

---

**Ed Humpherson, Director General for Regulation**

Stephen Balchin  
Head of Profession for Statistics  
Department for Work and Pensions  
[by email]

13 December 2017

Dear Stephen

**STATISTICS ON NATIONAL INSURANCE NUMBER ALLOCATIONS TO ADULT OVERSEAS NATIONALS**

Thank you for your letter of 12 December, regarding the National Statistics status of your National Insurance Number Allocations to Adult Overseas Nationals (NINOs) statistics.

We welcome the improvements that DWP has made to address some of the requirements from our [Assessment Report](#), published in January 2017. I am particularly pleased to see the introduction of a more-detailed user guide, including helpful information on the context and limitations of the statistics, and description of the data collection and quality assurance processes. We also recognise the value that has been added to these statistics by the introduction of [interactive maps](#) showing where in the world people are registering from.

Your letter indicated that, in their current form, these statistics do not have as much public value as some of the other DWP outputs, and therefore it would be better to dedicate your limited resources to enhancing other DWP statistics rather than trying to gain National Statistics status for NINO statistics. We welcome this decision. We are pleased to see from your letter that you intend to continue working with ONS and others to help make improvements to migration statistics, further enhancing the value of the NINO statistics.

The annex to this letter outlines our judgement of progress against each requirement.

I am copying this letter to John Pullinger, the National Statistician; the DWP statisticians – Russ Bentley and Steve Watkins; the assessors – Donna Hosie and Oliver Fox-Tatum; and Charles Lound from the GSS Good Practice Team.

Yours sincerely



Ed Humpherson  
Director General for Regulation

## Annex Progress against assessment requirements

Requirement	Actions taken by DWP to meet Requirements	Office for Statistics Regulation's evaluation of the extent to which this requirement has been met
<p><b>Requirement 1:</b> To maximise the public value of the statistics DWP should improve the commentary in the NINo statistical reports by:</p> <p>a) Adding more context, including explaining how they feed into wider analysis on immigration data</p> <p>b) Providing more explanation of changes seen in the time series, in particular the reasons for the large increases in NINo registrations since 2014</p> <p>c) Improving the signposting of the commentary for NINo Benefit Claimants or merging NINo Allocations and NINo Benefit Claimants into one publication</p>	<p>a) DWP revised <a href="#">NINo statistics: user guide</a> in February 2017. This includes helpful information on the context, purpose and limitations of the statistics, including a section on how NINo registrations fit in with other sources of migration data.</p> <p>DWP told us that it is reviewing the content of future statistical reports, particularly <i>NINo Benefit Claimants</i>, after considering feedback from the ONS user consultation on migration statistics, which includes NINos data. DWP plans to include a broader benefits base, such as Housing Benefit and pension age, similar to the development of benefit combinations experimental statistics seen in <a href="#">Quarterly Benefits Summary August 2017</a>.</p> <p>b) DWP has provided additional information to the latest statistical reports to explain the large increase in NINo registrations from 2014, including a link to the more detailed analysis, which was published as part of the May 2014 statistical report.</p> <p>c) DWP has added a link from the <a href="#">NINo Benefit Claimants webpage</a> to the related commentary available in <i>NINo Allocations</i>. It has also made improvements to the layout of the NINos webpage to make it easier to find the latest versions of <i>NINo Allocations</i> and <i>NINo Benefit Claimants</i>.</p>	<p>We judge that DWP has <b>met</b> this Requirement through:</p> <ul style="list-style-type: none"> <li>Revising <i>NINo statistics: user guide</i> to contain more information on the context, purpose and limitations of the statistics, and how they compare with other migration data.</li> <li>Including an explanation of the increase in NINo registrations as a result of lifting of EU restrictions on work for EU2 citizens in <i>NINo Allocations</i>.</li> <li>Improving the layout of the NINos webpage, making it easier to find the latest versions of <i>NINo Allocations</i> and <i>NINo Benefit Claimants</i>.</li> <li>Adding a link from the NINo Benefit Claimants webpage to the related commentary available in <i>NINo Allocations</i>.</li> </ul> <p><u>Future considerations</u></p> <p>We consider that it would be useful to highlight key information on data sources, data quality, coverage, and the main limitations of the statistics, in the statistical reports themselves, enabling all users to be more informed of the value of the statistics.</p> <p>We welcome the development of <i>NINo Benefit Claimants</i> and look forward to seeing how this adds public value to these statistics.</p>
<p><b>Requirement 2:</b> To improve the value of NINo statistics DWP should establish a culture of wide, regular and informative engagement with a wide user community by:</p> <p>a) Establishing effective engagement mechanisms to build open relationships with users outside government, as well as</p>	<p>a) DWP took part in an ONS-led consultation on migration statistics in December 2016, which included NINo registrations. ONS has shared the 15-20 relevant user responses with DWP, and a <a href="#">response to the consultation</a> was published in mid-March.</p> <p>DWP continues to be part of the cross-Government Working Group on migration statistics, and the Migration Statistics</p>	<p>We judge that DWP has <b>partly met</b> this Requirement.</p> <p>Positive factors we saw include:</p> <ul style="list-style-type: none"> <li>DWP's contribution to an ONS-led consultation on migration statistics.</li> <li>DWP's participation in the ONS-led cross-Government Working Group on migration statistics.</li> </ul> <p>However, we consider that the value of the NINo statistics could be improved further if DWP engaged</p>

