



# **WRITTEN EVIDENCE FOR ASSESSMENT: ORGANISATION LEVEL**

**Information Services Division,  
NHS National Services Scotland**

**v2.0, 04/05/2012**

**Version 1.1**

**November 2009**

## ORGANISATIONAL EVIDENCE FOR ASSESSMENT

### Introduction

The assessment process established by the *Statistics and Registration Service Act 2007* relates to individual statistical outputs. But some elements of the Code of Practice<sup>1</sup> relate to the producer body's practices as a whole. This part of the collection of evidence for assessment covers those policies and practices. The evidence we ask for in this document will apply to all subsequent assessments of your statistical outputs, thereby minimising the burden of the ongoing assessment programme. We will collect specific information for individual (groups of) outputs separately.

### Material required

This document asks for the evidence required in four sections:

1. links to documents that the Code requires you to publish.
2. other documents that should be available.
3. confirmation that you follow some standard practices, along with supporting evidence, and details of any exceptions.
4. additional evidence of Code-compliance relating to organisational practices.

The evidence collected in this document covers almost half of the practices in the Code. The relevant principles and practices from the Code are listed against each request.

This document focuses on drawing together existing evidence and asks for the minimum number of specific documents that demonstrate code compliance. You should only need to add a small amount of additional written material. Please don't provide additional documentation that does not relate to compliance with the Code, or that duplicates material provided elsewhere. When providing information, please:

- provide evidence that is specific to your organisation, not generic or GSS-wide;
- refer to relevant content on your website wherever possible and provide direct links;
- refer to published statements and policies that cover your organisational approach to statistical issues; and
- add other existing documentation where relevant, referencing relevant sections.

This document only covers organisation-wide evidence. We will collect information about specific statistical outputs separately during the assessment programme.

It would be helpful for us, and for users, if you publish all the relevant documents required by the Code in a single area of your website. This will enhance accessibility and transparency.

Once completed, this statement of evidence will remain a live document. Please keep us informed as any of the information in the document changes, and confirm during December each year that the information is up-to-date. Please do so by emailing the Assessment Team at [assessment@statistics.gsi.gov.uk](mailto:assessment@statistics.gsi.gov.uk). In the event of other significant organisational changes affecting the statistical production process, such as restructuring of departments, we will discuss with you separately the provision of new organisational evidence.

If you have any enquiries about this request please contact the Assessment Team.

Thank you.

**ASSESSMENT TEAM  
NOVEMBER 2009**

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<sup>1</sup> <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/code-of-practice-for-official-statistics.pdf>

## DECLARATION BY HEAD OF PROFESSION (OR EQUIVALENT)

I confirm that the information contained in this form is accurate, as at the date below.

Name: Duncan Buchanan, Head of Statistics

Organisation: Information Services Division, NHS National Services Scotland

Date: 04/05/2011

<b>Version control</b>			
<b>Version</b>	<b>Date</b>	<b>Description</b>	<b>Distribution</b>
various (previous numbering, v0.1 – v5.9)	various, Dec 2009 – Feb 2010	Various drafts worked through by ISD Head of Statistics team, incorporating contributions by a range of ISD staff including Senior Management Team and Statistical Advisory Group	various (internal)
1.0	3 February 2010	First final version.	UK Statistics Authority (03/02/10); various internal; other external (for info) to be confirmed
1.1	31 May 2010	Update of various sections	
1.2	February 2011	Update of various sections	UK Statistics Authority 03/02/11, and published by ISD
1.3	April 2011	Update of various sections	Philip Johnston
1.4	February 2012	General update, reflecting ISD developments since April 2011	Philip Johnston
1.5[tracked]	May 2012	General update, reflecting ISD developments since February 2012	Philip Johnston
1.5[detracked]	May 2012	Minor edits from 1.5[tracked]	Philip Johnston
2.0	May 2012	As 1.5[detracked] but version changed to v2.0	Philip Johnston; UKSA; and published

## SECTION 1 – PUBLISHED DOCUMENTATION

Please provide links to the following documents, which the Code of Practice requires you to publish.

- 1.1 Timetable of statistics releases over the coming year (Principle 1.4, Protocol 2.2).

The forthcoming page of the ISD website provides a list of all statistical publications (National Statistics and others) planned for the next 12 months. Please see [here](#). This page is updated each month. Forthcoming ISD releases are also included in the Scottish Government list of forthcoming publications (see [here](#)) and on the UK National Statistics Publications Hub (see [here](#)).

- 1.2 Information about users' experiences of statistical services, data quality, and the format and timing of reports (Principle 1.5).

ISD conducts an annual customer survey each year aimed at a wide range of users of our services and products including users of our website, those registered for our regular updates and those requesting specific data and analyses. Results from the ISD Customer Surveys are published, details of the 2010 survey are available from [here](#). A report from the 2011 survey is expected to be published in May 2012. Results from these surveys help ISD monitor customer experience and improve our products and services. The results also contribute to ISD performance management at NSS level.

ISD also undertake consultations – an example is the consultation on changes to Cancer Waiting Times statistics, a report on the consultation is available [here](#). Other examples are consultations on revisions of presentation of Waiting Times webpages (see [here](#)) and on a proposal for a new publication on Emergency Department statistics (see [here](#)).

The Scottish Government led a Review of Health & Care Statistics in 2010-11. The Scottish Government produced an internal report on the review. ISD contributed to the review.

- 1.3 Details of all approved exemptions and exceptions to the Code, and any breach reports (Principle 2.5, Protocol 2.8).

Details of any breaches and exemptions are published [here](#). Note that only 'major' breaches are recorded in this published listing and a separate listing of 'minor' breaches is kept, but not published. ISD has produced staff guidance on handling breaches, principally around breaches of early access, including Pre-Release Access.

