

# Assessment of compliance with the Code of Practice for Official Statistics

## Statistics on the Operation of the Homeless Persons Legislation in Scotland

*(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 of compliance with the Code of Practice for Official Statistics**

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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 reports<sup>1</sup> prepared under the provisions of the *Statistics and Registration Service Act 2007*<sup>2</sup>. The Act requires all statistics currently designated as National Statistics to be assessed against the *Code of Practice for Official Statistics*<sup>3</sup>. The report covers the following sets of statistics, produced by the Scottish Government:

- *Operation of Homeless Persons Legislation in Scotland, Annual*<sup>4</sup>; and
- *Operation of Homeless Persons Legislation in Scotland, Quarters*<sup>5</sup>.

1.1.2 Section 3 of this report adopts an ‘exception reporting’ approach – it includes text only to support the Requirements made to strengthen compliance with the *Code* and Suggestions made to improve confidence in the production, management and dissemination of these statistics. This abbreviated style of report reflects the Head of Assessment’s consideration of aspects of risk and materiality<sup>6</sup>. The Assessment team nonetheless assessed compliance with all parts of the *Code of Practice* and has commented on all those in respect of which some remedial action is recommended.

1.1.3 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 any points for action in this report. The Statistics Authority confirms that the statistics published in *Operation of Homeless Persons Legislation in Scotland* 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 July 2012.

1.2.2 The Scottish Government has informed the Assessment team that it has started to implement the Requirements listed in section 1.5. The Statistics Authority welcomes this.

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

<sup>2</sup> [http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga\\_20070018\\_en.pdf](http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf)

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

<sup>4</sup> <http://www.scotland.gov.uk/Topics/Statistics/Browse/Housing-Regeneration/RefTables>

<sup>5</sup> See footnote 4

<sup>6</sup> <http://www.statisticsauthority.gov.uk/assessment/assessment/guidance-about-assessment/criteria-for-deciding-upon-the-format-of-an-assessment-report.pdf>

### 1.3 Summary of strengths and weaknesses

- 1.3.1 The Scottish Government engages with the users of its homeless persons statistics through the Homelessness Statistics User Group. The Group was recently initiated to ensure that homeless persons statistics develop in a way that meets the needs of users. Following the most recent meeting, the Scottish Government has begun to develop a framework for users to record their needs and the use made of these statistics.
- 1.3.2 The Scottish Government has recently published a useful data quality guide for these statistics on its website. This guide provides information about the timeliness, accuracy and comparability of the statistics on homelessness.
- 1.3.3 The releases contain useful information about the policy and operational context in which the statistics have been collected. The releases are often quite detailed, but lack information about the wider context of homelessness.

### 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

<b>Requirement 1</b>	Provide more information about the comparability of the statistics on 'priority assessments' between the local authority areas (para 3.4).
<b>Requirement 2</b>	Report annually the estimated costs to local authorities for responding to the <i>HL1</i> and <i>HL2</i> forms, and explore ways to reduce the burden on local authority data suppliers (para 3.6).
<b>Requirement 3</b>	Improve the commentary and presentation, and include contextual information, in the releases so that they aid user interpretation of the statistics (para 3.7).
<b>Requirement 4</b>	Provide more information about the coherence of the tables in the publication and those in the accompanying reference tables to enable users to find the information they need (para 3.8).

