
Director General for Regulation

Professor Marion Bain
Co-Director Executive Delivery Group, Public Health Reform, Scottish Government
(by email)

9th July 2019

Dear Marion,

PUBLIC HEALTH SCOTLAND CONSULTATION RESPONSE

We have today published our response to the Scottish Government's consultation on the creation of the new National Public Health Body 'Public Health Scotland' (see annex). We welcome the opportunities that the new body will have to produce evidence to improve public health, and in particular the commitment to make better use of data.

We are aware that statistics production is an integral part of the Target Operating Model for the new body. Nevertheless, the statutory responsibilities that accompany its status as an official statistics producer, and the independent role of the Head of Profession for Statistics, need to be more prominently reflected in its governance and functions.

We look forward to working with Public Health Scotland to support its new role as the key producer of evidence to support the drive to improve Scotland's health.

Your sincerely



Ed Humpherson

Director General for Regulation

Annex – Office for Statistics Regulation response to the Scottish Government Consultation on the creation of the new National Public Health Body ‘Public Health Scotland’

The Office for Statistics Regulation submitted responses to Questions 2a, 6a, 6b, 8, 15 and 16.

Question 2: (a) What are your views on the general governance and accountability arrangements?

- Public Health Scotland will be Scotland’s second largest producer of National and official statistics and that function will be regulated by the UK Statistics Authority’s Office for Statistics Regulation. Public Health Scotland’s status as an official statistics producer, and its statutory responsibilities to adhere to the Code of Practice for Statistics, should be a more prominent feature of its governance.
- The Head of Profession for Statistics’ sole authority for decisions about Public Health Scotland’s statistical production, including the timing and content of releases, should be made clear.

Question 6:

(a) What are your views on the information governance arrangements?

- We welcome the commitment to make better use of data, including by bringing together data from across the health system to deliver insights. There is huge value to be gained from bringing together health, social care data, and other data held by the public sector of relevance to public health. All too often data sharing and linking is a lengthy and inefficient process with multiple (and sometimes duplicative) layers of approvals required from different bodies. Creating a robust legislative framework for secure and proportionate cross-sector data sharing with common information governance processes from the outset of Public Health Scotland could help to unlock the value of these data.

(b) How might the data and intelligence function be strengthened?

- In line with the provisions set out in the Code of Practice for Statistics, there needs to be strong public commitment to both data safeguarding and transparency to help demonstrate Public Health Scotland’s trustworthiness as a custodian of the public’s data.
- Public Health Scotland should consider ways to involve the public in major decisions about data sharing and use.

Question 8: What are your views on the functions to be delivered by Public Health Scotland?

- Public Health Scotland’s statistical outputs must strive to deliver wider public value and support society to better understand Scotland’s health and its determinants. Its intelligence function must not focus solely on the immediate needs of PHS or policy makers in government.
- Where other organisations continue (or start) to produce statistics relevant to public health in Scotland, it will be important to ensure outputs are coherent and easily accessible to users.

Question 15: What are your views on the arrangements for data science and innovation?

- Data science and innovation have the potential to deliver significant public value to users. The principles of Trustworthiness, Quality and Value set out in the [Code of Practice for Statistics](#) provide a helpful framework for data science outputs. Following the lead of a range of other organisations, we would encourage its extension to this area of work on a voluntary basis. [Voluntary application](#) of these principles would avoid a situation where one set of processes exists for official statistics, while other (or no) processes exist for assuring data science outputs.

Question 16: What are your views on the arrangements in support of the transition process?

- We are confident that ISD’s Head of Profession for Statistics is committed to ensuring the continued production of official statistics during the transition to Public Health Scotland without disruption to users. We would welcome a public statement outlining the wider organisational commitment, and the support that will be in place, to ensure this is delivered.

- Access to ISD's previous statistics outputs should be straightforward and not burdensome for users during and following the transition.
- Users should be involved in decisions about changes to existing statistical outputs or the development of new statistics as a consequence of the transition process.