Ed Humpherson, Director General for Regulation

Neil McIvor
Head of Profession for Statistics
Department for Education

13 October 2017

Dear Neil

NATIONAL STATISTICS STATUS OF STATISTICS FOR ENGLAND ON SCHOOLS, PUPILS AND THEIR CHARACTERISTICS, AND ON ABSENCE AND EXCLUSIONS

We have reviewed the actions that you and your team have taken in response to our Assessment Report number 332[1] on Statistics for England on Schools, Pupils and their Characteristics, and on Absence and Exclusions.

On behalf of the Board of the Statistics Authority, I am pleased to confirm the designation of these as National Statistics. This includes reinstating the National Statistics status of the statistics on unlawfully large infant class sizes which had their National Statistics status temporarily removed following concerns about their quality[2].

The assessment of these statistics raised two main areas of concern – the need for the Department for Education (DfE) to develop a greater understanding of the uses of the statistics and to increase transparency over its quality assurance arrangements.

Understanding the users and uses of these statistics is fundamental in ensuring that the best public value can be achieved from them. I am encouraged by the various ways that you have explored how to broaden the reach of these statistics and how you have used external expertise to help with this endeavour. My team will be interested in hearing how you continue with this work and what benefits can be realised.

I also welcome the improvements you have made to the information that you publish about quality assurance. Having reviewed the two new documents published I consider that users now have the appropriate information available to them. The content of the *School census: data quality and processing*[3] gives the detail and judgements required, while the *Quality assurance of Education Statistics*[4] gives users a clear and user friendly overview of DfE's internal quality assurance

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[1] https://www.statisticsauthority.gov.uk/publication/statistics-for-england-on-schools-pupils-and-their-characteristics-and-on-absence-and-exclusions/
[2] https://www.statisticsauthority.gov.uk/correspondence-list/?keyword=unlawful&date
[3] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/644733/School-Census-Data-Quality-and-Processing.pdf
[4] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/622918/Quality_Assurance_in_DfE.pdf

arrangements. I consider that the improvement that the statistics team have made to the documentation of its quality assurance arrangements enhances the quality of the statistics and will benefit users.

Specifically relating to the statistics on unlawfully large infant classes, I am pleased to see that you have improved the guidance to aid data collection and to see how you have successfully tested this guidance with a range of people in the data supply chain.

We have included more detail about our judgement in an annex to this letter. I, or my team, would be very happy to talk you or colleagues through any aspects of this letter, the annex or Code compliance more generally.

National Statistics status means that official statistics meet the highest standards of trustworthiness, quality and value and is something to be celebrated. We invite you to include a statement alongside the statistics which reflects this status.

Please feel free to discuss any aspect of this with us at any time. I am copying this letter to John Pullinger, the National Statistician and Mike Jones, Deputy Head of Profession for Statistics, who oversaw DfE's response to the assessment.

Yours sincerely

Ed Humpherson
Director General for Regulation

Annex: Review of actions taken by the Department for Education (DfE) in response to Assessment Report 332 on Statistics for England on Schools, Pupils and their Characteristics, and on Absence and Exclusions.

Requirement	Actions taken by DfE to meet Requirements	Office for Statistics Regulation evaluation of evidence in meeting Requirements
Requirement 1 In order to improve the public value of these statistics, DfE should: a) Proactively engage its user communities, reaching unheard voices, in order to uncover and prioritise unmet or unrecognised demand. b) Document demand for statistics on schools and pupils and their existing and potential public value.	1a) As part of ongoing user research, DfE has been exploring with groups of people for whom it considers its statistics are of relevance (e.g. parents choosing schools), but who do not access the data, what alternative sources they use and how the service might need to evolve in order to be more attractive to them within their decision making. In addition, DfE has also been undertaking discovery work with the Open Data Institute to explore how a privacy-controlling application programming interface (API) has potential to offer a digital service which allows new users to engage with detailed data in an engaging and secure way. DfE is committed to continue to use user research and insight opportunities to talk with a wide background of people on how it can continue to grow access to their data and statistical services across a broader set of areas. As the Digital, Data and Technology community and ways of working within DfE grow, customer insight will continue to grow as a fundamental aspect of iterative improvement to outputs. 1b) DfE has updated its methodology	To form our judgment on whether DfE has met the requirement, we considered: • DfE's user engagement work to speak to individual users, and potential users • DfE's plans to identify interested individuals through analysis of twitter • DfE's explanation of, and documentation of, different users and uses of the statistics within its methodology documents Positive factors we saw include: • DfE exploring how users access its data, and how changes to systems may improve access for current and future users • DfE's understanding of the wide range of users and uses of their data Since the publication of the assessment report, DfE has undertaken work to understand its wider user base. This initial phase of work has yet to lead to any significant changes to outputs however the work to understand user needs is promising. Taking these factors together, our overall judgment is that DfE has met the requirement. Future considerations To further enhance the public value of these statistics, DfE should continue to proactively engage with its user communities, and incorporate this feedback into future planned changes. DfE should ensure documented uses and users are updated.

