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**Ed Humpherson, Director General for Regulation**

Roger Halliday  
Chief Statistician & Head of Performance  
Scottish Government  
Room 2W.02  
St Andrews House  
Edinburgh  
EH1 3DG

09 March 2017

Dear Roger,

As you are aware my team has been exploring whether a comparison made by the Cabinet Secretary for Health and Sport was appropriate. This comparison was reported in the Scotsman<sup>1</sup> and drew on NHS Scotland's delayed discharge data and NHS England's number of bed days lost due to delayed transfer of care data. We have concluded that these comparisons are ambiguous and have the potential to mislead, as:

- firstly, while Scotland and England, both have a patient level measure reporting delayed discharge/ delayed transfer of care and a measure which translates this into total bed days lost, the base definitions are not the same:
  - NHS England<sup>2</sup> counts hospital in-patients who have been assessed as clinically ready to be discharged home or transferred to a social care or a different NHS hospital setting but continue to occupy a bed beyond the ready for discharge/transfer date.
  - NHS Scotland's Information Services Division<sup>3</sup> counts hospital in-patients who have been assessed as clinically ready for discharge from in-patient hospital care but continue to occupy a hospital bed beyond the ready for discharge date; this does not include in-patients who are awaiting transfer to a different NHS hospital setting.
- secondly, in the comparison drawn, the patient level measure of delayed discharge in Scotland was compared with the bed days lost measure in England. On the metric around delayed discharge/ transfer of care, an individual will be counted once however long they stay in hospital when ready for discharge. On the bed days lost measure an individual staying for 3 days past their discharge/transfer date will count as 3 bed days lost.

As you know, we expect Government producers of statistics to produce and use statistical information responsibly to ensure public trust in statistics is maintained. I am pleased to hear that: 1) Scottish Government will be reviewing their briefing material on delayed discharges to ensure any comparisons with other UK countries are appropriate, and 2) NHS Scotland's Information Services Division has included a comment on the UK comparability context in the

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<sup>1</sup> 14<sup>th</sup> February 2017: [www.scotsman.com/news/bed-blocking-rate-in-scottish-hospitals-drops-11-1-4366215](http://www.scotsman.com/news/bed-blocking-rate-in-scottish-hospitals-drops-11-1-4366215)

<sup>2</sup> [www.england.nhs.uk/statistics/wp-content/uploads/sites/2/2015/10/mnth-Sitreps-def-dtoc-v1.09.pdf](http://www.england.nhs.uk/statistics/wp-content/uploads/sites/2/2015/10/mnth-Sitreps-def-dtoc-v1.09.pdf)

<sup>3</sup> [www.isdscotland.org/Health-Topics/Health-and-Social-Community-Care/Delayed-Discharges/Guidelines/docs/Delayed-discharge-Data-Definitions-Recording-Manual-FINAL.pdf?](http://www.isdscotland.org/Health-Topics/Health-and-Social-Community-Care/Delayed-Discharges/Guidelines/docs/Delayed-discharge-Data-Definitions-Recording-Manual-FINAL.pdf?)

latest publication of delayed discharge statistics to help promote responsible use of these data.

We are very encouraged that this issue has been taken seriously. These actions will enable the general public to have a fair and clearer picture of the NHS performance in terms of delayed discharges in Scotland.

I would like to thank you for your support in this matter and let you know that I have asked my team to report back to me on whether after future publications of Scottish delayed discharge data, any Scottish Government statements contain appropriate comparisons.

I am copying this letter to the Cabinet Secretary for Health and Sport's office and Scott Heald the Head of Profession for Statistics at NHS Scotland's Information Services Division.

Kind regards,

Ed Humpherson