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**Statistical Governance Policy**

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Status	Approved
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Document Record ID Key

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Version	V1.3	Version Date	08/02/2017
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Director Responsible for this policy	Chris Roebuck
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Person to contact about this policy	Adam Little
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Author	Adam Little
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# Statistical Governance Policy

## Revision History

Version	Date	Summary of Changes
1	26/11/2013	Policy issued for new organisation
1.1	28/01/2014	Reviewed following change to directorate
1.2	31/03/2014	Revised following updates to internal policies
1.3	08/02/2017	Revised template

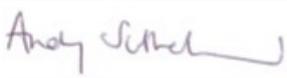
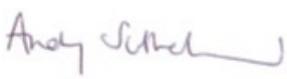
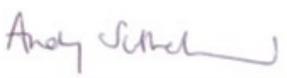
## Reviewers

This document must be reviewed by the following people:

Reviewer name	Title / Responsibility	Date	Version
Andy Sutherland	Head of Profession for Statistics	26/11/2013	1
Andy Sutherland	Head of Profession for Statistics	28/01/2014	1.1
Andy Sutherland	Head of Profession for Statistics	31/03/2014	1.2
Max Jones	Director of Information and Analytics	24/04/2014	1.2
Chris Roebuck	Head of Profession for Statistics	08/02/2017	1.3

## Approved by

This document must be approved by the following people:

Name	Signature	Title	Date	Version
Andy Sutherland		Head of Profession for Statistics	26/11/2013	1
Andy Sutherland		Head of Profession for Statistics	28/01/2014	1.1
Andy Sutherland		Head of Profession for Statistics	31/03/2014	1.2
Max Jones		Director of Information and Analytics	24/04/2014	1.2
Chris Roebuck		Head of Profession for Statistics	08/02/2017	1.3

**NB. The version of the policy posted on the intranet must be a pdf copy of the signed approved version.**

## Document Status

This is a controlled document. Whilst this document may be printed, the electronic version posted on the intranet is the controlled copy. Any printed copies of the document are not controlled.

## Related Documents

These documents will provide additional information.

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<b>Ref no</b>	<b>Doc Reference Number</b>	<b>Title</b>	<b>Version</b>
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## 1. Aim

The Statistical Governance Policy will ensure that the organisation:

Meets the requirements of section 13 of the Statistics and Registration Services Act 2007 (S&RS Act). This will include the requirements of any secondary legislation that is passed to support The S&RS Act e.g. the Pre-release Access to Official Statistics Order 2008.

Complies with the 8 principles and 3 protocols of the Code of Practice for Official Statistics for its National Statistics and as best practice for its Official Statistics.

## 2. Purpose and Scope

The Statistical Governance Policy applies to:

All staff, producing Official Statistics, working for or on behalf of the organisation including employees, temporary staff, contractors, and secondees.

All data and information which are held by the organisation, either solely or jointly, which are provided or planned as part of the Official Statistics services and product range of the organisation including:

- Electronic records, microfiche and microfilm and publications
- All IT application systems within the organisation including websites, databases, information systems, web based tools e.g. iView and registers
- Suppliers of information to NHS Digital.

NHS Digital will comply with the Code of Practice for Official Statistics for all National Statistics and as best practice for all Official Statistics.

### 3. Glossary of Terms

<b>Term / Abbreviation</b>	<b>What it stands for</b>
Assessment	The UK Statistics Authority will independently assess the quality and integrity of statistics against the new Code of Practice for Official Statistics to formally approve them as National Statistics.
Caldicott Guardian	Each NHS organisation and associated agencies is required to nominate a Caldicott Guardian. This is a senior person responsible for ensuring that organisation adheres to the principles of the Caldicott Report; namely, they protect the confidentiality of patient and service-user information and enable appropriate information-sharing.
Code of Conduct	The National Statistician is proposing a new Code of Conduct directed specifically at members of the Government Statistical Service which will define the values and ethical standards which they are expected to uphold, and which will complement and exemplify the more general Civil Service Code.
Code of Practice for Official Statistics	This code supersedes the National Statistics Code of Practice and its associated protocols. This new code was published by the UK Statistics Authority on 6 <sup>th</sup> January 2009.
Designation	A statistical publication that has been formally approved by the UK Statistics Authority following an assessment will be designated as a National Statistic.
Government Statistical Service	<p>The Government Statistical Service (GSS) is a mutually supportive community of all those involved in producing Official Statistics in the UK. Led by the National Statistician – the GSS is a flexible and diverse network of thousands of people across many different organisations; including statisticians and those who may be part of other professional groups.</p> <p>Members of the GSS strive to achieve high standards and broaden skills. They are part of a wider community of public servants providing high quality information, analysis and advice to decision-makers, focussing on producing the right statistics, using the right methods, for the right impact. The professional Government Statistician Group (GSG), within the GSS, comprises those who have completed the GSG entry process.</p>
Head of Assessment	An executive position on the UK Statistics Authority heading the Assessment function.
Head of Profession for Statistics	Organisations that are major producers of Official Statistics are required to have a designated Head of Profession for Statistics (HoP). They are responsible for the professional integrity of National Statistics produced by their organisation. In discharging their responsibilities, HoPs work closely with the National Statistician; and are responsible to them for the professional quality of the work produced by their organisation

