are due to local authorities not submitting all the data items for some of the people they report on, as they do not have close contact with all the people with learning disabilities who are known to them. SCLD does not apply statistical methods such as imputation or weighting of the data to account for the missing values, or linking with other relevant sources of data such as GP Records. As part of the designation as National Statistics, SCLD should develop methodology to minimise the impact of incomplete data on the statistics; publish this information; and provide links to all methods documents in *Learning Disabilities*<sup>23</sup> (Requirement 5). In meeting this Requirement we suggest that SCLD liaise with statisticians in Scottish Government for advice and assistance in applying appropriate statistical techniques to the data.
- 3.11 Neither *Learning Disabilities* nor its associated background documents include sufficient information about the quality of the statistics and their strengths and weaknesses. Local authorities are asked to submit data about individuals who receive a social service, and those who are known to the local authority but do not receive a service. SCLD does not publish any information about the comparability of these groups across local authorities, nor does it provide any analysis of potential bias or error that may result from this approach. SCLD notes some data quality issues in footnotes in *Learning Disabilities*; that local authorities use different methods for counting individuals included in the statistics and that some duplicate records are included. The fact that local authorities are using different methods to compile the statistics is not highlighted sufficiently clearly in the report or background documents, and there is no reference to the impact that these variations have on the statistics. As part of the designation as National Statistics, SCLD should publish information about the quality and reliability of the statistics presented in *Learning Disabilities*; make clear their strengths and limitations in relation to use; and ensure that users are informed of all main sources of error and bias<sup>24</sup> (Requirement 6).
- 3.12 SCLD publishes guidance about data collection<sup>25</sup> for suppliers. This details the data items that SCLD asks local authorities to submit, along with data definitions and codes. The guidance is based on the SCLD data standards

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<sup>22</sup> <http://www.sclد.org.uk/sclد-projects/esay/data-confidentiality/data-confidentiality>

<sup>23</sup> In relation to Principle 4, Practice 1 of the *Code of Practice*

<sup>24</sup> In relation to Principle 4, Practice 2 of the *Code of Practice*

<sup>25</sup> See footnote 8

document *eSAY National Learning Disability and Autism Spectrum Diagnosis Dataset*<sup>26</sup>. SCLD told us that anomalies and summary information are sent back to local authorities for checking. We suggest that SCLD publish summary information about the quality assurance procedures it uses to produce *Learning Disabilities*.

- 3.13 *Learning Disabilities* does not include links to other UK or international statistics on people with learning disabilities. SCLD told us that no other directly comparable statistics are available. *Learning Disabilities* does not provide further information about official statistics relating to people with learning disabilities prepared by other government departments, for example Scottish Government or Information Services Division of NHS National Services Scotland. SCLD does not indicate whether the definition of learning disability, as used in *Learning Disabilities*, is consistent with that used in other statistical releases. As part of the designation as National Statistics, SCLD should publish information, or links to information, about the comparability of these statistics with those produced by other UK administrations<sup>27</sup> (Requirement 7). We suggest that in meeting this Requirement, SCLD provide links to other sources of data in Scotland that could help broaden users' understanding of this area.
- 3.14 Until 2007 these statistics were released by Scottish Government based on summary data provided by local authorities. *Learning Disabilities* does not contain time series for the statistics prior to 2008. As part of the designation as National Statistics, SCLD should investigate the user need for historical data and take steps to meet any identified need<sup>28</sup> (Requirement 8).

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<sup>26</sup> See footnote 7

<sup>27</sup> In relation to Principle 4, Practice 6 of the *Code of Practice*

<sup>28</sup> In relation to Principle 4, Practice 7 of the *Code of Practice*

## Principle 5: Confidentiality

**Private information about individual persons (including bodies corporate) compiled in the production of official statistics is confidential, and should be used for statistical purposes only.**

- 3.15 SCLD receives anonymised datasets from local authorities, and told us that it takes all necessary steps to protect the confidentiality of the data it collects. It has a published data confidentiality paper<sup>29</sup>. All SCLD staff sign individual confidentiality documents.
- 3.16 SCLD assured us that when *Learning Disabilities* is released statistical disclosure control techniques are used to maintain confidentiality. This methodology was developed in conjunction with statisticians from Scottish Government.

