

Assessment of compliance with the Code of Practice for Official Statistics

Statistics on Student Support and Student Loans

*(produced by the Student Loans Company
and the Department for Business, Innovation and Skills)*

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About the UK Statistics Authority

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

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

The Statistics Authority has two main functions:

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

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ASSESSMENT AND DESIGNATION

The *Statistics and Registration Service Act 2007* gives the UK Statistics Authority a statutory power to assess sets of statistics against the *Code of Practice for Official Statistics*. Assessment will determine whether it is appropriate for the statistics to be designated as National Statistics.

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

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

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

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

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

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

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

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

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

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1 Summary of findings

1.1 Introduction

1.1.1 This is one of a series of reports¹ prepared under the provisions of the *Statistics and Registration Service Act 2007*². The Act requires all statistics currently designated as National Statistics to be assessed against the *Code of Practice for Official Statistics*³. The report covers the set of statistics reported in *Student Loans for Higher Education in Scotland*^{4, 5} produced by the Student Loans Company (SLC).

1.1.2 The Act also allows an appropriate authority⁶ to request an assessment of official statistics against the *Code of Practice for Official Statistics* in order for them to gain National Statistics status. The inclusion of the following statistics is in response to such a request:

SLC

- *Student Support for Higher Education in Wales*⁷
- *Student Support for Higher Education in Northern Ireland*⁸
- *Student Loans for Higher Education in Wales*⁹
- *Student Loans for Higher Education in Northern Ireland*¹⁰
- *Income Contingent Repayments by Repayment Cohort and Tax Year*¹¹ (Wales)
- *Income Contingent Repayments by Repayment Cohort and Tax Year*¹² (Scotland)
- *Income Contingent Repayments by Repayment Cohort and Tax Year*¹³ (Northern Ireland)

SLC and the Department for Business, Innovation and Skills (BIS)

- *Income Contingent Repayments by Repayment Cohort and Tax Year*¹⁴ (England)

1.1.3 This report was prepared by the Authority's Assessment team, and approved by the Assessment Committee on behalf of the Board of the Statistics Authority, based on the advice of the Head of Assessment.

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

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

³ <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/index.html>

⁴ <http://www.slc.co.uk/media/333183/slcsfr042012.pdf>

⁵ *Student Loans for Higher Education in Scotland* was considered within Assessment Report 75 – *Statistics on Lifelong Learning in Scotland*, produced by the Scottish Government. The responsibility for production of these statistics now lies with SLC

⁶ 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

⁷ <http://www.slc.co.uk/media/525910/slcsfr062012.pdf>

⁸ <http://www.slc.co.uk/media/525913/slcsfr072012.pdf>

⁹ <http://www.slc.co.uk/media/333177/slcsfr022012.pdf>

¹⁰ <http://www.slc.co.uk/media/333180/slcsfr032012.pdf>

¹¹ <http://www.slc.co.uk/media/333189/slcsfr052012.pdf>

¹² <http://www.slc.co.uk/media/333195/slcsfr042012.pdf>

¹³ <http://www.slc.co.uk/media/333192/slcsfr022012.pdf>

¹⁴ <http://www.slc.co.uk/media/333186/slcsfr022012.pdf>

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 *Student Loans for Higher Education in Scotland* are designated as National Statistics, and has determined that the statistics published in the products listed in paragraph 1.1.2 can be designated as new National Statistics products, subject to SLC and BIS implementing the enhancements listed in section 1.5 and reporting them to the Authority by November 2013.
- 1.2.2 SLC 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 SLC publishes a comprehensive range of student support and student loan statistics, and has been taking positive steps to engage with users about these statistics.
- 1.3.2 Given the user interest in these statistics, and developments planned for the next two years, the main concern is whether SLC will have sufficient resources to comply with the *Code*.

1.4 Detailed recommendations

- 1.4.1 The Assessment team identified some areas where it felt that SLC, and BIS in relation to *ICR England*, could strengthen their 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	Take steps to engage more widely with users of student support and student loan statistics and publish the SLC user engagement strategy for these statistics (para 3.1).
Requirement 2	Document the use made of the student support and loan statistics and publish information about users' experiences of the statistics (para 3.2).
Requirement 3	Publish information about the nature and extent of revisions at the same time that the revised statistics are released (para 3.4).