<b>Term / Abbreviation</b>	<b>What it stands for</b>
National Statistician	The National Statistician is the Head of the Government Statistical Service. The National Statistician is the UK Government's chief professional adviser on statistical matters. The National Statistician has responsibility for the professional quality of the outputs comprising Official Statistics. In fulfilling this role, he or she will work closely with Heads of Profession for Statistics.
National Statistics	National Statistics is a quality mark applied to certain of the United Kingdom's Official Statistics. Statistics labelled as 'National Statistics' must comply with the Code of Practice for Official Statistics. They should, for example, be fit for purpose, methodologically sound, politically independent and transparently produced. National Statistics have been assessed by the UK Statistics Authority against the Code of Practice for Official Statistics and found to comply. The decision to designate a National Statistic as such is the decision of the UK Statistics Authority.
Official Statistics	Official Statistics (which include National Statistics) are statistical publications produced by bodies listed on the Official Statistics Order. These include NHS Digital.
Pre-Announcement	A programme of release dates for Official Statistics is pre-announced at least a year in advance to ensure producers are open and transparent about their plans.
Pre-release Access	An arrangement whereby Ministers and/or a limited number of officials have access to Official Statistics data for briefing, management, quality assurance or 3 <sup>rd</sup> party publication purpose in advance of the pre-announced date of release.
Pre-release Access to Official Statistics Order 2008	The legislation relating to the granting of pre-release access to Official Statistics in their final form.
Publication Hub	All Official Statistics produced across the Government Statistical Service are pre-announced on and accessible from the UK Statistics Authority publication Hub.
Statement of Compliance	Each Government Statistical Service organisation responsible for producing National Statistics must publish a Statement describing the arrangements they have put in place to ensure their compliance with the Code of Practice for Official Statistics.
Statistics and Registration Services Act 2007	The Statistics and Registration Services Act (S&RS Act) was implemented in April 2008 and created the UK Statistics Authority.

Term / Abbreviation	What it stands for
UK Statistics Authority	<p>The UK Statistics Authority (UKSA) 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.</p> <p>The UK Statistics Authority's overall objective is to promote and safeguard the quality of Official Statistics that serve the public good. The Office for Statistics Regulation is the regulatory arm of the UK Statistics Authority, required to promote and safeguard:</p> <ul style="list-style-type: none"> <li>• the quality and comprehensiveness of Official Statistics</li> <li>• good practice in relation to Official Statistics</li> </ul> <p>The Statistics Authority has three main functions:</p> <ul style="list-style-type: none"> <li>• oversight of the Office for National Statistics (ONS) - its executive office</li> <li>• monitoring and reporting on all Official Statistics (The Office for Statistics Regulation)</li> <li>• independent assessment of Official Statistics (The Office for Statistics Regulation)</li> </ul> <p>Membership of the Statistics Authority's Board comprises:</p> <ul style="list-style-type: none"> <li>• the Chair</li> <li>• at least five other non-executive members (some appointed after consultation with the devolved administrations)</li> <li>• the National Statistician, directly responsible for the work of the current ONS, reporting to the Statistics Authority not ministers, and the Statistics Authority's Chief Professional Statistical Adviser and Chief Executive, and</li> <li>• two other executive members</li> </ul>

## 4. Equality Impact Assessment and Privacy Impact Assessment

An Equality Impact Assessment initial screening was completed in January 2017. The recommendation was that this policy does not require a full assessment.

## 5. Legal/Risk Mitigation

This policy is to ensure NHS Digital meets the requirements of section 13 of the Statistics and Registration Services Act 2007 (S&RS Act). This will include the requirements of any secondary legislation that is passed to support The S&RS Act e.g. the Pre-release Access to Official Statistics Order 2008.

