
Ed Humpherson, Director General for Regulation

Matthew Wilson
Interim Lead Official
NHS Business Services Authority
(by email)

12 May 2021

Dear Matthew

**Confirmation of National Statistics designation for Prescription Cost Analysis (PCA):
England**

We have reviewed the actions that your team has taken to address the requirements in [Assessment Report number 353: Statistics on Prescription Cost Analysis: England](#). I would like to commend you and your team's engagement with us during the assessment, demonstrating your commitment to improving the statistics for the public good.

On behalf of the Board of the UK Statistics Authority, I am pleased to confirm the designation of National Statistics for Prescription Cost Analysis: England, produced by the NHS Business Services Authority. The statistics are a valued, long-standing and robust data source used by a range of expert users.

As a new official statistics producer and with this as your first Assessment, you and your team showed great enthusiasm and ambition throughout the process. We were particularly impressed with your detailed [user engagement strategy](#) and how you have developed and innovated ways in which to communicate with users during the Assessment and beyond. You have also established good working relationships with the devolved administrations to improve the comparability of prescription cost statistics. We have included more detail around our judgement in an Annex to this letter.

I am copying this letter to Michael Brodie, CEO of NHSBSA, and to Lucy Vickers, Head of Profession for Statistics at the Department for Health and Social Care.

Yours sincerely



Ed Humpherson
Director General for Regulation

Annex: Review of actions taken in response to Assessment Report number 353: Statistics on Prescription Cost Analysis: England

Requirement	Actions taken by NHSBSA to meet Requirements	Office for Statistics Regulation's evaluation of evidence in meeting Requirements
<p>1 To enhance the value of PCA, NHSBSA should:</p> <ul style="list-style-type: none"> a. provide an explanation about the similarities and differences between the monthly and annual prescription cost analysis data b. establish clear signposting between the two sources c. include prominent advice about how PCA can and cannot be used. 	<p>Explanations of the similarities and differences between the monthly and annual PCA data and clear signposting are now in place and live on both parts of the NHSBSA website:</p> <ul style="list-style-type: none"> • Annual National Statistics • Monthly MI data feed <p>NHSBSA has added a new section to the Background Information and Methodology note detailing what the PCA can and cannot be used for.</p>	<p>The signposting between the two PCA data sources is now clear. The additional explanation of the similarities and differences between the two data sources really helps users to navigate and choose the correct source of information for their purposes.</p> <p>Advice about how PCA can and cannot be used is now included in the background and methodology note. This guidance is clear and concise and informs users about the appropriate use of the statistics and data.</p>
<p>2 To ensure the level of insight meets the full range of user needs, NHSBSA should collaborate with pharmaceutical experts (within and outside NHSBSA) or statisticians in the devolved administrations in its development of statistical commentary.</p>	<p>NHSBSA held a session with the Government Statistical Service (GSS) Good Practice Team (GPT) in November 2020 regarding the development of statistical commentary for the publication, and plans further engagement which is likely to be late spring or early summer 2021.</p> <p>OSR forwarded the user feedback collected as part our assessment to NHSBSA including views from pharmaceutical experts. NHSBSA's user research team consolidated the comments, coded and reviewed and followed up with those users who consented. Expert views were also sought via the public consultation and online user sessions.</p> <p>NHSBSA is adopting a new style release format for the PCA after using the Quarterly Mental Health output as a template. NHSBSA has shared with us a draft structure for the next PCA release including proposed additional sections on UK</p>	<p>NHSBSA has initiated and developed a number of ways to engage with users through the Assessment process and beyond. For example, hosting six-monthly virtual online sessions, embedding an online feedback survey on the PCA webpage, the public consultation and directly contacting users.</p> <p>As an organisation NHSBSA has shown commitment in seeking out expert user and statistician views in order to enhance and develop the PCA statistical commentary. The proposed new structure of the PCA release with the inclusion of additional sections will be more insightful and welcomed by users.</p>

