Race Disparity Audit – Statement of Compliance with the Code of Practice for Statistics

Contents

1.   Purpose of the Statement of Compliance

This statement of compliance serves two main purposes:

a. To provide transparency for users – by recording the way that the Cabinet Office's Race Disparity Unit (RDU) has approached the production and dissemination of the Race Disparity Audit (RDA), in terms of the principles of the UK Statistics Authority's (draft) Code of Practice for Statistics.
b. To identify areas in which compliance with the Code can be enhanced as the Audit is developed.

The refreshed draft Code sets out 70 statements of (good) practice, structured under 13 high level principles. To achieve the purposes of this statement of compliance we have described our approach to producing the first Audit at the level of the thirteen principles, drawing on the detailed practices as appropriate. For convenience we have included the Statistics Authority's description of each element of the Code. We have based this Statement on the draft Code rather than the 2009 version because the refreshed version of the Code has been developed in ways that address the greater dissemination of data via digital platforms such as the Audit.

2.   Background

2.1 About the RDA

The Prime Minister announced the Race Disparity Audit in August 2016; the objective was to publish Government data on disparities in treatment and outcomes in public services for all races. This work has been led by the RDU, a joint DCLG and CO unit, including staff from the CO, Government Digital Service, analysts and policy officials from across Whitehall, ONS and contractors.

The RDU has collected and cleaned ethnicity data from UK Government departments, collating and prioritising what should be published at launch. The team has compiled data commentary to present with the data on the Ethnicity Facts and Figures (EFAF) website and drafted a summary analytical report. The team has also designed and built a website that presents the data in a user-friendly way, and engaged with a wide range of external partners to understand potential uses of the data and to test demand for the website.

2.2 About the Code of Practice

The preparation and publication of a Code of Practice for Statistics are statutory responsibilities of the UK Statistics Authority, which is also responsible for assessing sets of official statistics against the Code with a view to awarding designation as National Statistics.

The first edition of the Code was published in January 2009. Over the last 18 months the Authority has reviewed the way in which the Code has been used. In July 2017 the Authority launched a consultation on a refreshed edition of the Code, structured around three pillars – trustworthiness, quality, and value – and a set of principles that can be applied to a wide range of numerical information; within these principles are embedded a series of detailed practices that producers of official statistics should adopt when producing and releasing official statistics. The Authority's intention has been to provide all producers of statistics and numerical information with a framework that can be applied in a proportionate and flexible way to improve public confidence. The consultation closed on 5 October.

3.   RDU's approach to the production and dissemination of the Audit

3.1   Trustworthiness: trusted people, systems and processes

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

All of our work on the Audit has been guided by the public interest. The decisions we have made – for example, about the range of data to be presented, the choice of time periods, the nature of the overarching analytical report, and quality assurance processes have been guided by a clear commitment to transparency, accessibility and objectivity and shaped by extensive user testing.

By 'public interest' we are referring to the Audit's capacity to demonstrate in an accessible way how people of different ethnicities are treated by public services.

3.1.1 Integrity

Confidence in statistics is dependent on the integrity of those producing statistics; the behaviours and actions of producers should reflect public interest and this should be apparent to users

RDU's senior management and analysts are aware that statistics that aren't trusted won't be used; also that any appearance of the partisan presentation of data might challenge the trustworthiness of the whole Audit. We have undertaken stringent quality assurance with a view to ensuring that the commentary identifies the salient points, and presents them clearly. Should any users feel that we have not been as objective as we have intended to be, we will review the commentary objectively. Those users who have seen beta versions of the website have been very positive, while offering helpful advice about potential improvements.

The detailed practices supporting the principle of Integrity stipulate a number of aspects of the orderly release (publication) of statistics. These considerations are particularly important when new statistics are released. In the case of the Audit - which is mainly drawing together previously published statistics (albeit some of the detailed analyses by ethnicity, such as social renting, overcrowding, and travel by distance/mode are new) – and which has involved the provision of data from a range of government departments, we believe that we have complied with the spirit of the Code. We think that we could enhance compliance in the future by pre-announcing the publication of updates well in advance, by publishing at 9.30 am, and by ensuring separation between the statistics (the Audit) and policy statements. We are aware of media coverage of the Audit in the run up to its launch, referring to specific (previously published) statistics, and we consider that this has been effective in promoting the launch of the Audit. Nevertheless, we consider that release arrangements that follow established best practice will enhance trust in the Audit.