Requirement 4	Provide more information about the sources and methods used to produce the student support and student loan statistics, and about their strengths and limitations in relation to use (para 3.8).
Requirement 5	Publish the quality guidelines used in managing the production of the student support and student loan statistics (para 3.9).
Requirement 6	Provide users with information about the comparability of the student support and student loan statistics across the four countries of the UK (para 3.10).
Requirement 7	Publish a statement on confidentiality and data access (para 3.11).
Requirement 8	Confirm that sufficient resources are available to allow these statistics to be produced to the standards of the <i>Code</i> (para 3.14).
Requirement 9	Improve the commentary in the reports so that it aids user interpretation of the statistics (para 3.15).
Requirement 10	Ensure that the student support and student loan statistics are made available through the National Statistics Publication Hub, and are classified to the correct producer (para 3.18).
Requirement 11	Publish records of those who have access to the student support statistics prior to release, as required by pre-release access legislation (para 3.19).

2 Subject of the assessment

2.1 The SLC¹⁵ is a non-profit making Government-owned organisation set up in 1989 to provide loans and grants to students in universities and colleges in the UK. SLC is an executive non-departmental public body sponsored by BIS. It pays loans and non-repayable grants for living costs and other expenses. It also provides loans to meet the costs of tuition fees, paid directly to universities and colleges on behalf of students. SLC collects loan repayments from customers who have left higher education. Higher education is a devolved matter in the UK, resulting in the separate release of statistics for each administration.

2.2 SLC produces three main official statistics reports reflecting the public expenditure on student support (the statistics do not contain an estimate of support from private bodies as this is not centrally collected):

- *Student Support for Higher Education (SSHE)* – separately for England, Wales and Northern Ireland
- *Student Loans for Higher Education (SLHE)* – separately for England, Wales, Scotland and Northern Ireland
- *Income Contingent Repayments by Repayment Cohort and Tax Year (ICR)* – for England, Wales, Scotland and Northern Ireland

SSHE and *SLHE* for England were assessed in Assessment Report 77¹⁶ and have had their designation as National Statistics confirmed. The Scottish Government has retained responsibility for producing statistics on student support in Scotland¹⁷.

2.3 SLC took over responsibility for producing statistics on student support for higher education in England and Wales and statistics on student loans for higher education for the UK from the former Department for Education and Skills in 2004. SLC began to produce separate statistical reports for England and for Wales in 2006 for student support and in 2007 for student loans. It began producing statistics on student loans for Scotland in 2007 and for Northern Ireland in 2008. From 2009, SLC produced a supplementary report for each of the administrations with further information about the repayment of loans where the payments are contingent on the level of income, on a cohort basis for those beginning repaying in the same period, irrespective of when the loan was borrowed.

2.4 *SSHE* and *SLHE* for England are produced jointly with the BIS¹⁸, with data preparation and presentation by SLC and the commentary produced by both SLC and BIS statisticians.

2.5 The statistics in *SSHE* and *SLHE* are derived from data maintained by SLC as part of administering the loans and grants awarded to students. SLC receives a

¹⁵ <http://www.slc.co.uk/About-Us.aspx>

¹⁶ <http://www.statisticsauthority.gov.uk/assessment/assessment/assessment-reports/index.html>

¹⁷ Assessed in Assessment Report 75:

<http://statisticsauthority.gov.uk/assessment/assessment/assessment-reports/assessment-report-75---lifelong-learning-in-scotland.pdf>

¹⁸ <http://www.statisticsauthority.gov.uk/assessment/assessment/assessment-reports/confirmation-of-designation-letters/letter-of-confirmation-as-national-statistics---assessment-report-77.pdf>