## 2 Subject of the assessment

- 2.1 The homeless persons releases present statistics on homeless applications to local authorities (LAs), assessments, and the resulting outcomes, over quarterly and annual reference periods. Additional statistics are presented about the numbers of households at risk of eviction in Scotland. The releases also include quarterly tables showing the numbers of households in temporary accommodation, and progress towards a Scottish Government commitment to offer settled accommodation to all unintentionally homeless people by 2012<sup>7</sup>. Homeless persons statistics are released in two annual statistical bulletins. Annual statistics for the previous financial year are released in the August following the end of the financial year in *Homeless Persons in Scotland, Annual*, with a quarterly breakdown released around six months later in *Homeless Persons in Scotland, Quarters*. The latter release provides new statistics for the first two financial quarters of the next year; it also incorporates updated statistics based on revised data received from LAs since the last annual publication. More detailed reference tables are also released to accompany the publications.
- 2.2 The data used to produce the homeless persons statistics are supplied by each of the 32 LAs in Scotland on two statutory returns. The HL1 return gathers data about the progress of each application for homelessness support from the point of application through to the point that the LA discharges its statutory duty to the applicant. The HL2 return is a quarterly summary completed by LAs; it provides information about the number of applications, cases closed and the number of households in temporary accommodation.
- 2.3 The statistics are used by the Scottish Government and LAs to monitor and review the operation and effectiveness of local government support for homeless people. The Scottish Government told us that these statistics are also used to help inform future policy relating to the provision of affordable housing, and enacting secondary legislation on the duties and powers of LAs in responding to housing need. The Scottish Housing Regulator<sup>8</sup> (SHR) uses the statistics to monitor the effectiveness of how social landlords, such as LAs, conduct their statutory duties concerning the provision of housing. SHR also uses the statistics to monitor how effective LAs are at preventing homelessness. LAs also supply data to Audit Scotland to inform the reporting of its 'Housing Indicator 19'<sup>9</sup>, which is a measure of an LA's performance in assessing housing need and provision. Voluntary sector organisations, such as Shelter Scotland<sup>10</sup>, use these statistics to lobby government, and to develop policies to help allocate resources to those most at-risk from homelessness.

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<sup>7</sup> <http://www.scotland.gov.uk/About/scotPerforms/indicators/Homelessness>

<sup>8</sup> SHR is an independent regulatory body, responsible for all social landlords in Scotland. SHR protects the interests of tenants, as well as people who face homelessness, or who have bought their house from a council or housing association. For more information see:

<http://www.scottishhousingregulator.gov.uk>

<sup>9</sup> <http://www.audit-scotland.gov.uk/performance/council/>

<sup>10</sup> Shelter Scotland provides housing advice and support to people in Scotland, and campaigns for long-term solutions to homelessness and sub-standard housing. The charity operates in England under the name 'Shelter' and is affiliated with Shelter Cymru, which operates in Wales.

### 3 Assessment findings

- 3.1 The Scottish Government engages with the users of its homeless persons statistics through the Homelessness Statistics User Group. Group membership is made up of: Scottish Government statisticians; SHR; LAs; and Shelter Scotland. The group reconvened in October 2011 after a break of over 6 years. The Scottish Government told us that it initiated the Group to ensure that the statistics develop in a way that meets the needs of users, and that the effort in producing them is proportionate to the need for the information. The Scottish Government has published information about the group and the minutes of meetings<sup>11</sup> on its website. Following the most recent meeting the Scottish Government has begun to develop a framework for users to record their needs and the use made of these statistics.
- 3.2 The Scottish Government publishes its homeless persons statistics in two annual volumes, six months apart. It is unclear whether this approach maximises accessibility to these statistics, especially as the releases have similar titles, but somewhat different content. The Scottish Government confirmed that it will discuss the frequency of the homeless persons statistics at the next meeting of its user group in April this year.
- 3.3 The Scottish Government has published<sup>12</sup> a useful document setting out how it implements revisions and corrections to the homeless persons statistics. The most recent Homeless Persons in Scotland, released on 14 February 2012, includes a short summary of this information for the first time.
- 3.4 *Homeless Persons in Scotland* presents statistics on the number of applicants assessed as homeless in Scotland, and the proportion of these that were assessed as ‘priority’<sup>13</sup> by LA area. A large proportion of those assessed as priority is recorded as “according to local policy”, but this is not expanded upon. No further information about the comparability of these statistics between each LA is provided. The release also provides information about some legislative changes to the priority assessment in a technical annex; however this is not particularly accessible. As part of the designation as National Statistics, the Scottish Government should provide more information about the comparability of the statistics on ‘priority assessments’ between the LAs<sup>14</sup> (Requirement 1). In meeting this Requirement, we suggest that the Scottish Government should provide further information about the forthcoming legislative changes, including what effect it will have on the statistics, and improve the accessibility of this within the release.
- 3.5 The Scottish Government has recently published a useful data quality guide for these statistics on its website – providing information about the data sources, timeliness, and accuracy of the statistics. Information about the comparability of the statistics with those produced in other countries of the UK is also provided.