- 1.4 Any organisation-level revisions policy (Principle 2.6).

The ISD Revisions Policy is available [here](#). Additional ISD Revisions Guidance was issued to ISD staff in March 2011 and is available on the NSS Intranet.

- 1.5 Details of the arrangements for confidentiality protection, including how the arrangements are sufficient to protect the privacy of individual information, but not so restrictive as to limit unduly the practical utility of the statistics (Principle 5.4)

ISD is a division of NHS National Services Scotland (NHS NSS), a special health board. As part of the NHS in Scotland NHS NSS takes seriously its duties and obligations on data protection and confidentiality. Information for the public is available on the NHS NSS website – see [here](#).

In addition further information on how ISD deals with confidentiality protection is available on the ISD confidentiality webpage – see [here](#).

This page includes links to

- a guide for patients
- a leaflet about Cancer Registry Data
- the Information Commissioner’s website and NHSScotland Information Governance webpages.

It also includes information on

- Protecting Patient Privacy
- NHS NSS Privacy Advisory Committee
- Research using personal data
- Secondary uses of health information
- Patient Confidentiality and Disclosure Control

In the context of the wider NHS, Health Rights Information Scotland has produced a series of leaflets about patients’ health rights, which can be accessed [here](#). In addition, information about the use of the Community Health Index (CHI) is included on the medical card issued to all NHS patients.

- 1.6 Links to authorisations from National Statistician or Chief Statistician in a Devolved Administration for any exceptions to the principle of confidentiality protection, if any (Principle 5.5).

There are no known prior authorisations for any exceptions to the principle of confidentiality protection.

Please note that within NHS National Services Scotland the Caldicott Guardian is responsible for decisions on releasing confidential information on patients rather than the Chief Statistician of the Scottish Government. Any authorisations for exceptions would be published [here](#).

- 1.7 Annual estimated costs of responding to your organisation’s statistical surveys (Principle 6.1).

The vast majority of the data collected and used by ISD are sourced from administrative and clinical sources operated by NHS Boards and partner organisations in Scotland (see the ISD Statement of Administrative Sources, available from [here](#)). A large part of ISD work is the provision of support services to NHS Scotland and the Scottish Government Health Department and others. These services are commonly based on the data that is also used for official statistics publications. As a result, and also because most of the data is a by-product of administrative and clinical sources from NHS

Scotland, it is not possible to produce such cost figures.

However any details of the surveys that ISD does undertake will be covered by the individual Output WEFA forms and published.

- 1.8 Published pre-release access lists (if required by the relevant Order), if a single document covers all your organisation's outputs. If pre-release access lists are linked to individual products we will pick this up during the assessment programme (Protocol 2.7).

Although not required to by the relevant legislative Order, ISD publishes information on provision of Pre-Release Access. The information is contained in individual publications. Information on provision of early access to management information, and early access for purposes of quality assurance, is also published.

- 1.9 Your organisation's guidelines about quality (Principle 4.4).

ISD's statistics are based on a wide range of data sets (approximately 100 in number, currently). Detailed quality guidelines commonly relate to individual, or groups of, data sets and outputs. The main organisational quality guidelines can be accessed from the following ISD webpages:

- [About Our Statistics](#)
- [Data Definitions & References](#)
- [Data Quality Assurance](#)
- [Data Protection and Confidentiality](#)
- [Data Recording Advisory Service](#)
- [Hospital Records Data Monitoring](#)
- [Structuring Healthcare Information](#)
- [Terminology Services & Clinical Coding](#)

ISD has used the European Foundation of Quality Management (EFQM) Excellence Model to assess its quality improvement and in October 2007 achieved the 'Committed to Excellence' award.

In common with all NHS Boards in Scotland, NHS National Services Scotland is assessed against the Clinical Governance and Risk Management National Standards, which are developed and monitored by NHS Healthcare Improvement Scotland. This reviews the performance of NHS NSS, including ISD, against a number of quality standards. The last review results are available [here](#).

ISD has also participated in Scottish Government statistics Cross-Office Networks, including one on quality.

There is a wide range of documentation available to staff on the NSS intranet, which includes guidance on presentation and checking, as well as statistical papers on best practice and methodologies.

## SECTION 2 – “OFF THE SHELF” DOCUMENTATION

Please provide the following additional documents, or links to them if they are published on your website. Most of these documents are requirements of the Code of Practice, but you may meet the requirements in different ways, so if the document is not available please say so, and provide any relevant details.

- 2.1 Documentation of users' needs relating to the statistical service your organisation (as a whole) provides (Principle 1.2, Protocol 1.1).

The users of ISD's services are internally classified as 'core' and 'non core' and user needs are documented in different ways depending on this. Core users are principally the NHS and partners such as local authorities, and Scottish Government - whom ISD, as part of NHS NSS, are funded to support.

The needs of core users are principally addressed, currently, through the individual work programmes across ISD - see [here](#). Core users feed into annual business plans via topic-specific steering, reference or user groups, which generally represent a cross section of NHS Boards, local and central government, and other key partners. A variety of other user groups exist, for certain of statistical products and tools which ISD provides for NHS Scotland and partners.

Individual programme plans feed into the overall ISD Business Plan. Performance review against this plan forms part of the NHS NSS annual report and the annual review of NSS by the Scottish Government (ie including assessment of performance against the the NSS Local Delivery Plan).

A National Information & Intelligence Framework for Health & Social Care (NI&IF) in Scotland has been established, with one of its aims being to set out the strategic priorities for ISD. An NI&IF Governance Group will steer ISD's strategic priorities. As part of the development of the National Information & Intelligence Framework, approximately 70 senior users and stakeholders of health and social care were interviewed.