- data set from HM Revenue & Customs (HMRC) with information about the repayment of loans made by borrowers via the tax system. SLC maintains records of all repayments, as well as student borrowing and support information on behalf of BIS and the devolved administrations. The Scottish Government is to take over the role of paying loans for Scottish domiciled students from the 2014 academic year but SLC will continue to manage the student loan debt for those borrowers applying interest and managing the repayment process.
- 2.6 Each of the student support and student loan statistical reports covers the students who were usually resident in the respective country when they started a higher education course in the UK (for Northern Ireland, also including HE students studying in the Republic of Ireland). They also cover applicants and students usually resident in the EU (outside the UK) studying in a higher Education Institute (HEI) in the respective UK country.
 - 2.7 Eurostat, the Organisation for Economic Co-operation and Development (OECD) and the United Nations Educational, Scientific and Cultural Organization (UNESCO) set¹⁹ the international standards²⁰ for the reporting of information about higher education including public expenditure on student support. Eurostat²¹ and OECD²² both present international comparisons on public spending on tertiary education – for example, OECD’s Indicator B5 How much do tertiary students pay and what public support do they receive?²³. The data are provided to both organisations through a joint questionnaire completed by each country. The OECD statistics for the UK do not always include all four countries of the UK²⁴.
 - 2.8 Other uses of the student support statistics are to develop and monitor policy, such as: *Making the higher education system more efficient and diverse*²⁵; the *For our Future – The 21st Century Strategy and Plan for Wales*²⁶; *Supporting a Smarter Scotland*²⁷, and *Graduating to Success – a Higher Education Strategy for Northern Ireland*²⁸. There is much interest from politicians and the media, and other organisations such as the National Union of Students, in the size of student debt, the amounts that are being repaid and the reasons for debt being written off. The Bank of England uses the loan statistics as part of its monthly and quarterly series on consumer credit. ONS accounts for student loans in the monthly *Public Sector Finances* statistics²⁹.
 - 2.9 The statistics are all accessible from the homepage of the SLC website. The statistics are published in PDF format with data tables in Excel. This equates to

¹⁹ http://epp.eurostat.ec.europa.eu/statistics_explained/index.php/Educational_expenditure_statistics

²⁰ http://epp.eurostat.ec.europa.eu/cache/ITY_SDDS/en/educ_esms.htm

²¹ See footnote 19

²² http://www.oecd-ilibrary.org/education/education-at-a-glance-2012_eag-2012-en

²³ http://www.oecd-ilibrary.org/education/education-at-a-glance-2012/indicator-b5-how-much-do-tertiary-students-pay-and-what-public-support-do-they-receive_eag-2012-20-en

²⁴ <http://www.oecd.org/edu/skills-beyond-school/educationataglance2009oecdindicators.htm>

²⁵ <https://www.gov.uk/government/policies/making-the-higher-education-system-more-efficient-and-diverse>

²⁶ <http://wales.gov.uk/topics/educationandskills/publications/guidance/forourfuture/?jsessionid=DF6799480CF4596EC7CAD0C6BF109924?lang=en>

²⁷ <http://www.scotland.gov.uk/Publications/2008/12/12121638/0>

²⁸ <http://www.delni.gov.uk/index/further-and-higher-education/higher-education/role-structure-he-division/he-policy/higher-education-strategy.htm>

²⁹ <http://www.ons.gov.uk/ons/rel/psa/public-sector-finances/april-2013/stb---april-2013.html>

a level 2 rating under the Five Star Scheme proposed in the *Open Data White Paper: Unleashing the potential*³⁰.

- 2.10 The SLC staff resource to produce these reports is approximately 1.5 full-time equivalents.

³⁰ http://data.gov.uk/sites/default/files/Open_data_White_Paper.pdf

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 SLC has developed a user engagement strategy and, in autumn 2012, it recruited a part-time user consultation manager to develop its engagement with users. In the past, SLC has primarily focused its engagement with users within SLC, and central and devolved government. More recently, it has begun to seek opportunities to engage the wider user community – for example, the statistician and user consultation manager are due to attend a Welsh Government event³¹ open to all users of education statistics, and the Lead Official has spoken at a similar event held by the Scottish Government. SLC has also started to explore better liaison with HEIs through SLC's HEI stakeholder contact. One user responding to this assessment said that they felt that SLC should do more to exploit its established stakeholder and partners network³² to engage about official statistics. SLC has developed a mailing list of those individuals and organisations that have contacted the SLC statistics team and is using this list to alert users to forthcoming publications and developments. As part of the designation as National Statistics, SLC should take steps to engage more widely with users of student support and student loan statistics and publish the SLC user engagement strategy for these statistics³³ (Requirement 1). In meeting this requirement, we suggest that SLC explore how the statistics team might better exploit the existing SLC stakeholder group network to strengthen user engagement.
- 3.2 BIS has published *How higher education statistics are used*³⁴ which provides some insight into the users and uses of student support and student loan statistics for England, but none of the statistical reports describe the uses made of these statistics. SLC has not published any information about user experiences of the statistics; however, it launched a user consultation survey³⁵ in November 2012 and has received approximately 50 responses. It has not reported on the feedback received or its plan to address issues identified. SLC told us that it has carried out some initial analysis of the survey results and that while it needs to consider how best to respond to the feedback, it has identified areas where it can make improvements fairly quickly – for example, the better use of charts to illustrate key trends. As part of the designation as National Statistics, SLC should document the use made of the student support and student loan statistics and publish information about users' experiences of the statistics³⁶ (Requirement 2). In meeting this requirement, we suggest that SLC refer to the types of use put forward in the Statistics Authority's Monitoring

