

## ATODIAD 2

### Ymatebion i Ymgynghoriad

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## 1. Felicity Chandler, Denbighshire County Council

Hello,

Please find below our response to the consultation for the STATS3 data collection.

1. What impact will these proposals have on your work?

I deal with supplying the Stats3 data and the proposals for this is to simply reduce the frequency of the data collection. The impact it would have would depend on what is being proposed as the new frequency of collection. At present, the annual data collection means that we have the information to hand and so it only takes a few days to compile and check the data. We keep the timesheets for staff for the last 2 to 3 years here so if the data collection was to be reduced to more than every 3 years, we may struggle to compile the information requested and would not feel confident that it was as accurate as it is now. When it is time to collate this information, it takes about 3 full days of employee time each year, so whilst I feel that reducing the frequency of data collection would make the process of starting again more difficult, I think it would only add an extra half day to the time. All in all, 3.5 days of employee time over a 3 year period is much better than 3 days every year. I would suggest that this is a good idea but should be no less than on a 3 year basis.

2. What do you use the statistics for?

We do not use these statistics in my department, just supply the data.

3. Do you agree with the focus on making datasets available in an open format with more analytical - but less frequent - statistical releases?

As we do not use these ourselves I can only answer from an outside perspective. The analytical stats are helpful as they give clear results and clarity of using this data for meaningful progress. However, I do feel that there is a risk that some useful data may be missed as it is not included in the analysed results. If these are too focused then some departments may find it too difficult to use the data. Is there a method for people to contact the organisation and request certain background data/information for a small financial charge to minimise this risk? The frequency will be a key issue I feel. Some companies may need to alter their working practices in order to accommodate this but there could potentially be a working group set up where companies who need certain data on a more frequent basis are in touch with each other and can share this data within that group. Whilst this would provide a smaller sample of data it could still be useful for those wanting a regular drip-feed of information to benchmark against, measure progress, determine trends and make adjustments to their workforce etc.

4. Where we are proposing to stop or reduce the statistics that are available, are there dependencies between our statistics and your work that we have not considered?

None that I am aware of at present.

5. Are there particular issues of timing that we should consider when planning for reducing the frequency of statistics?

As mentioned, three yearly would be our preference as any longer than this between collation of data would mean that we cannot ensure the data provided is accurate due to accessibility. For the Stats3 schools data, the data captured is for one day out of each

year. I think that if this is reduced to a less frequent period, the data requested needs to be reflective of the last 3 years i.e. not just one day each 3 years. I feel this will not accurately show any trends or patterns otherwise. One day each year over the last 3 years would be better although for accurate data a true reflection of the year I feel that one day each term might also be more accurate, or an average for the last 12 months, such as the average FTE of teachers in primary schools, all the vacancies for the last 2 months etc. This will produce more data but will be a more accurate reflection of the situation each year. Also, I feel this would be better following the academic year rather than a calendar year. The data requested tends to be for a day in the middle of January but there can be changes following the Christmas period that have not yet been reflected on our systems so again the data provided might not be a true reflection. An average of the year would be the most accurate but an alternative could be to request the data for a day at the start of December. This would be towards the end of a term which minimises the chance of inaccurate data (any changes due to staff records would be for the next year at this time).

Thank you

## **2. Gwion Dafydd, Ceredigion County Council**

Helo,

Rwy'n defnyddio nifer o'ch setiau data yn y maes addysg, er enghraifft, canlyniadau CA4, asesiadau athrawon, data CYBLD etc. yn enwedig y data sydd i'w ddarganfod ar StatsWales. Sylwaf nad yw'r cyhoeddiadau mwyaf pwysig (i mi) yn mynd i gael eu heffeithio gan y broses hon, ond teimlaf fod oedi mawr rhwng rhai o'r cyhoeddiadau a phryd y bydd y data ar gael ar StatsWales, er enghraifft data gwaharddiadau a chanlyniadau CA4/5. A dweud y gwir, mae'n haws i mi drin y data fel lawrlwythiad o StatsWales na mynd trwy pob cyhoeddiad a mewnbynnu'r data fy hun mewn i daenlenni, sydd yn gallu achosi data anghywir i gael ei storio gennyf ("human error"). Mae diddordeb mawr gennyf yn y tablau sirol gan fy mod yn cymharu Ceredigion ag awdurdodau tebyg yng Nghymru, ac nid yw'r data penodol rwyf ar ei ôl yn y cyhoeddiadau bob tro, felly mae'r aros tan fod StatsWales yn cael ei ddiweddarau yn gallu bod yn boendod. Felly nid oes gen i unrhyw wrthwynebiad i beidio cyhoeddi cymaint o ddatganiadau ond buaswn yn disgwyl i hyn ryddhau mwy o amser yr ystadegwyr i gadw StatsWales yn fwy "live" o ganlyniad.

Ar ôl trafod gyda rhai cyfoedion mewn adran arall yng Ngheredigion, teimlaf mae'r unig gyhoeddiadau sy'n sefyll allan yw'r rhain

<http://wales.gov.uk/statistics-and-research/local-area-summary-statistics/?lang=cy>

Gan fod rhain yn dod a data o sawl adran wahanol at ei gilydd, byddai'n anodd iawn i ni goladu'r data ynghyd o'r nifer o wahanol dablau StatsWales. Efallai mod yn anghofus, ond nid yw'r cyhoeddiad hwn wedi bodoli ers mwy na 2/3 blynedd beth bynnag felly teimlaf ei fod yn wastraff ei ddileu mor gynnar mewn i'w fodolaeth.

### **3. Jayne Dando, Abertawe Bro Morgannwg University Health Board**

Thank you for the opportunity to comment on the Welsh Government Consultation on proposals concerning official statistics.

Annex 1 includes under the proposal to “reduce the number of stats bulletins that we produce that simply duplicate stats on Wales that are readily available from other organisations” a reference to “NHS Staffing” (although the link in the annex is not live).

It is noted that whilst Workforce Education Development Services, NHS Wales Shared Services Partnership, provides data to Welsh Government from the NHS Wales Data Warehouse, it does not publish any data and does not make NHS Wales staffing information available via a web site.

It is therefore assumed that Stats Wales will continue to publish NHS Wales staffing information.

### **4. Ceri Davies, Natural Resources Wales**

**Welsh Government Consultation:  
‘Proposals concerning the publication of Official Statistics’  
Response from Natural Resources Wales**

Natural Resources Wales is the principle advisor to the Welsh Government on the environment, enabling the sustainable development of Wales’ natural resources for the benefit of the people, the economy and wildlife. Our purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.

As an evidence-based organisation, Natural Resources Wales welcomes the opportunity to respond to this consultation on the Welsh Government’s proposals on the publication of official statistics. Our response is based on our dual role both as a producer of Official Statistics (and other statistical data) and as a user of many of the environmental, social and economic statistics which are currently published by the Welsh Government.

Our response is provided below in relation to the questions outlined in the consultation document.

#### **What impact will these proposals have on your work?**

As one of the organisations named in the Official Statistics (Wales) Order 2013, Natural Resources Wales welcomes the opportunity to work more closely with the Welsh Government on the production and publication of those Official Statistics for which we are responsible. As we develop our role in this area, we are keen to discuss how we can work alongside the Welsh Government, ensuring that we avoid both duplication and

gaps in relation to environmental statistics<sup>1</sup>. Further detail will be required as to what is meant by 'working together' and the Welsh Government providing a 'leadership role', ensuring that all parties have a good understanding of our respective roles and responsibilities. We would also welcome more detailed discussion regarding the support that could be offered by the Welsh Government as we develop our new role in relation to the publication of official statistics.

As part of this evolving discussion, we are keen to gain greater clarity as to which environment statistics we will be responsible for, and which will be covered by either the Welsh Government or other responsible bodies. A distinction should also be made between responsibility for the *production* of data and the *publication* of data, with clarity as to who is responsible for which aspects. We would also welcome a discussion with the Welsh Government and others as to the range of environmental statistics which are required, in order to build a clear shared vision of what data is needed and how the production and publication of this should be prioritised.

### **What do you use the statistics for?**

Natural Resources Wales makes use of a wide range of statistics to inform our work, encompassing our advice, delivery, and monitoring and evaluation. We utilise a wide range of environmental statistics, along with other social and economic datasets such as those relating to health, population and the economy.

As we consider the future development of a State of Natural Resources Report (as proposed in the Welsh Government's Environment Bill), we will need to review a range of regularly published statistics to determine whether they could be a potential source of data and information. We will also be reviewing existing Welsh statistics (environmental, social and economic) to potentially help inform our Corporate Plan indicators.

### **Do you agree with the focus on making datasets available in an open format with more analytical - but less frequent - statistical releases?**

Yes, in principle we are in agreement with this. It is in keeping with wider trends in relation to the publication of statistics, such as the direction that is being taken by the ONS and the GSS more generally.

However, further consideration should be given to the 'accessibility' of available datasets, particularly by 'non-expert' users. Consideration should be given to providing appropriate metadata and guidance so that all users can understand how the data can be interpreted, and whether that are any assumptions or constraints to take into account. We would welcome a review of user's needs and whether the current design of StatsWales supports the proposed changing pattern of publication and use.

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<sup>1</sup> With reference to the term 'environmental statistics', please note that this is as yet undefined and could potentially encompass a wide range of data sources from biodiversity to waste and associated public attitudes and behaviours.