Users needs are also documented in the ISD Strategic Business Plan 2011-12 – 2016-17. This incorporates findings from the ISD Delivering Our Future initiative, which included structured engagement with a selection of 'critical friends' representing key stakeholder groups within the NHS and government, e.g. clinicians, finance and planners.

For information on the ISD Customer Survey, the Review of Health and Care Statistics and on ISD consultations, see 1.2.

Non-core customers are identified in a variety of ways, for example through the website, customer updates and surveys.

Users can register for regular updates on the ISD website - see [here](#). An ISD Customer Update newsletter is available to customers each month with links to recent news, outputs and products and the chance to feedback. Circulation is currently over 500 each month - an example is [here](#) .

A number of ISD business areas contact users through a distribution list newsletter - an example is [here](#).

Feedback from the ISD Customer Survey on specific issues is forwarded to

the relevant team for consideration. The redeveloped ISD website, launched in May 2011, was partly influenced by feedback received from previous ISD customer surveys. ISD organises themed conferences and seminars based on feedback from customers, for example on 'quality improvement' in 2010 to promote the change from SASM (Scottish Audit of Surgical Mortality) to eSASM. ISD also organised a conference on SCIMP (Scottish Clinical Information Management in Practice).

A central database of information requests is maintained across ISD with user contact details and details of all requests, which some business areas use to monitor user needs and tailor statistics releases – for more information on information requests see [here](#).

Scotstat is the network for users and providers of Scottish Official Statistics (see [here](#)). Scotstat members registered for Health and Care statistics are provided with routine updates of ISD publications and consultations.

Scotstat stakeholder views are sought via:

- the Scotstat Board
- a Scotstat network for analysts in local government and public bodies
- participation at Scotstat User conferences.
- other feedback, complaints and suggestions

ISD also participates in the Scotstat User Network. ISD has chaired the Scotstat 'Health and Care' Committee with wide user representation from government, local authorities, NHS and academia (note that the format of the Scotstat Health and Care theme is currently being reviewed).

2.2 Pricing policy for any supplementary statistical services for which a charge is made (Principle 2.9).

Many of ISD's supplementary statistical services, such as most bespoke information requests, are provided free of charge, as they are part of an overall programmed work for core customers. The ISD Information Request Charging Policy is available [here](#).

2.3 Declarations that staff with access to confidential data have to sign (Principle 5.2).

All members of staff confirm that they read and understand NHS NSS confidentiality guidelines at induction and on a yearly basis. The NHS NSS confidentiality guidelines were updated in 2011 and cover access to IT equipment and data, incident reporting, data security, disposal of confidential data and release of data.

In addition, to get access to specific confidential datasets, staff are required to gain approval by a senior member of staff. Access is strictly limited only for bona fide purposes and for to a maximum of 6 months after which access has to be renewed.

## 2.4 Learning and Development policies and competency frameworks (Principle 7.6).

ISD, as a division of NHS NSS, uses the Knowledge and Skills Framework (KSF) to document and manage the knowledge and skills NHS employees need to deliver quality services. KSF is the standard competency framework used by the vast majority of non-clinical staff in the NHS across the UK that are on the 'Agenda for Change' pay terms and conditions. It helps guide staff development, provide a fair and objective framework on which to base staff review and provide the basis of pay progression in the service. This is supported by the e-KSF tool – see [here](#).

All those posts within ISD that are on the Agenda for Change pay scale (i.e. the vast majority) have a KSF 'outline'. There are generic outlines, which apply to posts such as 'information analyst', describing knowledge and skills required for the post at two gateways (one after one year in post, the other nearer the top of the pay band). For all such members of staff, KSF outlines are the basis of ISD annual review process and are used to assess performance as well as identifying development needs.

To support staff in addressing their training and development needs a number of training courses and resources are available and can be found within the ISD Training Directory, the NHS NSS Learning and Development Guide and via the NHS NSS Learning Centre access to online learning and the learning library. An Analyst Training Programme has been developed and is to be introduced in 2012-13.

The Learning & Development strategy is to build on this foundation, aligning training suggestions to support a structured career pathway and also organisational change. Learning and development policies are available on the NHS NSS intranet.

As well as mandatory courses on KSF and PQ requests, staff in ISD have the opportunity to attend some general courses, for example in building customer relations, communications and assertiveness and project management. Specific training for analysts is provided in Business Objects XI Web Intelligence, Excel VBA and other internal IT support as well as training in better presentation and interpretation of information. External courses are offered on a variety of skills, including Writing About Numbers, and Principles of Information Design, with approximately 50 staff attending each of these courses so far.

In November 2011 over 20 ISD staff attended a course on Statistical Commentary, delivered by the National Statistician's Office. ISD plans to roll-out training on this across ISD.

A series of internal staff training seminars are undertaken, covering a variety of topics, including on a selection of statistical techniques and technical skills.

ISD staff also attend a range of statistical governance events – eg Scottish Government seminars on 'Statistical Reform', GSS training on 'Quality Assurance', etc – where developments and best practice can be brought back to ISD.

A survey – ‘ISD Analytical Strategy – Analyst Survey’ - of ISD analysts, to find out about use of data marts, Business Objects and analytical software in ISD, was carried out in January 2011. It was mainly driven by ongoing work to develop an Analytical Strategy for ISD. Results were published on the NSS intranet in April 2011.

2.5 Documentation on recruitment process for analytical staff (Principle 7.6).

Information on the careers in ISD and advertisements for jobs are available [here](#). All NHS NSS advertisements can be found on the NHS NSS Intranet in the weekly NHS NSS recruitment Bulletin. They can also be accessed online via the public SHOW (‘Scottish Health on the Web’) website along with all other vacancies in NHS Scotland – see [here](#).