³¹ <http://wales.gov.uk/topics/statistics/theme/post16ed/education-and-skills-statistics-user-event?lang=en>

³² <http://www.slc.co.uk/stakeholders-partners.aspx>

³³ In relation to Principle 1, Practices 1 and 2 of the *Code of Practice*

³⁴ <https://www.gov.uk/government/publications/how-he-statistics-are-used>

³⁵ <http://www.slc.co.uk/statistics/statistics-user-consultation.aspx>

³⁶ In relation to Principle 1, Practices 2 and 5 of the *Code of Practice*

Brief, *The Use Made of Official Statistics*³⁷ when documenting use. We further suggest that SLC publish the initial outcomes from the user consultation survey as early as possible.

³⁷ <http://www.statisticsauthority.gov.uk/reports---correspondence/archive/statistics-commission-archive/research/report-33--the-use-made-of-official-statistics--march-2007-.pdf>

Principle 2: Impartiality and objectivity

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

- 3.3 SLC publishes these statistics in an orderly and timely manner on its website, free of charge to users. The statistics are presented impartially and objectively.
- 3.4 SLC has published a revisions policy³⁸. As well as outlining the arrangements for managing any revisions to the statistics, the policy also describes its procedures for pre-announcing any changes to methods, sources and classifications that might impact the statistics. *SSHE* for Wales clearly marks any revisions and presents a summary describing and quantifying those revisions but SLC does not apply this model to its other statistical reports. For example – *ICR* labels the statistics as provisional as repayment notifications for a tax year can continue to be notified several years. Planned revisions to the statistics to account for these late repayment notifications are not highlighted in the report and the scale of any revisions is not described. None of the reports include a link to the revisions policy. As part of the designation as National Statistics, SLC should publish information about the nature and extent of revisions at the same time that the revised statistics are released³⁹ (Requirement 3).

³⁸ http://www.slc.co.uk/media/520775/slc_statistics_-_revisions_policy.pdf

³⁹ In relation to Principle 2, Practice 6 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.

- 3.5 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.
- 3.6 Compliance with the *Code* requires that the relevant statistical Head of Profession (HoP) has the sole responsibility for deciding on statistical methods and procedures, and on the content and timing of statistical reports. In the case of arm's length bodies like SLC, the appointed Lead Official for Statistics (Lead Official) assumes this role and is the 'person responsible' referred to in the *Statistics and Registration Service Act 2007*, and the *Pre-release Access to Statistics Orders*. The Senior Manager for Data Services & Analysis at SLC is the Lead Official for these statistics.
- 3.7 As part of the standard model for engagement with the UK statistical system, BIS's statistical HoP, who is professionally accountable to the National Statistician, should provide advice, guidance and support to the Lead Official at SLC on statistical matters, including their responsibilities under the *Code* and statistical legislation. SLC and BIS both advised that the BIS Deputy HoP sends the latest communications relating to the Government Statistical Service (GSS) to the Lead Official, and BIS told us that it encouraged and supported the recruitment of a statistician to SLC's statistical team. However, we found that there were gaps in the professional knowledge of SLC's statistical team that would benefit from the opportunity to network more closely with GSS colleagues. We suggest that the SLC Lead Official and BIS's Statistical HoP take steps to further develop their working relationship to support continuous professional development of the team and future implementation of the *Code*.

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.