3.1.2 Good governance

Statistics production should be underpinned by strong leadership, effective and transparent planning, and clear lines of responsibility and accountability for observance of the Code

While the Audit was a No.10 commission, from the earliest stages of work the Unit's leaders voluntarily set the ambition to comply with:

● the Code of Practice - in practical terms this was realised by close engagement with the UK Statistics Authority's Office for Statistics Regulation, the Office for National Statistics Good Practice Team, and the secondment of analytical staff to the Unit from across the Government Statistical Service.
● the Government Digital Service's (GDS) Digital Service Standard - a set of 18 criteria to help government create and run good digital services. All public facing transactional services must meet the standard. It is used by departments and the GDS to check whether a service is good enough for public use. The first of the 18 criteria is "Understand user needs".

The detailed practices supporting the principle of Good Governance specify the role of the statistical Head of Profession in the production process – for example, that the Head of Profession should have sole authority for deciding on the content and timing of the release of statistics. Reflecting the origins and nature of the Audit - a new, high profile statistical exercise with likely policy implications - we have accepted that decisions about content and timing will ultimately be influenced by ministers. Indeed, we consider that Ministers' commitment to the Audit, and their engagement in its development and in shaping the policy direction, were crucial to delivering such a large cross-governmental project. We anticipate that in future we will be able to enhance compliance with this aspect of the Code, while ensuring that ministers – as users of the statistics – continue to have an input to the coverage of the Audit.

Clearly defined processes and procedures are important aspects of good governance. Amongst these, we:

- developed (with input with our Technical Working Group) a set of statistical principles for the Audit, covering its scope and coverage; types of data; responsible analysis and meaningful comparisons; commentary and presentation; quality and quality assurance; identifying gaps and harmonisation; ethnicity (classifications); geography; and specific statistical issues such as the presentation of data about income, and disclosure control. These principles are annexed.
- used the standard Government Digital Service (GDS) development model, including testing alpha and beta versions of the web tool with users.
- used Google analytics to understand users' journeys through the web tool.
- commissioned Gateway Reviews at the alpha and beta stages, and implemented the recommendations.
- have used gov.uk service standards; and
- developed a revisions policy (to address any data errors or the availability of updated data).

3.1.3 Statistical capability

Sound professional and technical skills are needed to ensure good statistical judgement

Most of the analytical staff in the Unit were seconded in from across the Government Statistical Service and, therefore, already had appropriate skills and experience. Training was provided on the Unit's IT systems, as required.

3.1.4 Protected confidentiality

The privacy of individuals and business information must be protected in the production and release of statistics and data, ensuring legal obligations are met

We have taken advice from the Office for National Statistics and also from the statistical experts on each department that has supplied data to us, about how to protect the confidentiality of individuals. For each measure we have described the particular approach taken to suppress data that might otherwise breach confidentiality, for example by not including data derived from a sample size of less than 30.

3.2   Quality: robust data, methods and statistics

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. 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

At a conceptual level it is helpful to distinguish between the quality of each source/item of data included in the Audit, and the quality of the Audit as a whole.

In prioritising the data to be included in the Audit, the criteria we adopted included 'quality' and 'relevance'. We have been guided by the statistical experts across government about the quality of particular sources, and where possible we have drawn on official (including National) statistics. For each measure on the website we have included background sections covering a brief summary of noteworthy aspects of the data sources and the associated methodology, and relevant web links. And we adopted quality assurance arrangements that made the most of the expertise of Departmental statisticians.

At the level of the Audit as a whole, we have enhanced quality by ensuring that the initial set of data included covered a broad range of topic areas, and by the use of established presentational frameworks and statistical classifications. We have also included in the overarching analytical report a clear summary description of some key considerations of quality:

- That there are some areas of public services where there is little or no data about ethnicity.
- That where relevant data *is* collected, a common challenge is having insufficient numbers of cases to study in the ethnic minority groups; inevitably this limits the degree to which firm conclusions can be made about differences

between ethnic groups, and the ability to take account of other factors in analysis in addition to ethnicity.