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<sup>29</sup> <http://www.sclld.org.uk/sclld-projects/essay/data-confidentiality/data-confidentiality>



## Principle 6: Proportionate burden

**The cost burden on data suppliers should not be excessive and should be assessed relative to the benefits arising from the use of the statistics.**

3.17 Local authorities input data from their administrative systems into a form that they upload to the eSAY database. SCLD does not collect information about the time that it takes for each local authority to provide the data and it does not report the estimated cost of compliance with its annual data request. Some data suppliers told us that they use a variety of IT systems and that in some cases their local systems do not record all the required data items; extra work is therefore required to obtain this data elsewhere. As part of the designation as National Statistics, SCLD should a) publish annually the estimated compliance cost to suppliers of data for these statistics and b) investigate ways to assess and reduce the burden on local authority data suppliers<sup>30</sup> (Requirement 9). We suggest that SCLD take the lead in working with local authorities to investigate the development of standardised methods of transferring the data or the introduction of common IT systems to capture these data.

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<sup>30</sup> In relation to Principle 6, Practice 1 of the *Code of Practice*

## Principle 7: Resources

**The resources made available for statistical activities should be sufficient to meet the requirements of this Code and should be used efficiently and effectively.**

3.18 *Learning Disabilities* is produced by a small statistics team; this includes the project lead, a research officer, a data analyst and the Director of SCLD. The statistics team told us that it does not have the statistical expertise to work on some aspects of the statistical production process suggested by the Assessment team, such as imputation or weighting. When SCLD first took responsibility for producing these statistics, the statistics team sought advice from Scottish Government about developing some areas of methodology, for example statistical disclosure control. However, SCLD has not sought further advice on other aspects of methodology, for example imputation of missing data. As part of the designation as National Statistics, SCLD should review the resources assigned to the production of the statistics to ensure that they are sufficient to meet the standards of the *Code*<sup>31</sup> (Requirement 10). We suggest that in meeting this SCLD appoint a member of the statistics team as the lead official in statistical matters to liaise with the appropriate statistical staff in Scottish Government about methods, standards and procedures, and take responsibility for the timing and content of statistical reports.

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<sup>31</sup> In relation to Principle 7, Practices 1 and 6 of the *Code of Practice*

## Principle 8: Frankness and accessibility

**Official statistics, accompanied by full and frank commentary, should be readily accessible to all users.**

- 3.19 *Learning Disabilities* presents key points at the start of the report and more detailed statistics in charts and tables throughout. The language used is straightforward and includes helpful references to the appropriate Scottish Government policy in the introduction. The usefulness of the report is limited by the amount of missing data; this means that changes in the statistics are often as a result of improved data collection and do not reflect actual changes in the population being measured. The commentary does not provide any information about the impact that the lack of reliable estimates of actual change could have on the use of the statistics.
- 3.20 *Learning Disabilities* presents statistics on adults with learning disabilities who are known to local authorities. It does not cover other groups of people with learning disabilities, such as adults with learning difficulties who have never had contact with a local authority. This coverage is not made consistently clear in the commentary or in the title of the report. As part of the designation as National Statistics, SCLD should improve the commentary in the report so that it aids user interpretation of the statistics<sup>32</sup> (Requirement 11). We suggest that in meeting this requirement SCLD consider the points detailed in annex 2.
- 3.21 SCLD does not present these statistics clearly on its website. SCLD publishes *Learning Disabilities* in the SCLD Projects area of its website and it might not be clear to users that this is where they can find the statistics. SCLD's use of the term eSAY to refer to the statistics on its website could also be confusing for some users who are not familiar with the term. SCLD publishes supplementary tables at national and local authority levels on its website in PDF format only. As part of the designation as National Statistics, SCLD should make all the statistics available in a format which encourages re-use, and make clear to users how they can access information relevant to their needs<sup>33</sup> (Requirement 12).
- 3.22 SCLD present a range of documents in Easy Read format, including the statistical report and guidance documents for the statistics<sup>34</sup>. Data visualisations<sup>35</sup> are available for the data presenting a range of statistics by each local authority area.

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<sup>32</sup> In relation to Principle 8, Practice 2 of the *Code of Practice*

<sup>33</sup> In relation to Principle 8, Practices 3, 4 and 6 of the *Code of Practice*

<sup>34</sup> <http://www.sclد.org.uk/sclد-projects/esay/publications-and-resources/easy-read-documents>

<sup>35</sup> <http://www.sclد.org.uk/sclد-projects/esay/esay-statistics-releases/data-visualisation/data-visualisation>

## **Protocol 1: User engagement**

**Effective user engagement is fundamental both to trust in statistics and securing maximum public value. This Protocol draws together the relevant practices set out elsewhere in the Code and expands on the requirements in relation to consultation.**

3.23 The requirements for this Protocol are covered elsewhere in this report.

## Protocol 2: Release practices

**Statistical reports should be released into the public domain in an orderly manner that promotes public confidence and gives equal access to all, subject to relevant legislation.**