- 3.8 SLC includes a lot of information about concepts and definitions in the statistical reports, but says very little about the data sources and the methods used to produce the statistics. No information is presented about procedures adopted to quality assure the statistics. SLC presents some information about factors affecting the time series but does not present information about the strengths and limitations of the statistics in relation to their use. Footnotes are used extensively in place of background or explanatory notes. As part of the designation as National Statistics, SLC should provide more information about the sources and methods used to produce the student support and student loan statistics, and about their strengths and limitations in relation to use⁴⁰ (Requirement 4).
- 3.9 SLC told us that quality guidelines were signed off by its executive directors in February 2013 and that it is making arrangements to publish them on its website. As part of the designation as National Statistics, SLC should publish the quality guidelines used in managing the production of the student support and student loan statistics⁴¹ (Requirement 5).
- 3.10 For *ICR* and *SLHE*, SLC publishes separate statistical reports for the four countries of the UK but does not present any UK statistics, or make any comparisons across the four countries. As part of this assessment, users expressed an interest in UK statistics and told us that they make their own comparisons. SLC told us that it is possible for users to sum amounts of money from the four country reports but there may be double counting if they attempt to do this for borrowers. However, SLC said it would be possible for them to produce some headline UK statistics. As part of the designation as National Statistics, SLC should provide users with information about the comparability of the student support and student loan statistics across the four countries of the UK⁴² (Requirement 6). We suggest that SLC develop and publish summary UK student support and student loan statistics.

⁴⁰ In relation to Principle 4, Practices 1, 2 and 3 and Principle 8, Practice 1 of the *Code of Practice*

⁴¹ In relation to Principle 4, Practice 4 of the *Code of Practice*

⁴² In relation to Principle 4, Practice 6 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.

- 3.11 SLC has assured us that it takes all necessary steps to protect the confidentiality of the data it collects. SLC told us that it has data sharing agreements with the devolved governments and HMRC, as required for the exchange of confidential statistical records for statistical purposes. SLC has developed a statement on confidentiality and data access, but has not yet published these. As part of the designation as National Statistics, SLC should publish a statement on confidentiality and data access⁴³ (Requirement 7).

⁴³ In relation to Principle 5, Practice 4 of the *Code of Practice*

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.

- 3.12 Data used to produce the student support and student loan statistics are sourced from SLC's own administrative systems.

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.

- 3.13 The majority of SLC's funding is provided by BIS (85 per cent), with 5 per cent from each of the devolved governments. SLC has service level agreements (SLAs) with each of these organisations but only the BIS SLA identifies requirements for official statistics. SLC has no ring-fenced budget for official statistics.
- 3.14 The Lead Official at SLC is the Senior Manager for Data Services & Analysis. The team is responsible for producing management information and analyses for SLC and organisations including the devolved governments, the Higher Education Statistics Agency (HESA) and HEIs. The team also answers any media or Freedom of Information requests. The official statistics are mainly produced by one full-time statistician with the support of the Lead Official. The Lead Official told us that the team has been under some resource pressure and that further developments and additional outputs are planned during 2013 and 2014. It is not clear to the Assessment team whether the current resources are sufficient to address the Requirements identified in this report and meet the standards of the *Code*. As part of the designation for National Statistics, SLC should confirm that sufficient resources are available to allow these statistics to be produced to the standards of the *Code*⁴⁴ (Requirement 8).

⁴⁴ In relation to Principle 7, Practice 1 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.

3.15 The statistics are presented in a professionally sound manner and have some useful commentary to explain the statistics, including helpful key points and contextual information about student funding policy and related operational issues. SLC told us that it is reviewing, in the light of its recent user consultation, how it might improve the statistical reports to aid user interpretation. Some of the areas where improvements are most needed are as follows:

- The concepts and language are often technical in nature and important terms are not explained the first time that they occur, making it difficult for non-expert users to interpret the statistics. Different terminology is used in the reports for the four countries. This is sometimes necessitated by policy differences but more could be done to aid comparison of the statistics;
- There are presentational differences across the reports for the four countries. It is not clear if this is driven by the data or determined by the preferences of BIS and the devolved governments. Again, it does not aid comparison;
- More use could be made of charts in the reports. Where SLC has presented charts, it has been done to good effect. Also, some of the reports would benefit from the presentation of longer time series, to aid analyses of trends. In some cases, only three years' data are presented; and
- Some thought is needed around the overall balance of the presentation. SLC provides a lot of helpful contextual information but it is not clear that it all needs to be intertwined with the statistics. Much of the most interesting information is contained in long lists of footnotes.

