

Assessment of compliance with the Code of Practice for Official Statistics

Scottish Index of Multiple Deprivation

(produced by the Scottish Government)

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About the UK Statistics Authority

The UK Statistics Authority 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*.

The Authority's overall objective is to promote and safeguard the production and publication of official statistics that serve the public good. It is also required to promote and safeguard the quality and comprehensiveness of official statistics, and good practice in relation to official statistics.

The Statistics Authority has two main functions:

1. oversight of the Office for National Statistics (ONS) – the executive office of the Authority;
2. independent scrutiny (monitoring and assessment) of all official statistics produced in the UK.

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ASSESSMENT AND DESIGNATION

The *Statistics and Registration Service Act 2007* gives the UK Statistics Authority a statutory power to assess sets of statistics against the *Code of Practice for Official Statistics*.

Assessment will determine whether it is appropriate for the statistics to be designated as National Statistics.

Designation as National Statistics means that the statistics comply with the *Code of Practice*. The *Code* is wide-ranging. Designation can be interpreted to mean that the statistics: meet identified user needs; are produced, managed and disseminated to high standards; and are explained well.

Designation as National Statistics should not be interpreted to mean that the statistics are always correct. For example, whilst the *Code* requires statistics to be produced to a level of accuracy that meets users' needs, it also recognises that errors can occur – in which case it requires them to be corrected and publicised.

Assessment Reports will not normally comment further on a set of statistics, for example on their validity as social or economic measures. However, Reports may point to such questions if the Authority believes that further research would be desirable.

Assessment Reports typically provide an overview of any noteworthy features of the methods used to produce the statistics, and will highlight substantial concerns about quality. Assessment Reports also describe aspects of the ways in which the producer addresses the 'sound methods and assured quality' principle of the *Code*, but do not themselves constitute a review of the methods used to produce the statistics. However the *Code* requires producers to "seek to achieve continuous improvement in statistical processes by, for example, undertaking regular reviews".

The Authority may grant designation on condition that the producer body takes steps, within a stated timeframe, to fully meet the *Code's* requirements. This is to avoid public confusion and does not reduce the obligation to comply with the *Code*.

The Authority grants designation on the basis of three main sources of information:

- i. factual evidence and assurances by senior statisticians in the producer body;
- ii. the views of users who we contact, or who contact us, and;
- iii. our own review activity.

Should further information come to light subsequently which changes the Authority's analysis, it may withdraw the Assessment Report and revise it as necessary.

It is a statutory requirement on the producer body to ensure that it continues to produce the set of statistics designated as National Statistics in compliance with the *Code of Practice*.

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1 Summary of findings

1.1 Introduction

1.1.1 This is one of a series of reports¹ prepared under the provisions of the *Statistics and Registration Service Act 2007*². The Act requires all statistics currently designated as National Statistics to be assessed against the Code of Practice for Official Statistics³. The report covers publications of the Scottish Index of Multiple Deprivation produced by the Scottish Government, the most recent version of which was *Scottish Index of Multiple Deprivation 2009: General Report*⁴. For convenience the publications are referred to throughout as SIMD(s), or SIMD followed by the year when referring to a specific publication.

1.1.2 This report was prepared by the Authority's Assessment team, and approved by the Board of the Statistics Authority on the advice of the Head of Assessment.

1.2 Decision concerning designation as National Statistics

1.2.1 The Statistics Authority judges that the statistics covered by this report are readily accessible, produced according to sound methods and managed impartially and objectively in the public interest, subject to the caveats in this report. The Statistics Authority confirms that the statistics detailed in 1.1.1 are designated as National Statistics, subject to the Scottish Government implementing the enhancements listed in section 1.5 and reporting them to the Authority by April 2011.

1.3 Summary of strengths and weaknesses

1.3.1 The Scottish Government has consulted extensively with users about both the content and the format of SIMD publications. The Scottish Government also holds events for users, encourages feedback from users via its website and, where possible, provides users with the information and additional analysis they require.

1.3.2 Although information is provided about the quality of the individual indicators, there is a lack of such information for the domains and overall index. Also, information about methods used is not easily accessible as it is not all available in one place.