We also support the proposal for more analytical statistical releases, and would welcome the opportunity to discuss some of these in more detail. In terms of frequency, we would recommend that this should be steered by the needs of users of individual statistical outputs.

**Where we are proposing to stop or reduce the statistics that are available, are there dependencies between our statistics and your work that we have not considered?**

A key area of interest to Natural Resources Wales is the proposal to stop the publication of the State of the Environment Report. As this is closely linked to the development of a new State of Natural Resources Report (as proposed in the Environment Bill), we consider this to be an important area of discussion as we move forward. The scope, timing, and data collection responsibilities of this have as yet to be determined, and will impact on any proposed changes to the current publication of environmental statistics. Discussion should also encompass how and where the proposed State of Natural Resources Report should be published, and whether it will be available via StatsWales.

In the interim, cessation of the State of the Environment report could lead to an increase in individual requests for data on some of these topics, and managing these requests with current resources is an area of concern. We are also concerned that proposals to stop the State of the Environment will result in updated data not being published, with the potential implication of people using the out-of-date statistics which are available on StatsWales. We would be keen to discuss the opportunity to publish some of our data on StatsWales, and to provide links to some of our related publications, for example those related to the Welsh Outdoor Recreation Survey.

With regard to changes to the publication of certain compendia publications, we have some concerns about the proposal to stop the production of the Local Area Summary Statistics. As we move toward the development of Natural Resource Planning as our future approach to managing the environment, the need to take account of economic and social data means that the provision of these statistics in an integrated document at the local authority level will be important source of information.

In terms of stopping the publication of Fly Tipping release as official statistics whilst continuing its availability as underlying data, we would appreciate an opportunity to discuss this proposal with you in more detail, in particular regarding how this data will be provided to the Welsh government in the future.

Similarly, as users of agriculture statistics, we would welcome the opportunity to discuss the detail of any changes to the production of other compendia publications on this topic.

We are also users of the greenhouse gas and air quality inventories. As we currently take this data from the Defra, DECC, and NAEI sites, we would support the proposal to no longer publish these on StatsWales.

With regards to the other changes, although it has been noted that some outputs could be stopped as the data is available from other UK or England / Wales sources,

consideration should be given to accessibility of the Wales-only data. In some instances, there could be value in providing the Wales-only data on StatsWales to make it more accessible to users without them having to search wider datasets for it.

### **Are there particular issues of timing that we should consider when planning for reducing the frequency of statistics?**

In general, we consider that the frequency of statistical outputs should be considered on an individual basis, and determined by users needs. Consideration should also be given to aligning the publication of Wales' indicator data with that of UK equivalents so that the Welsh data is available concurrently.

With regards to the frequency of environmental statistics, this should take into account the timescale of the proposed State of Natural Resources report, which is currently being considered on a 5 year reporting schedule.

## **5. Paul Davies AM, Welsh Conservatives**

### **Proposals concerning the publication of official statistics**

#### **Welsh Conservative Response**

**March 2014**

Welsh Government proposals

- To build on our collaborative community with partner organisations and remove duplication in the publication of official statistics;
- To allow more time for value added interpretation and analysis, where appropriate we will publish datasets through StatsWales, whilst reducing the number of routine monthly and quarterly statistical outputs. We will seek to publish the datasets in a more timely fashion and with appropriate user support;
- To move the data from many of our compendia publications from hard copy/pdf to StatsWales, ensuring that the data is available to users in a manner that is open source and downloadable.
- For those few outputs that add less value, or have little use outside a very specialist or internal audience, we will reduce the frequency or cease either the data collections/publications.
- To publish ad-hoc requests for statistical information, whilst aligning our standards of service with our Freedom of Information commitments.

Feedback

### **What impact will these proposals have on your work?**

The proposals for reducing the datasets and ceasing datasets which are seen as specialist need to be handled very carefully. The datasets which are to be phased out should be advertised widely in the public domain with those who use them frequently being consulted with. If possible, those statistics should be absorbed into other releases.

Welsh Conservatives support as much data being hosted on StatsWales as possible and the process of making statistics available and downloadable to as wide a group as possible.

**What do you use the statistics for?**

The data released is important to our work as opposition Members, seeking to accurately understand areas of policy which are devolved to the Welsh Government. Regular datasets help us to work with third parties; to understand what the situation they are facing, and how we can support them in analysing and holding the Government to account.

We also regularly seek to put in freedom of information requests to local authorities or health boards where the Welsh Government does not record certain datasets. This is often in areas where Government policy has specified a target but we are unable to monitor the progress with this target as the statistics are not collated at a national level. An example of this would be the Government's empty homes target. The number of homes brought back into use by the Government's policy is collated; however the current number of empty homes are not even collated on an annual basis.

**Do you agree with the focus on making datasets available in an open format with more analytical - but less frequent - statistical releases?**

As mentioned above, data released by Government allows us as opposition Members to understand devolved policy in detail. For this reason, whilst we support more detailed analysis by qualified statisticians, we do not believe that the data itself should be delayed. It is important that data is released periodically and on time, with further statistical analysis if necessary being made available at a later date.

The frequency of statistics is important to accountability, and we believe it is important to be able to keep a close eye on what is happening within policy areas without waiting for several months to elapse. Whilst we understand that this may allow a fuller picture to develop, it is very important not to be kept in the dark while important developments are missed.

**Where we are proposing to stop or reduce the statistics that are available, are there dependencies between our statistics and your work that we have not considered?**

As mentioned above, there are third parties who we work with on a regular basis who use statistics to help them to implement Welsh Government policy. If certain statistics are to be reduced or stopped, every effort should be made to ensure those who are using the statistics are consulted with, and if possible, those statistics incorporated into another dataset.

We do not believe that there are areas of policy which should not be measured, even if the datasets are no longer used as indicators by Welsh Government.

**Are there particular issues of timing that we should consider when planning for reducing the frequency of statistics?**

Importantly, when changing the frequency of statistics, analysis of whether comparisons can be made with older sets of statistics should be considered. It is important that policy aims can be traced through statistics year on year and not devalued by changes in how they are measured. If changes are to be introduced then there should be an overlap before one measurement ceases.

## 6. Sian Donne, Welsh Liberal Democrats

Welsh Liberal Democrats' Consultation Response the Proposals concerning the Publication of Official Statistics  
March 3<sup>rd</sup> 2014

The Welsh Liberal Democrats note with concerns proposals within the consultation on the publication of official statistics. Whilst we recognise the importance of the internal use of statistics in helping government allocate resources, plan and understand their policy effectiveness, they have a far more public role too.

Accountability has regularly been an issue in the context of devolved politics in Wales; public awareness of where fault lies for poor records on key issues and where credit is due for success has been limited at the Welsh level. It is therefore important that any change in how statistics are produced and published does not have a detrimental impact on transparency and accountability.

There has often been a difficulty in accessing key statistics; such cases have been particularly prevalent on the ONS Website, but also in some instances on the StatsWales website too. We strongly suggest that concerns regarding accessibility should be addressed to ensure that individuals and organisations can easily access the data they need. Accordingly, in line with the Code of Practice for Official Statistics there should be continual engagement with users of statistical information through obtaining feedback, and ensuring ease of access to statistics.

In aiding accountability, there should be a clear presentation of progress in key areas such as NHS Waiting Times and the quality of schools in Wales. Monitoring ongoing progress is challenged when datasets are continually changing in form.

In response to the Welsh Government proposals; we, among other organisations value statistical publications and whilst we accept a reduction in terms of efficiency to avoid duplication, it is vital that useful statistics are not ended under the veil of 'removing duplication'. We encourage consultation over which statistics will no longer be collected as a result of this process and where statistical publications are moved to partner organisations, these should be clearly signposted and easily sourced.

However, we do welcome efforts to publish datasets in a more timely fashion, where previously there have often been unacceptable delays in the time taken to produce datasets. On a number of occasions we have had to use statistics that were half a year out of date and beyond. We would urge clarity over which statistical outputs will be reduced in frequency.

The Welsh Liberal Democrats also welcome the move to electronic copies of compendia publications. However we believe in the value of producing pdf copies of compendia productions as these documents are more easily searched, read and archived. With the consideration of the time taken to publish these documents, it may be prudent to examine how they are produced before abolishing them.

We also welcome the move to publish ad-hoc requests for statistical information and FoI requests. The Welsh Liberal Democrats strongly believe in open data-sharing where possible, which contributes to a healthy democracy.

In conclusion, we are pleased to hear that efforts are being made to improve the frequency of statistical publications and improve efficiency. However we believe that further efforts must be made to prioritise accessibility of information and would be concerned over any proposal to end the publication of statistical information which would limit the transparency and accountability of the Welsh Government and its agencies.

## **7. Janine Edwards, Conwy County Council**

Hello

I'm afraid I haven't had time to make a full response to the consultation, and I won't be at WSLC this Thursday to participate in discussions around the issues, so I thought I'd send a quick response by email.

In general, though I shall miss the KAS versions of some statistical bulletins and outputs because they are usually very clearly presented and help focus on specifically Welsh concerns\*, I understand the need to rationalise resources and move away from producing outputs which mirror the outputs of other organisations and agencies. I would just ask that KAS - through the WG website and StatsWales and the fortnightly email updates - continue to point us towards the outputs of these other data/information providers, as your websites are easier to navigate than some of the other providers. (\* that's also my way of saying I think your statistical bulletins are often superior to those produced by ONS or DWP or the Home Office etc.)