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<sup>11</sup> <http://www.scotland.gov.uk/Topics/Statistics/15257/22540>

<sup>12</sup> <http://www.scotland.gov.uk/Topics/Statistics/15257/revisionpolicy>

<sup>13</sup> Priority need is defined by each LA, against a set of developed criteria that includes: a household with a vulnerable member, such as dependent children, pregnant, old age or other health issues; the applicant is a young person; and a range of other criteria such as fleeing from domestic violence, harassment, or a household members has recently been discharged from the Armed Forces, hospital or prison. LAs must identify at least one reason for priority assessment.

<sup>14</sup> In relation to Principle 4, Practice 2 and Principle 8, Practice 1 of the *Code of Practice*

Further information about the different stages of the application stages are published on the website. Each release also includes a technical annex that provides some information about data sources, changes to methods and known quality issues. We were told that all future releases of *Homeless Persons in Scotland* will contain a summary of the quality of the statistics and links to the published data guide for more information.

- 3.6 The Scottish Government collects the data on homeless persons from LAs by means of two electronic returns. The Scottish Government has published<sup>15</sup> more detailed information about the HL1 and HL2 returns, along with guidance for LAs on their completion. The Scottish Government told us that the data capture and processing system has been designed to handle data efficiently by: alerting LAs electronically about errors and inconsistencies in cases; and generating an automatic email to each LA, attaching the latest quarterly or annual report for the specific LA. Some of the LAs that responded to us as part of this Assessment told us that considerable time can be taken in checking apparent errors. The Scottish Government told us that it has not investigated the costs incurred by LAs in providing this data. As part of the designation as National Statistics, the Scottish Government should report annually the estimated costs to LAs for responding to the HL1 and HL2, and explore ways of reducing the burden on Local Authorities<sup>16</sup> (Requirement 2).
- 3.7 The releases set out the legislative context and the findings in thorough detail, yet lack information about the wider context of homelessness – such as information about the provision of housing in Scotland, or the preventative action that LAs and others are taking to reduce homelessness. Also, the arrangement of some graphs comparing LAs makes them difficult to interpret. As part of the designation as National Statistics, the Scottish Government should improve the commentary and presentation, and include contextual information, in the releases so that they aid user interpretation of the homelessness statistics<sup>17</sup> (Requirement 3). We suggest that in meeting this requirement the Scottish Government should consider the points detailed in annex 2.
- 3.8 The Scottish Government publishes detailed reference tables that provide more information about homeless persons in Scotland. However, the Scottish Government does not make clear how to access the information provided in the publication from the reference tables; it presents the information differently, and the table numbering is different from that in the releases. As part of the designation as National Statistics, the Scottish Government should provide more information about the similarities and differences between the tables in the publication and those in the accompanying reference tables to enable users to find the information they need<sup>18</sup> (Requirement 4).
- 3.9 The Scottish Government told us that 29 people are granted pre-release access to these statistics in their final form, but that these lists are not published. We suggest that the Scottish Government publish records of those who have access to homelessness statistics prior to their release.

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<sup>15</sup> See footnote 4

<sup>16</sup> In relation to Principle 6, Practice 1 of the *Code of Practice*

<sup>17</sup> In relation to Principle 8, Practices 1 and 2 of the *Code of Practice*

<sup>18</sup> In relation to Principle 8, Practice 4 and 6 and Protocol 1, Practice 2 of the *Code of Practice*

## Annex 1: Suggestions for improvement

A1.1 This annex includes some suggestions for improvement to the Scottish Government's homeless persons statistics, 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.

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|---------------------|---|
| <b>Suggestion 1</b> | Provide further information about the forthcoming legislative changes, including what effect it will have on the statistics, and improve the accessibility of this within the release (para 3.4). |
| <b>Suggestion 2</b> | Consider the points detailed in annex 2, in seeking to improve the statistical releases (para 3.6).   |
| <b>Suggestion 3</b> | Publish records of those who have access to homeless persons statistics prior to their release (para 3.8).  |

## **Annex 2: Compliance with Standards for Statistical Releases**

- A2.1 In October 2010, the Statistics Authority issued a statement on *Standards for Statistical Releases*<sup>19</sup>. Whilst this is not part of the *Code of Practice for Official Statistics*, the Authority regards it as advice that will promote both understanding and compliance with the *Code*. In relation to the statistical releases associated with *Operation of the Homeless Persons Legislation in Scotland*, this annex comments on compliance with the statement on standards.
- A2.2 In implementing any Requirements of this report (at paragraph 1.5) which relate to the content of statistical releases, we encourage the producer body to apply the standards as fully as possible.