1.3.3 Similar indices of multiple deprivation are produced across the four UK administrations and regular contact between the statisticians producing the indices helps ensure all four administrations continue to follow similar methods. The administrations also work together to solve common methodological problems.

¹ <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/index.html>

² http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf

³ <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/index.html>

⁴ <http://www.scotland.gov.uk/Publications/2009/10/28104046/0>

1.4 Detailed recommendations

1.4.1 The Assessment team identified some areas where it felt that the Scottish Government could strengthen its compliance with the Code. Those which the Assessment team considers essential to enable designation as National Statistics are listed in section 1.5. Other suggestions, which would improve the statistics and the service provided to users but which are not formally required for their designation, are listed at annex 1.

1.5 Requirements for designation as National Statistics

Requirement 1	Publish information about the quality of the overall index (para 3.9).
Requirement 2	Review the Statement of Administrative Sources to ensure it includes all administrative data sources used (para 3.25).

2 Subject of the assessment

- 2.1 SIMDs identify the relative level of multiple deprivation in small areas across Scotland in a consistent way. SIMD 2009 builds on the first SIMD that was published in 2004. Before the creation of SIMD 2004, an interim index, based on electoral wards, was produced by the Department of Social Policy and Social Work, University of Oxford (now the Social Disadvantage Research Centre)⁵ and published in February 2003. SIMD 2004 was based on the same methods as the interim index published in 2003. It used newly developed 'datazones' for Scotland. These are small area geographies that had been developed to allow statistics across a number of policy areas to be presented on a consistent and stable geography⁶.
- 2.2 SIMD 2009 is constructed from seven domains, or types of deprivation, which are combined to produce a single overall ranking of multiple deprivation for each datazone. These domains, constructed from 38 indicators, are:
- Income;
 - Employment;
 - Health;
 - Education;
 - Housing;
 - Geographic Access; and
 - Crime.
- 2.3 The Robertson Centre for Biostatistics, University of Glasgow conducted a review⁷ of the methods used in SIMD 2004. The changes made to SIMD 2006 as a result of the review are detailed on the Scottish Government's website⁸.
- 2.4 SIMD 2009 was designed to be similar to SIMD 2006 but some changes were made to indicators. Notably, Tax Credit data were added to the Income domain and an improved indicator covering those 'Not in Education, Employment or Training' (NEET) was added to the Education domain. Improved outputs were produced taking account of users' responses, including summary reports for each local authority and an improved online, interactive mapping facility.
- 2.5 A long-term strategy for measuring deprivation in Scotland was originally published in 2003 by the Scottish Centre for Research on Social Justice (SCRSJ). The recommendations made by SCRSJ were accepted by the then Scottish Executive shortly after the report was published. The Scottish Government continues to work towards addressing these recommendations and provides updates to users on progress.⁹
- 2.6 SIMD is used by a wide range of organisations including central and local government, the NHS, charitable trusts, academic researchers and community

⁵ <http://www.spsw.ox.ac.uk/fileadmin/static/sdrc/media/OCSI.html>

⁶ <http://www.scotland.gov.uk/Resource/Doc/47210/0027016.pdf>

⁷ <http://www.scotland.gov.uk/Publications/2005/10/1893201/32023>

⁸ <http://www.scotland.gov.uk/Publications/2005/11/statspubnoticevalsimd2004>

⁹ <http://www.scotland.gov.uk/Topics/Statistics/scotstat/snsgroup/MDAG/MDAG25Feb08PaperIII>

groups. Uses include: informing decisions about the allocation of funding, in particular of the Fairer Scotland Fund¹⁰; monitoring and addressing health inequalities; and assisting local authorities, community planning partners and charities in the effective targeting of resources.

- 2.7 Broadly equivalent indices are produced for England by the Department for Communities and Local Government (DCLG)¹¹, for Wales by the Welsh Assembly Government¹², and for Northern Ireland by Northern Ireland Statistics and Research Agency (NISRA)¹³. The assessments of the Welsh and Northern Ireland indices were carried out in parallel with the Scottish assessment and the reports are available on the UK Statistics Authority website¹⁴. The English index will be considered for assessment later, once the future plans for the English IMD are clearer.
- 2.8 The estimated cost of the production of SIMD 2009 is £135,000. This figure includes staff costs, the costs of the publication and the development of the interactive mapping website.