Open data - just wanted point out that, unlike some central government departments seem to think, a huge flat .csv file isn't really in the true spirit of 'open data'. Though 'putting it all out there' may seem the easiest way to make sure everything that could possibly be needed is freely available, it actually excludes users from accessing the information they are looking for, and can hide the true value of the data. It takes a considerable degree of data sophistication to extract what you want from large, unformatted datasets, both in terms of understanding the data and in terms of using the appropriate software. This is before you consider that a few staff hours saved on data formatting for the producing department is potentially offset by many hours spent by 22 individual UAs (and everyone else) producing their own aggregations. And that these individual UA-level extracts may then turn out to be applying 22 different, incompatible extraction methodologies. Please, in the move to more 'open' data production, continue to publish your data in sensible geographic, thematic and time-series aggregations, and don't just give us a data dump.

Availability of data on StatsWales - some departments in WG don't publish their data outputs via StatsWales, or even through the wales.gov.uk website. I'm thinking particularly of transport statistics, which are always difficult to find. The last few times I have needed data on road accidents, for example, I have had to ask the department

directly for the information, which took a couple of days to-ing and fro-ing to get the precise data I wanted. As well as being less time consuming, if the data had been available on via the website I would have been able to examine the datasets more fully and possibly gained new insights into the subject, as well as being able to bench-mark against other areas and across time periods.

I hope that's helpful. Thanks for the opportunity to respond

## **8. Emma Edworthy, Welsh Government**

Good morning,

I would like to comment on the following recommendation in relation to. : ENERGY GENERATION AND CONSUMPTION FOR WALES.

*Reduce the frequency of some Statistical Bulletins containing secondary analysis that changes very little from year to year. We will consider each in turn and ensure that detail on the next planned publication year is included on the StatisticsWales*

Energy generation and consumption data is used extensively within SF and EST. The data is used extensively for the following:

- To support the FM's energy Programme
- To support the MNRF energy portfolio
- To support MEST energy portfolio
- To respond to weekly FM OAQ's
- To respond to MNRF AND MEST WAQs and OAQs
- Within the Green Growth Agenda signed off by Cabinet in November 2013 (joint steering group being set up by MEST and MNRF)

Indeed if anything the political significance of energy means that it would be preferable to expand the energy statistical publication to include cost of energy. Energy has risen up the political agenda in recent months, not only at a UK level but at a Welsh level. This is not likely to go away and indeed is only likely to increase. It is essential that as a government we are able to use data that transparent and easily available. Without the annual publication by stats it inevitably adds extra pressure to Energy teams in SF and EST to compile a report themselves.

I would argue that if WG stats can not produce the report annually then there is very little point in it being produced every 2 or three years because policy officials will be forced to compile a report themselves given the volume of questions that are received on a weekly basis.

Hence I would strongly argue that this publication continues to be published annually but indeed it is expanded to include further statistics that our Ministers are increasingly needing in order to carry out their daily Government Business.

## **9. Guy Goodwin, Office for National Statistics**

Thank you for the opportunity to respond to your proposals concerning the publication of official statistics.

Your proposals mention that Welsh Government (WG) will work very closely with a range of partners including the Office for National Statistics (ONS) to remove duplication in the publication of official statistics. We welcome such collaboration and confirm that ONS will continue to include figures for Wales in our publications where we currently do and where it is feasible to do so. We note that with ONS potentially becoming the source for some statistics this might lead to an increase in queries to our customer services and we will handle these where we can. Where users require more specific knowledge, we will continue to refer them to Welsh Government statisticians as we would do now.

The proposals ask in particular that we consider any dependencies between the statistics WG propose to no longer publish and our work, in case these need further consideration. In this respect ONS officials are meeting with WG officials to ensure that proposals for changes to Local Government Data collections do not impact on the UK's legal requirements on reporting of debt and deficit.

Best wishes for taking the proposals forward.

## **10. Lynda Grove, Swansea City and County Council**

Hi apologies that our response is late

In relation to the local authority housing roles around homelessness and gypsy and traveller count the proposals to

- Publish Homelessness statistics on StatsWales quarterly, with a twice yearly Statistical First Release (Replaces quarterly Statistical Release) will not have an impact on our work and we agree with the reduction in frequency of statistical releases
- In relation to the Review of frequency and content of Gypsy and Traveller caravan count, it is felt that the current count of twice yearly is adequate.

## 11. Meri Huws, Comisiynydd y Gymraeg

### Cynigion yn ymwneud â chyhoeddi ystadegau swyddogol

Mae Comisiynydd y Gymraeg yn croesawu'r cyfle i roi sylwadau ar yr ymgynghoriad ar gynigion yn ymwneud â chyhoeddi ystadegau swyddogol.

Prif nod y Comisiynydd yw hybu a hwyluso defnyddio'r Gymraeg. Gwneir hyn drwy ddwyn sylw at y ffaith bod statws swyddogol i'r Gymraeg yng Nghymru a thrwy osod safonau ar sefydliadau. Bydd hyn, yn ei dro, yn arwain at sefydlu hawliau i siaradwyr Cymraeg.

Mae dwy egwyddor yn sail i waith y Comisiynydd:

- Ni ddylid trin y Gymraeg yn llai ffafriol na'r Saesneg
- Dylai personau yng Nghymru allu byw eu bywydau drwy gyfrwng y Gymraeg os ydynt yn dymuno gwneud hynny.

Dros amser fe fydd pwerau newydd i osod a gorfodi safonau ar sefydliadau yn dod i rym trwy is-ddeddfwriaeth. Hyd nes y bydd hynny'n digwydd bydd y Comisiynydd yn parhau i arolygu cynlluniau iaith statudol trwy bwerau y mae wedi eu hetifeddu o dan Ddeddf yr Iaith Gymraeg 1993.

Crëwyd swydd y Comisiynydd gan Fesur y Gymraeg (Cymru) 2011. Caiff y Comisiynydd ymchwilio i fethiant i weithredu cynllun iaith, ymyrraeth â'r rhyddid i ddefnyddio'r Gymraeg yng Nghymru ac, yn y dyfodol, i gwynion ynghylch methiant sefydliadau i gydymffurfio â safonau.

Un o flaenoriaethau'r Comisiynydd yw craffu ar ddatblygiadau polisi o ran y Gymraeg. Felly, prif rôl y Comisiynydd yw darparu sylwadau yn unol â'r cylch gorchwyl hwn gan weithredu fel eiriolwr annibynnol ar ran siaradwyr Cymraeg yng Nghymru y gallai'r diwygiadau arfaethedig effeithio arnyn nhw. Mae'r ymagwedd hon yn cael ei harddel er mwyn osgoi unrhyw gyfaddawd posibl ar swyddogaethau'r Comisiynydd ym maes rheoleiddio, a phe bai'r Comisiynydd yn dymuno adolygu'n ffurfiol berfformiad y sefydliad yn unol â darpariaethau'r Mesur.

Dyma ein sylwadau ar y cynigion:

**Cynnig 1: 'Adeiladu ar ein cymuned gydweithredol gyda sefydliadau partner a diddymu dyblygu yn y gwaith o gyhoeddi ystadegau swyddogol.'**  
Cytunwn â'ch bwriad.

**Cynnig 2: 'Caniatáu rhagor o amser i ddehongli a dadansoddi gwerth ychwanegol, a lle bydd hynny'n briodol, byddwn yn cyhoeddi setiau data trwy StatsCymru, gan leihau nifer yr allbynnau ystadegol misol a chwarterol rheolaidd.'**  
Nodwn eich bwriad. Ni welwn fod dim ynddo sy'n effeithio'n uniongyrchol ar y Gymraeg nac ar ein gwaith.

**Cynnig 3: 'Symud y data o lawer o'n cyhoeddiadau compendia o gopi caled/pdf i StatsCymru, gan sicrhau fod y data ar gael i ddefnyddwyr ar ffurf cod [sic] agored ac y gellir eu llwytho i lawr.'**

Rydym yn gofidio y bydd rhoi terfyn ar gynhyrchu'r 'Compendiwm Ystadegau Ysgolion', yn benodol adran 'Y Gymraeg' ynddo, yn ei gwneud yn fwy anodd i'r defnyddiwr achlysurol o ystadegau ddod o hyd i'r ystadegau mewn ffordd hwylus.

**Cynnig 4: 'Yn achos yr ychydig allbynnau hynny sy'n ychwanegu llai o werth, neu y mae ychydig iawn o ddefnydd ohonynt y tu allan i gynulleidfa arbenigol iawn neu fewnol, byddwn yn lleihau eu hamledd neu'n rhoi'r gorau i gasglu/cyhoeddi'r data.'** Nodwn eich bwriad. Ni welwn fod dim ynddo sy'n effeithio'n uniongyrchol ar y Gymraeg nac ar ein gwaith.

**Cynnig 5: 'Cyhoeddi ceisiadau ad hoc am wybodaeth ystadegol, a chysoni ein safonau gwasanaeth â'n dyletswyddau Rhyddid Gwybodaeth.'**

Tynnwn eich sylw at fwllch yn y ddarpariaeth bresennol, sef sicrhau argaeledd data a gyhoeddir mewn adroddiadau an-ystadegol.