ISD carry out generic recruitment for information analysts and statisticians across the whole division based on generic job descriptions for each Agenda for Change grade. The job profiles for these descriptions were created at a national (UK) level but ISD led on the creation of profiles for all NHS statistical staff through consultation, on behalf of the Royal Statistical Society. The profiles for analysts can be found [here](#). In particular the profiles for ‘Information Analyst’, ‘Information Analyst Specialist’, ‘Information Analyst Advanced’ and ‘Information Analyst Principal’ equate to the Agenda for Change bands 5, 6, 7 and 8A/8B respectively which together cover most of the analytical staff within ISD.

Documentation on the recruitment process is available on the NHS NSS Intranet. Interviews for information analyst posts follow a Competency Framework that is mapped to the relevant job description and job profile described above.

2.6 Details of any accidental or wrongful releases that you investigated and reported to the National Statistician (Protocol 2.8).

Details are published [here](#). Note that only ‘major’ breaches are included in this list. A separate list is kept, but not published, of ‘minor’ breaches. ISD is preparing staff guidance on handling breaches, principally around breaches of early access, including Pre-Release Access.

2.7 Statement of Administrative Sources (Protocol 3.5).

The vast majority of official statistics that ISD produce are sourced from administrative and clinical data sources provided by NHS Scotland. The ISD Statement of Administrative Sources is available from [here](#).

## SECTION 3 – INTEGRITY AND STATISTICAL PRACTICES

### Part A

Please give examples of how your organisation meets the following requirements of the Code.

- 3.1 Those producing statistical reports are protected from any political pressures that might influence the production or presentation of the statistics (Principle 3.2).

ISD statisticians work closely, and are in daily contact with, Scottish Government policy and analytical colleagues and have close links to the policy process. However ISD is a division of NHS National Services Division, which is an NHS body at arms length from the Scottish Government with its own statistics Head of Profession, and its own Chief Executive. This helps to reduce the risk of political pressure on the production of official statistics.

ISD and the Scottish Government Health Department have an agreement on the respective roles and responsibilities around publication of official statistics which was agreed by both parties and signed by the Director-general of the Health Department and NHS NSS Chief Executive. This confirms that the final responsibility for the content, format and timing of releases lies with ISD. This is covered in the following documents: 'Pre-Release Access to Official statistics Publications, 16 March 09'; 'Protocol for ISD and SGHD staff covering Pre-Publication Access'; and in various sections of the ISD Publication Protocol. These documents have all been the focus of various types of staff training and awareness and are all available on the NHS NSS intranet.

Roles and responsibilities are also described in the Framework for Scottish Official Statistics published by the Chief Statistician of the Scottish Government with input from ISD (available from [here](#))

Within ISD, official statistics publications are overseen by senior staff with a process that requires every publication to have senior approval for release.

ISD staff attend monthly Scottish Government 'publication handling meetings' – see 3.4.

- 3.2 A culture within which statistical experts can comment publicly on statistical issues, including the misuse of official statistics is promoted (Principle 3.7).

ISD statistical publications are now almost always produced in a standard 'Publication Report' format. These are accompanied by a Publication Summary (recent examples can be accessed via the ISD 'Latest Publications' webpage – see [here](#)). Each Publication Summary includes key points and background information about the publication or release. These are designed to offer objective and clear commentary on the release for the general user including the media. The more detailed Publication Reports generally offer more extensive statistical commentary.

ISD routinely deals with a number of media enquiries for information/advice and these are responded to through an internal network of media spokespeople; these requests generally result in ISD analysts, managers or clinical advisors contacting journalists directly. Guidance on handling media

enquiries is included in the 'ISD Information Request Protocol', see [here](#).

ISD will on occasion write to the media to correct published errors or misinterpretation.

In 2008, NHS NSS took a high profile landmark legal case to the House of Lords regarding the potential release of disclosive data under the Freedom of Information (Scotland) Act. This was after appealing against a decision by the Scottish Information Commissioner and was aimed at protecting the principle of confidentiality through statistical disclosure control. A final decision statement was issued by the Scottish Information Commissioner on the outcome of this case (see [here](#)). NHS NSS statements on the outcome are available [here](#) and [here](#).

3.3 No indication of the substance of a statistical report is made public or given to the media or any other party not recorded as eligible for access before publication (Protocol 2.8).

ISD have a managed process to pre-release access that conforms to the Scottish Parliament's Official Statistics Order and is set out in the ISD Publications Protocol. Access is restricted by a coordinated process within which central staff working to the Head of Statistics and Head of Profession provide pre-release access links and documents for all ISD publications to a limited number of named Scottish Government, NHS Board and other relevant contacts.

Any other pre-release access is relatively rare and has to be agreed with the ISD Head of Statistics.

Through an agreed process, statisticians in the Scottish Government Health Directorate and in the Scottish Government Justice Directorate control access to ISD publications to named policy and other contacts within government and keep records on behalf of ISD.

The Director of ISD wrote to NHS Board Chief Executives and Communications Leads in January 2009 to describe the new regulations around pre-release access and recipients are reminded of their obligations in a covering statement with each release. The Director of ISD issued a further letter in May 2011, describing changes arising from the implementation of the new ISD website and reminding recipients of obligations around pre-release access.

The majority of the data that ISD works with are derived from administrative sources. Such data is commonly available in forms related to, and in advance of, published official statistics. For example, data might take the form of 'management information'. Data might also be shared prior to publication for purposes of 'quality assurance'. For such types of early access there is detailed guidance for ISD staff, e.g. in the ISD Publications Protocol and elsewhere, to ensure that sharing is restricted and that data recipients understand their obligations.

