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HEALTH AND SAFETY COMMISSION

Release arrangements for health & safety statistics

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Issue

1. The arrangements for releasing health and safety statistics into the public domain and whether to move to a single main release.

Timing

2. Not urgent. The release dates are fixed for 2007. Of the options for change, one could be implemented in 2008, the other not before 2009.

Recommendation

3. The Commission is asked:
 - to consider and give a steer on the current picture of statistical releases into the public domain that involves both formal and informal routes;
 - to consider whether to continue with two main formal releases or move to a single release date for health and safety statistics
 - if a single release date is preferred, to decide which option for change should be taken forward.

Background

4. The arrangements for presenting occupational health and safety statistics were developed to meet very different circumstances to those prevailing now. Originally these statistics were produced for a narrow audience including ministers, the Commission and key stakeholders in the health and safety field. Public interest has grown steadily and the external focus has shifted to monitoring progress (of HSC/E, local authorities and the broader health and safety system) against target reductions in the rates of injury, ill health and days lost. Within HSE, these statistics have been used increasingly to inform policy development, target and manage interventions and measure progress on

objectives. In the last year or so the Board has questioned whether we can identify more interesting dimensions to the statistics to achieve more media coverage and, in doing so, further raise awareness of the harm health and safety failures cause. A Statistics Steering Group of senior HSE and local authority staff was set up last autumn to steer this work (see annex 1).

5. These developments have led to a number of parallel and overlapping sets of statistics. Statistics Branch publishes HSE statistics, usually under the National Statistics¹ banner, meets internal demand for more immediate and detailed analysis to support policy and operational management and responds to ad hoc requests from stakeholders and the public. Policy and operational teams gather and analyse some of the same data, both for internal purposes and to release to particular stakeholders in support of their initiatives and interventions. Stakeholders, such as trade associations and trades unions, collect information about health and safety performance in their own area of interest and produce and publicise related statistics.
6. Some significant changes have been made to HSE statistics in the last ten years to respond to the new agenda. The main ones have been:
 - Moving the bulk of our statistics to the web;
 - The main releases cover both HSE and LA enforced sectors;
 - Only the main statistical release (in November) involves a hard copy publication, now a pocket-sized booklet dealing with the highlights and progress against targets;
 - There are only two formal press launches, for fatalities in July and for the November release.
7. The development of HSE's statistics web pages has enabled us to release statistics into the public domain throughout the year. Some are badged as National Statistics (where they reach the necessary standard/accuracy); others, for example quarterly unvalidated RIDDOR data and trends to be launched shortly, are not. Most of these are released on our website without fanfare, other than a website notice, an e-mail to our Statistics User Group and, for the higher profile statistics, a ministerial submission. *(We don't currently notify the Commission about these routine releases but could do so if Commissioners wish)*. The current schedule of formal releases (see annex 2) is much simpler than the equivalent a few years ago
8. The Chair and senior managers in HSE continue to seek further simplification of the statistical release timetable. One of the drivers is concern that the separate release of fatal injury statistics in July may give them undue weight compared with disease-related deaths. Another is the wish to see all our statistics released as soon as possible after the reference period. Demand, particularly from internal customers, for more immediate data and trends throughout the year is also increasing.
9. The government is currently developing proposals to give the Office for National Statistics greater independence. This is likely to include a 'publications hub' (to be run by ONS) for the release of all National Statistics to demonstrate that independence and improve co-ordination. We believe the impact on HSE's release arrangements will be small.

¹ National Statistics, introduced by the current government in 2000, set down strict guidelines on quality and independence (from political/policy interference) to build greater public trust and confidence,

Argument

10. The Commission are asked to give a steer/ decide on:

- a) How we should balance the flow of raw (more immediate) and validated (Nat Stats) statistics into the public domain;
- b) Whether the benefits of moving to a single, annual statistics event, i.e. combining the fatals and main statistics releases, outweigh the risks, and
- c) If yes to (b), which of the options for change they prefer.

