Office for
Statistics Regulation

UK Statistics
Authority

Assessment of compliance with the Code of
Practice for Statistics

Personal Independence Payment Statistics for Northern Ireland
(produced by the Department for Communities, Northern Ireland)

Assessment Report 355   May 2021

Office for Statistics Regulation

We provide independent regulation of all official statistics produced in the UK. Statistics are an essential public asset. We aim to enhance public confidence in the trustworthiness, quality and value of statistics produced by government.

We do this by setting the standards they must meet in the Code of Practice for Statistics. We ensure that producers of government statistics uphold these standards by conducting assessments against the Code. Those which meet the standards are given National Statistics status, indicating that they meet the highest standards of trustworthiness, quality and value. We also report publicly on system-wide issues and on the way statistics are being used, celebrating when the standards are upheld and challenging publicly when they are not.

Contents

Executive Summary

Judgement on National Statistics Status

ES.1   These statistics provide relevant and trusted information on Personal Independence Payment (PIP) in Northern Ireland (NI). They enable users to better understand PIP as a relatively new benefit and its role in social security reform.

ES.2   In requesting this assessment, the statistics team at the Department for Communities (DfC) is demonstrating its commitment to produce PIP statistics that meet the standards required of National Statistics and the Code of Practice for Statistics. We have identified four actions for DfC to address in order to enhance the public value and quality of the NI PIP statistics and to achieve National Statistics status. These are described in chapters one to three of this report.

ES.3   Once the statistics team demonstrates that these steps have been undertaken, OSR will recommend that the UK Statistics Authority designate the statistics as National Statistics.

Key Findings

Public Value

ES.4   The PIP statistics are used by a range of users across the advice and charity sectors, as well as within DfC, which is interested in how PIP as a relatively new benefit is performing and its role in social security reform. The key user engagement activity is coordinated by the PIP operations team through a quarterly consultative forum, attended by advice and disability groups. However, we found that users would welcome direct engagement with the statistics team to ensure developments to the statistics are prioritised in line with user need.

ES.5   The majority of users we spoke to highlighted that the Department for Work and Pensions' (DWP) PIP statistics contain more breakdowns for Great Britain (GB) than are available for NI, even though the data are sourced from the same system. The statistics team needs to engage more actively with users to communicate its ambition to better align the statistics in NI with what is available for GB. Where data gaps can't be addressed, this should be communicated clearly to users and reasonable alternatives should be explored.

ES.6   We found that user interest has begun to shift away from reassessments of individuals who were previously receiving the Disability Living Allowance (DLA) onto PIP, towards understanding award reviews and how these may impact individuals' entitlements. The statistics team should ensure the statistical bulletin and data tables draw out the relevant insights to help users understand where NI is in its journey of rolling out PIP.

ES.7   Users we spoke to were positive about the length and presentation of the bulletin. However, we found that accessibility could be improved by better signposting between the bulletin and the supplementary tables as some of the detail can be missed if the underlying data tables are not viewed.

Quality

ES.8 The statistics team maintains a good working relationship with the PIP operations team and engages with it regularly. The users we spoke to have no concerns with the quality or methodology of the statistics, as the data for the PIP statistics are sourced from the PIP Computer System which represents a 100% population of PIP claimants with a postcode in NI on the reference date.

ES.9 The statistics team has carried out a self-assessment of its understanding of administrative data against our Quality Assurance of Administrative Data (QAAD) framework. The statistics team should bring out the relevant information from its QAAD self-assessment to expand the methodology and quality notes in the bulletin and tables, to support the appropriate use of the statistics.

ES.10 The Professional Services Unit (PSU), in which the responsible statisticians for PIP sit, is currently exploring the use of Reproducible Analytical Pipelines (RAP) in the production of its statistics, with a view to improving the quality of the statistics by reducing the risk of human errors associated with its current software packages. Once RAP has been fully implemented, PSU anticipates that this will free up resources, which can be reallocated to address developments requested by users.

ES.11 The statistics team told us that although it has access to the same data as DWP, there is not currently a process in place for sharing code needed to produce statistics which are comparable with DWP. The statistics team needs to build stronger links with DWP to ensure a common understanding of the quality and priorities of PIP statistics and of the PIP Computer System.

Trustworthiness

ES.12 The statisticians working on PIP are well established and users we spoke to said the team is always helpful and knowledgeable when responding to their queries. DfC has a dedicated webpage about its statistics protocols and compliance with the Code of Practice for Statistics and users in DfC told us that pre-release access is controlled well and that the statistics team are not influenced by senior authority within the organisation.

