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Date 27th September 2017
Your Ref
Our Ref SH/fl

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Dear Ed

Thank you for copying me into your letter to Dorothy Grace Elder regarding ISD's Chronic Pain Waiting Times publication. As you know, ISD takes its responsibilities under the Code of Practice for Statistics seriously, and we will act to address the points raised in your letter.

I am disappointed that your letter only makes passing reference to the developmental nature of these statistics. These statistics are not official statistics because there are data quality issues with the underlying data; ISD could have chosen not to publish but we decided that these figures were better served in the public domain. We are currently working to address the data quality issues with NHS Boards, and to respond to user feedback on the content of future publications, in an effort to transition these figures from developmental to official statistics status.

I agree that, to date, user engagement on these statistics has been narrow, though this is a reflection of where we are in their development. We have recently sought to address this by undertaking a consultation with users which will inform future chronic pain publications. We do take user engagement seriously and this is an area which we will continue to build on beyond the current consultation. The findings from our current consultation will be published at the end of October 2017.

I am pleased that you have found no evidence of politically motivated interference in these statistics. Our independence as a producer of official statistics is something which ISD prides itself on. As you indicate, there are lessons we can learn from the recent production of these statistics. I think it is unfair to describe our actions as "misjudged" regarding the commentary and coverage of these statistics. The team, in my opinion, made well intended decisions regarding the content of the publication summaries in an attempt to aid understanding of these statistics and to make concerns about data quality clearer. I accept your view that our attempt to add clarity may have actually caused further confusion, and we will consider these points for future publications.

I'm also disappointed that your letter does not make reference to ISD's record in the production of official statistics. Earlier this year, a series of waiting times and public health related publications were awarded "National Statistics status", following on from many of our publications which have achieved this status in previous years. Our record demonstrates our commitment to the Code of Practice in terms of trustworthiness, quality and value. I welcome the review of a wider selection of ISD publications as part of the compliance checks you will be undertaking this autumn, and I am

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Chief Executive	Colin Sinclair
Director	Phillip Couser

confident that our publications will continue to demonstrate the compliance with the Code of Practice which our staff take so seriously.

ISD produces over 120 discrete publications each year and it is important that we balance the needs of all users with the available analytical and data management resources. Ensuring we have adequate resources in place to deliver high quality statistics over the entire spectrum of healthcare both in ISD and within NHS Boards which collect the source data, is crucial. Resource constraints have impacted our ability to fully develop the chronic pain statistics; we will be following this up with colleagues in NSS and Scottish Government as part of our planning for 2018/19.

The team responsible for these statistics have previously offered to meet with Dorothy Grace Elder to discuss her concerns about these statistics and I will follow up directly with her in response to this letter.

I would be happy to participate in a follow-up with the Office for Statistics Regulation on the recommendations in your letter.

Yours sincerely



Scott Heald

Head of Profession for Statistics, NHS National Services Scotland

c.c.Dorothy-Grace Elder

Roger Halliday, Scottish Government Chief Statistician

