



# Faculty of Public Health

of the Royal Colleges of Physicians of the United Kingdom

Working to improve the public's health

## Response from the Faculty of Public Health to the Disclosure Review for Health Statistics Consultation

The Faculty of Public Health welcomes the opportunity to contribute to the consultation on this important subject. The remit of the Faculty includes the setting of professional standards in dealing with all aspects of data processing for public health professionals, and also promoting the use of information and interagency collaboration.

The Faculty's comments relate in the main to guidance on the non-disclosure of numbers in tabulated data for cells for which the data value is less than 5. This policy has a significant impact on public health teams that are responsible for producing or using statistical data, particularly for those working with local data sets, for which numbers are much lower than in the corresponding national data. We recognise that there is a need for guidance, and also that there is considerable variation in the extent to which current guidance is followed.

The Faculty recognises that there are important sensitivities surrounding the release of such data, particularly where it is felt that the disclosure may result in the identification of individuals, and that such identification must be avoided. Equally, however, it is our view that a more measured risk management approach should be taken to guidance on the publication of small numbers within statistical tabulations, since the risk that disclosure of such data will result in identification of individuals is not simply dependent upon the data value in a cell.

In particular, we recommend that future guidance should emphasise the need to take into account a range of factors that should determine the balance of risks and benefits including:

- the likelihood of identification of individuals, (particularly the size of the denominator population from which the numerator in any cell is drawn),
- the sensitivity of the health issue to which the data relate e.g. for some issues, such as sexual or mental health, even the perception that individuals might be identifiable could give rise to significant concern,
- additional risks associated with linking data over time or with other data sets
- the value of the information provided..

Since the effect of the current guidance on disclosure is very significant at local level, the Faculty is concerned to note the lack of representation from staff working at this level. Current rules on disclosure can make it impossible for health service staff to work effectively in partnership with local authorities where local authority and health geographical units are not coterminous. We feel that this is a serious issue and recommend that PCT, SHA and local authority representatives should be included in the project board to ensure that local health communities can continue to work effectively.