ES.13 The statistics team could enhance its trustworthiness by being open about its statistical development plans and its progress towards achieving these developments, even if the timescales are uncertain. Whilst PSU does not routinely publish a development plan, some users we spoke to felt that the lack of transparency around development priorities can lead to data gaps being perceived as DfC withholding information.

Next Steps

ES.14 We expect the DfC statistics team to report back to us by September 2021 outlining the steps that it has taken to address the requirements. The UK Statistics Authority will take advice from OSR based on the evidence received and decide whether to award the National Statistics designation.

Chapter 1: Public Value

Introduction

1.1   Value means that the statistics and other numerical information are accessible, remain relevant and benefit society; helping the public to understand important issues and answer key questions.

1.2   Value is a product of the interface between the statistics or other numerical information and those who use them as a basis for forming judgements.

Findings

PIP is a benefit under high scrutiny and so the statistics are important

1.3   Personal Independence Payment (PIP) is a benefit replacing the Disability Living Allowance (DLA) for people aged between 16 and State Pension age. The policy intent of PIP is to help towards some of the extra costs arising from having a long-term health condition or disability (ill health or disability that is expected to last 12 months or longer) and it is assessed on how a person's condition affects their daily life, not the condition they have.

1.4   PIP began as a pilot in England in early 2013 and did not start to roll out in Northern Ireland (NI) until June 2016. PIP was implemented in NI under the Welfare Reform (NI) Order 2015, in which the Department for Communities (DfC) committed to carrying out two reviews of the process of implementation of the benefit. These reviews have both been completed and their findings published.

1.5   The Northern Ireland Audit Office has also been carrying out a review into the Management and Delivery of the PIP Contract in NI. These reviews, combined with the sensitivity of the subject which they concern, mean that PIP as a benefit is under high scrutiny. DfC told us it responds to lots of Assembly Questions concerning PIP.

1.6   The impact of the COVID-19 pandemic on PIP has been less severe than for Universal Credit, due to the telephone assessment process already being established. However, the disproportionate impact of COVID-19 on disabled people means that the statistics continue to be of heightened interest.

Greater signposting would enhance the accessibility of the statistics and data

1.7   DfC publishes the NI PIP statistics quarterly through a bulletin and supplementary data tables. The bulletin presents a short summary of the latest data and includes a combination of infographics, charts and commentary. Users we spoke to were positive about the length and presentation of the bulletin and several users noted that the process map and glossary of terms made the statistics more accessible to users who may not have the domain knowledge.

1.8   However, we found that accessibility could be improved by better signposting between the bulletin and the supplementary tables, as some of the detail can be missed without looking at the underlying data tables. For example, one of the charts in the bulletin groups together several disabling conditions as "Other" but the individual conditions are available in the data tables, which is not made clear to the reader. The accessibility of the bulletin would be enhanced if the relevant data

tables were highlighted throughout the bulletin so that anyone reading it could easily find the data the charts refer to. This is particularly important for the charts that have an axis in absolute terms (e.g. the number of claimants) but where the commentary refers to the percentage of claimants.

1.9   The bulletin provides links to further information on PIP as a benefit as well as PIP statistics for Great Britain (GB). Where there is known interest in data that are not held by the statistics team, the statistics team could also signpost to these organisations to support users' understanding of what data are available.

Taking a direct role in user engagement would ensure developments are informed by user need

1.10   The PIP statistics are used by a range of users across the advice and charity sectors, who are often supporting individuals through the PIP process, and also users within DfC working on PIP policy and operations. Users that we spoke to as part of this assessment are using the statistics to understand social policy, social security reform and outcomes for vulnerable groups.

1.11   The statistics bulletin, supporting tables and landing page contain a link to a survey that allows users to feed in their views on the statistics and outputs. However, users told us that they would welcome greater direct engagement with the statistics team so that their views are considered when prioritising developments of the statistics. Most of the user engagement concerning PIP is carried out through a quarterly consultative forum, led by the DfC PIP operations team and attended by advice and disability groups.

1.12   The statistics team told us that the Professional Services Unit (PSU), in which the responsible statisticians for PIP sit, is currently exploring setting up a user group covering several of its publications on benefits and it has met with colleagues in other branches to explore good practice that is taking place across the Northern Ireland Statistics and Research Agency (NISRA) with regards to user engagement. Given the heightened interest in the PIP statistics, the statistics team should take a more proactive role in engaging with its users so that the statistics remain fit for purpose and developments are aligned with user need.