### **Appropriate identification of the statistics being released**

- A2.3 Each of the releases has a title that reflects the coverage and reference period of the statistics. They include the logos for National Statistics and for the Scottish Government. The introductions are not explicit about the frequency of the releases but such frequency may be inferred from the titles. The name of the responsible statisticians and their contact information is given at the end of each release. The hard copies of the release do not give an outline of their contents but the web pages detail the contents and hyperlink directly to the relevant sections.
- A2.4 Both publications adopt standard formatting. The annual publication does not expressly identify which statistics are new, whereas the quarterly publication states that it updates the previous annual publication and earlier years.

### **Include commentary that is helpful to the non-expert and presents the main messages in plain English**

- A2.5 The language in each release is straightforward. Each release sets out the main findings as a series of bullet points; however, these are duplicated for each topic that the report covers, and they stretch over two pages. The purpose of the statistics is to record and report on the operation of homeless legislation. The reporting of this in the main points section is often very detailed.
- A2.6 The releases focus on changes in the measures over time. Further analyses are by characteristics of homeless support applicants, such as: household type; age; ethnic group; whether applicants have an armed forces background; prior housing circumstances; and actions taken by LAs to support the needs of the homeless. The arrangement of some graphs comparing the performance of the LAs makes them difficult to interpret. For example a few are ordered alphabetically, and in one case the quarterly performance is provided for all 32 LAs in one tightly packed graph. The releases use charts, graphs and tables to illustrate comparisons, but no maps are provided. The releases explain the national targets for all homeless applicants to be offered settled

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<sup>19</sup> <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-releases.html>

accommodation by 31 December 2012. Further information about uses is provided on the website, such as why information about repeat applications is important to LAs and the Scottish Government. No explanation of the wider uses of these statistics, beyond those of the Scottish Government and LAs, is given in the releases or on the website.

### **Use language that is impartial, objective and professionally sound**

A2.7 The text used in the releases is impartial and evidence-based.

### **Include information about the context and likely uses**

A2.8 The releases contain factual information about the policy and operational context in which the statistics have been produced. Tables within the releases show each LA's progress towards meeting the 2012 commitment. Legislative changes that may have impacted upon the statistics are also set out in the releases. Social changes and their potential impact on the statistics are discussed, for example information is given about the increasing proportions of young people living independently and about the increase in the rate of household dissolution following breakdowns in relationships. Some information is given about those who were 'rough sleepers' immediately before application stage, but no information is given about the wider context of homelessness, such as information about the total number of people who are sleeping rough in Scotland.

### **Include, or link to, appropriate metadata**

A2.9 The releases include many notes that help to explain why the statistics in the release may differ from those previously released. Information about the data sources is also provided. The releases contain good explanations of where data collection methods have changed. Links to further information and guidance are also provided in the releases.

A2.10 The website provides links to other relevant information, but this is not explained in the releases. Information about the comparability of these statistics, with similar statistics produced by the other UK administrations, is provided in the release.

## Annex 3: Summary of assessment process and users' views

A3.1 This assessment was conducted from December 2011 to February 2012.

A3.2 The Assessment team – David Duncan-Fraser and Iain Russell – agreed the scope of and timetable for this assessment with representatives of the Scottish Government in December. The Written Evidence for Assessment was provided on 16 December 2011. The Assessment team subsequently met with the Scottish Government during February 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

A3.3 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.

A3.4 The Assessment team received 10 responses from the user consultation. The respondents were grouped as follows:

Local authority data suppliers	8
Regulatory body	1
Voluntary sector	1

A3.5 The majority of respondents were LA data suppliers who reported good engagement with the statistics team; they told us that the guidance and instructions given to supply the data was comprehensive. Some of these respondents would like to know more about how the Scottish Government uses the statistics, as they felt that the guidance did not cover this. Some LAs concluded that the burden of supplying the data could be reduced following a review of the data requirements. LAs also told us that they would like the statistics to better reflect the homelessness prevention work that they undertake.

A3.6 Users who contacted us confirmed that the statistics were useful in respect to their particular needs and that their engagement with the statistics team was good. Users told us that they felt that the navigation to the relevant statistics on the website was not straightforward. There was an interest in tools that would allow greater interrogative facilities of the data by external users.

### Key documents/links provided

Written Evidence for Assessment document