As part of the designation as National Statistics, SLC should improve the commentary in the reports so that it aids user interpretation of the statistics⁴⁵ (Requirement 9). We suggest that in meeting this requirement SLC should consider the points detailed in annex 2. SLC and BIS has begun to address the advice from the Assessment team and made improvements to the presentation and commentary in *ICR England* published in June 2013. These included an explanation of ICR early in the report and a more straightforward description of the key findings. SLC also included some additional charts in the *SLHE* reports, including the total amount of public debt outstanding at the end of the financial year.

⁴⁵ In relation to Principle 8, Practice 2 of the *Code of Practice*

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.

3.16 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.

- 3.17 SLC produces a detailed production timetable for the student support and student loan statistics including provisional publication dates. The Lead Official then takes advice on these dates from statistical colleagues in BIS and the devolved governments, before deciding and announcing the final dates. SLC announces the month of publication 12 months in advance and seeks to announce the exact publication date three months in advance. SLC currently announces the next publication date alongside each report. SLC confirmed that the statistics are always released at 9.30am.
- 3.18 SLC told us that it does not currently release any of its statistics via the National Statistics Publication Hub⁴⁶. The Assessment team found that some SLC reports are available from the Hub but SLC is not the listed producer – for example, the listed producer for *ICR* and *SLHE* for Scotland is Scottish Government. As part of the designation for National Statistics, SLC should ensure that the student support and student loan statistics are made available through the National Statistics Publication Hub, and are classified to the correct producer⁴⁷ (Requirement 10). In meeting this requirement, we suggest that SLC publish the timetable of statistical reports for 12 months ahead on the National Statistics Publication Hub.
- 3.19 SLC generally complies with the rules and principles on pre-release access set out in legislation⁴⁸ but while it maintains records of those who have pre-release access it does not publish these records, as required for statistics relating to England, Wales and Northern Ireland. During the course of the assessment, SLC published the pre-release access lists for the *ICR* reports. As part of the designation for National Statistics, SLC should publish records of those who have access to the student support statistics prior to release, as required by pre-release access legislation⁴⁹ (Requirement 11).

⁴⁶ <http://www.statistics.gov.uk/hub/index.html>

⁴⁷ In relation to Protocol 2, Practice 3 of the *Code of Practice*

⁴⁸ <http://www.statisticsauthority.gov.uk/about-the-authority/uk-statistical-system/legislation/pre-release-access/index.html>

⁴⁹ 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.

3.20 SLC has published its Statement of Administrative Sources⁵⁰.

⁵⁰ http://www.slc.co.uk/media/520778/slc_statistics_-_statement_of_administrative_sources.pdf

Annex 1: Suggestions for improvement

A1.1 This annex includes some suggestions for improvement to the students support and loans statistics produced by SLC and BIS, 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 | Explore how the statistics team might better exploit the existing SLC stakeholder group network to strengthen user engagement (para 3.1). |
| Suggestion 2 | 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 3.2). |
| Suggestion 3 | Publish the initial outcomes from the user consultation survey as early as possible (para 3.2). |
| Suggestion 4 | SLC Lead Official for Statistics and BIS's Statistical Head of Profession take steps to further develop their working relationship to support continuous professional development of the team and future implementation of the <i>Code</i> (para 3.7). |
| Suggestion 5 | Develop and publish summary UK student support and student loan statistics (para 3.10). |
| Suggestion 6 | Consider the points detailed in annex 2, in seeking to improve the statistical reports (para 3.15). |
| Suggestion 7 | Publish the timetable of statistical reports for 12 months ahead on the National Statistics Publication Hub (para 3.18). |

Annex 2: Compliance with Standards for Statistical Reports

- A2.1 In November 2012, the Statistics Authority issued a statement on *Standards for Statistical Reports*⁵¹. 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 reports associated with Student Loan Company's statistics on student support and student loans in higher education, 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 *SSHE* and *SLHE* have clear titles that outline the subject matter and the time period and geographic area covered. The term, 'income contingent repayments' and the title of *ICR* are not straightforward to understand. Following the advice from the Assessment team, SLC and BIS made improvements to the presentation and commentary in *ICR England*. These included an explanation of ICR early in the report and a more straightforward description of the key findings.
- A2.4 The student support and student loan reports each have an introduction which outlines the content and provides some policy context but these tend to be technical in nature. Commentary setting out the key points is given in each report alongside the main data tables; they are helpful and generally straightforward to understand.
- A2.5 Important terms are not explained the first time they occur in the text and entries in the glossary are not highlighted. For example, 'domiciled' is used in the reports but it is not explained in the main body of the text, although it is included in the glossary. However the explanation given does not help clarify the implications of any cross-border issues, such as, students living in Wales who attend HEIs in England.
- A2.6 The reports for the various countries tend to be similar but with some differences in the terms used and content. It is not clear whether this is due to the underlying systems or data in the devolved administrations not being the same, or due to the different preferences of the devolved administration or BIS.