Training is also provided to new members of staff to ensure adherence to regulations and to the ISD Publications Protocol.

- 3.4 Government statements issued alongside statistics, and referring to, or based upon them, meet the standards set out in the Code (Protocol 2.9).

As part of a body at arms length from the Scottish Government, ISD does not routinely input into government statements issued alongside our statistics releases, although ministerial comments are often released at the same time as ISD statistical releases. Ministerial comments are normally discussed by Scottish Government communications staff and statisticians, who have their own internal guidance on this. On occasion ISD seek to provide comment on draft statements where they refer to, or relate to, data released by ISD. In these cases ISD will liaise with government statisticians and communications staff in the Scottish Government over content.

It is agreed common practice now for any government statement alongside ISD statistical releases to refer to ISD as the source of the data, describe the status of the statistics (e.g. Official Statistics, National Statistics, management information) and provide a prominent link to the official statistics release – see example [here](#). ISD will alert government colleagues in cases where this has not happened.

During the 5-day pre-release access period the Scottish Government normally convene a ‘publication handling meeting’ consisting of relevant government statisticians, policy, communications and other staff, and also (generally senior) ISD analysts and ISD Assistant Head of Statistics. These meetings allow Scottish Government communications staff to gain an understanding of the statistics and agree lines to take with Scottish Government policy / statistician colleagues. Comments and feedback on the release are also provided to ISD attendees and are dealt with in line with protocols described in 3.1 above. On occasion, low profile publications are not discussed at the handling meetings, as agreed between ISD and the Scottish Government.

## Part B

If any of the following situations have occurred, please give details, including any resulting changes to organisational policies or practice. If none, state “none” in the appropriate box.

- 3.5 Regular statistical reports not released, free-of-charge, on the internet (Principle 2.8).

None

- 3.6 National Statistics releases not accessible from the National Statistics Publication Hub (Principle 2.3, Protocol 2.3).

None [Note that ISD adds all Official Statistics publications to the Publication Hub.]

- 3.7 National Statistics not issued at the standard time of 9.30am on a weekday (Protocol 2.4).

None

- 3.8 Changes to pre-announced release dates not publicised or fully explained (Protocol 2.5).

None

- 3.9 Delays to releases influenced by non-statistical matters, or decided by someone other than the statistical Head of Profession (Protocol 2.5)

None

- 3.10 Statements or comment about the figures released alongside statistical reports, or statements or comments – based on prior knowledge – were issued to the press or published ahead of the publication of the statistics (Principle 3.1).

None

- 3.11 The Head of Profession did not have sole responsibility for deciding statistical methods, standards and procedures, and on the content and timing of statistical releases (Principle 3.3).

None

- 3.12 Statutory obligations and internationally endorsed guidelines governing the collection of data, confidentiality, and release not followed (Principle 3.4).

None

- 3.13 The National Statistician was not informed about complaints that relate to professional integrity, quality or standards (Principle 3.5)

None

3.14 Individuals abused the trust placed in them for personal gain (Principle 3.6).

None

3.15 Statutory guidelines and relevant codes of practice not observed in relation to the handling of personal data (Protocol 3.1).

None

## SECTION 4 – ADDITIONAL INFORMATION

- 4.1 Please provide any additional details of organisation-wide initiatives to identify and engage with users, in accordance with Protocol 1 of the Code, which are not already covered above. In particular, please tell us how engagement with users influences statistical planning and priority setting (Principle 1.1, Principle 1.3, Principle 7.2, Protocol 1).

In addition, please see answer to 2.1.

ISD is engaged in a comprehensive organisational review, designed to help meet changing customer needs. Prior to this organisational change ISD operated around 20 topic-specific steering groups. The organisational change is expected to result in changes to the network of these steering groups. More information on the organisational change is available from [here](#) [see link under 'A Fitter Future'].

In common with other NHS Boards, NHS NSS agrees a Local Delivery Plan (LDP) each year with the Scottish Government that describes how the Board is going to deliver the NHS priorities and performance targets – a copy is available on request. ISD contributes a number of objectives from the ISD Business Plan into the LDP in discussion with the Scottish Government. Performance against the Plan is reported each year in the Annual Report (see [here](#)) and reviewed each year in an Annual Review with Scottish Government Ministers.

ISD staff were involved in hosting the Royal Statistical Society Annual Conference in Edinburgh in September 2009 – e.g. on the organising committee, chairing sessions, presenting. ISD also funded attendance of approximately 20 staff..

UK Health Statistics Users' Group – ISD presented at the 2010 annual conference and is represented on its committee. ISD uses this group as another community for feedback on consultations etc.

ISD analysts and medical staff collaborate on research projects with researchers in other organisations and contribute to and lead on research publications. ISD are preparing to publish a list of such work.

ISD staff regularly present at national and international research conferences – details of one example (the European Society of Cardiology (ESCARDIO) Congress) are available in this [newsletter](#) (see final article).

ISD also has a Scottish Health Information Service Research (SHIS-R) programme, specifically designed to help meet the needs of the 'research' user community, via controlled access to detailed data – see [here](#) for more information.

ISD has a Communications Manager who arranges a number of services for users including production and issue of electronic newsletters, preparation of promotional material, and attending and displaying at health-related conferences and events. Programme leaflets and posters give a brief explanation of ISD's services and contact information – one example is the Women and Children's Health Information Programme newsletter, example copy [here](#).

The ISD website includes a 'MyISD' option where users can create a personalised webpage, for easier access to information which is of particular interest to them. The ISD website also allows users to subscribe to RSS feeds. Each ISD publication enables users to provide ratings on five questions and also give additional comments.