Balancing the flow

11. As mentioned in para 5 there is a now a rich and diverse flow of statistics both within HSE and emerging into the public domain. The benefits and risks of this pattern are:

<i>Benefits</i>	<i>Risks</i>
More timely and relevant information is available to support policy and operational planning	Provisional picture may be misleading and so mis-inform policy decisions
Staff can see and feel more in touch with the impact/outcomes of their work	If validated picture is different, media may focus on the change (and HSE's statistical 'failure') rather than our message
Stakeholders see HSE as more 'in touch'	Changes above could dent stakeholder confidence in HSE
Our statistics look more 'fleet of foot'	HSE gives conflicting messages from informal and Nat Stats routes simultaneously

12. We have some control over the flow of informal statistics from HSE although, in practice, it would be very difficult to stop it altogether. The best course is probably to ensure that the status of all our statistics is clear and to concentrate on mechanisms to avoid 'conflicting' data or messages appearing simultaneously. We have no control over the flow of statistics from stakeholders although the more rapidly our statistics appear, the less likely are others to produce their own..

13. The Commission is asked to endorse the mixed model of HSE releasing informal and National Statistics into the public domain. The Commission is also asked to agree that HSE should aim actively to co-ordinate, and set in context informal releases to reduce the risks set out above while getting as much information into the public domain as quickly as possible.

Continuing with two separate releases

14. There are currently two high profile releases, fatals in July and the other main statistics in November. If the Commission decides that they prefer to continue with this arrangement, we should be able to bring forward the release of fatals next year at least into June. This opportunity will arise from planned improvements to our validation processes.

Moving to a single release date

15. The options for a single release date are:

- a) Delay releasing fatals until November;
- b) Bring forward the main release to July, or
- c) Move both releases to a date between July and November

16. The technical issues involved in implementing option (b) are substantial and are described in annex 3. At this stage, Statistics Branch believe this option is viable but this is not entirely in HSE's hands. For example, although ONS indicate we could get the change in the Labour Force Survey (LFS)² schedule we would need, the final decision on this rests with an interdepartmental steering group. The benefits and risks of each option are set out below and discussed in more depth in annex 3:

Option (a) – single release in November	
<i>Benefits</i>	<i>Risks</i>
Enables a balanced presentation of injury and ill health fatality risks	Unofficial estimates of fatals statistics may fill void and we lose control of the agenda
One high profile statistics event to focus media attention	National Statistics rules probably prevent official HSE comment on any unofficial estimates of fatals
No technical challenges	May be hard to resist FOI requests for fatals statistics during delay period
Change could be implemented in 2008	HSE statistics look even less 'fleet of foot'

Option (b) – single release in July	
<i>Benefits</i>	<i>Risks</i>
Enables a balanced presentation of injury and ill health fatality risks	Changes needed to our LFS data gathering schedule introduce risks to the quality and hence reliability of ill health and days lost estimates.
One high profile statistics event to focus media attention	Need to change basis for target progress judgements (previously agreed with Treasury) and significantly reduced confidence in them.

² The Labour Force Survey is being superseded by the Integrated Household Survey (IHS) in 2009. Our current question set in the LFS will simply be rolled forward into the IHS and we refer to LFS only for simplicity in the body of the paper.

HSE statistics look more 'fleet of foot'	Fuller analysis of progress against targets produces different judgement to that released in July with consequent presentational risks.
	Very limited sector or country/regional analysis of non-fatal injury data available and so reduced ability to support sector and country/regional press releases and media work.

17. Option (c) is not considered further because it combines the risks of both (a) and (b) without the full benefits of either. Also, because the change needed to our main data source, the LFS, requires a calendar quarter change (see annex 3), moving to July is as easy as the in-between months.