¹⁰ <http://www.scotland.gov.uk/Topics/Built-Environment/regeneration/fairer-scotland-fund>

¹¹ <http://www.communities.gov.uk/publications/communities/indicesdeprivation07>

¹² <http://wales.gov.uk/topics/statistics/theme/wimd/?lang=en>

¹³ http://www.nisra.gov.uk/deprivation/nimdm_2010.htm

¹⁴ <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/index.html>

3 Assessment findings

Principle 1: Meeting user needs

The production, management and dissemination of official statistics should meet the requirements of informed decision-making by government, public services, business, researchers and the public.

- 3.1 Scottish Government statisticians keep a log of SIMD user requests received by telephone and email and the responses provided, as well as a record of questions asked at events and presentations. They use this log to monitor the uses made of the statistics and to keep the Frequently Asked Questions (FAQ) section¹⁵ of the website up to date. Feedback from users is encouraged through the Scottish Government's website¹⁶. The Scottish Government makes new users aware of ScotStat¹⁷, which is a network of users and providers of Scottish Official Statistics, and provides a mechanism for statisticians to consult with users and for users to keep abreast of changes and to provide feedback.
- 3.2 A consultation¹⁸ was held in June 2009 asking users for their views on what outputs should be produced for SIMD 2009. A summary of responses and the actions taken by the Scottish Government in response to these comments is available on the Scottish Government's website¹⁹.
- 3.3 The Measuring Deprivation Advisory Group, which includes representatives of users of the SIMD within central government departments, local government, and the community and voluntary sector, provides the Scottish Government with advice on measuring deprivation as it works to implement the long-term strategy for measuring deprivation²⁰. Advice covers the needs of users, development priorities, methodological options, quality of outputs, dissemination and guidance on the use of outputs. The Scottish Government publish papers and minutes from meetings of this group²¹.
- 3.4 The Scottish Government has responded effectively to user feedback. For example, it has added a postcode look-up function²² and re-designed the SIMD web pages so that users can find the information they need more easily. In the run up to the publication of SIMD 2009, several users questioned the time periods used for the employment domain (2008 calendar year) because they were keen to see the impact of the recession on the overall index. In response to this, the Scottish Government worked with the Department for Work and Pensions (DWP) and the Office for National Statistics (ONS) to obtain the most up to date figures (July 2008 to June 2009), recalculated the domain using these data and produced an analysis of the results. A report about the effect of using more recent employment data in SIMD 2009 was published²³ alongside

¹⁵ <http://www.scotland.gov.uk/Topics/Statistics/SIMD/FAQ>

¹⁶ <http://www.scotland.gov.uk/Topics/Statistics/SIMD/Contacts>

¹⁷ <http://www.scotland.gov.uk/Topics/Statistics/scotstat>

¹⁸ <http://www.scotland.gov.uk/Topics/Statistics/SIMD/09Cons>

¹⁹ <http://www.scotland.gov.uk/Topics/Statistics/SIMD/consultationresponse>

²⁰ <http://www.scotland.gov.uk/Topics/Statistics/scotstat/snsgroup/MDAG/MDAG25Feb08PaperIII>

²¹ <http://www.scotland.gov.uk/Topics/Statistics/scotstat/snsgroup/MDAG/Meetings>

²² <http://www.scotland.gov.uk/Topics/Statistics/SIMD/SIMDPostcodeLookup>

²³ <http://www.scotland.gov.uk/Topics/Statistics/SIMD/EmploymentCalendarPaper>

SIMD 2009 to enable users to understand the impact of using 2008 data as opposed to more recent data. The Scottish Government is also working to produce annual updates for the income and employment domains in response to requests from key users, in particular local authorities and regeneration agencies.

- 3.5 Statisticians in the Scottish Government encourage feedback and when they identify inappropriate use of the data, they contact users to provide guidance on using the data. They also direct users to the guidance leaflet and hold various events to publicise the statistics and draw attention to their uses²⁴. This includes a statistical press conference and presentations to local authorities, health boards, voluntary organisations and other interested parties. These events focus on how the indices are created, how the index and domains can be used for external analysis and what the SIMD does and does not show about deprivation in Scotland.