The annual ISD Customer Survey allows respondents to provide a range of free text comments and to provide contact details for future engagement (see 1.2).

ISD routinely request feedback from customers who receive information via bespoke information requests. Information gathered in this way aims to help improve service delivery, build organisational capability, enhance customer and partner engagement, and develop staff.

In 2011 an ISD staff member participated in one of a series of videos on Surgical Profiles statistics. This particular video, available [here](#), aims to help users understand 'control charts' which are a feature of the Surgical Profiles publications.

ISD publications are publicised via Twitter, using the NHS National Services Scotland 'NHSNSS' account. The '#isdscotland' hashtag is used.

- 4.2 Please provide a copy of a business plan that includes your organisation's statistical activities, highlighting:
- the budget, number of staff, and any budget set aside for user consultation;
  - information about how you monitor expenditure against work programmes and demonstrate effective stewardship of resources allocated to statistical work; and
  - any records you may have showing the relationship between the statistical planning process, the work programme, the allocation of resources, and the outcomes (Principle 7.1, Principle 7.3, Principle 7.4).

See also 2.1.

ISD is funded from the NHS NSS allocation, which is received from the Scottish Government, with additional funding on an annual basis provided for specific projects and programmes of work. As such, NHS NSS is subject to scrutiny by, and is accountable to, the Scottish Government in terms of expenditure and use of resources. Summary information on financial reports is contained in NHS NSS Annual Reports, available from [here](#).

In the planning and budgeting process ISD does not distinguish analytical staff working on official statistics, from the other services that these staff provide, such as management information and research. ISD does not produce a separate statistical business plan since statistical work is covered in team plans and priorities are reflected in the overarching ISD Business Plan. However a plan of work is produced for the Head of Statistics team, which covers areas such as statistical governance.

ISD places all programme and group business plans on the NHS NSS

intranet.

In January 2010, ISD provided information on estimated analytical staff resources and costs, i.e. those involved in the preparation and publishing of official statistics publications, as a contribution to the National Statistician's Statement.

Effective stewardship of resources is achieved through staff training, recruitment and retention. The ISD Workforce Plan includes information on drivers for change, policies, staff group projections and recommendations. The writing up of Business Plans (five-year and one-year plans at various levels) also contributes to managing resources effectively.

The ISD Business Plan is monitored quarterly by the Senior Management Team plans are monitored within the respective areas, commonly involving oversight by steering groups.

#### 4.3 Please tell us how your organisation publicises its statistical outputs (Principle 8.4).

**See also 4.1.**

##### **Website**

All ISD publications are published on the ISD website [www.isdscotland.org](http://www.isdscotland.org). Collaborative publications, such as those issued by the Scottish Public Health Observatory, and clinical audits such as the Scottish Audit for Surgical Mortality, are linked to or available from the ISD website. Links to the ISD website can be followed from other relevant websites including the Scottish Government and Scottish Health on the Web (SHOW) – see [here](#).

The ISD website hosts a number of access points to official statistics publications including:

- . links to the most recent month's publications from the home page
- . latest and forthcoming publications pages
- . a search tool
- . The 'A to Z' index
- . Links to individual 'Health Topic' and Products & Services' sections
- . details on how to access further information

Forthcoming publications are pre-announced on the website for the next 12 to 15 months and are updated on a monthly basis. Finalised dates are published around six weeks prior to each publication date. Current and forthcoming ISD publications can also be accessed from the UK Publication Hub and from the Scottish Government Statistics web pages.

A major redesign of the ISD website was introduced in May 2011 with improvements to layout, presentation, content and navigation. The design of the new website was partly influenced by previous user feedback (e.g. via the annual ISD Customer Survey) and by discussions with selected stakeholders (eg certain 'critical friends' in the ISD Delivering Our Future initiative). Emerging findings from the ISD Customer Survey 2011 are that most users think that the new website is generally an improvement from the

previous version.

Most ISD publications are planned to be released on the last Tuesday of each month to help ensure a managed, orderly release. This 'bunching' of releases allows efficiencies in ISD processes. However the dates of some publications are planned to coincide with particular relevant events, e.g. National Breastfeeding Awareness Week (see relevant ISD Publication Summary, [here](#)) or to coincide with other relevant publications, e.g. at UK level (see immunisation statistics, see relevant ISD Publication Summary, [here](#), as an example) to increase publicity and improve user access. The ISD Customer Survey for 2010 sought views from users on the practice of bunching of ISD publications - feedback indicated that the vast majority of users were either supportive of this practice or had no preference compared to a 'non bunching' practice.

Since May 2011 a 'Publication Summary' has been produced for all ISD statistical publications. The release of a Publication Summary is in addition to a full 'Publication Report' and to spreadsheets, webpages, etc. The Publication Summary is primarily aimed at the non expert or new user, with the aim of allowing such users a quick way of assessing the content of the statistics, and whether they wish to find out more. The summary is short (two pages), generally a précis of the statistics and 'key points'.

A small proportion of ISD statistical publications are not classed as official statistics. These are generally clinical audit and registry reports and the classification reflects the collaborative nature of the reports, commonly with a degree of external editorial control. These publications will generally be issued on 'non bunching' dates, often to coincide with events such as annual conferences.

### **Direct communications**

This includes direct publicity using the following direct communications:

- . An advance alert ('calling notice') is sent to a news media agency (Newslink) a few days before publication.
- . E-mail update sent to registered ScotStat users
- . E-mail update sent to SG, NHS and other core customers
- . Monthly ISD Customer Update newsletter (see section 2.1)
- . Individual topic area communications, for example customer newsletters (see section 4.1 for an example link)

Individual ISD teams publicise their outputs to their key stakeholders via their steering groups and other key engagement groups.