Rhodddwn ddwy enghraifft:

Cynhwysodd adroddiad blynyddol 2012-13 ar Strategaeth Addysg Cyfrwng Cymraeg Llywodraeth Cymru ddangosyddion am Ddeiliant 3 nad ydynt, hyd y gwelwn, ar gael o StatsCymru.

Mae data dangosyddion Rhaglen Lywodraethu Llywodraeth Cymru yn cael eu cyhoeddi ar wahân ond nid yw'n gyfoes. Ar hyn o bryd data am 2011 yw'r diweddaraf sy'n cael ei ddangos<sup>1</sup>. Mae un o'r dangosyddion hynny sy'n ymwneud â'r Gymraeg – 'canran y disgyblion yng Nghymru, sy'n 5 oed ar ddechrau'r flwyddyn academaidd, sy'n siarad Cymraeg yn rhugl gartref' (dangosydd OU099, sydd hefyd yn un o'r prif ddangosyddion a adnabyddir ar gyfer gwerthuso *Iaith Fyw Iaith Byw*) – heb ei gynnwys yn StatsCymru hyd y gwelwn.

Unwaith eto diolch i chi am y cyfle i ddarparu sylwadau ar eich ymgynghoriad. Gofynnwn i chi roi ystyriaeth lawn i'r sylwadau a nodir uchod.

### **Proposals concerning the publication of official statistics**

The Welsh Language Commissioner welcomes the opportunity to comment on this consultation concerning the publication of official statistics.

The principal aim of the Commissioner is to promote and facilitate the use of Welsh. This entails raising awareness of the official status of the Welsh language in Wales and imposing standards on organizations. This, in turn, will lead to the establishment of rights for Welsh speakers.

Two principles underpin the Commissioner's work:

- In Wales, the Welsh language should be treated no less favourably than the English language;
- Persons in Wales should be able to live their lives through the medium of the Welsh language if they choose to do so.

In due course, secondary legislation will introduce new powers allowing the setting and imposing of standards on organizations. Until then, the Commissioner will continue to

inspect statutory Welsh language schemes through the powers inherited under the Welsh Language Act 1993.

The role of the Commissioner was created by the Welsh Language (Wales) Measure 2011. The Commissioner may investigate failure to implement a language scheme; interference with the freedom to use Welsh in Wales and, in future, complaints regarding the failure of organizations to meet standards.

One of the Commissioner's strategic objectives is to influence the consideration given to the Welsh language in policy developments. Thus the Commissioner's principal role is to provide comments in accordance with this remit, acting as an independent advocate on behalf of Welsh speakers in Wales who might be affected by these proposed changes. This approach is employed to avoid any potential compromise of the Commissioner's regulatory functions and should the Commissioner wish to conduct a formal review of individual bodies' performance or the Government's performance in accordance with the provisions made in the Measure.

Here are our comments on the proposals:

**Proposal 1: 'To build on our collaborative community with partner organisations and remove duplication in the publication of official statistics.'**

We agree with your intention.

**Proposal 2: 'To allow more time for value added interpretation and analysis, where appropriate we will publish datasets through StatsWales, preferably in a more timely fashion and with user support, whilst reducing the number of routine monthly and quarterly statistical outputs.'**

We note your intention. We do not see anything in it which affects the Welsh language or our work directly.

**Proposal 3: 'To move the data from many of our compendia publications from hard copy/pdf to StatsWales, ensuring that the data is available to users in a manner that is open source and downloadable.'**

We are concerned that ceasing the production of the 'Schools Statistics Compendium', specifically the 'Welsh language' section in it, will make it more difficult for the occasional user of statistics to find the statistics in a convenient way.

**Proposal 4: 'For those few outputs that add less value, or have little use outside a very specialist or internal audience, we will reduce the frequency or cease either the data collections/publications.'**

We note your intention. We do not see anything in it which affects the Welsh language or our work directly.

**Proposal 5: 'To publish ad-hoc requests for statistical information, whilst aligning our standards of service with our Freedom of Information commitments.'**

We draw your attention to a gap in the present provision, namely assuring the availability of data published in non-statistical reports.

We give two examples:

The 2012–13 annual report on the Welsh Government's Welsh medium Education Strategy included indicators for Outcome 3 which are not, as far as we can see, available on StatsWales.

Data for the Welsh Government's Programme for Government are published separately but are not up-to-date. At the moment data for 2011 are the most recent shown<sup>1</sup>. One of those indicators which deals with the Welsh language – 'percentage of pupils aged 5 at the start of the academic year that speak Welsh fluently at home' (indicator OU099, which is also one of the main indicators identified for the evaluation of *Iaith Fyw Iaith Byw*) – is not included in StatsWales as far as we can see.

I would like to thank you once again for the opportunity to comment on this consultation. We ask that you give full consideration to the comments made above.

## **12. Ian Johnson, Plaid Cymru**

### **Response to Official Statistics Consultation**

#### **Central concepts**

1. Thank you for the opportunity to respond to the consultation concerning the publication of official statistics.
2. Our central principle is that the publication of statistics should be transparent and easily intelligible.
3. To that end, we are concerned that important statistics may not be published or might not be available in a format that allows easy comparison.
4. We believe that the focus of this review should be on introducing new datasets that will better allow scrutiny of government actions in Wales and provide useful data.
5. We are concerned that this consultation has the potential to reduce the amount of data being published. However, to ensure we can compare historical trends we do not wish to see any statistics 'disappear'. The trend needs to be for more information, not less.
6. We should move towards an open publishing system whereby available data should be published where possible in order to promote transparency, and it should not be the case that information or data is 'hidden' when it might be expected to be in the public realm.
7. It is also crucial that the data collected is of the highest possible standard and comparable with other data published by similar organisations. Data for comparison is meaningless if methodologies or methods of capture are different within the same sector.

8. There is always a difficult compromise to be made between the publication of all forms of data and providing meaningful commentary that makes this data intelligible to the non-expert.
9. Therefore, in addition to the above comments, we would welcome improvements to the StatsWales website to make it more presentable and user-friendly. Training courses for researchers and the general public might be helpful in this – particularly to ensure that basic statistics and their implications can be understood.

### **Particular areas of concern**

10. Plaid Cymru believes that it is vital that we are able to accurately and quickly monitor the Welsh economy and, with this in mind, a Welsh GDP figure should be developed that can be published on a quarterly basis and updated for accuracy. This has been supported by business groups such as the Federation for Small Business Cymru.
11. The proposal for further financial powers contained in the Silk Commission's report for a future Welsh Treasury makes it essential that more detailed economic statistics are developed on a Wales basis, including forecasting. These should begin as soon as possible in order to ensure quality of beta statistics so that they can be fine-tuned ahead of the Welsh Government taking responsibility for these areas of the Welsh economy.
12. Plaid Cymru supports the production of a Welsh version of GERS (Government Expenditure and Revenue Scotland), published annually and containing detailed information on the actions of the Welsh Government.
13. The impact of investment is particularly important, regarding the number of jobs created or secured (under two separate categories rather than merged), the number of projects, investment value and location. It is particularly concerning that little data appears to be available regarding the impact of enterprise zones. Imports and exports figures should be developed on a sub-UK basis, i.e. from Wales to England or from Scotland to Wales etc. There should be a balance of trade figure for Wales, in goods and services separately.
14. We note the recommendation by the Holtham Commission that the statistics should be reformed to "ensure that official statistics reflect the reality of devolved government and would help clarify the distinction between expenditure by UK Government departments and by the devolved administrations." We think that this is particularly appropriate to Wales where there is frequently confusion regarding funding responsibility.
15. The Holtham Commission also recommended that there be an annual publication that would enable direct comparisons between Assembly Government expenditure covered by the Barnett Formula and similar expenditure in England.

16. These concerns were repeated by the Silk Commission who say in their second report that

“[w]e have also heard specific concerns about the lack of economic and public finance data, and the capacity for economic modelling. These are both areas in which Scottish experience is more advanced. There is scope for the two Governments to work with the Office for National Statistics and the academic and business communities to gather more robust and timely data, and to develop better models of how the Welsh economy works. This should lead to better-informed policy decisions on what interventions in the economy are likely to be most effective.”

17. These recommendations from both the Holtham and Silk Commissions highlight the need for additional economic statistics, in particular.
18. There should be further energy statistics published, including should also be regular and up-to-date energy generation and consumption split into each source (wind, solar, gas, nuclear, oil etc)

### **Response to the proposals**

19. With regards to the consultation proposals, we believe that proposal one appears fair provided that statistics are regularly updated and links given to other websites. However, we believe that headline statistics and summaries can be useful as journalists or non-experts rarely examine the full dataset and may not fully comprehend complex data. We therefore believe that these should be maintained. There is concern about what changes, including discontinuation, might later be implemented by external organisations that may negatively impact our ability to compare statistics in future. It can also be difficult to uncover accurate Welsh data within larger UK datasets so this should be well sign-posted.
20. We broadly disagree with proposal two about publishing statistics on a less frequent basis. Routine monthly or regular statistical updates are valuable in exposing and understanding trends. It is unclear how less frequent publication will assist in public understanding or interrogation of the data.
21. Plaid Cymru broadly supports proposal three that a one stop website for all datasets would be useful, and support the proposals for compendia in fields for which there is currently no single document. Those areas, including local government, social services and health that cross large numbers of local authority or health board boundaries are particularly important for this.
22. We have similar concerns regarding proposal four as to proposal two. Although examples of datasets which might not be published so frequently are provided, it is unclear how the usefulness of a dataset is to be determined. Concern has been expressed about the decision to stop the publication of the State of the Environment report that includes valuable data on climate change, sustainable use of resources, biodiversity, landscapes and seascapes, local environment and environmental hazards that might not be easily collated elsewhere.