Users would value greater coherence of PIP statistics between NI and GB

1.13   The migration process for claimants from DLA to PIP was completed for NI by the end of November 2019 and user interest has since shifted from reassessments of individuals who were previously receiving DLA onto PIP, to award reviews (i.e. where a claimant's receipt of PIP has ended and they must be reassessed). The statistics team should ensure the bulletin and data tables reflect the changing state of PIP in NI and draw out the relevant insights to help users understand these changes.

1.14   The users we spoke to told us that any statistics that can make the claimant journey through PIP more transparent would be welcome. We found that the statistics team has worked hard to develop the statistics publication from scratch since the introduction of PIP in NI, where it is still a relatively young benefit compared to PIP in GB, and that the statistics have been developed substantially in this time.

1.15   However, the majority of users pointed to the fact that Department for Work and Pensions' (DWP) PIP statistics contain more breakdowns for GB than are available for NI and some users said that this can be perceived as DfC trying to hide something. Similarly, users told us that the lack of coherence between outputs in NI

and GB prevents them from being able to compare the performance of PIP in different nations which damages the trustworthiness of the statistics.

1.16   We identified several common data gaps that the users we spoke to would like to see in the NI PIP statistics:

    a. Duration of awards

    b. Information on award reviews and whether the award has been disallowed, increased, reduced or maintained following the review

    c. Success rates by main disabling condition

    d. How often Capita advice is overruled and why[1]

    e. More-granular geographical breakdowns

1.17   As well as these breakdowns, several other data gaps about the PIP process were highlighted by individual users we spoke to. For example, some users were interested in data on appeals, independent advice, tribunals, complaints and how often carers and companions are present for assessments. We also spoke to users who were interested in more data on the characteristics of claimants ranging from the ethnicity of claimants to more-granular data on the main disabling condition and comorbidities.

1.18   The statistics team told us that it is working to develop the statistics in line with what is available for GB but that not all of the data gaps highlighted could be resolved with the current source data available to PSU. For example, PIP is not covered by Section 75 of the Northern Ireland Act (in which Public Authorities are obliged to carry out their functions with due regard to the need to promote equality) and therefore ethnicity data are not collected routinely. To enhance the public value of the PIP statistics, the statistics team must work with users to understand their interests and how developments might add value. The statistics team should take forward the feedback from users and work with its data suppliers to implement these developments.

1.19   Where data gaps cannot be addressed, the statistics team should communicate clearly to users why this is the case and what alternatives the team might explore. For example, where sample sizes are restricting the team's ability to report data at a more granular level, the team could consider producing thematic analysis on a particular aspect of PIP or specific disabling condition to inform users' understanding without the need to publish a new breakdown of data.

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[1] In Northern Ireland, Capita provides the PIP consultation service for DfC. These consultations include a qualified Capita Disability Assessor carrying out an assessment of the claimant's condition and how it affects their daily life and ability to work. The assessor then writes a report for DfC setting out their findings and judgement regarding entitlement to PIP. These reports are then reviewed by PIP case managers in DfC who are able to overrule the judgment made by Capita if they have evidence to disagree with the judgement.

Table 1: Value – Findings and Requirements

Findings	Examples	Requirement
DfC does not directly link the charts in the statistical bulletin to the corresponding data tables and therefore the detail of the data can be missed if the reader does not view the supplementary data tables.	• The data tables contain a lot of useful breakdowns which are not referred to in the bulletin. • Some of the charts have an axis in absolute terms (e.g. the number of claimants) but the commentary refers to the percentage of claimants which is not labelled on the chart.	1. To enhance accessibility of the statistics, the statistics team should: a) Improve signposting between charts in the bulletin and the data tables which they correspond to. b) Make it clearer what other breakdowns can be found in the data tables and draw out insights in the statistical bulletin where appropriate.
DfC does not use strong user engagement to inform all the decisions it makes with regards to the development and production of the statistics. There are several data gaps concerning the claimant journey for PIP which prevent users from understanding how the policy is performing.	• The statistics team is seen as helpful when approached but it does not proactively engage with users. • Now that reassessments are complete in NI, the political debate on PIP has shifted to award reviews which are not covered by the statistics. • Many users noted that the DWP publishes more breakdowns in its PIP statistics than DfC. • Data gaps on duration of award and appeals were seen as important gaps to users for being able to support claimants to PIP effectively.	2. To maximise use of the statistics and ensure their development is informed by users, the statistics team should: a) Participate in user forums coordinated by the operations team, so that it can engage directly with users to discuss priorities for developments. b) Work closely with a range of users to understand their data needs and the type of insight they require. c) Work with data suppliers to identify potential solutions to filling data gaps. d) Publicly set out plans for addressing users' need and provide a clear explanation where gaps cannot be addressed.