### **Other**

ISD staff routinely present and publicise their work at both national and international conferences and seminars (see section 4.1 for an example).

### **Communication strategy**

ISD has a corporate communication framework in place, which aims to help

deliver the NHS NSS Communications Strategy. These aim to: help build a positive image of NHS NSS and ISD, its people and services, with external stakeholders and customers; develop more robust capability for proactive and reactive communication, particularly with the press and media; to manage the reputation of the organisation; and to keep staff informed about and engaged in the work of NHS NSS. They are designed to stimulate more consistent and effective communication, building better understanding and appreciation of NHS NSS internally and externally and facilitate the delivery of our mission and operating plans.

- 4.4 Please tell us what your organisation does to enhance the statistical potential of administrative data, and maximise opportunities for the use and re-use of administrative data. For example, working with data suppliers to enhance their administrative systems, so they are able to provide more appropriate and timely data. (Principle 6.3, Protocol 3.3).

See also 4.1 and 4.5.

Most of the data that ISD publishes as Official Statistics have their origin in administrative, management and clinical systems in the NHS and its partner organisations, for example in the areas of child health, primary care, workforce and hospital care.

ISD is routinely involved in designing administrative and clinical systems (e.g. Patient Administration and Management Systems). This involvement varies from specific initiatives to allow capture of data on individual topics/subjects, to influencing the strategy for and requirements of, national IT procurements through e-Health.

Several of ISD's official statistics are sourced from administrative data provided by Practitioner Services Division (PSD), which is another division of NHS NSS (see [here](#) for more information on PSD). PSD are responsible for, among other things, the remuneration and reimbursement of NHS contractor services such as GPs, pharmacists and dentists. The data collected as part of the payment process is then passed to ISD for storage, analysis and publication. ISD work closely with PSD and are involved in changes to the payment process which result in changes to the final data specification.

One example is that in recent years PSD have made improvements to the data collection process to ensure that the patient index number, which appears on a GP prescription, is captured and passed on to ISD. This allows patient-based analyses of prescription data, for example, by age, sex and deprivation, and opens up the ability to link prescription data to other NHS datasets such as hospital records for innovative analyses and research.

Another example is that Workforce information is now captured through the Scottish Workforce Information Standard System ([SWISS](#)) - Workforce Information Repository. SWISS is the data collection and analysis system that is now being used by NHS Scotland for local, regional and national reporting. The aim of the SWISS project is to develop a workforce information system to support the needs of NHS Scotland, linking Human Resources, Payroll and other systems (including finance).

ISD has a long history and high reputation in the area of Medical Record Linkage, which enhances the value of the various data sets that ISD sources from administrative and clinical systems in the NHS. This involves developing a method for routinely linking centrally held NHS databases at the patient level to allow innovative analyses of patient outcomes, safety and quality of care. ISD routinely links hospital inpatient records, cancer registration records and death registrations from the National Records of Scotland, for example. For more information see [here](#).

Some specific examples where linkages have been used to develop specific high value outputs (designed to help improve patient care) are:

- . SPARRA – Scottish patients at risk of readmission – see [here](#).
- . Surgical Profiles – encouraging improvements in surgical care by making best use of existing Scotland-wide data sources – see [here](#).

ISD have contributed to Scottish Government statistics Cross-Office Groups on Administrative and Management Data and on Data Sharing.

ISD were represented on the National Statistician’s Task Force, which developed the National Statistician’s Guidance on the Use of Administrative or Management Information.

4.5 Please tell us what your organisation does to maximise opportunities for the use and reuse of data. (Principle 8.6).

Most of the data included within statistical releases on the ISD website are available in downloadable spreadsheet format for ease of use. ISD understands that many users appreciate the option of stand alone outputs; thus, from May 2011, the vast majority of our publications are now also produced in PDF (as a full Publication Report and also as a short Publication Summary). ISD has for many years also operated an Information Request service, which allows users to request bespoke outputs and datasets for further analysis. Currently around 2500 information requests are dealt with each year, including several hundred Parliamentary Questions. More information is available [here](#).

In accordance with the Freedom of Information (Scotland) Act 2002, NHS National Services Scotland operates a ‘publication scheme’ – this can be accessed [here](#) (see ‘NSS Publications Scheme’ link).

Data and analysis for formal Freedom of Information requests answered by ISD are published on the NHS NSS website [here](#), for potential re-use.

Current ISD re-use and copyright policy for published data, and other terms and conditions, are described on the website [here](#).

ISD operates a daily ‘media monitoring’ service for NHS and other users. A list, with links, of media health stories is emailed to subscribers and a webpage updated. These media health stories often refer to ISD statistics. More information is available [here](#).

ISD is currently developing an overarching corporate data warehouse that links all the various national data marts and databases that are held centrally as part of the Scottish Health Information Service programme – see [here](#). Access to this data warehouse will then be opened up to NHS organisations as part of ISD's strategy for delivering a Secondary Uses Service (SUS) for the NHS in Scotland. Currently a pilot version of this access to specific datamarts is being tested in two Scottish NHS Boards.

ISD is a collaborating partner in the Scottish Health Informatics Programme along with several universities in Scotland. This Programme aims to provide improved access to data already held by ISD for research purposes within a secure environment. For more information, see [here](#) (see also 4.1).

4.6 Please tell us about any organisation-wide policy on records management and archiving, which is relevant to how you manage official statistics (Principle 8.7).

NHS NSS has a Corporate Records Management Policy that sets out a framework to ensure that NSS records are managed and controlled effectively, and at best value, commensurate with legal, operational and information needs. In support of this Policy the 'NSS Document Storage, Retention and Disposal Policy' is available to ISD staff on the NHS NSS intranet., There are also specific guidelines on management of emails on the same web page.