²⁴ <http://www.scotland.gov.uk/Topics/Statistics/sns/SNSEv>

Principle 2: Impartiality and objectivity

Official statistics, and information about statistical processes, should be managed impartially and objectively.

- 3.6 SIMD 2009 is available via the National Statistics Publication Hub and the Scottish Government's website. The statistics are presented impartially and objectively.
- 3.7 In July 2010 an error was discovered in the HM Revenue & Customs (HMRC) data used in the construction of the Income domain. As a result, ScotStat users were informed, the affected content was removed from the Scottish Government's website and a timetable was published for the correction and re-release of the revised statistics. The statistics have now been re-released.

Principle 3: Integrity

At all stages in the production, management and dissemination of official statistics, the public interest should prevail over organisational, political or personal interests.

- 3.8 No incidents of political pressures, abuse of trust or complaints relating to professional integrity, quality or standards were reported to or identified by the Assessment team.

Principle 4: Sound methods and assured quality

Statistical methods should be consistent with scientific principles and internationally recognised best practices, and be fully documented. Quality should be monitored and assured taking account of internationally agreed practices.

- 3.9 The SIMD website includes detailed information about each of the SIMD domains and how statistics about each can be used²⁵. The information summarises the quality of the individual indicators but does not provide information about the quality of the overall index. As part of the designation as National Statistics, the Scottish Government should publish information about the quality of the overall index²⁶ (Requirement 1).
- 3.10 The Scottish Government is currently developing quality guidelines and in the interim uses ONS' 'Guidelines for Measuring Statistical Quality'²⁷ as a framework for reporting on data quality issues.
- 3.11 Indices of multiple deprivation are published in the four UK administrations using similar methods. Any differences reflect policy priorities, legislative systems and data availability. The Scottish Government is a member the Four Nations IMD working group which is made up of representatives from each producer department. ONS also participates in the group in an advisory role. This group has discussed the need for a UK-wide index. It concluded that the development of a single UK measure was not appropriate due to insufficient demand and because it would be limited by the lack of data available at a consistent, UK-wide small area geography. The group has developed guidance for the use of IMDs in allocating resources consistently across the UK²⁸. Some users who contacted us as part of this assessment identified a need for a UK-wide index, and felt that even a partial UK-wide index would be a step forward from having no UK-wide index. We suggest that the Scottish Government work with the Welsh Assembly Government, NISRA and DCLG to investigate and more fully explore the user need, data availability and options for a common geographical basis for an experimental UK-wide index.
- 3.12 ONS provides guidance on the use of small area statistics. It provides a page on its website²⁹ which summarises the four UK administrations' indices of multiple deprivation and provides links to the websites for the four administrations. The way in which the methods are described, the dissemination of the underlying data, and the methods used to summarise the deprivation within a local area, differ between administrations. This makes it difficult and time consuming for users who are interested in analysis of the indices from more than one administration. We suggest that the Scottish Government works with the Welsh Assembly Government, NISRA and DCLG to review the feasibility of providing documentation and data in a common

²⁵ <http://www.scotland.gov.uk/Topics/Statistics/SIMD/DataSourcesSuit>

²⁶ In relation to Principle 4 Practice 2 of the Code of Practice.

²⁷ <http://www.statistics.gov.uk/STATBASE/Product.asp?vlnk=13578>

²⁸ <http://www.neighbourhood.statistics.gov.uk/dissemination/Info.do?page=analysisandguidance/analysisarticles/comparing-across-countries-indices-of-deprivation-guidance-paper.htm>

²⁹ <http://www.neighbourhood.statistics.gov.uk/dissemination/Info.do?page=analysisandguidance/analysisarticles/indices-of-deprivation.htm>

format for each of the UK administrations' indices, liaising with ONS as appropriate.

Principle 5: Confidentiality

Private information about individual persons (including bodies corporate) compiled in the production of official statistics is confidential, and should be used for statistical purposes only.