NHS Digital also aims to comply with the 8 principles and 3 protocols of the Code of Practice for Official Statistics for its National Statistics and as best practice for its Official Statistics.

## 6. Rights and Responsibilities

The Statistical Governance Policy applies to:

All staff, producing Official Statistics, working for or on behalf of the organisation including employees, temporary staff, contractors, and secondees.

All data and information which are held by the organisation, either solely or jointly, which are provided or planned as part of the Official Statistics services and product range of the organisation including:

- Electronic records, microfiche and microfilm and publications
- All IT application systems within the organisation including websites, databases, information systems, web based tools e.g. iView and registers
- Suppliers of information to NHS Digital

NHS Digital will comply with the Code of Practice for Official Statistics for all National Statistics and as best practice for all Official Statistics.

## 7. Principles

### 7.1 Policy on Principle 1: Meeting User Needs

- NHS Digital will ensure that the production, management and dissemination of Official Statistics will meet the requirements of informed decision-making by government, public services, business, researchers and the public by adopting the following approach.
- NHS Digital will regularly consult with users of statistics (e.g. government, business and the community) to ensure its statistical publications and their source data remain relevant.
- The organisation will seek the views of users by asking for feedback in every publication. User views will be welcomed and considered.
- Major changes to reports or collections designated as National Statistics by the The Office for Statistics Regulation including substantial changes to methodologies, data sources and formats of presentations will involve formal user consultation.

- Formal or informal consultation on smaller changes to other official statistics will be proportionate to the overall impact on users as determined by the NHS Digital Head of Profession.
- Results from consultations will be made available to users.
- NHS Digital will adopt systematic statistical planning arrangements, including transparent priority setting, that reflect the obligation to serve the public good.
- NHS Digital will publish statistical reports according to a published timetable that takes account of user needs.
- The Head of Profession will work closely with the GSS to ensure that developments in the Health and Care Theme are reflected and encourage a coherent statistical service from national producers of official statistics.
- The NHS Digital Contact Centre will manage the enquiries coming into the organisation. NHS Digital will respond openly to all enquiries about Official Statistics, including from the UK Statistics Authority and Parliament, and, subject to resources and legal and confidentiality constraints, will make all records open to scrutiny on request within 20 days.

### Management Information

- NHS Digital will promote the use of timely data to inform management decision making as set out in the National Statisticians' Guidance to Management Information.

## 7.2 Policy on Protocol 1: User engagement

- NHS Digital will seek to ensure effective user engagement which promotes trust in statistics and secures maximum public value.
- Consultations with users of statistics on the design, production and evaluation of Official Statistics will aim to be:
  - an integral part of the statistical process
  - clear, simple and transparent
  - focused, scaled and inclusive
  - co-ordinated to maximise value and minimise burden
  - Access to National Statistics will be made as easy as possible.
- NHS Digital will welcome customer feedback.

## 7.3 Policy on Principle 2: Impartiality and Objectivity

- NHS Digital will ensure that Official Statistics, and information about statistical processes, are managed impartially and objectively.
- NHS Digital will publish statistical reports in an orderly manner, in accordance with Protocol 2.
- NHS Digital will strive to promote equality of access to Official Statistics making them accessible to the widest possible community.
- All Official Statistics publications will be made available free of charge on the NHS Digital website. Charges for additional analyses will be in line with the organisational policy.

- NHS Digital will be open and transparent about any revisions and will ensure that users have easy access to comprehensive information about those revisions. Revisions to Official Statistics will be produced in accordance with the NHS Digital Revisions Procedure.
- Scheduled or planned revisions to releases will be published on the NHS Digital website.
- NHS Digital will manage published errors in accordance with its incident reporting and learning processes and report them in accordance with the NHS Digital Revisions Procedure.

## 7.4 Policy on Principle 3: Integrity

- NHS Digital will ensure that at all stages in the production, management and dissemination of Official Statistics; public interest will prevail over NHS Digital, political or personal interests.
- NHS Digital may respond, in an impartial manner, to any misunderstandings or misleading interpretations of outputs.
- Final responsibility for the content, format and timing of the release of Official and National Statistics will rest with the NHS Digital Head of Profession acting, where necessary, in consultation with the National Statistician.
- Publication release dates will not be influenced by the content of the release or set in such a way as to create a presumed advantage to any particular group or individual.
- NHS Digital will follow all statutory obligations and internationally endorsed guidelines governing the collection of data, confidentiality and release.
- As much detail as is reliable and practicable will be made available, subject to legal and confidentiality constraints.