● That the quality of data on the ethnicity of individuals varies and is generally better when reported by people themselves, as it is in surveys and the Census. Administrative data – such as is collected from service users – can suffer high levels of non-recording of ethnicity and overuse of 'other' categories, undermining the ability to identify differences in how people in each ethnic group are treated.

3.2.1 Suitable data sources

Using and understanding the most appropriate data sources is the foundation of producing robust statistics

The scope of the Audit is UK Government data. An initial review required all Government Departments to identify what data they held on UK public services that could be analysed by ethnicity. The review identified a vast amount of information, some of which is already published and some that had not yet been analysed for ethnic differences. The data identified by the Audit was very varied in quality and depth. It spanned the Census, published official statistics, numerous Government surveys and Departments' own administrative records.

Some datasets have been prioritised for inclusion in the first release. The intention is that others will follow in due course. The criteria for prioritising data reflected its quality, readiness, manageability and relevance to key concerns identified by users of the data, including members of the public, NGOs, public services and Government Departments themselves. The emphasis was on opening up data to the public where it was reasonably reliable, with caveats as necessary. In prioritising we were aiming to:

● cover subject areas that matter most to our users e.g. health, education, work
● provide more granular ethnicity breakdowns i.e. favouring a higher number of different ethnicities than merely "white or non-white"
● include breakdowns by geography, income and gender
● provide more granular breakdowns by local area or business unit e.g. school, prison, hospital

The prioritised list for launch was approved with government departments and No.10, with all other remaining datasets and measures to be added following the launch.

We recognise that a key objective of the next phase of the Audit will be to broaden and deepen the range of measures, and we expect to continue to collaborate with departments and others to do so.

3.2.2 Sound methods

Transparent judgements about statistical definitions and methods, together with judgements about strengths and limitations, are essential in supporting confidence in the quality of the statistics

To the greatest extent possible the Audit brings together official statistics (and in many cases National Statistics), because the methodologies underpinning these are demonstrably robust. The Unit has taken the advice of experts across the Government Statistical Service about the strengths and limitations of different sources: in some cases, for example, we have aggregated more than one year of data to provide sufficiently reliable data.

Each measure includes a summary of the key aspects of the methodology, prepared in as accessible a form as we have been able to, a section called 'Things You Need To Know', and details of the data source, including the approach taken to data suppression (confidentiality protection) and rounding.

In order to benefit from best practice, expertise, rigorous public consultation and testing, we referenced the measurement framework used by the Equality and Human Rights Commission (EHRC). The EHRC framework measures and monitors progress on equality and human rights in England, Scotland and Wales and consists of a number of domains, indicators and measures. It aims to "describe the central and valuable things in life that are important to people and provide them with opportunities to flourish such as enjoying an adequate standard of living, being healthy, having good opportunities for learning and education, having legal security, and being free from crime and the fear of crime."

There are a number of parallels between the EHRC domains and the areas that government is responsible for. In their final public consultation in early 2017, EHRC identified education, work, housing, health, living standards and social care, security and justice, participation and private life as their 7 proposed domains. This helped guide the 6 domains we now use, which give structure to the underlying ethnicity facts and figures:

- Community and community action
- Crime, justice and the law
- Education

- Health
- Housing and living standards
- Work

EHRC have a framework model using domains, indicators and measures:

- Domains reflect the things or areas in life that are important to people and enable them to flourish
- Indicators are intended to capture and define the underlying concept that we are trying to measure
- Measures capture and define the specific statistics that we are using to measure the underlying concept

Our framework has a parallel structure in the form of topics, sub-topics and measures:

- Topics reflect the key areas within the public sector that are important to people
- Sub-topics group together similar subject areas within a topic
- Measures capture specific facts and figures on a subject e.g. victims of crime, unemployment

We did not base our framework on government structures or departments. Instead, they are based on people's perceptions and how they group subjects together. The website is structured around this framework and has been thoroughly tested to check that users can navigate easily and find the content that they are looking for.

3.2.3 Assured data quality

Producers should demonstrate how they assure themselves that the statistics are robust and reliable

The Unit has adopted a multi-stage process to quality assurance. First, in drawing on statistics held (and in most cases already published) by other government bodies, it can draw strength from the QA processes adopted by those responsible for collecting/compiling the data originally.