18. ***The Commission is asked to consider the above options and their risks and benefits and decide whether change should be pursued and, if so, which option they prefer.***

Consultation

19. Policy group, operational directorates, LACORS, Communications Directorate, Planning and Finance Division.

Presentation

20. The profile of the two main releases is significant in the specialist and regional media but there is little impact at national level. The fatals release in July has attracted rather more coverage at national level than the November release. Changing the release arrangements would not, therefore, be high risk but either option for a single release carries some presentational challenges. For (a) the delayed release of the fatals statistics would probably be the most noticed change and we might expect unfavourable comment in the specialist media. It would also carry the risk of losing control of the agenda as mentioned in para 16. We might also face criticism, particularly in the transitional year, that we were delaying 'to bury bad news', irrespective of whether the 'news' was in fact 'bad'.

21. Option (b) has mixed presentational implications. On the one hand combining the two highest profile releases could be a positive development, allowing a better balance to be struck between the injury and ill health messages. On the other, any seasonal or other transitional effects on the statistics and trends are likely to be very difficult to get across. We may manage this with the more informed audience (i.e. DWP ministers/officials and some other stakeholders) but probably not with the 'public' or 'media'. Option (b) also raises implications for the handling and release of the more detailed RIDDOR non-fatal data and the other elements of the current November package (including those for major injury) which cannot be brought forward to July.

Costs and Benefits

22. All options will have little or no cost/benefit impact on duty holders or stakeholders.

Financial/Resource Implications for HSE

23. Both options for change would provide both financial and resource savings from holding only one press briefing a year rather than two as at present. These savings are estimated at £xxx³. They include staff time for planning and delivering the press briefing (ranging from the Chair & Board members to press officers and support at £xx⁴) and associated website activity at ~£3k).
24. Option (b) would involve extra resource in CoSAS during the transitional year (for extra analysis to understand and estimate transitional effects – an estimated 6 to 12 staff months (mainly at bands 2-4; costing £31-62k). If we are able to secure two slots (or other means to get extra data) in the transitional year to support this process, there would be a commensurate increase in analytical resource required to analyse the data – a further 6 to 18 staff months (mainly at bands 2-4; costing £31-93k), depending on the sophistication of the adopted methods. These costs could only be absorbed within current staffing by dropping other work. There will also be financial implications for this option arising from the costs of our survey questions in the LFS/IHS. Our annual LFS question module currently costs £250k. If we seek questions in additional quarters to help estimate transition effects, additional costs of a similar order would be incurred and this would have to come from the already diminished extra-mural research budget at the expense of other, probably survey, work.

Environmental Implications

25. Minor and positive for either single release option in that it will eliminate travel for ~ 20 people to and from one of the two separate press briefings.

Other Implications

26. None

Action

27. If the Commission decides to retain the status quo we will aim to bring the fatals release forward in 2008 at least into June. If a single release is preferred using option (a) this would be implemented for next year's releases. If option (b) is preferred Statistics Branch will continue to work with the Office for National Statistics to secure the necessary change to the timing of HSE's questions in the Integrated Household Survey. A fuller analysis of the potential impact on the progress judgements and the proposed mitigation will also be prepared. We will also discuss with DWP and others the need to change the methodology for making our target judgements from that set out in the Statistical Note.

³ Figures will be provided when the paper is presented to the Commission.

⁴ Ditto

Statistics Steering Group

Terms of reference

1. To provide strategic direction on HSE and LA statistical needs and the means of meeting them, taking account of the views of Ministers, other key stakeholders and external customers (as expressed through the Statistics User Group).
2. To provide a steer on presentation of the statistics at the main releases (currently fatals in July and all H&S stats in November).
3. To keep HSE statistics (e.g. headline releases, statistical publications, detailed analysis on the website) under review and advise whether they are meeting the needs and strategic direction set out in (1).
4. To advise the Board, through the Chief Scientific Adviser (CSA), on the above issues.