The earliest *Scottish Health Statistics* publication is dated 1958 (see [here](#) for more information). The early *Scottish Health Statistics* volumes were produced by the Statistics Branch of the Department of Health for Scotland (since ISD didn't exist until 1974). ISD held paper (catalogue card) records of all of the early ISD series of print publications, as well as computerised records of more recent (mostly 1990s) print publications in the ISD library database.

Since May 2011, all ISD files which form part of a statistical publication remain available and are not replaced, even if data is revised. The exception to this practice is where an 'unplanned revision' is undertaken; unplanned revisions are relatively rare but may result in a replacement of an original file. In such cases, ISD will follow the ISD Revisions Policy and the ISD Revisions Guidance (see 1.4).

ISD currently follows the Scottish Government Records Management: NHS Code of Practice (Scotland) version 2.0 (see link [here](#)) regarding the breaches of legislation and code of practice on records management. Any breaches or incidents are reported on an online or paper form (available on request). We are not aware of any breaches of the legislation on records management.

The Public Records (Scotland) Act 2011 comes into force in 2013. In addition, a new code of practice on records management by Scottish public authorities under the Freedom of Information (Scotland) Act 2002 was issued by Scottish Ministers in December 2011.

A range of other relevant policies and guidelines are available on the NHS NSS intranet, including the Freedom of Information Code of Practice ('Code Of Practice On The Discharge of Functions By Public Authorities Under The Freedom Of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004'.

- 4.7 Please provide any additional existing material that helps to demonstrate compliance with particular practices of the Code (at an organisational level). For example:
- any relevant review material you may have that focuses on your statistical operations as a whole, such as Internal Audit reports; Capability Reviews; or reports from audit offices;
  - about a brief summary of how you've put the recommendations from such reviews into practice;
  - organisation initiatives to reduce burden on data suppliers; and
  - statistical policies not covered elsewhere in this document.

The Statistical Advisory Group (SAG) advises the ISD Senior Management Team on any issues concerning the professional status, practice and support of analysts and statisticians in their employment for ISD. In particular, it aims to support analysts by:

- Developing and maintaining formal documentation of Standard Operating Procedures (SOPs);
- Developing and maintaining training modules specific to SOPs;
- Giving support and guidance to enable staff to meet the general professional standards, which ISD operates.

The SAG Technical Group aims to ensure consistency of approach for analysis across ISD by investigating statistical queries brought to light by analysts or by the organisation, and by providing links to technical resources. The group is made up of representatives from across ISD. The SAG Technical Group has produced some technical resources, procedures and analytical recommendations on the Analyst Information Area of the NHS NSS Intranet.

The ISD Publication Protocol contains extensive guidance on adherence to certain aspects of the Code of Practice. The ISD Head of Statistics team maintain a range of material on statistical governance, for example covering statistical disclosure control, early access to data, UK Statistics Authority assessment preparation and process; and this is augmented by staff training and awareness seminars.

ISD staff learning and development seminars often feature statistical training, for example one seminar in January 2012 was titled 'Introduction to Standardisation'.

There are a number of staff guidance documents on the NSS intranet. For example, one covers 'Formatting and Presentation' and there is currently work in progress to combine this with related ISD guidance, eg on 'Writing For The Web' and also on external guidance (eg GSS statistical commentary and from UNECE).

Other types of staff guidance cover specific analytical or presentational questions, for example arising from NHS organisational changes (such as the dissolution of NHS Argyll & Clyde in 2006 and changes to Community Health Partnerships in Glasgow in 2011).

Organisation initiatives to reduce burden on data suppliers are key to ISD's work. Best use of technology is made in the collection of all datasets. If users are capable of supplying electronic extracts from their systems then these will be processed according to agreed validation rules based on national definitions and standards. If users cannot supply electronic systems then ISD will, where possible, produce Web front ends for customers to key in and validate data returns at source (for example the submission of national Scottish Morbidity Records by NHS Boards to ISD). Where electronic transfer of information is required ISD will, where possible, process information through one central team who will be responsible for tracking all returns, validating returns and ensuring Confidentiality and Security standards are adhered to (for example Drugs Misuse information).

NHS NSS undertaken a capability assessment at Project, Programme and Portfolio level using the PM3M3™ assessment model, with all the divisions including ISD being assessed.

The Chief Executive of NHS NSS has introduced 7 Strategic Enhancement Themes (7SET). Each NSS division is reviewed internally against these standards, yearly. The 7 SET standards are:

- § Improve customer service
- § Increase our efficiency
- § Ensure our quality
- § Strengthen our partnership working
- § Enhance our leadership capability
- § Develop our people
- § Modernise our working practices

In 2005 a Strategic Review of Health and Care statistics in Scotland was published by the Scottish Executive Health Department. This affected the way ISD published their statistics (i.e. a monthly omnibus release and the publication of Publication Summaries on the ISD website).

In 2010-11 the Scottish Government led a Review of Health & Care Statistics. ISD contributed to this review. The Scottish Government produced an internal report on the review.

Please don't send documentation that doesn't directly demonstrate compliance with any aspect of the Code of Practice. If you are in any doubt about the documentation you think we might want to see, please ask first before sending.

## FEEDBACK

Please make any comments you wish to about this assessment process. Please estimate the total number of person hours it took you to provide this information.

Approximately 25 days WTE, of varying staff seniority for version 1.0 (published February 2010). Approximately 5 days WTE for the 2011 update. Approximately 4 days for the 2012 update.

When completed, please return this evidence to the Assessment Team at [assessment@statistics.qsi.gov.uk](mailto:assessment@statistics.qsi.gov.uk).

Thank you.