Chapter 2: Quality

Introduction

2.1   Quality means that the statistics and numerical information represent the best available estimate of what they aim to measure at a particular point in time and are not materially misleading.

2.2   Quality is analytical in nature and is a product of the professional judgements made in the specification, collection, aggregation, processing, analysis, and dissemination of data.

Findings

The statistics are based on sound data and methods

2.3   The data for the PIP statistics are sourced from the PIP Computer System and represent a 100% population of PIP claimants with a postcode in NI on the reference date. The PIP Computer System is also the source for PIP statistics for GB and therefore the PIP statistics produced by DWP are comparable with those for NI. Users told us that they had no concerns with the quality or methodology of the statistics and thought that the frequency of the statistics was good.

2.4   The statistics team has a strong relationship with the PIP operations team which enables it to investigate and respond to issues in a timely manner. The data-sharing agreement was updated at the beginning of the COVID-19 pandemic to ensure that the statistics and operations teams could more easily investigate claims that appeared to have errors, which helps assure the quality of the statistics.

2.5   The bulletin and tables include a methodology and quality note for the statistics but the information provided is brief and does not cover any limitations of the statistics. The team has carried out a self-assessment against our Quality Assurance of Administrative Data (QAAD) framework, as part of a NISRA-wide initiative, to assure itself of the level of quality at all stages of the production process. The statistics team should build on its methodology and quality notes in the bulletin and tables to bring out the key information from its QAAD self-assessment, to give users the necessary information to use the statistics appropriately.

Reproducible analytical pipelines are being developed to reduce errors

2.6   PSU is currently exploring the use of Reproducible Analytical Pipelines (RAP) in the production of its statistics. RAP involves introducing methods to make analysis easily reproducible. The statistics team told us that the aim of introducing RAP is to improve the quality of the statistics by reducing the risk of human errors associated with its current software packages. The team also hopes the adoption of RAP will enhance the accessibility of the statistics and data, by introducing the capability for filtering and drop-down options in the charts within the publication. We welcome the plans to introduce RAP into the production of the statistics as it shows commitment to quality and innovation.

2.7   The roll-out of RAP across PSU's statistics was intended to start with one statistical release being piloted, before being adopted more widely across PSU. However, the COVID-19 pandemic has slowed progress on the pilot and therefore the team told

us that a steering group has been set up to develop RAP across publications rather than waiting for the pilot to be completed. It is hoped that once RAP has been fully implemented, it will free up resources within the team that can be reallocated to address developments requested by users.

Greater collaboration with DWP would improve coherence and quality

2.8   A Service Level Agreement is in place between PSU and DWP to facilitate data sharing. The statistics team has access to a selection of 73 tables monthly relating to NI PIP data, sourced from the same PIP Computer System. However, the statistics team told us that, although it has access to the data, the PIP statistics require complex analytical coding to match the right datasets and to apply the correct rules to the data to produce statistics that are comparable with DWP. This has been a barrier to replicating the breakdowns available in DWP's PIP statistics as the statistics team do not have access to the code which DWP uses to produce the PIP statistics.

2.9   More generally, it is imperative that the team is aware of issues or amendments in the PIP Computer System. DWP communicates with DfC on such changes or issues. However, PSU would benefit from strengthening this relationship and these communications. The statistics team in DfC acknowledged this challenge and said that whilst it had good relationships with DWP, the relative size of DWP compared to DfC and staff changes can make it difficult for the statistics team to foster the same links that the operational and policy colleagues have formed.

2.10   The statistics team needs to form a stronger and more collaborative relationship with DWP to enhance the coherence of PIP statistics across the UK. The statistics team should establish regular engagement with the statisticians working on PIP in DWP and use existing user groups or forums to keep up to date on changes made to the PIP Computer System and developments with the DWP publication. A more joined up approach will also ensure a common understanding of the quality and priorities of PIP statistics.