Membership

Patrick Mcdonald,	Chief Scientist	(Chair)
Kevin Myers,	Director, Hazardous Installations Directorate	
Colin Douglas,	Director, Communications Directorate	
Elizabeth Gibby,	Director, Injury Reduction Programme	
Derek Allen,	LACORS	

Current release schedule for health and safety statistics (in 2007)

National Statistics publications schedule

Publications planned for 2006 and 2007

Release	Date	Form of Release (a)
HSE statistics on worker blood-lead levels	See footnote (c)	N
Self-reported work-related illness and workplace injuries in 2005/06: Results from the Labour Force Survey (d)	July 2007	N
Statistics of fatal injuries 2006/07	26 July 2007	PB
Health and Safety Statistics 2006/07 (b)	1 November 2007	PB

a) PB – Press Briefing and Press Release; PR – Press Release only; N – Neither (release is normally announced by email to interested users).

b) with additional supporting material published on HSE's website.

c) Originally planned for release in February 2007, now postponed due to higher priority work. Further information will appear on this page when plans are clear.

d) The headline LFS figures for 2005/06 were released in November 2006. Tables containing breakdowns by region and industry were published on 1 May 2007, and type of illness by gender on 18 May 2007. This release covers further, more detailed analysis by region and industry.

Detailed explanation of timetable for validation and analysis of data for fatalities, LFS, non-fatal injuries, enforcement, and other key data.

Overview

1. The main issue determining the possible release date for statistics is the time needed (after the reference period) to gather, validate and analyse the raw data to an acceptable quality. The National Statistics protocol calls for statistics to be “released as soon as practicable once they and any accompanying commentary or analysis are judged fit for purpose” (see annex 4 for the relevant section on *Earliest possible release*).
2. Gathering and validating data to a ‘fit for purpose’ standard means that July is currently the earliest we can release the fatalities statistics. Improvements in data validation processes to be introduced soon should enable us to bring this release forward at least into June.
3. The release of the other main health and safety statistics takes place in November. The processes that determine this date are:
 - receipt (in May) of the Labour Force Survey (LFS) data and the detailed analysis to derive estimates for injury, ill health and days lost;
 - the assembly, validation and tabulation of the non-fatal RIDDOR injury data and data on enforcement activities (HSE and LA);
 - the collation of other sources of ill health data: THOR⁵, mesothelioma deaths and industrial injury disablement benefit;
 - preparation of this material for publication: updating disease and injury commentaries and preparation of regional and industry briefs;
 - analysis and documentation in support of the statistical judgement on progress against targets.
4. Data gathering and analysis for the LFS, the non-fatal RIDDORs and THOR trends would all need to be compressed to achieve an earlier main release. The first two are undertaken by HSE and the third by the THOR team at Manchester University.
5. The options for a single release are:
 - a) Hold back the fatalities statistics and release them in November; or
 - b) Shorten the November production process (for example by getting delivery of the LFS data earlier, i.e. February) to enable us to complete analysis by July.
6. Option (a) presents no analytical difficulties and could be implemented for 2008. ‘Bundling’ of releases, involving delaying the release of one set of statistics until a related set is ready, is permitted under the National Statistics protocol (see annex 4), though a three month delay would constitute an extreme example of this principle. However, the Statistics Steering Group considered that it would create significant presentational risks and make it very difficult for HSC/E to remain in control of the agenda on fatalities. This problem exists even with the July release date as interested parties outside HSE already do their own counting and make their estimates public. This problem would be significantly greater with a November release. HSE’s fatalities statistics might anyway need to be released in response to Freedom of Information Act requests during the delay period.

⁵ THOR is The Health and Occupation Reporting network run by the University of Manchester collecting information from consultants and GPs in the health service.