Include information about the context and likely uses of the statistics

- A2.7 The student funding policies and operational issues are explained at the start of the background material but tend to be complicated. It is difficult to get a sense of some issues that would be of general interest, such as: the proportion of students that take out loans or that have not repaid according to the expected schedule; or, whether the government funding of loans has gone up over time or how it has changed overall.

⁵¹ <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-reports.html>

A2.8 The contextual information sets out changes to arrangements but it does not make a clear link between the issue and the consequent impact on the statistics.

A2.9 The reports do not outline the types of uses made of the student support and student loan statistics.

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

A2.10 The factors affecting the time series sections provide some information about the operational and definitional issues that affect the statistics. *SSHE* and *SLHE* include information about revisions to the statistics. *ICR* says that all accounts have been updated but it is not clear what revisions have occurred. It is not clear whether audits are carried out on the administrative data and the nature of quality is not explained fully. *SLC* has not related the strengths and limitations of the statistics to the types of uses made of each of the statistical series.

A2.11 Each report focuses on the country covered by the particular report but does not refer or signpost users to the equivalent information for the other countries. No comparison is made of the differences between the countries in definitions or coverage of the statistics. It is not clear what statistics can be combined to form UK level figures and where that would not be appropriate.

Be professionally sound

A2.12 Overall the statistics are presented in a professionally sound manner. The reports have some useful commentary to explain the statistics, particularly helpful when the statistics may appear counterintuitive. However some parts of the commentary could be reviewed to ensure that it is clear in describing the statistics – for example, *ICR* for England says in the first bullet point of the key points section that the latest entry cohort 2012 has fully repaid but then the third bullet says 2010 cohort is the latest cohort to have made a repayment.

A2.13 The *SLHE* reports present statistics for the last three years only and do not explain why longer term trends are not given. It is therefore difficult to get a sense of the changes over time.

A2.14 The reports include some charts – for example, the *ICR* reports each include a summary chart showing average amount repaid by repayment cohort over the past six years. However while *SLHE* for Wales presents a helpful summary chart of the total amount lent during the last three financial years by type (whether for tuition fees or maintenance loans), similar charts are not included in the equivalent reports for the other UK countries.

Include, or link to, appropriate metadata

A2.15 Each report provides a substantial amount of information about the operational and policy definitions related to student funding and about the changes to the eligibility and the nature of student support. However, little information is given about the data sources and collection arrangements. The footnotes to the data tables provide some helpful additional information and these are used extensively in place of an annex of background or explanatory information.

Annex 3: Summary of assessment process and users' views

A3.1 This assessment was conducted from September 2012 to June 2013.

A3.2 The Assessment team – Penny Babb and Donna Livesey – agreed the scope of and timetable for this assessment with representatives of SLC in September. Partial Written Evidence for Assessment was provided on 5 February. The Assessment team subsequently met SLC and BIS during May and June 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 the user consultation. The respondents were grouped as follows:

Central government	2
Devolved government	2
Public body	1
Membership organisation	1
Media	1

A3.5 Where users had dealings with the statistical team, they generally found it to be helpful and professional, although some users suggested that more could be done to engage existing stakeholder groups. Users were generally content with the quality and timeliness of the statistics, though more than one user said it would be helpful to have the statistics earlier. Users welcomed the comprehensive statistics and found them to be well laid out. Suggestions for improvement included:

- the greater use of charts to illustrate key points and to draw out trends;
- the use of simpler language and common terminology and formatting across the reports to aid interpretation and support comparison; and
- the need for more information about the quality of the statistics – for example, about any potential for double counting. There was also a sense that users would welcome some separation of information about methods and quality from the narrative about the latest statistics.

Key documents/links provided

Written Evidence for Assessment document