Table 2: Quality – Findings and Requirements

Findings	Examples	Requirement
DfC publishes a data quality statement but it does not detail its understanding of the quality of administrative data.	• The methodology notes in the bulletin are brief and do not cover any limitations of the statistics. • The team has reviewed the statistics against our QAAD framework.	3. To reassure itself and users of the quality of administrative data, DfC should expand the information on data quality within the bulletin and tables, highlighting any limitations or issues that were identified through the QAAD framework.

Findings	Examples	Requirement
The relationship between DfC and DWP needs to be stronger to facilitate the development of DfC's PIP statistics and to improve coherence between outputs on PIP.	• The statistics team recognises the importance of strengthening its relationship with DWP for access to code to replicate DWP's statistics and being made aware of crucial developments to the operational system from which the data are sourced. • Users highlighted a lack of coherence in outputs between DWP and DfC.	4. To enhance the coherence and quality of PIP statistics, DfC must build strong links with the responsible statisticians in DWP and establish regular engagement with DWP, to discuss issues and priorities for developments.

Chapter 3: Trustworthiness

Introduction

3.1   Trustworthiness means that the statistics and other numerical information are produced free from vested interest, based on the best professional judgement of statisticians and other analysts.

3.2   Trustworthiness is a product of the people, systems and processes within organisations that enable and support the production of statistics and other numerical information.

Findings

The statistics team are well established and trusted

3.3   Contact details for PSU are provided in the bulletin and landing pages for users who require further information about the statistics. The statisticians in PSU working on PIP have been in post for a long time and have a good understanding of the context and history of PIP statistics. Users who have contacted PSU told us that the team is always helpful and knowledgeable when responding to their queries. This demonstrates the professional capability of the team and the trustworthiness of the statistics.

3.4   The statistics team has developed strong and positive working relationships with policy and operational colleagues in DfC and regularly provides information to support operational activity or policy development. We found that the statistics team strives to help with internal queries as far as possible and that decisions made to supply new breakdowns of data are made in line with the Code of Practice for Statistics, ensuring that statistics and data are handled with honesty and integrity.

3.5   DfC has a dedicated webpage for its statistics protocols and compliance, which includes a publication timetable, revisions policy, information on who has been granted pre-release access, and a statement of compliance with the Pre-release Access to Official Statistics Order (Northern Ireland) 2009. Users within DfC told us that pre-release access is controlled well and that the statistics team is not influenced by senior figures, further demonstrating commitment to handling data in a trustworthy manner.

DfC should be transparent about its development priorities

3.6   Due to the uncertainty of the COVID-19 pandemic, a business plan was not finalised for PSU for 2020/21. Whilst PSU does not routinely publish a statistical development plan, the statistics team should be transparent about its development priorities and its progress towards achieving these developments, even if the timescales are uncertain. Being open about why the PIP statistics in NI may differ from those for GB and explaining why information highlighted earlier in this report as data gaps has been available on an ad-hoc basis through Freedom of Information requests and Assembly Questions, would enhance the trustworthiness of the statistics.

Table 3: Trustworthiness – Findings and Requirements

Findings	Requirement
The PIP statistics are released in an orderly way and the statistics team is well established and trusted.	We have no requirements relating to the trustworthiness of the statistics.

Annex 1: The Assessment Process

A1.1   This Assessment was conducted from November 2020 to March 2021.

A1.2   This report was prepared by the Office for Statistics Regulation and approved by the Regulation Committee on behalf of the Board of the UK Statistics Authority, based on the advice of the Director General for Regulation.

A1.3   The regulatory team – Elise Baseley, Catherine Bremner and Nisha Bunting – agreed the scope of and timetable for this assessment with representatives of DfC in November 2020. Documentary evidence for the assessment was provided by DfC in December 2020.

A1.4   The regulatory team discussed and met with the statistics team in March 2021 to review compliance with the Code of Practice for Statistics, taking account of the evidence provided and research performed.

A1.5   A key part of the assessment was talking to people who use the statistics, to help us to understand the current value of the statistics, and where there is the potential to increase this. We approached known and potential users of these statistics and conducted seven interviews and received one submission of written feedback. These users worked within DfC, Capita, advice agencies and the Northern Ireland Assembly. Our engagement gave us some insight into the extent to which the statistics meet different users' needs and the extent to which users feel that the statistics' producers engage with them.