Second, the Unit's processes have themselves emphasised QA. With input from the Technical Working Group we developed templates so that data, metadata and key points, provided by Departments, were standardised. Data provided by Departments has been checked, and any apparent problems discussed with the suppliers; the commentary about the statistics has been based on material provided by the

Departmental expert and checked by the Unit's analysts and content management team in order to ensure transparency, objectivity and consistency; then, once the commentary and charts have been brought together they have been shared with the Department and the Head of Profession has signed off the material for each measure.

Each measure is accompanied by information about relevant aspects of quality and methodology.

3.2.4   Coherence

Statistics should be consistent and comparable, while remaining relevant to society

The main challenge to coherence has resulted from the different categorisations of ethnicity adopted across different data sets, and also as a result of changes to the categorisation over time.

We have included a section called 'about ethnicity' on the website. This explains the 18 categories used in the 2011 Population Census, the five broad categories, and the 'binary' categorisation - and the circumstances in which these are used. It also explains that some organisations continue to use the categorisation from the 2001 Census. It also gives context by providing an overall picture of the population by ethnicity, to enhance understanding of the measures.

The geographical coverage of the Audit is the UK, and we have included data about the position in Wales, Scotland and Northern Ireland where the data has been provided to us by (UK) government departments. We have engaged all the Devolved Administrations throughout the Audit to discuss the processes and systems involved and hold open discussions regarding the inclusion of data that is devolved. The Welsh Government have agreed that published Welsh data can be included in the Audit and this will be taken forward post-launch. The Northern Ireland Executive have not had a functioning government in place during the timeline the Audit and therefore are not in a position to affirm participation. The Scottish Government have advised that they do not wish to participate in the Audit, at this time. We will continue to engage all Devolved Administrations in the Audit and further discuss their possible participation in the Audit.

3.3   Value: statistics that serve the public good

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. 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.

We consider that the rationale for and nature of the Audit are absolutely aligned with the principle of securing public value.

3.3.1 Accessible

Statistics must be equally available to all and not released partially to selected audiences

We have been guided by the statistical experts across government about the quality of particular sources, and where possible we have drawn on official (including National) statistics. We have viewed this expert guidance through the lens of accessibility – we are committed to ensuring that the Audit meets the needs and captures the attention of a wide range of users, including non-specialists. So, for example, in many places we have presented estimates in a rounded form, rather than showing decimal places – our judgement has been that in the context of the Audit, the slight loss of precision is outweighed by the benefit of making the data and the messages easier to absorb.

As a web-based statistical service, the information about the measures included in the Audit is freely available. Each measure includes information (about data sources and key aspects of the underlying statistical methodologies, for example) which we have sought to make as accessible as possible to a wide range of users; we have also provided links to more technical information produced by the department which provided the data, and contact details of the department's statistical expert.

Content designers reviewed each measure to make sure that the content:

- was written in plain English
- avoided jargon and explained technical terms clearly and simply
- was consistent across the website
- highlighted salient points and caveats or inconsistencies
- followed the GOV.UK and ONS style guides

More generally, we also engaged closely with open data experts.

3.3.2 Insightful

Statistics should help to clearly answer society's important questions

The purpose of the Audit is to describe, using statistics, the extent of differences in outcome or treatment for people of different ethnicities. It is important to emphasise that the Audit is *not* seeking to explain why differences exist – in preparing commentary about the different measures we have avoided attributing causality. This approach has been supported by the wide range of experts we have worked with, within government and across the academic and third sectors.

3.3.3 Reflect the range of users and uses

Producers should understand and promote the variety of uses and potential uses of statistics

We have put considerable effort into actively engaging with users about the scope of the Audit, and its delivery via a web site.

We have spoken to hundreds of users since the project started, to help us understand who are users are, what their different needs are, how those might already be met elsewhere, and what problems they had that we could solve.

The different groups of users included:
- members of the public - from diverse ethnicities and backgrounds
- Central and local government - policy and programme officials and analysts
- NGOs
- academics
- public service managers from sectors such as education, employment and health e.g. headteachers, job centre managers

Their needs vary a great deal as does their comprehension of statistical data. We had to present our content in a clear and meaningful way to non-experts in statistics and data. We also needed to make sure it was accessible so that visually or manually impaired people could use the service. Users with more expertise in statistics and data manipulation needed access to the data and richer background information to give context on how it was collected and analysed. And we released alpha and beta versions of the web tool (showing only data that had previously been published) to selected users and stakeholders.