- 3.24 *Learning Disabilities* is not currently available through the National Statistics Publication Hub<sup>36</sup>. As part of the designation as National Statistics, SCLD should ensure that *Learning Disabilities* is made available through the Publication Hub<sup>37</sup> (Requirement 13).
- 3.25 SCLD told us that the statistical reports are issued at the standard time of 9.30am on a weekday.
- 3.26 *Learning Disabilities* includes contact details for the statistics team towards the end of the publication.
- 3.27 SCLD provided the Assessment team with a pre-release access list as part of the Assessment. This list contains approximately 90 individuals. SCLD told us that the list had recently been reviewed and more individuals were added at that time, as it was discovered that data suppliers had shared the statistics with colleagues. The *Pre-release Access to Official Statistics (Scotland) Order 2008*<sup>38</sup> stipulates that access granted to individuals under the Order must be restricted to that individual, with the exception of the limited circumstances specified in the *Order*. As part of the designation as National Statistics, SCLD should review the arrangements for granting early access to the statistics and ensure that all those with access understand their obligations under the *Pre-release Access to Official Statistics (Scotland) Order*<sup>39</sup> (Requirement 14).

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<sup>36</sup> <http://www.statistics.gov.uk/hub/index.html>

<sup>37</sup> In relation to Protocol 2, Practice 3 of the *Code of Practice*

<sup>38</sup> <http://www.legislation.gov.uk/ssi/2008/399/introduction/made>

<sup>39</sup> In relation to Protocol 2, Practice 7 of the *Code of Practice*

### **Protocol 3: The use of administrative sources for statistical purposes**

**Administrative sources should be fully exploited for statistical purposes, subject to adherence to appropriate safeguards.**

3.28 In advance of this Assessment, SCLD prepared a Statement of Administrative Sources documenting the administrative sources that it uses in the production of *Learning Disabilities*. This Statement was shared with the Assessment team but has not been published. The Statement does not explain the arrangements for auditing the quality of the data. As part of the designation as National Statistics, SCLD should finalise and publish its Statement of Administrative Sources and include details in the Statement about the arrangements for auditing the quality of the data<sup>40</sup> (Requirement 15).

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<sup>40</sup> In relation to Protocol 3, Practice 5 of the *Code of Practice*

## Annex 1: Suggestions for improvement

A1.1 This annex includes some suggestions for improvement to *Learning Disabilities* 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.

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|---------------------|---|
| <b>Suggestion 1</b> | Refer to the types of use put forward in the Statistics Authority's Monitoring Brief, <i>The Use Made of Official Statistics</i> when documenting use (para 3.1).   |
| <b>Suggestion 2</b> | Publish a plan detailing the actions that SCLD proposes to take as a result of responses to the user survey (para 3.2).   |
| <b>Suggestion 3</b> | Consider the timeliness of responses when addressing the potential misuse of official statistics (para 3.9).  |
| <b>Suggestion 4</b> | Liaise with statisticians in Scottish Government for advice and assistance in applying appropriate statistical techniques to the data (para 3.10).  |
| <b>Suggestion 5</b> | Publish summary information about the quality assurance procedures that SCLD uses to produce <i>Learning Disabilities</i> (para 3.12).  |
| <b>Suggestion 6</b> | Provide links to other sources of data in Scotland that could help broaden users' understanding of this area (para 3.13).   |
| <b>Suggestion 7</b> | Take the lead in working with local authorities to investigate the development of standardised methods of transferring the data or the introduction of common IT systems to capture these data (para 3.17).   |
| <b>Suggestion 8</b> | Appoint a member of the statistics team as the lead official in statistical matters to liaise with the appropriate statistical staff in Scottish Government about methods, standards and procedures, and take responsibility for the timing and content of statistical reports (para 3.18). |
| <b>Suggestion 9</b> | Consider the points detailed in annex 2 in seeking to improve the statistical (para 3.20).  |

## **Annex 2: Compliance with Standards for Statistical Reports**

- A2.1 In November 2012, the Statistics Authority issued a statement on *Standards for Statistical Reports*<sup>41</sup>. 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 report associated with adults with learning disabilities known to local authorities in Scotland, 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 reports, we encourage the producer body to apply the standards as fully as possible.

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

- A2.3 *Learning Disabilities* contains a narrative that is accessible to users and includes a summary of the key findings. The report covers individuals with learning disabilities who are known to local authorities; however the limitations of this coverage are not made consistently clear in the commentary or in the title of the report. This information is highlighted in Section 1 of the report; it states that 'Local authorities reported on the number of adults with learning disabilities known to services in their area'. SCLD does not provide information about any potential differences between adults known to local authorities and all adults with learning disabilities, or about the comparability of the statistics between local authority areas and the impact on use.