	<p>comparisons and further analyses on drivers for cost increases.</p> <p>NHSBSA ran a public consultation from December 2020 to February 2021 to help shape the commentary for PCA. The consultation response and intended actions have been published on the NHSBSA website.</p>	
<p>3 To improve the comparability of PCA across the UK, NHSBSA should work with the devolved nations to ensure that the guidance in making any comparisons is clear and well defined. NHSBSA should also engage with users on making financial year PCA data available.</p>	<p>NHSBSA has engaged with statisticians in the Devolved Administrations to take this requirement forward.</p> <p>NHSBSA has met with Welsh Government, NISRA and Public Health Scotland regarding UK comparability of PCA. NHSBSA also asked for input to develop a single joint narrative about how the releases compare across the UK.</p> <p>As part of the sessions held with Welsh Government, Public Health Scotland and NISRA, NHSBSA proposed the idea of a UK prescribing statistics working group. NHSBSA plans to engage further on this to work more on harmonising outputs and sharing guidance.</p> <p>The updated Background Information and Methodology note now includes UK comparability guidance on page 16 under section 6 – related statistics, comparability and useful resources.</p> <p>NHSBSA has consulted on changing the release to financial year data (rather than calendar year data), to be comparable with the other nations.</p> <p>Responses from the public consultation were positive and supported this change to align with other datasets. To help users with the transition to financial year data, NHSBSA plans to include an additional dataset of the latest calendar year data.</p>	<p>NHSBSA has begun to develop good working relationships with the Devolved Administrations.</p> <p>The updated Background Information and Methodology note now includes a clear description of how the statistics from the four nations can and cannot be compared.</p> <p>The proposed working group is a good example of how NHSBSA is committed to engage with others and to improve the comparability of PCA data across the UK.</p> <p>NHSBSA has sought user views around making financial year PCA data available, in line with the devolved nations through the public consultation. In response, the 2021 PCA publication will be moved to financial year reporting, with calendar year data also available to assist users with the transition.</p>
<p>4 To ensure coherence and comparability across the UK, NHSBSA should consult and</p>	<p>NHSBSA sought input from the Office for National Statistics (ONS) Methodology Advisory Service (MAS). MAS reported back with independent expert opinion on 9 December 2020.</p>	<p>We are content with NHSBSA's engagement with experts and agree with the feedback that the new methodology will more accurately</p>

<p>incorporate the views of experts working in the other nations of the UK or abroad in the methods review.</p>	<p>NHSBSA met with DHSC to outline the proposed changes to the methodology and additional improvements planned for the PCA such as providing geographical breakdowns and the move to financial year reporting.</p> <p>NHSBSA carried out a public consultation about the proposed methodology change. NHSBSA's actions from the public consultation on this point are proposed to be:</p> <ul style="list-style-type: none"> • adopt the new methodology both for the annual PCA National Statistics and the monthly management information PCA data to ensure all forms of PCA are consistent. • engage with users after the transition to address any concerns raised about the utility of the changes to explore their impacts. • release more guidance about the changes to the PCA publication, including how users can still get data on drugs prescribed generically from the new format 	<p>determine which class drug data should be attributed to in PCA.</p> <p>NHSBSA has published the responses from the public consultation and been transparent in its plans in adopting the new methodology for PCA. To ensure consistency, it is good to see that the methodology will be adopted by both the annual PCA National Statistics release and the monthly PCA data.</p>
<p>5 To further improve the trustworthiness of NHSBSA, the relationship with the Head of Profession for Statistics in DHSC should be reinstated, to ensure the Lead Official is fully supported in their role to produce Official Statistics.</p>	<p>Quarterly catchups now in place between the lead official at NHSBSA and the Head of Profession (HoP) at DHSC. The interim lead official told us that he feels professionally supported in his role with good links established with DHSC, including for ad hoc advice.</p>	<p>We consider that these arrangements will help to further improve the trustworthiness of NHSBSA.</p>
<p>6 To improve the public confidence and transparency of NHSBSA:</p> <p>a. all data access processes should be clearly defined and publicly documented to ensure that all users understand and are fully aware of the new process.</p>	<p>a. NHSBSA has committed to improve its webpage detailing data access routes.</p> <p>A refreshed set of webpages is due to go live soon, with user research to follow. User research is expected to start following the release of the new webpages with recruitment of a user group.</p> <p>All corporate policies will be updated with links to the improved webpage once complete and will include clear narrative on the process.</p>	<p>a. NHSBSA used feedback from interviews including from the Assessment process and Google Analytics to redesign the Information Services department and 'Access our data' landing pages. NHSBSA intends to include clearer routes for users to access data. This is detailed within the plans shared with us. The 'Access our data' option now appears more prominently on the webpage making it easier for users to navigate.</p>

<p>b. NHSBSA should reflect on the FOI requests received and review whether to include the information in future routine data publications</p>	<p>b. NHSBSA created Medicines Used in Mental Health to meet the need of recurring FOIs and PQs that NHSBSA received on the subject. This new release is now included in the published NHSBSA work plan for 2021/22.</p> <p>NHSBSA has implemented a tagging system with the Information Governance team to allow easier identification of themes of work arising from incoming FOI requests.</p> <p>There is work ongoing within the Data & Insight directorate to improve access to data. Plans are to move more data from the website to the Open Data Portal alongside all accompanying metadata.</p>	<p>As part of the redevelopment of the webpages, we are pleased to see that the NHSBSA is involving a panel of users to feedback views on the proposed changes and will use this to inform any further improvement.</p> <p>b. NHSBSA is now regularly reviewing the FOIs in liaison with its Information Governance team and the tagging system will help to identify any future themes for official statistics and open data releases.</p>
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