23. Annual reports that are currently available should continue to be published, whether that be in an online format or in hard copy.
24. We broadly support proposal five. This could be improved by publishing the disclosure log on Stats Wales, sorted by category/subject matter.

### **13. Anne Jones, Information Commissioner's Office**

#### **The Information Commissioner's response to the Welsh Government's Consultation: Proposals concerning the publication of official statistics**

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The Information Commissioner's Office (ICO) is the UK's independent public body set up to promote access to official information and the protection of personal information. We have responsibility for promoting and enforcing the Data Protection Act 1998 (DPA) and the Freedom of Information Act 2000 (FOIA). We do this by providing guidance to individuals and organisations, solving problems wherever possible, and taking appropriate action when the law is broken.

We note the proposals for changes to official statistics outputs produced by the Welsh Government, and have considered these in relation to the legislation that we regulate. In particular we welcome the Chief Statistician's statement in his foreword on page three, with regard to ensuring that statistical outputs and analysis add value to public debate and focus on the right priorities.

#### **Proposals 2 and 3: provision of datasets**

Given the changes that you are proposing, you are no doubt aware of the so-called 'dataset provisions' which were introduced via the Protection of Freedoms Act 2012, and which amended FOIA. Broadly speaking, these provisions are intended to ensure that public authorities make datasets available, either in response to a FOIA request or proactively under a publication scheme, in a way that allows them to be re-used. They create a duty to provide datasets in a re-usable form and under licensing conditions that permit re-use. We therefore welcome the current proposals, in the light of the new requirements within FOIA with regard to datasets.

The frequency of making statistics available is not something we would specifically comment on. This will be related to their usefulness to the users and is something that

the Welsh Government will be best placed to assess. However, we would expect that any timings for their publication which are set out in the Welsh Government's FOI publication scheme are adhered to, as a failure to do so is likely to constitute a breach of FOIA section 19.

We have produced guidance that may be of help if a more in-depth understanding is required of what constitutes legal compliance when making datasets available.

### **Proposal 5: publishing ad hoc requests for statistical information**

We note the inconsistency between current service standards and the requirements of FOIA and welcome the proposal to align these standards. Whilst in the event of a complaint to the ICO, our own yardstick can only be the Act itself rather than an organisation's set of service standards, nevertheless in our view there is also no doubt that aligning standards will serve to simplify local processes and add to efficiency.

We also welcome the proposal to publish responses to ad-hoc requests, particularly as this consideration is now a legal requirement. See section 19(2A) of FOIA:

*A publication scheme must, in particular, include a requirement for the public authority concerned –*

- (a) to publish –*
  - (i) any dataset held by the authority in relation to which a person makes a request for information to the authority, and*
  - (ii) any up-dated version held by the authority of such a dataset,**unless the authority is satisfied that it is not appropriate for the dataset to be published,*
- (b) where reasonably practicable, to publish any dataset the authority publishes by virtue of paragraph (a) in an electronic form which is capable of re-use,*
- (c) where any information in a dataset published by virtue of paragraph (a) is a relevant copyright work in relation to which the authority is the only owner, to make the information available for re-use in accordance with the terms of the specified licence.*

You will note that this requirement is qualified, in that the public authority does not have to publish a dataset as part of its publication scheme if it is satisfied that it is "not appropriate" to do so.

In the last paragraph of section 7.5 of your consultation document, you refer to the intention to "move towards publishing our responses". We welcome this, but we would highlight the fact that the legal requirement under FOIA section 19(2A)(a)(i) to make requested datasets available is already in force (unless, as mentioned above, it is 'not appropriate' to do so). In other words, public bodies have a duty already to do more than merely 'move towards' making responses available.

## **Anonymised data and the risk of re-identification**

In general, it will not be possible to identify living individuals from published statistics. However with increasing numbers of published datasets, we are aware that the possibility of re-identification of individuals can arise where separate, anonymised datasets can be collated or merged by users. The risk of re-identification will differ according to the way the anonymised information is disclosed or published, however we would recommend carrying out adequate risk analyses on the likelihood and potential consequences of re-identification at the initial stages of producing and disclosing anonymised data. We have published [guidance on anonymisation](#) to assist organisations in this.

We would be happy to provide you with further information on any of the above points if necessary.

## **14. David Jones, Estyn**

**Estyn response to the Welsh Government consultation document 'Proposals concerning the publication of official statistics'.**

**Proposal 1: To build on our collaborative community with partner organisations and remove duplication in the publication of official statistics.**

We would welcome the plans for the Welsh Government to:

- 'Continue to play a leadership role in supporting arms-length bodies to take a responsibility for directly publishing their own statistics in an orderly and transparent manner. We will seek to minimise the impact on users of any changes in responsibility.'
- 'Continue to represent Welsh users interest in ensuring that UK bodies present statistics for devolved administrations separately.'
- 'Ensure that pages on our StatisticsWales website provide clarity on what information is available and which producers are responsible for publication.'
- 'Continue to develop StatsWales to enable other official statistics producers to directly publish data about Wales.'

We have noted that StatsWales does not always have up-to-date data and is not always updated in a timely manner. Regular and timely updates to StatsWales will be of paramount importance to Estyn and other users as more information is accessed through StatsWales.

StatsWales can be hard to use and find information for someone who is not familiar with the website or for someone who does not use the website on a regular basis. We would welcome work to be done to develop the StatsWales website to make it user friendly and easier to navigate, before transferring more data and outputs to StatsWales (as proposed in proposal 3).

We think that there is a need for an easily accessible webpage that contains maintained weblinks to all other statistical producers. It is important that we can continue to access data from the pupil destinations survey on the Careers Wales website, as we do use this data. We would welcome improvements to the ability to access data on the Careers Wales website, and we agree with the proposal for the headline statistics 'Pupil Destinations (Careers Wales)'

Also, we are aware of the education outputs listed below but do not make specific use of them:

Headline statistics:

- Destination of Leavers from Higher Education (Higher Education Statistics Agency)
- UCAS statistics (UCAS)
- Student finance annual statistics (Student Loans Company)

Statistical bulletins:

- Students in Higher Education
- Destination of Leavers from Higher Education
- UCAS statistics
- Higher Education Performance Indicators

**Proposal 2: To allow more time for value added interpretation and analysis, where appropriate we will publish datasets through StatsWales, whilst reducing the number of routine monthly and quarterly statistical outputs. We will seek to publish the datasets in a more timely fashion and with appropriate user support;**

We agree with the proposal for the 'Quarterly NEET bulletin', but would want more work to be done to make StatsWales more user friendly (as we note under proposal 1) and we would want quarterly NEET numbers to be available on StatsWales.

Also, we are aware of the education outputs listed below but do not make specific use of them:

- EMA monthly statistics
- Student finance monthly statistics

**Proposal 3: To move the data from many of our compendia publications from hard copy/pdf to StatsWales, ensuring that the data is available to users in a manner that is open source and downloadable.**

While we agree in principle with the move away from hard copy / pdf publications, we think that StatsWales needs to be developed further (as we note under proposal 1) before further data is transferred to StatsWales. Also it is worth noting that it can sometimes be useful to have a publication in a format that can be browsed easily. For example, if you need a specific piece of information on the Welsh language, you can currently browse section 8 of the 'School statistics compendium' and find what you need through browsing.

We would be concerned if there is a reduction in the statistics and information available from the three publications listed below, as some of the information is not published anywhere else. We use these publications as contextual information for our inspections and in our thematic surveys, so it would be very useful for us to see all of the content retained (data, charts, maps, commentary, footnotes and supporting guidance).

- Further education, work-based learning and community learning
- School statistics compendium
- Local area summary statistics

We note that the supporting information to the tables is very useful (commentary, footnotes, and supporting guidance in appendices) and would not be as easily accessible if transferred to StatsWales.

As the 'Schools in Wales: Examination Performance' publication is not listed in this proposal, we assume that it will continue to be published. We do use all the data in this publication so it would be important to us for all data in the publication retained.

We do not make use of 'School statistics by Assembly constituency area' but trust we could access geography reference tables to enable us to produce this sort of analysis ourselves should we require it.

**Proposal 4: For those few outputs that add less value, or have little use outside a very specialist or internal audience, we will reduce the frequency or cease either the data collections/publications.**

We do not agree with the proposal regarding the 'Academic achievement by pupil characteristics' and 'Attendance by pupil characteristics' bulletins. These bulletins are useful as contextual information, particularly during inspections. We request that these two bulletins are continued to be published every year.

We feel that the information in the education outputs listed below is very important. We agree with the individual proposals in principle provided that they would result in better methodologies, less duplication and greater accessibility to the data.

- Levels of Highest Qualification held by working age adults (Bulletin). We would welcome production of this bulletin every two years.
- Pupils with statements of special educational needs (SEN).
- Teachers in service, vacancies and sickness absence.
- Pupil destination StatsWales cubes, this information will be available through Careers Wales.
- Pupils Leaving Full-time education with no qualifications'

Also:

- We would like the weblink to the Careers Wales website to appear in an appropriate place on StatsWales.

