
Director General for Regulation

Simon Briscoe
By email

12 July 2016

Dear Simon,

You contacted the Authority about two specific instances where your requests to DfE for information on particular aspects of attainment were unsuccessful and I will return to these. During the course of our subsequent discussions it became clear that you had underlying concerns about:

1. The absence of information about unregulated international GCSEs from the school-level attainment statistics and the underlying data in the National Pupil Database (NPD) and the resulting gap in coverage
2. Whether the school-level attainment statistics in the Performance Tables – that are principally designed as a tool for holding state-funded schools to account and therefore reflect changing education policy – can hold National Statistics status

These underlying concerns require nuanced judgment based on case history and precedent and have wider implications for use and for National Statistics. For all of those reasons we have considered carefully the points you have raised. It was very helpful to explore the issues extensively with you to bring out these important concerns. This letter sets out our main conclusions and I have published a report with this letter that gives the detail of our investigations and conclusions, and sets out the actions that DfE should take to ensure continuing compliance with the Code of Practice for Official Statistics¹.

We previously supported the publication of school-level attainment statistics in the Performance Tables as it increased their public value². We suggested that DfE should consider them as official statistics on the grounds that DfE uses them publicly in support of government decisions that are of clear public interest. I can see no reason to change that view. Subsequently, we assessed³ the school-level attainment statistics against the Code and awarded National Statistics status after receiving evidence that DfE had met the requirements that we set in our report⁴.

Since we made that judgement, your enquiry has highlighted the absence of information about unregulated international GCSEs from the attainment statistics and the underlying data

¹ <https://www.statisticsauthority.gov.uk/monitoring-and-assessment/code-of-practice/>

² <https://www.statisticsauthority.gov.uk/publication/school-level-examination-statistics/>

³ <https://www.statisticsauthority.gov.uk/publication/school-level-examination-statistics-for-england/>

⁴ <https://www.statisticsauthority.gov.uk/publication/school-level-examination-statistics-for-england-letter-of-confirmation-as-national-statistics-1/>

in the National Pupil Database (NPD). DfE told us that the primary purpose of the attainment statistics as presented in the Performance Tables is as an accountability tool to hold state-funded schools in England to account for their performance, based on performance measures set by the Secretary of State. Viewed in that light, there is no gap in coverage in the Performance Tables themselves; they reflect the performance of individual schools against the prevailing standards. I do agree that the absence of information about unregulated international GCSEs – that principally affects independent schools – leads to a gap in coverage about pupil attainment across the suite of attainment statistics and data as a whole. I do not consider, however, that the gap in pupil attainment statistics means that the school-level attainment statistics for England in the Performance Tables should have National Statistics status removed.

For some uses, such as finding out about individual school performance, other sources of information may fill this gap. For research and analysis covering attainment across all types of schools in England, including the purposes that you wish to use them for, this is not the case. Our report sets out, based on discussions with DfE and developments that it was already pursuing, how DfE will address the gap in coverage.

There is no reason that an accountability tool like the school-level attainment statistics in the Performance Tables – or any other sets of statistics with a similar purpose – cannot hold National Statistics status. It does need statisticians to make clear their purpose and content and also to make clear any implications for use such as policy changes that lead to discontinuity in the statistics. But this last point – clarity on implications of policy changes – is important. I agree with you that the Performance Tables should explain more clearly why some schools, notably some independent schools, show 0% against some key stage 4 measures when, in prior years, they had shown relatively high scores. DfE has recognised that it could improve the way it describes the purpose, content and implications for use – including the change to 0% – and we have asked them to take action to do this.

Our overall conclusion, nevertheless, is that the National Statistics status of the school-level attainment statistics for England – as presented in DfE's Performance Tables – should continue, on the understanding that DfE implements the requirements that we have set out in the report that we will publish with this letter. We also conclude that DfE's planned actions – along with information available from other organisations – should be sufficient to meet most needs. And finally, we are concerned about the gap in statistics on *pupil* attainment in respect of international GCEs, which, though different from *school* performance, is important for a range of policy and research questions. On this I welcome the actions that DfE proposes to take to improve access to a wider range of data on attainment and we have asked DfE to keep demand for these data and statistics under review.

Your enquiry began with you highlighting two specific information requests – for STEM 'A-level' results and for attainment data including international GCSEs – where you were unable to access particular performance information. You are understandably frustrated that you have not yet received data that meet your needs. We also recognise that the issue of access to data is not easy or quick for DfE to resolve.

We understand that before our involvement, DfE had started work to enable access to NPD data through a secure data lab and it hopes to be in a position to make an announcement about this soon. This would provide access to available education data to you and others like you who do not meet access requirements for direct access to the NPD. Another issue preventing access in this specific instance is that data about international GCSEs are not processed or held on the NPD. As we said in the report, DfE is working to make available an alternative version of the NPD that contains a wider range of exam results for the purposes of research and analysis. I consider that this action by DfE will improve your future access –

as well as that of others – to more complete data on attainment. I look forward to seeing the improvements to the statistics arising from these actions.

I would like to thank you for raising important issues about the completeness of school-level attainment statistics for England and the National Statistics status of those statistics as presented in DfE's Performance Tables. I would also like to thank you for your patience in allowing us the time to investigate these issues thoroughly. Our resulting investigations have highlighted ways in which DfE can further improve the statistics and data on attainment to extend their public value.

I am copying this letter to Sir Andrew Dilnot – with whom you first raised these issues – and I have written separately to Iain Bell, Head of Profession for Statistics at DfE. We have published the letters with the report – that details our investigations and conclusions and the actions that we expect DfE to take – on the Authority's website.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ed Humpherson', written in a cursive style.

Ed Humpherson