3.13 The Scottish Government has an arrangement with each of its data suppliers which allows it to make available as much data on the indicators as possible, without breaching confidentiality and by using appropriate disclosure control methods. The only individual (person) level data used in the production of SIMD 2009 are those collected from police forces for use in the Crime domain. An appropriate data access agreement is in place between the Scottish Government and the police forces. The Scottish Government has published a Corporate Policy statement of confidentiality. This covers the security of the data it holds, statistical disclosure control methods and data sharing procedures. We suggest that the Scottish Government provides a link to this statement at an appropriate place on the SIMD website and document how SIMD procedures comply with this policy statement.

Principle 6: Proportionate burden

The cost burden on data suppliers should not be excessive and should be assessed relative to the benefits arising from the use of the statistics.

- 3.14 The majority of the indicators in SIMD 2009 use data that are already produced for other purposes. To reduce the burden on data providers, the Scottish Government accepts data in a number of formats - for example police forces were given a number of options for providing data for the crime domain of SIMD 2009.

Principle 7: Resources

The resources made available for statistical activities should be sufficient to meet the requirements of this Code and should be used efficiently and effectively.

- 3.15 In the past DWP provided data to the Scottish Government free of charge, but it no longer has the resources to undertake the analysis required to do this. The Scottish Government is exploring alternative solutions for obtaining this data from 2011 onwards, in collaboration with DCLG and the Welsh Assembly Government.
- 3.16 SIMD is included in the Office of the Chief Statistician's work plan³⁰, which is published as part of the statistics business plan on the Scottish Government's website for consultation.
- 3.17 The Scottish Government has a dedicated training and development intranet that includes a competence framework and provides learning and development opportunities for staff. It also has well-established and robust procedures for recruiting staff.

³⁰ <http://www.scotland.gov.uk/Topics/Statistics/About/Planning>

Principle 8: Frankness and accessibility

Official statistics, accompanied by full and frank commentary, should be readily accessible to all users.

- 3.18 The Scottish Government disseminates commentary about and analysis of SIMD through its website and in published documents. The SIMD web pages³¹ are well structured and provide an introduction to the statistics as well as links to more detailed and technical information. SIMD 2009 is available in easy-to-access map form, which was developed to improve the user experience. The website is accessible to those with disabilities.
- 3.19 Much of the underlying data that are used to produce SIMD are available for re-use in Excel files. The Excel files contain notes that identify the source of, and specification for, the data.
- 3.20 The Technical report³² provides information about the availability of the data used to compile these statistics. It directs users to a number of different sources including the SIMD website, the Scottish Neighbourhood Statistics system³³, and DWP's tabulation tool³⁴. In some instances the data used to produce the indicators are not available but related statistics are provided. The Scottish Government told us that the reason some indicator data are not available is to avoid disclosing confidential data or to adhere to agreements in place with data suppliers. Where indicator data cannot be made available, we suggest that the Scottish Government publishes the reasons for this.
- 3.21 SIMD is a relative measure of deprivation and as such cannot be used to measure changes in deprivation over time or to describe absolute levels of deprivation. This is explained in several documents including the main report and user guidance but some users commented that they needed more guidance to help them interpret the index, including changes over time. The Scottish Government told us that it plans to develop case studies to illustrate the various ways in which SIMD can be used. We support this plan, and suggest that the Scottish Government works with colleagues in the other UK administrations to develop consistent advice and guidance.

³¹ <http://www.scotland.gov.uk/Topics/Statistics/SIMD>

³² <http://www.scotland.gov.uk/Topics/Statistics/SIMD/simd2009technical>

³³ www.sns.gov.uk

³⁴ www.dwp.gov.uk/asd/tabtool.asp

Protocol 1: User engagement

Effective user engagement is fundamental both to trust in statistics and securing maximum public value. This Protocol draws together the relevant practices set out elsewhere in the Code and expands on the requirements in relation to consultation.

3.22 The requirements for this Protocol are covered elsewhere in this report.

Protocol 2: Release practices

Statistical reports should be released into the public domain in an orderly manner that promotes public confidence and gives equal access to all, subject to relevant legislation.

- 3.23 Timetables are prepared for producing and publishing SIMD. These are discussed with users at Measuring Deprivation Advisory Group³⁵ meetings and published on the Scottish Government's website³⁶.
- 3.24 The pre-release access list for these statistics has 84 recipients, which we consider to be too many. The list includes representatives of local authorities who attend pre-release briefings held by the Scottish Government. The Scottish Government told us this enables local authorities to produce their own briefings. This practice is in accordance with the Pre-release Access to Official Statistics (Scotland) Order 2008. We suggest that the Scottish Government reviews the list of those with pre-release access to these statistics.