- We would support the use of the Pupil Level Annual School Census (PLASC) being used to collect data and statistics about teachers in Wales. We would also welcome data from the General Teaching Council for Wales (GTCW) to be more accessible and also available at regional level (currently data for all Wales is only shown). We are interested in sickness absence data for teachers.
- We would welcome a new and more robust data collection for 'Pupils Leaving Full-time education with no qualifications'.

**Proposal 5: To publish ad-hoc requests for statistical information, whilst aligning our standards of service with our Freedom of Information commitments.**

We agree with this proposal, as this is likely to be very helpful for us to see and use education data from ad-hoc requests.

## **15. Steve King, Swansea City and County Council**

Please find attached my response to the current consultation. Thank you for providing the opportunity to comment on these proposals.

In general terms, I would certainly support the overall direction of travel suggested – which seems sensible, both in terms of public sector resource constraints, and (just as significantly) how those resources should be used. As noted in the Foreword, the proposals also fit in with the recent GSS strategy vision to “shift the balance from collection to analysis, interpretation and user support.”

Here are some further, specific comments:

- It is reassuring that the proposals seem less about cutting back, but more about re-prioritising, which would allow the development of emerging series in accordance with user need, e.g. Jobs Growth Wales, Flying Start statistics, etc.
- Whilst the greater use of StatsWales as a dissemination vehicle is fine in principle, this needs to be accompanied by development of the system where necessary, by way of improved functionality (and simplicity in some cases), user support/training, and some form of future release timetable or alert system – along the lines of the '30-day notice' now used for WG bulletins and publications.
- Page 6: I am pleased that WG will continue to work with HESA on their data – this is especially important in student areas such as ours. I have also tended to refer to the annual HE/FE publications rather than StatsWales in this case, but need to break that habit clearly.
- Page 7: the reference to the Tackling Poverty Action Plan is interesting – we are looking to monitor the issues/indicators raised in that for our latest 'Poverty Profile' but the statistical sources are not always there for these indicators.
- Page 9: the reference to the Administrative Data Research Centre is also interesting – it would be useful if the user community could be kept informed of developments, perhaps via WSLC, Knowledge Hub, etc.

- Proposal 7.1 (page 11): support in principle – whilst it is accepted that re-hashing other organisations’ statistics is not a good use of resources, I feel that KAS does have an important role in *effectively* signposting users in Wales to these external sources.
- Proposal 7.2: agreed, subject to the earlier comments on StatsWales (pt.2 above). However, in general it would seem sensible that most current monthly/quarterly outputs will continue to be released at least on an annual basis.
- The individual proposals in annex 2 seem reasonable – my only query would relate to the NEETs release. Whilst it seems sensible to link in with the quarterly APS outputs, as the data is sourced from the same survey, I’m wondering if there’s a place for the administrative-based NEET data, which we’ve previously acquired on request from Careers Wales. It could be a signposting issue, and/or finding a means to bring together the separate sources (perhaps in a separate annual release).
- Proposal 7.3: I accept the reasons behind stopping most/all compendia publications, as long as the content is still on StatsWales, but I have a degree of concern that less ‘statistically-aware’ users will not easily find their way around StatsWales to access the required information in the way they used to, and therefore risk make wrong choices on sources. However, I’m not sure what the solution is in this case – perhaps the answer partly lies in clear signposting/direction or creation of single ‘headline statistics’ tables on StatsWales for specific topics/themes, to replicate the compendia approach as far as possible.
- Proposal 7.4: this seems reasonable in principle. However, some of the specific items noted in the annex are very useful / valuable and I hope would not be diminished as part of this process. For example, the WG “Business Demography” release has recently added considerable value to the ONS output (e.g. providing stocks, births/deaths by industry sector, which ONS do not routinely publish now). The annual APS-based “Commuting” dataset is also very useful and (as far as I’m aware) not published elsewhere. Whilst noting that the data is the most important part (*although as an aside, I’m not sure why the 2012 commuting data has been delayed pending this consultation if there is no proposal to consider stopping it – it was due in January*), the visual aspect – i.e. the ‘Interactive Commuting Statistics viewer’ – will hopefully continue and develop for this and other datasets that may benefit from this approach.
- For annex 4, I agree that just signposting to other releases is sensible, e.g. Nomis, Eurostat, ONS outputs (for RPI/CPI etc.)
- Proposal 7.5: agreed – it would also be useful if wider users can be alerted to any ad hoc analyses when published.

I hope you find these comments helpful, and that WG continue to engage with users during this process.

## **16. David Lermon, ICAEW**

Dear Sir/Madam

### **Proposals Concerning the Publication of Official Statistics**

#### **Introduction**

ICAEW welcomes the opportunity to comment on the Welsh Government's Proposals concerning the publication of official statistics.

#### **Background**

ICAEW is a world-leading professional accountancy body. We operate under a Royal Charter, working in the public interest. ICAEW's regulation of its members, in particular its responsibilities in respect of auditors, is overseen by the UK Financial Reporting Council. We provide leadership and practical support to over 142,000 member chartered accountants in more than 160 countries, working with governments, regulators and industry in order to ensure that the highest standards are maintained.

ICAEW members operate across a wide range of areas in business, practice and the public sector. They provide financial expertise and guidance based on the highest professional, technical and ethical standards. They are trained to provide clarity and apply rigour, and so help create long-term sustainable economic value.

ICAEW, an active member of Commerce Cymru (formerly Business Wales) and the Council for Economic Renewal, has 3,000 members in Wales. We work closely with the Welsh Government in a number of different ways.

ICAEW has more than 20,000 members working outside the UK. The ICAEW qualification is recognised around the world as a prestigious professional business qualification. Members are entitled to the description chartered accountant and to the designatory letters ACA or FCA. Examinations for the qualification can be taken in a wide range of countries across the globe including China, Russia, Malaysia and Pakistan: however, papers are always set and marked in the English language.

#### **Response**

We accept that there is a balance to be struck between the timely publication of statistics, the need for suitable analysis and explanation, and the call on staff resources, given the tight constraints on public expenditure. In general, we accept that the proposals made represent a proportionate response and from our perspective, we do not believe that they will have any significant adverse effect on the Institute or our members.

However, we would stress that if the default position is to be for data to be published as soon as they are available, with Statistical First Releases produced less frequently than at present and Compendia no longer published, it is essential to ensure that suitable communications systems are deployed to alert potential users to the publication of data and analysis and to signpost them to the data. We believe email distribution lists and social media need to be employed to ensure users are aware of data as they are made available.

We also believe that a high priority needs to be given to improving user support mechanisms for Stats Wales, as suggested under Proposal 2.

Turning to more specific points, from the Institute's point of view, we feel that it would be preferable to retain the monthly publication of the regional economic and labour market profile, if at all possible, although a quarterly bulletin would be acceptable.

While we also accept the logic of no longer producing analysis of other organisations' statistics, we would stress the importance of the Annual Business Survey to ourselves and other business organisations and would hope that the Welsh Government will give priority both to publicising the publication of Survey data and to signposting to the relevant Welsh data within these datasets. Similarly, if the annual analysis of business demography (births and deaths) is no longer published, good signposting to the relevant data on StatsWales will be essential

We would also stress the importance of transparency over local government finance and expenditure. We note that proposals are to be developed to find an alternative approach to the publication of the compendium on Local Government Financial Statistics and would stress our view that any alternative should not diminish or dilute the information made available publicly.

As an additional point, we would emphasise the need for robust statistical information for the Welsh Government's Treasury function as that develops. Information provided should be as accurate as possible, and the level of accuracy should be clearly stated.

## **17. Nathan Lester, Public Health Wales**

Please find response below to the above consultation on behalf of the Public Health Wales Observatory.

### **What impact will these proposals have on your work?**

The proposals will have a generally positive impact. Data released in downloadable format, for example via Stats Wales are more useful than those released in pdf format in statistical bulletins and the like.

### **What do you use the statistics for?**

We use these statistics to describe and analyse population health and its determinants and to analyse use of health services at the population level.

### **Do you agree with the focus on making datasets available in an open format with more analytical - but less frequent - statistical releases?**

Yes

### **Where we are proposing to stop or reduce the statistics that are available, are there dependencies between our statistics and your work that we have not considered?**

Not that we are aware of.

**Are there particular issues of timing that we should consider when planning for reducing the frequency of statistics?**

Not that we are aware of.

**18. Chris Hywel Macey, Ceredigion County Council**

I welcome the move towards greater availability of information on the StatsWales website and less use of statistical bulletins.

The bulletins, though often interesting reading, suffer from the weakness of only quoting a handful of statistics, which are very open to being taken out of context. Requiring interested parties to delve into the detail is likely to produce better quality analysis, understanding and use of the data.

Whilst the ability to download data from the StatsWales website into Excel is very welcome, it would be helpful if each line were to contain all relevant information. For example, on the tables for school budgets, the LA is only included as a heading; when sorting the information on an all-Wales basis, there is no cell which associates a school with its LA. This can be done by extracting the LA number from the beginning of the school reference or by copying the heading down to each line. However, having the LA name in each row from the time of download would eliminate the need for this particular manipulation of the data.

