
Ed Humpherson, Director General for Regulation

Dr Janet Egdell
Interim Chief Executive
National Records of Scotland (NRS)
(by email)

4 April 2023

Dear Janet

Assessment of 2022 Census in Scotland

Today we have published our [phase 2 assessment report of the 2022 Census in Scotland](#). Our report highlights areas of strength and good practice in NRS's census planning and development, along with areas that NRS needs to address to ensure the high standards of public value, quality and trustworthiness are met. I would like to thank your teams for their engagement and openness throughout the assessment to date.

NRS has faced unexpected challenges in the last year as live census operations did not achieve the return rates that were originally anticipated. NRS has taken various steps since that point to develop its use of data and methods to ensure the best possible estimates of the population of Scotland are produced. My team and I have been impressed at how NRS has drawn on expertise and explored new solutions to adapt to these changing circumstances and the commitment of staff at NRS throughout. NRS will have gained valuable insights and experiences which will benefit other statistical producers in Scotland, across the UK and beyond. We encourage NRS to showcase its new approaches in methods and my team would be happy to support you in doing so if that would be helpful.

Our assessment report includes five requirements for NRS to address before OSR will recommend that National Statistics status for these statistics is confirmed – these can be found in Annex A. The theme of these requirements is one of transparency and openness. NRS needs to ensure, both ahead of the first census outputs and as the outputs are published, that users have the information available to them to assure them that census data and statistics are fit for purpose.

Engagement and communication with users are vitally important in securing the best value from census data and statistics and we have seen many examples in the past where NRS has been transparent in sharing its plans, progress, and seeking users views. We do consider, however, that NRS needs to continue to offer reassurances to users in the coming months, ahead of census data being released, about how its developments in data and methods are likely to affect the quality of estimates that will ultimately be produced. This is one of the key concerns from the assessment and we expect NRS to take action to address this before we make a designation decision on Scotland's Census statistics.

Census estimates for Scotland will start to be published from autumn 2023. This will be the beginning of a highly anticipated schedule of statistical releases which will serve to help decision makers, planners, and the public understand the population of Scotland. NRS plans to provide census data users with supporting information and guidance on data quality with its statistical outputs. This will be particularly important to assure users of the quality of the data and statistics they are working with.

My team will continue to engage and work with NRS now our assessment report is published and we look forward to seeing how you address our assessment findings.

I am copying this letter to Alastair McAlpine, Interim Chief Statistician in Scotland, Scottish Government, and Jon Wroth-Smith, Director of Census Statistics, National Records of Scotland.

Yours sincerely

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

Ed Humpherson
Director General for Regulation

Annex A – Scotland’s Census assessment requirements

Requirement 1

NRS demonstrated its trustworthiness and was transparent in the early stages of census planning by providing users with its expectation of the quality for census outputs through, for example, its KPIs on accuracy. While specific quality measures will only be possible as part of its census outputs, NRS should be open ahead of those outputs about how its developments in data and methods are likely to affect the quality of estimates that will ultimately be produced.

NRS should publish information and assurance for users so they can understand the expected quality of census data. This should be communicated in an accessible and timely way ahead of outputs. NRS should be open about how its users’ needs will be met or how it plans to address any unmet needs.

Requirement 2

While NRS has been open to discussing data quality concerns with users, its engagement strategy may benefit from review to ensure it reaches a broad range of users.

NRS should be transparent about its approach to public engagement with regard to its confidence in data quality. NRS should review its communication and engagement plans, prioritising users where concerns over data quality are greatest and where there is most risk from inaccurate census estimates.

Requirement 3

NRS introduced a new trans history question for Scotland’s Census 2022 and there have been concerns raised over the collection of data about sex. The trans history question used in Scotland and the guidance for the sex question differs from the equivalent in the 2021 Census in England and Wales.

NRS should ensure that, when it publishes statistics on trans history or produces demographic breakdowns by sex, these are accompanied by clear information on the definitions and guidance used to produce those statistics. NRS should explain the coherence and comparability of its statistics from the 2022 census with those from other censuses, especially given the differences in guidance for the census sex question.

Requirement 4

NRS’s plans to provide quality information alongside its census outputs should be delivered to support and assure users of the value and quality of the data and statistics. These plans should take account of key areas of interest or concern raised.

NRS should ensure that supporting documentation, guidance and information on data quality, including bias and uncertainty, is communicated in its outputs. This information should be refreshed and added to as its programme of outputs is delivered. For known areas of user interest, for example for data on sex, NRS should provide detailed information on quality indicators, such as the outcomes from its quality assurance processes, in assessing census estimates against other data sources.

Requirement 5

UK census data will be affected by various factors including differences in the timing of census across the countries of the UK. While responsibility for UK estimates lies with ONS, users are likely to reach out to both NRS and ONS for information and support.

NRS should take further steps to communicate plans and provide more-detailed information to users of UK census data in Scotland. NRS should continue to work together with the other census offices to explain any impacts on UK census data quality and describe where user needs may or may not be met as a result.