## 7.5 Policy on Principle 4: Sound Methods and assured Quality

- NHS Digital will ensure that the statistical methods used are consistent with scientific principles and internationally recognised best practices, and are fully documented. Quality will be monitored and assured taking account of internationally agreed practices.
- The NHS Digital Head of Profession will be responsible for ensuring that these principles are followed.
- NHS Digital's Publications Process provides a coherent and systematic process for the production of Official and National Statistics, including scope, purpose and methodology to secure publications are fit for purpose and of high quality.
- The selection of statistical sources, methods and procedures is a professional responsibility and will be based on scientific principle and best international practice, taking into account cost implications to Government and providers.
- Processes and methods used to produce Official Statistics will be fully documented.
- Knowledge of Official Statistics will be supported by published quality measures.

## 7.6 Policy on Principle 5: Confidentiality

- NHS Digital will ensure private information about individual persons (including bodies corporate) used in the production of Official Statistics will be confidential and used for statistical purposes only.
- All staff involved in the production of Official Statistics will be made aware of their obligations to protect confidentiality and of the legal penalties likely to apply to wrongful disclosure. These obligations will continue to apply after completion of service.
- NHS Digital will follow the practices of this principle with the following two exceptions:
- With regard to the first practice of this principle, NHS Digital will not publish statistics that are likely to identify an individual unless informed consent has been obtained from that individual.
- However, there is a critical distinction in the fields of health statistics between patient confidentiality and practitioner confidentiality. The Protocol's wording always holds good for patients but does not precisely apply to practitioners or organisations. Publishing information about practitioners or organisations (e.g. Clinical Commissioning Groups (CCGs), hospital trusts, Local Authorities), in relation to their activities in the public service, can be an important element of the portfolio of information which both patients and professionals require in their assessments of services. An organisation whose information is held and may be published will be notified.
- Publishing information about Practitioners, in relation to their activities in the public service, will follow the Information Commissioners Office (ICO) advice on releasing staff details.
- Restricted access to data which identifies individuals will be agreed by the organisation's Caldicott Guardian.
- For information on how NHS Digital secures patient information and restricts access, please contact our Data Access Request Service ([DARS](#))

### 7.7 Policy on Principle 6: Proportionate burden

- NHS Digital will ensure that the cost burden on data suppliers is not excessive and is assessed relative to the benefits arising from the use of the statistics.
- NHS Digital will ensure that it keeps the cost burden on data suppliers to a minimum by:
  - Using the Review of Central Returns (ROCR) process which is managed by NHS Digital and the Outcomes and Information Development Board which covers social care and is managed by DH, jointly chaired by DH and the Association of Directors of Adult Social Services (ADASS) and which NHS Digital attends. These are in place to try and ensure data are collected only once but used many times
  - Complying with ONS Survey Control requirements
  - Sourcing data from administrative sources, surveys and collections from NHS and Social Care organisations
- NHS Digital will regularly review its outputs to ensure its finite resources have maximum positive impact with the statistics it produces.

### 7.8 Policy on Principle 7: Resources

- NHS Digital will ensure that the resources made available for statistical activities should be sufficient to meet the requirements of the Code of Practice for Official Statistics and are used efficiently and effectively.

- The provision of Official Statistics will be effectively managed.
- Processes and methods used to produce Official and National Statistics will be documented in accordance with the NHS Digital Statistical Publication Process.
- NHS Digital recruitment will ensure statistical staff (those reported to the National Statistician's Office as being entitled to be called/having the status of statistical officer or statistician) are recruited and promoted following GSS guidance.
- Statistical staff within the organisation will be responsible for their own professional development. They will follow GSS guidance to keep an up to date Continuing Professional Development logbook.
- NHS Digital will ensure that resources are available for continuance of Official and National Statistics subject to changes made following consultation, and in accordance with – for National Statistics – procedures agreed by the UK Statistics Authority.

## 7.9 Policy on Principle 8: Frankness and Accessibility

- NHS Digital will ensure that Official Statistics, accompanied by a level of commentary that meets user needs, will be readily accessible to all users.
- NHS Digital will ensure that publications are easy to use and interpret, and incorporate factual information about the statistics. Publications will be published in a variety of formats, utilising new technologies appropriately.