**19. Joshua Miles, Federation of Small Businesses Wales**

**Proposals concerning the publication of official statistics**

**The Federation of Small Businesses Wales**

The Federation of Small Businesses Wales welcomes the opportunity to present its views to the Welsh Government on its proposals concerning the publication of official statistics. FSB Wales is the authoritative voice of small businesses in Wales. With 10,000 members, a Welsh Policy Unit, two regional committees and twelve branch committees; FSB Wales is in constant contact with small businesses at a grassroots level. It undertakes a monthly online survey of its members as well as an annual membership survey on a wide range of issues and concerns facing small business.

**Introduction**

FSB Wales is concerned that there is currently insufficient economic analysis provided by Welsh Government in relation to many statistics. The current consultation proposals serve to further exacerbate this problem. In light of greater fiscal autonomy provided for under the Wales Bill, FSB Wales feels far more capacity is needed as part of a treasury function in order to properly service the decision making process in Wales. There are also specific statistical releases that are under threat as a result of this consultation that would be of detriment to decision making in Wales, particularly in light of the Welsh Government's stated aim of encouraging growth and jobs.

## Treasury Function

If the Welsh Government is to assume greater fiscal accountability then suitable resources must also be available within the Welsh Government's Finance Department to model public policy decisions. As the Holtham Commission noted in its final report:

*"We envisage that some enhancement to the Assembly Government's Finance Department would be necessary once any tax-varying powers are devolved, though this is likely to comprise a fairly small unit of specialists, including economics and statistical expertise."*

Presently, there is little statistical data available to document how much revenue is likely to be raised from taxation in Wales, except for the important work carried out by the Holtham Commission in 2007-08 and the Silk Commission for the period 2007-11. The HMRC currently produces experimental data on taxes raised by UK Nations, but this is subject to little or no analysis by the Welsh Government.

The Silk Commission's published research papers highlight a number of alternative forms of fiscal federalism within an international context<sup>3</sup>. For example, the Government of New South Wales Treasury forecasts and reports on revenue raised within the state and provides policy analysis to inform the fiscal policies of the NSW Government. Wales needs similar capacity, enabling more coherent planning of policy decisions regarding the Welsh tax base. It is therefore encouraging to see the Silk Commission recommend an emphasis on strengthening the Welsh tax base as a key element of a Welsh Treasury. Unfortunately, it is not clear how this is going to be implemented in practice.

All nations in Europe hold public accounts in the form of Input Output (IO) tables; this is true of Wales where Cardiff Business School have managed IO tables for more than twenty years. However, it is necessary to go beyond this to ensure any fiscal changes in Wales are done on sound economic advice, particularly through the creation of a Computed General Equilibrium Model (CGE), something already in existence in Scotland<sup>5</sup>. As Dr Crawley and Professor Munday of Cardiff Business School note in their response to the Silk Commission:

*"...as yet there has been limited progress towards a full Welsh model. If Wales was to gain fiscal powers in respect of tax it would be difficult for economists to advise the Welsh Government on likely consequences without the construction of a specific Welsh Model."*

We would like the Welsh Government to put in place similar capacity in anticipation of the further fiscal autonomy prescribed by the Silk Commission. In this respect, the Scottish Government through its Scottish National Accounts Project has made significant advances on this issue.

The other important economic measure, Gross Value-Added (GVA), is currently measured annually with a significant time lag for the data meaning it is often out of date when it is published. For the business community, the relative decline in Gross Operating Surplus, the element of GVA relating to profitability, should be analysed and addressed by Welsh Government; particularly as it could impact on revenue raised in Wales from taxation. A good start would be publishing quarterly statistics to enable civic society far greater capacity to scrutinise Wales' economic performance.

Again the Scottish Government has made significant progress in this regard. SPICe also publishes a compendium of economic statistics with analysis against the Scottish Government's objectives. Crucially, this includes analysis of exports to other parts of the UK, Europe and the rest of the world.

### **Business Demography**

Business Demography is currently published annually and includes an element of analysis. The 2013 release has been postponed which is of concern to FSB Wales. FSB Wales uses this data to scrutinise the performance of Welsh Government policies, indeed FSB Wales feels that this data should be a key performance indicator in the Welsh Government Programme for Government.

Under proposal four of the current consultation, FSB Wales is concerned that there will be no future analysis on an annual basis of the birth, death and survival rates of firms in Wales. This would seriously damage the ability of external stakeholders to examine Welsh Government performance in encouraging an environment suitable for growth and jobs.

### **Regional Economic and Labour Market Profiles**

FSB Wales does not agree with the proposal to reduce analysis of regional economic and labour market profiles from a monthly to a quarterly basis. This has the potential to undermine scrutiny of the Welsh Government's overarching aim of creating jobs and growth in the Welsh economy. Without regional analysis on a monthly basis, FSB Wales feels it will be difficult to track progress against this objective. FSB Wales also feels that in light of the Welsh Government's recently announced skills strategy, the analysis of employment conditions should be linked to the Welsh Government's Labour Market Intelligence gathering to provide a fuller picture of performance.

### **Conclusion**

FSB Wales believes the Welsh Government requires more rigorous statistical analysis. This is particularly important as we move towards greater fiscal autonomy. The progress of the Wales Bill will undoubtedly place an emphasis on securing economic growth on the Welsh Government. This should be reflected in the statistical data collected, analysed and published by Welsh Government.

### **The Federation of Small Businesses**

The FSB is non-profit making and non-party political. The Federation of Small Businesses is the UK's **largest campaigning pressure group** promoting and protecting the interests of the self-employed and owners of small firms. Formed in 1974, it now has **200,000 members across 33 regions and 194 branches**.

### **Lobbying**

Our lobbying arm - led by the Westminster Press and Parliamentary office - applies pressure on MPs, Government and Whitehall and puts the FSB viewpoint over to the media. The FSB also has Press and Parliamentary Offices in Glasgow, Cardiff and Belfast to lobby the devolved assemblies. Development Managers work alongside members in our regions to further FSB influence at a regional level.

## **Member Benefits**

In addition, Member Services is committed to delivering a wide range of high quality, good value business services to members of the FSB. These services will be subject to continuing review and will represent a positive enhancement to the benefit of membership of the Leading Business Organisation in the UK.

## **Vision**

A community that recognises, values and adequately rewards the endeavours of those who are self employed and small business owners within the UK

The Federation of Small Businesses is the trading name of the National Federation of Self Employed and Small Businesses Limited. Our registered office is Sir Frank Whittle Way, Blackpool Business Park, Blackpool, Lancashire, FY4 2FE. Our company number is 1263540 and our Data Protection Act registration number is Z7356876. We are a non-profit making organisation and we have registered with the Information Commissioner on a voluntary basis.

## **Associate Companies**

We have two associated companies, FSB (Member Services) Limited (company number 02875304 and Data Protection Act registration number Z7356601) and NFSE Sales Limited (company number 01222258 and Data Protection Act registration number Z7315310).

## **20. Dai Morris, South Wales Fire and Rescue Service**

### **South Wales Fire and Rescue Service Consultation Response**

Feedback Questions:

1. We believe that the proposals will generally have a positive effect on our working practises. In particular the removal of duplication and the move to more community focussed data sets will enhance the picture painted and will improve the decision making at all levels. The move to more timely data provision will improve the value of the statistics and clearly the departure from raw data to further analysis and narrative will enhance the information further.

The reduction in the publication of the Deliberate Fire Data document from 1 to 2 years will have a small impact in terms of bench marking with our service colleagues in Mid & West and North Wales. However, when the publication dates are taken into account (latest version published Feb 2013 for 2011/12 data) the delay in the data contained within them can, and will normally be sourced directly through other channels. Therefore the extension to biannual publication is not seen as a large problem.

A major consideration for us moving forward is that the presentation of the data remains as simplistic as possible and the web site remains easy to navigate.

2. We use data very much for bench marking and indentifying results and figures reported by our fire service colleagues across Wales. It is very much a source of statistics we use on a regular basis. In addition, we also use the site to reference figures and stats not normally available through Fire Service channels. For example, population counts, WIMD data, dwelling counts etc.
3. We believe the opening up of the data to be a major step forward and an improvement of service. When considering the frequency of statistical releases, as long as the main stakeholders are engaged and consulted and are content with any proposed changes there would be little point in investing time and effort in their compilation and publication.
4. South Wales Fire and Rescue Service are content that the Deliberate Fire Report publication period is extended to 2 years and have not identified any dependencies between it and any other statistical work we conduct.
5. Timeliness for us is a crucial aspect but understand that the Fire and Rescue data cannot be published until fully audited and authorised. We would ask that the data sets are published as timely as can possibly be achieved when considering all constraints.
6. Additional Comments:
  - a. Para 7.1 Fully support the proposal but would be interesting to know if any statistical partnering has been considered with the Welsh Data Unit and its web based outputs Info Base Cymru and LSB insight? The Data Unit appears to be involved in many Unitary Authorities through their Local service Boards and Single Integrated Plans etc?
  - b. Para 7.2 Fully supported
  - c. Para 7.3 Fully supported but would reiterate that the data that is made available is easily traceable and the site is kept as simple as possible in its functionality.
  - d. Para 7.4 Fully supported. The move to produce the Deliberate Fire report biannually is accepted. We believe the document provides first rate data but there is always a delay between what is contained within the document and the publication date. We fully understand the reason for this but where there is a need to review the data it would normally be sourced from other venues i.e. speaking directly with our Welsh Service colleagues.
  - e. Para 7.5 Fully supported. It is important that Stats Wales is able to provide additional and ad-hoc data on request. Whilst these requests may be fairly rare occurrences it is a vital form of support. We have requested priority information in the past and the support and response was first class.