7. Option (b) is much more challenging. The most important elements in the main release are the estimates derived from the LFS data. To produce these for July we would need to resolve the following issues:
- i. Secure a slot in an earlier quarter in the new Integrated Household Survey (IHS) that supersedes the LFS next year;
 - ii. LFS respondents are asked about their injury and ill health experience in the past year – by moving to an earlier quarter, the reference year for the questions will no longer match the financial year we use for our statistics;
 - iii. There may be a seasonal effect so that estimates (for injury and ill health in the relevant year) derived from the same questions in different quarters may differ;
 - iv. Tackling (ii) and (iii) may require a transitional year when we ask the questions in both the last and an earlier quarter so that we can estimate the effect of the change on longer-term trends.
8. We are currently in discussion with the Office for National Statistics (ONS), who run the LFS/IHS about the availability of slots in earlier quarters. They have expressed doubts about its technical advisability but the change looks possible provided we do not change our questions the first time we run in the earlier quarter. We have also asked ONS about the possibility of having two slots during a transitional year to enable us to meet the challenge in (iv) above. Other possibilities include gathering our data across all the quarters but only from a proportion of the respondents (there are five 'waves' in each quarter) – we are in discussion with ONS on this as well. Although ONS can advise on the practicalities of the proposed change, the final authority lies with the interdepartmental LFS steering group.
9. The restriction on change to the question module would delay the gathering of better information on the flow from the workforce (due to work-related illness and injury) on to Incapacity Benefit. We are due to introduce this in Q1 2009 but it would have to wait until Q4 2009.
10. We are almost certain that the issues in (ii) and (iii) will have an effect on the estimates for injury, ill health and days lost. This could be significant with respect to the year-on-year changes we are seeking to track for the Revitalising and PSA targets. There is therefore a risk to the robustness of one of our key statistical measures. If we are able to compare 'before' and 'after' estimates as proposed in (iv), we can seek to adjust for any transitional effects in our progress judgements. Even if we can't do this, in the longer-term, any 'step' effects in the trends for injury etc resulting from the change may become apparent (so that we can explain and discount them). Any adjustment of this kind will add uncertainty to our statistical messages.
11. Compressing the timetable for RIDDOR and THOR analysis is more problematic and we can see no way of completing the necessary work for a July release. We would therefore need to make the following changes to the basis for our main statistical release:
- i. Progress would have to be judged using a more limited set of information (and so not be in line with the statistical note on progress judgement agreed with the Treasury);
 - ii. Regional and sector analysis of non-fatal RIDDOR data would be much more limited than at present;

The issue in (i) would not affect the current PSA targets as the changes could not take effect before the final judgement but it could have an impact on Revitalising. For example, ill health data from THOR has so far given a similar picture to LFS. If this were to change, a judgement based solely on LFS released in July might be thrown

into doubt later by the THOR analysis. We think this risk is small but it does need to be taken into account in deciding whether to change to earlier release of the main statistics.

12. The reduced portfolio of country/regional statistics would create presentational difficulties. We are already under pressure for more analysis to meet local needs at the November release to support regional media work. Any reduction would mean a lost opportunity for promoting important health and safety messages.
13. Adopting a single main release date in July would block off the opportunity to advance the publication date for the fatals which could now be achieved given planned improvements in validation processes.

Timelines for main sources

LFS

14. To release headline figures for injury, ill health and days lost from the LFS in November the following steps are undertaken:

Stage 1 (mid May - mid August) Data validation and preparation for analysis:

- Checking routing of questions;
- Calculating the appropriate weighting to adjust the estimates for non-response;
- Checking for and dealing with anomalous or inconsistent responses;
- Compiling derived variables for injury and ill health analysis;
- Building and applying imputation models to deal with incomplete responses on days lost;
- Preparing final data set for analysis using the statistical package STATA.

Stage 2 (mid Aug - end September) Analysis for HSS:

- Adjusting and running STATA syntax files and completing checks;
- Undertaking significance and trend tests;
- Populating headline tables for web, producing draft charts and commentary for HSS booklet;
- Completing additional supporting analysis for assessment of progress against the targets.
- Checking headline tables on web test bed and draft HSS booklet

Stage 3 (first half October) Compiling web based documents:

- Producing charts and commentary for:
- Industry web pages;
- Region/ country web pages;
- Disease web pages;
- Historical pictures web pages.