## 7.10 Policy on Protocol 2: Release Practices

- NHS Digital will ensure that statistical reports will be released into the public domain in an orderly manner that promotes public confidence and gives equal access to all, subject to relevant legislation.<sup>1</sup>
- Releases of Official Statistics will be pre-announced on both the NHS Digital and UK National Statistics Publication Hub up to one year in advance of publication and the exact date of release will be announced at least 4 weeks in advance of release. For any exceptional circumstances the release period will be agreed with the Head of Profession for Statistics. All NHS Digital National and Official Statistical publications will be made available online at 09:30 on the day of release.
- NHS Digital will maintain lists of those officials who received pre-release access to the data. This includes those with access for management, briefing, quality assurance or third party publication purposes. Those officials being briefed on the content of a statistical release will receive access no more than 24 hours ahead of publication. Alongside each publication, a list of those officials who received pre-release access to the data for briefing or third party publication purposes will be published.
- All information that is shared ahead of its official release will be accompanied by guidance for recipients of the purposes for which the information is shared, the potential damage of unauthorised release, and the responsibilities on those with whom it is shared.
- Any unplanned release of information ahead of its official release will be investigated according to NHS Digital's incident processes and reported to the National Statistician if required under the Code or National Statistician's guidance.

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<sup>1</sup> [http://www.opsi.gov.uk/si/si2008/draft/ukdsi\\_9780110832203\\_en\\_1](http://www.opsi.gov.uk/si/si2008/draft/ukdsi_9780110832203_en_1)

- Release arrangements for revisions will be determined by the Head of Profession taking account of the size and extent of the revision's likely impact on users. The NHS Digital Revisions Procedure will be followed.

### **7.11 Policy on Protocol 3: The use of administrative sources for Statistical Purposes**

- The Code of Practice for Official Statistics states that administrative sources should be fully exploited for statistical purposes, subject to adherence to appropriate safeguards.
- The NHS Digital Information Asset Owners are the data managers within the organisation. They are responsible for:
  - guarding the integrity and security of their data holdings in accordance with the NHS Digital Security Policy
  - compiling and maintaining metadata to cover the whole life cycle of each of the statistical resources they manage
  - maintaining their resources in line with the organisation's Document and Records Management Policy
- NHS Digital has a Statement of Administrative Sources<sup>2</sup>.

## **8. Governance**

### General policy management

- The Statistical Governance Policy will be reviewed at least annually.
- Any changes to the policy will be approved by the Head of Profession for Statistics.
- The corporate master version of this policy and all its supporting documents is owned by the Head of Profession for Statistics who will maintain change control procedures and hold the corporate record.

Internal NHS Digital staff training is developed and delivered (or commissioned from external bodies) by the Statistical Governance Team. This includes:

- awareness training as part of the personal development plans of staff producing Official Statistics
- specialist training for organisation Programme Heads, Programme Managers and Section Heads responsible for the collection, analysis or dissemination of Official Statistics to enable them to comply with their obligations
- input into corporate organisation induction training
- refresher training offered to all organisation staff for new/changed requirements (e.g. a change in legislation, corporate policy)
- bespoke training as necessary

Statistical Governance (SG) staff will attend specialist training (where provided) to ensure that they keep up-to-date with the latest information and legislation and can provide expert SG advice to the organisation.

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<sup>2</sup> <http://content.digital.nhs.uk/article/1789/Statement-of-administrative-sources>

Promotional material to publicise and raise awareness of Statistical Governance Policy and procedures will be developed and maintained on the organisation internet. It is the responsibility of the SG Team to develop and maintain this promotional material.

### **Related Documents**

These are listed in the next section. Where internal web links have been provided access via these links is restricted to internal NHS Digital staff only. However, where possible, documents accessed via internal links can be provided on request. Please contact the NHS Digital contact centre on 0845 300 6016 or email [Enquiries@nhsdigital.nhs.uk](mailto:Enquiries@nhsdigital.nhs.uk) to make a request.

## **9. References**

### **Documents required to support the policy (public unless stated otherwise).**

NHS Digital Disclosure Control Procedure

NHS Digital Data Access and Information Sharing Procedures (not public)

NHS Digital Statistical Publication Process (not public)

[NHS Digital Pre-release Access Statement of Compliance](#)

[NHS Digital Revisions Procedure](#)

### **Other supporting documents**

[NHS Digital Statement of Administrative Sources](#)

### **Staff training**

Published training programme for staff

### **Related information governance policies and relevant legislation and regulations - Internal**

IG Legal Compliance policy

Document and Records Management Policy

Information Security Policy

Re-Use of Information, Re-use Licence Fees Policy