## **21. Clive Noble, Conwy County Borough Council**

### **Conwy Education Services Response to Consultation**

We do find the Stats 2 data useful as it feeds into the whole Wales data and we can then use this to judge ourselves against other authorities

We do not use the Stats 2 to analyse data, but use it to provide information to others as required about annual statistics and how we compare with other authorities.

We have an ICT system that allows us to get specific information out at any given time throughout the year, which is up to date. Whereas the Stats 2 data is on one day in January.

Many authorities including Conwy provide support for SEN pupils through delegation to schools and also directly from funding by the authority without a statement. Statements may be done away with before too long following the completion of the SEN reforms what is the proposal then for collating data?

The impact on us of not having the Stats 2 will be minimal

## **22. Lesley Rees, Carmarthenshire County Council**

### **Consultation on the Publication of Official Statistics**

#### **Proposal 1:**

There is duplication of data, therefore I agree with this proposal. If it is intended to signpost users directly to statistics on other official websites, then it would be useful to have a link directly to the documentation required. A link to the homepage of the website of ONS could prove to be a mammoth task of finding the relevant documentation required. There also needs to be clear data on HESA statistics.

#### **Proposal 2:**

It would be beneficial to be able to download the datasets from Stats Wales. Allowing more time for interpretation and analysis would also assist local authorities that are short staffed and do not have the capacity to analyse the information. There is a need for clear data on NEETs statistics on Stats Wales.

#### **Proposal 3:**

To be able to download the data from Stats Wales would be very useful, although the compendia publications are very well detailed and presented. However, if there is a one-stop shop for us to download the data then it would ensure that all local authorities are using comparable data.

#### **Proposal 4:**

Agree with this proposal, and agree that much of the bulletins which contain secondary data do not change from year to year, and being able to access the underlying data sets

when possible would be useful. Clear data on the gypsy and traveller count is required for Stats Wales.

**Proposal 5:**

This proposal may assist local authorities greatly in the current climate. Many experienced officers have been lost due to redundancies/early retirement and unfortunately these positions are being given up as efficiency savings. If Welsh Government can assist with ad-hoc requests for statistical information, it may ease the burden for some authorities.

Advance notification on when updates are available on Stats Wales for data would be beneficial in assisting us with meeting deadlines for any work that is being undertaken. It would also assist local authorities if the timescales of policies/strategies required by Welsh Government coincided with the relevant data being released.

**23. Rachel Richardson, Conwy County Borough Council**

Hi,

I am responding to the consultation: Proposals concerning the publication of official statistics on behalf of Conwy County Borough Council, Housing Services Department.

We would welcome the changes in Proposal 2, particularly the frequency and additional analysis of the new build and homelessness statistical release.

Under Proposal 4, we would welcome the review of the Gypsy Traveller Caravan Count. At present the twice yearly caravan count doesn't provide a robust evidence base of Gypsy Travellers in Conwy. It would be more beneficial to record caravans as and when encampments occur, this would help develop a clearer picture of the Gypsy Traveller community in the area.

Thank you,

**24. Jamie Thorburn, Ceredigion County Council**

We would broadly support the published proposals as a reasonable approach cutting down on duplication of other official data sources and on little-used publications whilst maintaining the topicality of key datasets.

## 25. Sian Walton-Jones, Wrexham County Borough Council

### Response to Consultation Document

#### Proposals concerning the publication of official statistics.

Wrexham LA find the completion of the Stats2 Return extremely useful for the following reasons:-

- 1) The return is compulsory and therefore completed by all authorities across Wales.
- 2) The data is recorded on the same date in January and therefore provides consistency year on year – Wrexham LA always refer to the published number of pupils with a Statement of SEN.
- 3) The data is published and therefore enables authorities to compare data / number of pupils across Wales.
- 4) The return allows for data to be broken down into categories which enables LA's to monitor trends and target specific areas year on year.
- 5) All authorities across North Wales use the CAPITA ONE database to record pupils with a Statement of SEN and the Stats2 Return is generated using this system.
- 6) The First Release information collated following the Stats2 collection is very useful and informative.

To conclude, I feel that it is important at the current time for the Stats2 Return to continue in its current form. The collation of SEN statistics will have to change in the future dependent on SEN Reforms.

## 26. Russell Watts, Vale of Glamorgan Council

Stats Info Desk,

We would be grateful for feedback on our proposals, in particular on the following questions. **Annotated below**

What impact will these proposals have on your work?

**I think the proposals will generally improve the scope and access to relevant topics and providing internet navigation is straight forward should provide a more rewarding experience.**

What do you use the statistics for?

**I don't use all areas of the statistics but it raises awareness of what is out there and who produces what. The areas of data I usually get asked to access are generally in support of Planning and Transportation issues but there are times when I've had to delve into other less common areas in a more corporate role (Local Service Board – Business Intelligence Group) to assist in producing a Unified Needs Assessment for the Authority.**

Do you agree with the focus on making datasets available in an open format with more analytical - but less frequent - statistical releases?  
**Most definitely.**

Where we are proposing to stop or reduce the statistics that are available, are there dependencies between our statistics and your work that we have not considered?  
**None that I'm aware of.**

Are there particular issues of timing that we should consider when planning for reducing the frequency of statistics?  
**Nothing critical here**

**Particularly in favour of Proposal 3**

## **27. Roisin Willmott, Royal Town Planning Institute**

Dear Sir/Madam,

### **Response to: Proposals concerning the publication of official statistics**

Thank you for the opportunity to comment on the above consultation. The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 23,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

This response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

The Welsh Government published its Draft Planning (Wales) Bill and Positive Planning: Proposals to Reform the Planning System in Wales Consultation on 4 December 2013 and seeks views on how best to deliver planning services in the future. The draft Bill is likely to bring significant changes to the planning system; and in relation to this consultation there are proposals relating to measuring the performance of Local Planning Authorities (LPAs). In turn the proposals for the planning system are likely to be effected by the issues set out in this consultation; it is important that the two consultations are brought together to ensure there is complementarity between the final proposals.

We welcome the reference in the consultation to the Future Generations Bill and the commitment to "considering the requirement for supporting indicators" (p7). There

are a number of other Bills set out in the Legislative Programme that should also be monitored throughout their progression through the National Assembly for Wales. This includes the Planning (Wales) Bill, Housing (Wales) Bill, and Environment Bill.

We note there is no reference to statistics in relation to the Welsh Language. RTPI Cymru is concerned that future approaches to statistics being mooted, including the proposals to the Census, would reduce the quality of information on the Welsh language.

## **28. Welsh Statistical Liaison Committee – March 2014 meeting**

Discussion held at the March 2014 meeting of the Welsh Statistical Liaison Committee, a key consultative committee to the Welsh Government on official statistics.

### **General comments**

WSLC broadly agreed with the proposals we have put forward. Some stated they had not formally responded to the consultation because they had no concerns to raise.

It was asked whether we would undertake a review later down the line, after the proposals in the consultation had been implemented; and if it would be possible for users to make a case to revert changes later if needed. GJ stated that we continuously review our activity to ensure user needs are met but agreed that we would give particular attention to reviewing these proposals over time.

GJ explained an initial response to the consultation will be issued by the end of April. A more in-depth response will be included as part of the KAS Evidence Plan, to be published end of May/beginning of June.

### ***Proposal 1 – To build on our collaborative community with partner organisations and remove duplication in the publication of official statistics***

It was asked how we will be assuring the quality of data published by our arm's length bodies on StatsWales. GJ responded that it was a risk we were aware of but that ultimately the arm's length bodies will be accountable for the quality of their data.

It was queried whether we would still be publishing FE / HE data on StatsWales or whether we would just be signposting using to the HESA website. GJ explained a mixed approach would be taken but we would be publishing Wales data on StatsWales that could not be easily acquired from HESA (for example data on Welsh domicile students).

### ***Proposal 2 – To allow more time for value added interpretation and analysis, where appropriate we will publish datasets through StatsWales, preferably in a more timely fashion and with user support, whilst reducing the number of routine monthly and quarterly statistical outputs.***

It was pointed out that WSLC members were in general more interested in the underlying data so would generally be in support of a move towards publishing data on StatsWales (as long as it was accessible). The point was raised that other users may find the bulletins more useful and it was asked whether these types of user had been properly consulted.

It was suggested that we should use some sort of alert / pre-announcement system for the publication of StatsWales data cubes so that users are made aware of when data sets are updated.

It was pointed out that there is no general link to the StatsWales website anywhere (currently the only way to enter the site is via a topic specific link).

**Proposal 4 – *For those few outputs that add less value, or have little use outside a very specialist or internal audience, we will reduce the frequency or cease either the data collections/publications.***

It was felt that the Gypsy Traveller Caravan Count publication was used by planners and housing, and reducing its frequency from twice a year to annually might cause inconvenience. GJ explained more work on that particular proposal was needed and Welsh Government statisticians would be talking to local authorities before progressing any plans.

**Proposal 5 – *to publish ad-hoc requests for statistical information, whilst aligning our standards of service with our Freedom of Information commitments.***

If publishing an ad-hoc request from a particular local authority, it was asked whether we could consider publishing the information requested for all local authorities (if it did not result in much additional work).