

30 July 2021

Dear Rose

### **Internal review of decision regarding FOI 1409**

Our Reference: FOI/2021/1409

I am writing to you in response to your request for an internal review of the decision regarding your Freedom of Information (FOI) request.

In your original request, you asked us to provide you with a dataset for the whole of 2020 showing all deaths by ICD-10 codes using lead cause grouping, including the 5-year average for each week. You also asked for 2020, all cause totals for England and Wales separately with lead cause groupings with a single lead cause per death, as presented on our NOMIS website.

We responded to your request stating that the requested analysis would need to be created using a high level of skill and judgement and that, subsequently, we are not obligated to create information in response to requests. We therefore considered the requested information not to be held.

In order to be helpful, we also provided all the analysis that we do hold and have published that is similar to your request in case this was of interest to you.

As per your request for internal review, I have assessed how your request has been handled.

### **Information not held**

Upon review, I have found that our response was correct and therefore has been upheld.

In order to create a table of all deaths in 2020 by leading cause group, the raw data would need to be manipulated in order to provide breakdowns by both cause and week, grouped according to leading causes, and to check for disclosure control risk. The addition of calculating the five-year average for each cause group also increases the amount of time this would take to execute.

In order to provide totals for England and Wales separately with every single individual underlying cause of death shown separately grouped into a table with lead cause headings, we would also need to analyse raw data, which would similarly need to undergo disclosure controls and quality assurance before it could be released.

All these tasks require a high level of statistical skill and judgement to complete and therefore would need to be created as a bespoke output. This has been estimated to take about four to five days to complete. Public authorities are not obligated to create analysis in order to respond to

requests. Therefore, we were correct in our conclusion that the requested analysis was not held by our organisation.

Our response also advised you that our Deaths Registered Series and NOMIS webservice will be updated with 2020 data once the data have been finalised in July 2021. This will present the data by individual underlying cause of death. This was suggested, as once this service is updated, this may help to answer the second part of your request.

Upon review, I have found that we should have also offered the option of ordering bespoke analysis through our bespoke services route. Once the data have been finalised at the end of next month, 2020 mortality data will be available to order as bespoke analysis. Such services would be subject to legal frameworks, disclosure controls, resources and agreement of costs. If you would like to request this bespoke dataset, please contact [health.data@ons.gov.uk](mailto:health.data@ons.gov.uk) to discuss your enquiry further. Please note, there may be a charge for this work which would be subject to our [charging policy](#).

## Conclusions

I have found that our original decision that the requested information is not held was correct and has been upheld. To provide the requested information would require the creation of information using a high level of statistical skill and judgement, which public authorities are not obligated to do under the Freedom of Information Act 2000 (FOI). The request was responded to within the statutory time frame and we also provided advice and assistance by providing links to similar information. We should have responded further mentioning that you have the option to order the requested information via our bespoke services. Please accept our apologies for this.

If you are still unhappy with the outcome of this review, you have the right to appeal to the Information Commissioner. They can be contacted by writing to:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Yours faithfully,

Lois Young  
Legal Services

On behalf of:  
Robert Bumpstead  
Deputy Director - Central Policy Secretariat, UK Statistics Authority