Our users came from a variety of ethnic backgrounds, locations and demographic profiles to reflect the diversity of the website's user base.

3.3.4 Innovative

Statistics need to continue to evolve to remain relevant in a changing world

As far as we are aware, the Audit is unprecedented in scope and transparency. We consider that it builds upon well-established approaches to bringing statistics together from different sources – Social Trends, for example – but the truly innovative aspects of the Audit are rooted in the exploitation of technology to provide users not only with descriptive statistics but also the underlying data to support secondary analysis. And the provision of information about the measures in open source format means that others can take the data and use it for secondary analysis. There is a clear commitment to continue the Audit, and we are actively seeking feedback both on what we have presented in the initial release, and how we should develop it in future – including more measures, improved presentation, and greater functionality.

3.3.5   Efficient data collection and use

Statistics should be produced from data which has been compiled in an efficient way.

All of the information presented in the Audit is sourced from existing survey and administrative data held by Government departments: there have been no costs of new data collection. We have sought to balance the burden on departments of providing us with data with our need for common formats and data structures, and we have worked closely with government analysts in developing our templates and specifications.

It is too soon to express an opinion about how the open data aspects of the website will be used. However, we hope that the provision of the underlying data in csv format will enable others to explore the data in full. We encourage feedback from users that will help us to enhance the service that the website represents.

Statistical Principles for the Race Disparity Audit

Scope and coverage

1. The Audit will compile statistics about public services which can be disaggregated by ethnicity.

2. The Audit will compile statistics on ethnicity using information about people's ethnicity.

3. Where data can be disaggregated by ethnicity, it will be included in the Audit regardless of whether it shows the presence or absence of disparities.

4. Data by ethnicity should always be further broken down by income and/or geography where available.

5. There will be tradeoffs to make between the granularity of ethnicity data in combination with income and geography data, but the primary focus should be on ethnicity data.

6. The Audit will capture information about a range of income and socio-economic groups broken down by ethnicity, but will not otherwise seek to define specific groups such as 'the White Working Class'.

7. The Audit will present statistics at the smallest geographic level possible to help make it as relevant as possible to the public.

8. The Audit will present data on institutions and business units (eg schools, police forces, hospitals) to increase its relevance to the public and help drive service transformation.

9. The Audit will publish statistics on ethnic disparities for the whole of the UK, but comparability across devolved administrations will be limited due to differences in geography, public services and data systems.

Types of data

10. The Audit is not a repository for research on ethnic disparities.

11. The Audit will compile quantitative data on ethnic disparity from a range of sources including Census, surveys and administrative data.

12. The Audit will present descriptive statistics and may also refer to findings based on more advanced statistical analysis, such as regression, provided these are already published official or national statistics or peer-reviewed.

13. The Audit will collect and report time series, possibly phased subject to resources and demand.

14. The Audit will demonstrate commitment to transparency and build trust by publishing a forward programme for release of future phases of data and new datasets or analysis.

Responsible analysis and making meaningful comparisons

15. The Audit will disaggregate ethnicity data by income and by geography, and other key relevant factors (e.g age, gender etc) to expose differences and/or avoid misleading conclusions.

16. Departments will consider the granularity required to show differences which might be otherwise masked eg to analyse different types of health complaint or criminal offence.

17. The Audit will present data on the observed differences between ethnic groups without statistical adjustment, but departments may - on a case by case basis - perform the adjustments necessary to avoid misleading conclusions. While unadjusted statistics/rates will generally be used to show disparities, such as about processes, it may be necessary to adjust some outcomes for confounding factors eg age and sex in health outcomes.

18. The Unit will work with departments on a case by case basis to understand the complexities of analysing inequity in treatment by public services which depend on need and accessibility as well as other factors (eg personal choice & use of alternative services).

19. Departmental proposals for further analysis to aid understanding of ethnic disparities will be tabled in a public forward work plan.

20. The Unit will scrutinise departments' statistics to ensure they demonstrate integrity, are meaningful, and highlight disparities where they do and don't exist.

21. The Audit will communicate statistical analysis in a non-technical and standardised way, using the <u>ONS style guide</u>, specific good practice guidance (as advised) and digital platform content designers.