### **Include information about the context and likely uses of the statistics**

- A2.4 *Learning Disabilities* presents background information about the statistics on the first page; this explains why the data are collected by local authorities in Scotland. However, it does not include information about the likely uses of the statistics, or about their importance.

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

- A2.5 As noted in paragraph A2.3, *Learning Disabilities* presents information about adults with learning disabilities who are known to local authorities. For example, this will include adults with a learning disability who receive a service from the local authority or those who have had some form of contact with a local authority. However, the data might not include those adults with learning difficulties who have never had contact with the local authority. This information is not always made clear in the text, and the impact of incomplete data on the uses of the statistics is not explained. The Assessment team considers that some users may incorrectly regard these statistics as providing information about all adults with learning disabilities resident in Scotland.

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<sup>41</sup> <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-reports.html>



A2.6 *Learning Disabilities* does not include information about likely errors, their impact on the statistics and the implications for use. Neither *Learning Disabilities* nor its associated background documents include sufficient explanation about the quality of the statistics and their strengths and weaknesses. *Learning Disabilities* often reports on changes in the data between years that are due either to more complete data becoming available, or changes to data collection methods. For example, *Learning Disabilities 2011* reports large decreases in estimates for four local authorities that have been attributed to 'more stringent quality control checks and changes to collection processes', rather than actual changes to the population being measured. The report does not provide any information about the impact that the lack of reliable estimates of actual change could have on the use of the statistics, or any other information about the quality of the statistics.

### **Be professionally sound**

A2.7 *Learning Disabilities* includes descriptive statements that are consistent with the statistics in the charts and tables. However, the use of decimal places is not consistent, for example, some percentages are expressed as rounded numbers and others are shown to one decimal place. Alignment of text is not consistent across tables.

A2.8 Key Findings and Section 1 of the report discusses the 'number of people with a learning disability per 1,000 population'; however, it does not make it clear that only adults are included, and that this will not include adults who are not known to local authorities in Scotland.

A2.9 The report presents information in summary tables and in different types of charts. Some of the pie charts are difficult to interpret as the colouring of different sections is similar; it is also difficult to discern different sections when printed in black and white. Some of the tables are difficult to interpret, for example the table for 'Local Area Co-ordination use and availability' presents a total row that double counts the rows above, in other tables subtotals are used but not clearly identified.

### **Include, or link to, appropriate metadata**

A2.10 The title of the report does not make clear that it only includes adults with learning disabilities that are known to local authorities in Scotland.

A2.11 *Learning Disabilities* does not contain information about the methods used to compile the statistics or links to relevant documents about methods or about the quality and reliability of the statistics.

## Annex 3: Summary of assessment process and users' views

- A3.1 This assessment was conducted from September 2012 to February 2013.
- A3.2 The Assessment team – Emily Gleeson and David Duncan-Fraser – agreed the scope of and timetable for this assessment with representatives of SCLD in September. The Written Evidence for Assessment was provided on 2 November. The Assessment team subsequently met SCLD during November 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 7 responses from users of the statistics and 9 responses from data suppliers from the user consultation. The respondents were grouped as follows:

Charity	3
Academia	2
Government	2
Local authority data supplier	9

- A3.5 The users who responded to our consultation told us that they use these statistics to obtain a 'snapshot' of the population with learning difficulties. One user told us that they are using the statistics to help inform the new 'The same as you?' policy being developed by the Scottish Government. The statistics are also used to identify and inform research projects about the impact and incidence of learning disabilities in the adult population. One user told us that they had some questions about the accuracy of the statistics, particularly when comparing local authorities for which clear differences between the populations would not be expected. Two users told us that they would like more timely information, but appreciated that this would be difficult due to the way that the data are collected by local authorities. A statistician from the Scottish Government told us that *Learning Disabilities* meets their needs well, but that there are some problems arising from the amount of missing data used to produce these statistics; the same user said that SCLD might want to explore the feasibility of data linking with other relevant sources, such as GP records or the 2011 Census.

A3.6 The data suppliers who responded told us that they were pleased with the level of engagement with the team in SCLD, particularly around disseminating the guidance and definitions information that is used in the collation of the data. However, a few of the local authorities told us about the concern they have with the differences in recording 'known adults with learning disabilities' between local authority areas. Two data suppliers told us that it might be useful for SCLD to focus on streamlining the data to ensure that core information is collected regularly and rigorously.

**Key documents/links provided**

Written Evidence for Assessment document