<p>other relevant government departments, to allow direct consultation on their needs as users</p> <p>b) Producing and publishing clear, explicit documentation explaining how it is responding to what it has learned from its user engagement, including who uses the statistics and what decisions they inform, and how it takes account of these users' needs when planning publications</p>	<p>User Forum.</p> <p>DWP told us it will be using the StatXplore user list to inform users of plans to develop the NINo Benefit Claimants statistics.</p> <p>b) DWP has added a section in <i>NINo statistics: user guide</i> on understanding user requirements, which describes a number of methods available for users to share their views on these statistics with DWP.</p>	<p>with a wider subset of users, including those outside government, on a more regular basis to improve its understanding of users' needs and ensure the relevance of the statistics is maintained.</p> <p>We would also encourage DWP to publish more information on user engagement that has taken place and the impact of this. This is an important step in ensuring there is transparency about how users' views are considered and used to add value to the statistics.</p>
<p><b>Requirement 3:</b> To improve the accessibility of the range of data available DWP should:</p> <p>a) Outline its vision for the development of the NINo statistics, including its contribution to the cross-government analytical work using these data</p> <p>b) Signpost the most recent and relevant ad hoc releases on the NINo data from the NINo webpages</p> <p>c) Clearly set out what data are and are not available, including explanations about why certain data are not available, for example due to lack of data availability or lack of resources, to aid users' understanding of what analyses can be carried out using NINos statistics</p>	<p>a) DWP has added a section in <i>NINo statistics: user guide</i> on new developments and future changes, which currently includes information on new visualisations via interactive world maps, and a review of migrant DWP working age benefit claimant statistics.</p> <p>b) DWP has added links from the NINos webpage to three ad hoc releases that use NINos data, making it easier for users to find relevant analysis that DWP has carried out.</p> <p>c) DWP has added a section in <i>NINo statistics: user guide</i> on data structure, which describes which fields are contained in the NINos dataset, and an explanation of why some other fields are not available.</p>	<p>We judge that DWP has <b>partly met</b> this Requirement.</p> <p>Positive factors we saw include:</p> <ul style="list-style-type: none"> <li>• Inclusion of information on new developments and future changes added to <i>NINo statistics: user guide</i></li> <li>• Link to relevant ad hoc releases now available from the NINos webpage.</li> </ul> <p>However, we consider that value could be added if DWP were more explicit about the vision for the future of these statistics, and of how it will be contributing to the cross-government analytical work on migration. In doing this it may also be helpful to include a link to the ONS article <a href="#">International migration data and analysis: improving the evidence</a>, which outlines development plans for improving migration statistics.</p> <p>We also consider that more clarity could be provided to users to explain some of the difficulties involved in carrying out certain types of analysis. For example, explaining that producing statistics on active NINos is a costly and time-consuming process that requires matching up of DWP and HMRC data. This type of information could help users to make more informed requests for data, and would provide more transparency around why certain analysis was not readily available. This work could be considered in the context of the wider development of these statistics in</p>