Stage 4 (second half October) Completing final checks and contribute to briefing

- Checking draft HSS booklet
- Checking headline tables on web test bed
- Checking web based documents on web test bed
- Contributing to briefing and Q&A

Fatal injury

Information on fatal injuries is accumulated throughout the year and is subject to two rounds of case-by-case validation, first in December/January for the half-year figures, then in May/June for the (provisional) annual figures. These are then tabulated and written up for publication in July. The mid year checking process for 2005/06 had to be abandoned because of problems with COIN data lists, and subsequent discovery of inconsistencies in the final dataset led to the postponement of the publication of the full year's data. A review of these processes is underway, and some gain in the speed of publication may be achievable.

15. But however quick the validation process, a reasonably stable figure for the fatalities in a particular year cannot be produced until we have established the following in a comfortable majority of cases:

- Reportability;
- Enforcing authority;
- Key statistical features of the case (age, sex, region, industry, employment status).

Counting time for preparation of tables and commentary, this puts the natural publication date for fatal work injuries in June or July of the next (financial) year.

Non-fatal RIDDORs , enforcement, and employment estimates

16. One of the primary sources for the non-fatal injury data is the Incident Contact Centre (ICC). To allow for the time taken from an injury occurring to it being reported, the earliest time for receipt of this data is mid-May. Over the course of the current ICC contract, improved quality control processes have been implemented at source. This has reduced, but not yet removed, the need for in-house validation checks. Some of the validation issues can be unpredictable, so although reducing the validation time by (say) one month may be possible, it reduces the leeway should a problem occur. The preparation of regional and industry briefs and the associated tables also takes time -- currently about 2 months,- due to the level of complexity and detail requested by the customers. However, this cannot commence until the detailed validation is complete. Unless we chose to launch without this detailed backup material available, bringing publication of these data forward to July looks unachievable.

17. Enforcement data for HSC is sourced from COIN, and that for the local authorities from the LAE1 return. COIN continues to be a complex data source, and the ongoing 'bedding-in' of the system requires extra care in the extraction, validation and interpretation of the figures. The COIN data quality group has committed to 100% checks on prosecutions records, and appropriate checks on notice records, so this situation should improve, but at present a significant advance of the earliest publication date for HSE enforcement data does not look possible.

18. While most local authorities return their LAE1 forms by the end of July there is a long tail of late returns. Again, significant advance of the publication date does not look possible.

19. Employment estimates, as supplied by the Office for National Statistics, are used to identify the numbers considered to be at risk, and hence injury rates are calculated

accordingly. Whilst the top-level employment data would be available for a July release, the detailed breakdowns are not available until later in the year.

THOR trends

20, One of the problems with the use of THOR data to assess trends is that there are variations in participation rates in the schemes. The raw data (delivered to HSE at the end of May, for the previous calendar year) are therefore not a sound basis for assessing trends. Over the past couple of years, the THOR team have developed a methodology for adjusting the data for variations in participation. Under the current arrangements the results of this analysis are delivered in September. The THOR contract is currently being renegotiated, and early delivery of these analyses could be sought.

Extract from National Statistics release protocol*Earliest possible release*

- (l) Statistics will be released as soon as practicable once they and any accompanying commentary or analysis are judged fit for purpose. There must be no opportunity – or perception of opportunity – for the release of unfavourable data to be withheld or delayed for political reasons.
- (m) An exception may be made where two sets of figures measure facets of the same issue, and simultaneous release would present a more coherent picture to users, as for example where export and import data are issued together in the UK trade statistics. In this case the release of one set of statistics may be delayed to coincide with publication of the other, provided users' wishes are taken into account. Such decisions on 'bundling' of releases will be taken by the relevant Head of Profession, and if necessary by the National Statistician.
- (n) For periodical releases, the decision on timing will usually involve a trade-off between achieving the earliest possible release for a particular period, and maintaining consistency over time. Such decisions will be taken by the relevant Head of Profession, and if necessary by the National Statistician.