³⁵ <http://www.scotland.gov.uk/Topics/Statistics/Browse/Social-Welfare/scotstat>

³⁶ <http://www.scotland.gov.uk/Resource/Doc/43830/0078312.doc>

Protocol 3: The use of administrative sources for statistical purposes

Administrative sources should be fully exploited for statistical purposes, subject to adherence to appropriate safeguards.

3.25 The Scottish Government published its Statement of Administrative Sources³⁷ in December 2009 and updated it in March 2010. The statement is not complete as some of the data used in SIMD are derived from administrative sources not included in the statement. As part of the designation as National Statistics, the Scottish Government should review the Statement to ensure it includes all administrative data sources used³⁸ (Requirement 2).

³⁷ <http://www.scotland.gov.uk/Topics/Statistics/About/StatementAdminSources>

³⁸ In relation to Protocol 3 Practice 5a of the Code of Practice.

Annex 1: Suggestions for improvement

A1.1 This annex includes some suggestions for improvement to the Scottish Index of Multiple Deprivation produced by the Scottish Government, in the interest of the public good. These are not formally required for designation, but the Assessment team considers that their implementation will improve public confidence in the production, management and dissemination of official statistics.

- | | |
|---------------------|---|
| Suggestion 1 | Work with the Welsh Assembly Government, NISRA and DCLG to investigate and more fully explore the user need, data availability and options for a common geographical basis for an experimental UK-wide index (para 3.11). |
| Suggestion 2 | Work with the Welsh Assembly Government, NISRA and DCLG to review the feasibility of providing documentation and data in a common format for each of the UK administrations' indices, liaising with ONS as appropriate (para 3.12). |
| Suggestion 3 | Provide a link to the Scottish Government's Corporate Policy Statement of Confidentiality at an appropriate place on the SIMD website and document how SIMD procedures comply with this policy statement (para 3.13). |
| Suggestion 4 | Where indicator data cannot be made available, publish the reasons for this (para 3.20). |
| Suggestion 5 | Continue the work to develop case studies and work with colleagues in the other UK administrations to develop consistent advice and guidance (para 3.21). |
| Suggestion 6 | Review the list of those with pre-release access to these statistics (para 3.24). |

Annex 2: Summary of assessment process and users' views

A2.1 This assessment was conducted from April to August 2010.

A2.2 The Assessment team – Elspeth Maclean, Emma Bowditch, Celia MacIntyre and Ed Swires-Hennessy – agreed the scope of and timetable for this assessment with representatives of the Scottish Government in April 2010. The Written Evidence for Assessment was provided on 10 May. The Assessment team subsequently met the Scottish Government during July to review compliance with the Code of Practice, taking account of the written evidence provided and other relevant sources of evidence.

Summary of users contacted, and issues raised

A2.3 Part of the assessment process involves our consideration of the views of users. We approach some known and potential users of the set of statistics, and we invite comments via an open note on the Authority's website. This process is not a statistical survey, but it enables us to gain some insights about the extent to which the statistics meet users' needs and the extent to which users feel that the producers of those statistics engage with them. We are aware that responses from users may not be representative of wider views, and we take account of this in the way that we prepare assessment reports.

A2.4 The Assessment team received 30 responses from the user consultation. The respondents were grouped as follows:

Local Government	7
Scottish Government	1
UK Government	1
Academia	12
NHS	5
Other public sector	1
Private Consultancies	2
Other	1

A2.5 Overall, users were satisfied with the accessibility and presentation of the data, the publication timetable and the contact with statisticians at the Scottish Government. Users also referred to the statisticians as being receptive to comments and suggestions and proactive in promoting the index. Some users told us that annual updates would be useful, while others reported no need for this. Some users also commented on the measure not being good at identifying rural deprivation, due to differences in population dispersal between rural and urban areas and the lack of rural-specific deprivation measures. Additionally, some users told us they would find a UK-wide measure very useful, or at least the possibility for UK comparisons for the Income and Employment domains.

Key documents/links provided

Written Evidence for Assessment document