		DWP and across government.
<p><b>Requirement 4:</b> DWP should assure itself and its users about the quality of the NINo statistics by:</p> <p>a) Ensuring that it has a full understanding of the data quality assurance processes used in the production of the statistics, including the checks that are carried out by the data suppliers and the statistics team, and about any audits or third party assurance of the source data</p> <p>b) Making improvements to its processes necessary to assure users of good quality NINo statistics</p> <p>c) Publishing a clear and comprehensive summary of its findings at an appropriate level of detail for its users</p> <p>d) Publishing a process map to aid users' understanding of the journey of the NINo data through the DWP and HMRC data systems and quality assurance processes undertaken at the various stages throughout the process</p> <p>e) Ensuring that the administrative data sources used in the production of the NINo Benefit Claimants are listed in its SoAS</p> <p>As part of meeting this Requirement, DWP should refer to the Authority's Administrative Data Quality Assurance Toolkit.</p>	<p>a) DWP has added a section in <i>NINo statistics: user guide</i> on data collection and the data process flow, along with improved material on data quality assurance processes. This includes an indication of some of the checks carried out by HMRC and DWP as the data is passed along the supply chain.</p> <p>b) DWP told us it has introduced an additional layer of independent peer review of the statistical reports and supporting tables by other analysts in the division.</p> <p>c) DWP told us it will add an explanation to the <i>NINo statistics: user guide</i>.</p> <p>d) DWP has published a process map in the <i>NINo statistics: user guide</i>, which shows the movement of data from source to publication.</p> <p>e) DWP has added the Migrant Workers Scan, the administrative data sources used in the production of the NINo Benefit Claimants, to its Statement of Administrative Sources (SoAS).</p>	<p>We judge that DWP has <b>partly met</b> this Requirement. Positive factors we saw include:</p> <ul style="list-style-type: none"> <li>• Additional information on quality assurance processes added to <i>NINo statistics: user guide</i>.</li> <li>• Additional layer of peer review and contingency added to process.</li> <li>• Process map showing data journey added to <i>NINo statistics: user guide</i>.</li> <li>• NINo Benefit Claimants administrative source added to the DWP SoAS.</li> </ul> <p>However, we consider that users would gain more reassurance of the quality of the NINos data if DWP demonstrated how it has followed the guidance in the Authority's <i>Administrative Data Quality Assurance Toolkit</i>.</p> <p>The current information published on quality assurance of NINos data is quite high-level. Further reassurance could be provided to users of the quality of these statistics by DWP explaining more comprehensively the quality assurance processes carried out early in the data journey, for example, at the initial registration stage.</p> <p>The process map would benefit from having a description of the quality assurance processes that are undertaken at each stage of the data journey to help users to better understand the quality of the data.</p>
<p><b>Requirement 5:</b> To enhance the public's knowledge and understanding of the quality of NINo statistics and their appropriate use, DWP should publish a comprehensive and accessible set of quality and methods information that:</p> <p>a) Outlines all the known limitations of the</p>	<p>a) DWP included sections on 'limitations of the statistics' and 'how do NINo registrations fit in with other sources of migration data' in <i>NINo statistics: user guide</i> in February 2017. This provides information on known limitations of the data, explains reasons for differences between NINos and the International Passenger Survey, and includes links to the two ONS analytical notes published on</p>	<p>We judge that DWP has <b>partly met</b> this Requirement through:</p> <ul style="list-style-type: none"> <li>• Including information on limitations of the statistics, how NINo registrations fit in with other sources of migration data, seasonality, and the impact of lifting of EU restrictions on work for EU2 citizens in <i>NINo statistics: user guide</i>.</li> <li>• Creating a link to information on</li> </ul>