	documents to explain the key user groups, and uses of, its statistics, in addition to information about internal DfE users including in the Schools Census process document (see Req 2).	
Requirement 2 In order to enhance the quality of statistics on school and pupil characteristics, DfE should publish information that assures users about their quality that includes: a) a detailed and accessible account of the quality assurance processes in place that includes the data checks carried out by data suppliers and details about any audits or third party assurance of the statistics b) information about the statistics team's judgements in relation to any identified quality issues and their implications on the quality of the statistics and the team's rationale for reaching these judgements in terms of their known and potential uses c) information on the limitations and possible biases of the statistics in relation to use d) a link to an up-to-date statement of	2a), 2b) and 2c) In order to assure users about the quality of these statistics, DfE has: Published a *Quality Assurance of Education Statistics*[5] document, which sets out the principles being embedded within the DfE to ensure quality-assured statistics are produced. Published an extended *Schools, pupils and their characteristics methodology document*[6] which sets out information about the data collections, timing and accuracy. Published a *School census: data quality and processing*[7] document which covers the data collections, data supply and data quality, data processing and quality checks and data updates which aims to present the specific QA information in a complete and readable format for users. 2d) DfE has published an updated statement of administrative data sources[8].	We judge that DfE has met the requirement, through its updated and newly developed documentation, which includes: • A well-written Quality Assurance strategy, aimed at DfE staff but accessible to external users • A clear, detailed explanation of data quality assurance processes both from the data suppliers and within DfE within the Schools census data quality and processing document which reflects practices from the Administrative Data Quality Assurance Toolkit • Examples of where underlying data are likely to be of higher and lower quality, and the steps taken by DfE to ensure the inherently lower quality data – for example that not required by schools for other purposes – is fit for purpose • An explanation of the potential biases of the data collection, linked to funding, within the Methodology and the Quality and Data Processing documents. For further clarity, we have recommended that DfE cross reference these documents and ensure all three are easily accessible for users.

[5] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/622918/Quality_Assurance_in_DfE.pdf
[6] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/623126/SFR28_2017_Methodology_Document.pdf
[7] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/644733/School-Census-Data-Quality-and-Processing.pdf
[8] https://www.gov.uk/government/publications/standards-for-official-statistics-published-by-the-department-for-education

administrative data sources As part of meeting this Requirement, DfE should refer to the Office for Statistics Regulation's Administrative Data Quality Assurance Toolkit		
Requirement 3 To enhance the quality of these statistics, DfE should: a) Test changes to guidance on data collection for the affected statistics among a sample of suppliers to check that it is now clear b) Review its procedures, including guidance for data suppliers, and introduce and verify changes as appropriate to avoid similar data quality issues arising in the future.	3a) DfE has sought feedback on its improved unlawfully large class sizes guidance with both schools (as data suppliers) and software suppliers (who facilitate the capture of the data). Both agreed the guidance was clear. DfE tested the schools and software suppliers understanding of the improved guidance, which showed it to be a consistent interpretation of the rules on recording unlawfully large infant classes. 3b) The Head of Profession for statistics at DfE has reviewed the current procedures, which are now far better documented given requirement 2, and he is satisfied with the Quality Assurance processes built in at the collection phase.	We judge that DfE has met the requirement, through the work undertaken by DfE to review and test its guidance and review its procedures. Positive factors we saw include: • Clarity within both the data suppliers and software suppliers for the data requirements • Ongoing dialogue with software suppliers who enable the correct data to be collected Following the de-designation of the Unlawfully Large Class Sizes data DfE strengthened its guidance for data providers and introduced additional data checks in the collection and production process. Given this additional evidence that the improved data collection guidance is well understood, we deem the risk of future data quality issues to be low, and hence are re-designating the Unlawfully Large Class Sizes data as National Statistics.
Requirement 4 DfE should document and publish its corrections policy in more detail, particularly the different approaches to minor and major corrections and how DfE makes this differentiation.	4) DfE has updated and published its revision policy[9] which now makes clearer the distinction between major and minor errors.	Our judgment is that DfE has met the requirement.

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[9] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/622906/DfE_Revisions_policy_1.2.pdf