Commentary & presentation

22. Departments will provide supporting analytical commentary to include key headline findings and their statistical significance, and caveats around the data quality and analysis - being transparent about strengths and weaknesses.

23. Findings should focus on key statistically significant differences which highlight both existence of ethnic disparity in access to public services as well as parity of access.

24. The Audit advises use of the <u>ONS style guide</u> and specific good practice guidance (as advised) for consistently high standard analytical commentary.

Quality & quality assurance

25. The Audit will not seek to suppress data if it is poor quality but will instead provide necessary warnings and caveats around data if it is the best available.

26. The Audit will seek expertise from GSS Good Practice Team and Office for Statistics Regulation (OSR, the regulatory part of the UK Statistics Authority) on advice to departments on assessing and communicating quality.

27. The Audit will work with the Technical Working Group and other key stakeholders (including GSS Good Practice Team and OSR) to agree quality thresholds for inclusion of data in the Audit to meet its purposes.

28. Departmental analysts will assure the quality of their data, analysis and commentary, signed off by Heads of Profession (HoPs); and the Unit will seek ONS and OSR quality assurance for the overall product.

Identifying gaps and harmonisation

29. The Unit continues to work with departments and engages with users, academics and other key stakeholders to identify gaps in data and understanding, and prioritises areas for improvement.

30. The Audit acknowledges current inconsistencies in the classification of data on ethnicity, income and geography across public services and will make recommendations for harmonisation.

31. The Unit will ask departments to identify potential further data collection or analysis which could be done to help improve understanding and will make this knowledge publicly available as part of the Audit process.

Ethnicity

32. The Audit advises that ethnicity information is reported using 2011 Census 18 + 1 ethnic group classification where possible, but lack of comparability across all sources will be inevitable.

33. Pooling multi-year data when appropriate may increase the reliability of analysis by ethnicity, income, geography and other relevant sub groups but recognise there will be tradeoffs (eg time-series).

34. Departmental analysts should explore the trade-offs required in banding ethnicity, income and geography and seek input from the Unit.

35. As a minimum reporting standard, White British people should be distinguished where possible from all other ethnic minorities (including other White and White Gypsy Traveller).

Income

36. Income is reported using weekly income bands where possible.

37. Equivalised household income is used where possible to take account of household composition and enable fair comparisons.

38. Where there is no income data available, proxy measures may be used in the following order of preference:

    a. Measures of individual or household economic well being (eg Free School Meals), followed by measures of socio-economic group.

b. Area-based measures of deprivation at neighbourhood (ie LSOA level).

c. Area-based measures of deprivation at higher geographic level, but not higher than a local authority.

39. The Indices of Deprivation are the recommended area-based measures of deprivation, and the Unit will work with departments to select the most suitable geography, index and summary measures.

The White Working Class

40. The Unit will not define 'working class' and will infer this using income data where available in preference to occupation-based measures (eg NS-SEC).

Geography

41. Geographical analyses should use statistical geographies, presented in line with ONS geography policy, or well-known administrative geographies.

42. Data should be disaggregated to the smallest level possible, and by region as a minimum, using multi-year data if appropriate.

43. The Audit will, where possible, *collect* data for Lower-layer Super Output Areas (not wards) *and may use it to produce and report ward level estimates.*

Business Units or Institution level data

44. The Unit recommends reporting information at 'business unit or institution level' (eg hospital, school, prison. The Unit will work with departments on case by case basis to understand the capacity and technical considerations which will be relevant to phasing of this data, and potential impacts.

Data formats

45. The Unit intends to collect aggregated, unrounded numbers and statistics and will work with departments to devise the most appropriate measures to highlight ethnic disparities which aid comparisons across services.

46. The Unit will develop processes for uploading data which will seek to minimise errors, reduce the burdens of uploading and checking data, and improve standardisation.

47. The Audit will include comprehensive metadata, drawing on relevant GSS guidance, and will seek to devise a sustainable system for collecting standardised information from departments.

Disclosure control

48. The Audit will not hold data which is identifiable or disclosive and will not hold any records on individuals even when these are anonymised.

49. Departmental statisticians will ensure there is no disclosure of identifiable data, signed off by the Head of Profession, and will inform users about disclosure controls applied to the data.

Future updates

50. The Unit will work with departments to better understand how to prepare for future updates, including their capacity for APIs.