<p>statistics, and the implications for the quality of the statistics, in terms of their existing use for measuring migration and other potential uses, and in relation to the European Statistical System quality dimensions</p> <p>b) Clearly explains the reasons for the discontinuities in the historical series, and how to account for quarterly seasonality when comparisons are made</p> <p>c) Updates its published information to aid users' understanding about the NINo application process, NINo eligibility, and the statistical methods used to produce the statistics, including the justification for the benefit hierarchy used in NINo Benefit Claimants</p>	<p>this.</p> <p>b) DWP included information in <i>NINo statistics: user guide</i> in February 2017 on the discontinuity in the data due to the removal of restrictions on work for EU2 citizens, including a link to the more-detailed explanation provided in the May 2014 statistical report. The background and methodology document also includes information on seasonality, and provides a table of the seasonality over the last few years.</p> <p>c) DWP added a link from the NINos webpage to the 'application process' section of the DWP website in February 2017. More information on the NINos statistical methods has been provided in the <i>NINo statistics: user guide</i>.</p> <p>DWP told us that information on the justification for the benefit hierarchy used will be provided in future publications of <i>NINo Benefit Claimants</i>.</p>	<p>the NINos application process from the NINos webpage.</p> <p><u>Future considerations</u></p> <p>We consider that it would further enhance users' understanding of the quality of the statistics if DWP were to refer to the ESS quality dimensions in <i>NINo statistics: user guide</i>.</p> <p>While DWP provides information about the discontinuity in the data due to the removal of restrictions on work for EU2 citizens, it does not provide information about the discontinuity in the quarterly data in 2014 as a result of the transition of NINo registration from HMRC to DWP. We consider that it would benefit users if DWP were able to give an indication of the magnitude of this discontinuity, and explain what analysis could be done with the statistics over this period, and how this change in the processing may affect the data, such as any improvements in processing times.</p> <p>While <i>NINo statistics: user guide</i> contains information about seasonality, we consider that it would benefit users if some explanation was provided on the implications of this, and the impact on how users should interpret the statistics.</p>
<p><b>Requirement 6:</b> To enhance transparency in these statistics DWP should:</p> <p>a) Publicly commit to announcing future changes to methods or classifications in advance of the publication of NINo Allocations</p> <p>b) Provide sufficient explanation on the impact and magnitude of these changes on the use of the statistics</p>	<p>a) DWP included a section on 'new developments and future changes' in <i>NINo statistics: user guide</i> in February 2017. It includes information on new interactive visual world maps, which have now been published, and advance notice of a review of the migrant DWP working age benefit claimant statistics later in 2017.</p> <p>b) From February 2017, DWP has included an explanation in NINo Allocations of the impact on the NINos data of the removal of restrictions on work for EU2 citizens, including a link to more-detailed analysis that was carried out in 2014.</p>	<p>We judge that DWP has <b>met</b> this Requirement through:</p> <ul style="list-style-type: none"> <li>• Including information on current and future developments in <i>NINo statistics: user guide</i>.</li> <li>• Including an explanation of the impact of lifting of EU restrictions on work for EU2 citizens included in <i>NINos Allocations</i>.</li> </ul> <p><u>Future considerations</u></p> <p>We consider that the section on 'new developments and future changes' in <i>NINo statistics: user guide</i> would benefit from further context and detail about the potential implications of these changes when more detail is known.</p>
<p><b>Requirement 7:</b> To increase the trustworthiness and to reassure users of the confidentiality of the NINos</p>	<p>DWP published a revised version of <i>NINo statistics: user guide</i> in February 2017. It includes more information on the process for maintaining confidentiality, including</p>	<p>We judge that DWP has <b>met</b> this Requirement through:</p> <ul style="list-style-type: none"> <li>• Revising <i>NINo statistics: user guide</i> to contain a more</li> </ul>

<p>data DWP should publish documentation on the confidentiality arrangements that are in place. This might include information on encryption of data, memoranda of understanding with other government departments, and statistical disclosure control methods.</p>	<p>the use of Memorandums of Understanding, and data encryption.</p>	<p>comprehensive account of confidentiality protection practices.</p> <p><u>Future considerations</u></p> <p>We consider the confidentiality arrangements that are in place an example of good practice. We consider that highlighting these processes better and providing more detail on the range of processes that are in place could further reassure users of the confidentiality of the NINOs data.</p>
<p><b>Requirement 8:</b> To promote public confidence in the NINo statistics DWP should:</p> <p>a) Reduce the number of people included on the NINo Allocations pre-release access list and provide a justification for each individual listed</p> <p>b) Ensure that the pre-release access list is reviewed prior to each publication and updated accordingly, and includes the number of post holders where there is more than one</p> <p>c) Include a link to the pre-release access list directly from its NINos webpage</p>	<p>a) DWP has reduced the number of people included on the published NINo Allocations pre-release access list from 73 to 27. This reduction is mostly due to the removal of people who had received access in the past, but who no longer get access. This list now contains only those who had access to the latest set of statistics.</p> <p>b) DWP told us that the pre-release access list is reviewed and updated prior to each publication.</p> <p>c) DWP added a link from the NINos webpage to a 'Policies and procedures' webpage in February 2017. This contains a direct link to the pre-release access list.</p>	<p>We judge that DWP has <b>met</b> this Requirement through:</p> <ul style="list-style-type: none"> <li>• Reducing the NINo Allocations pre-release access list from 73 people to 27.</li> <li>• Ensuring the pre-release access list now only contains people who had access to the latest set of statistics.</li> <li>• Creating a link to the pre-release access list from the 'Policies and procedures' section of the NINos webpages.</li> </ul> <p><u>Future considerations</u></p> <p>The list includes reference to 'special advisers'. This should be listed as named individuals or the number of advisers should be listed.</p>