

Our ref: Fol/202100221321

J Grove

request-771349-0e7aabab@whatdotheyknow.com

23 August 2021

Dear J Grove,

Response to request for review of original response

Thank you for your request of 30 July 2021 asking for an internal review of our response to your request under the Freedom of Information (Scotland) Act 2002.

Further to my letter of 2 August 2021, I have now completed my review.

Your request

In your original request of 6 July 2021 you requested from us:

“(...) all of the recorded data/information/statistics that the NRS holds on the number of deaths of children (i.e. persons under the age of 16 or however the NRS defines children) where COVID-19 appears on the death certificate.

Of the number of deaths of children where COVID-19 (or SARS-CoV-2) is recorded on the death certificate please provide the numbers of deceased children where:

1. The death was within 28 days of a positive COVID-19 test (e.g. PCR or lateral flow test).
2. The child was recorded as having an underlying health condition (e.g. Down's syndrome, type 1 diabetes)."

In your review request of 30 July 2021 you told us:

“Whilst I am generally happy with the information provided I am going to express a dissatisfaction with the response and this internal review is, perhaps, more of a clarification and check on the information provided. The other reason for my concern is that a link was provided and as the NRS should reasonably know these links can get broken thus removing the disclosed information from the public domain. An

additional reason for the review is that the first age range is ambiguous. The age range may be 0 to 4 but this is not explicitly detailed as it is recorded simply as "0". Can the NRS please confirm that between March 2020 and June 2021 one child in the age range 0 to 4 has died with COVID-19 mentioned on their death certificate and it is recorded by the NRS that this child had an underlying health condition that was recorded on the death certificate (i.e. that the child may have died with COVID rather than from COVID)?

Can the NRS please confirm that between March 2020 and June 2021 one child in the age range 5 to 9 has died with COVID-19 mentioned on their death certificate and it is recorded by the NRS that this child had an underlying health condition that was recorded on the death certificate?

Can the NRS please confirm that between March 2020 and June 2021 one child in the age range 10 to 14 has died with COVID-19 mentioned on their death certificate and it is recorded by the NRS that this child had an underlying health condition that was recorded on the death certificate?

Can the NRS please confirm that between March 2020 and June 2021 one child (or young person) in the age range 15 to 19 has died with COVID-19 mentioned on their death certificate and it is recorded by the NRS that this child had an underlying health condition that was recorded on the death certificate?

Can the NRS confirm the Section 17(1) exemption provided specifically that the NRS holds no positive test result data for those children (or that child) and, potentially, the young persons (or person) in the 15 to 19 age range who have died with COVID-19 being mentioned on the death certificate?

Given that the British Broadcasting Corporation (BBC) continue to release information on the number of deaths from COVID-19 within 28 days of a positive test result then it seems improbable that this positive test result information is not recorded by Scotland's statistical authority when it is linked to deaths. It would be anticipated that this positive test data may not have been captured during the early stages of the SARS-CoV-2 outbreak but it is reasonable to expect that by this time that this data would be captured and recorded by the NRS."

Outcome of review

I have concluded that the original decision should be confirmed, with modification.

You requested confirmation that the information provided in the table was correct. I can confirm that it is.

One point of clarification that you requested was whether the entry in the table for age 0 related instead to age 0-4. The figure stated in the table is correctly given for children aged 0. There have been no deaths of children aged 1-4 where COVID-19 was mentioned on the death certificate. In response to your enquiry, we accept that there is potential for misunderstanding. We have therefore updated our published table to include a line showing 0 deaths for children aged 1-4. You can access the table using this link:

<https://www.nrscotland.gov.uk/files//statistics/covid19/weekly-deaths-pre-existing-conditions-by-age.xlsx>

You questioned whether it was correct that NRS does not hold data on COVID-19 test results. I can confirm, under section 17(1) of FOISA, that National Records of Scotland does not hold this information. NRS produces statistics of deaths in Scotland based on causes of death entered on death certificates. Death certificates are completed based on the professional opinion of the certifying doctor. They may write suspected or probable COVID on the death certificate without a test having been done, if in their professional opinion they believe the deceased had COVID. Test data for COVID-19 is held by NHS Scotland, and published by the Scottish Government.

You commented that information provided via a link has the potential to become inaccessible if the link is broken. This is of course true of any web based publication. However, the information we provided you with forms part of our COVID-19 deaths statistics publications (<https://www.nrscotland.gov.uk/covid19stats>), which we are committed to maintaining for the foreseeable future. NRS maintains extensive archives of statistics relating to deaths in Scotland, which are available on our website.

In addition, and as a further safeguard to public transparency, the [NRS Web Continuity Service](#) has captured multiple, time-stamped copies of the NRS website, as part of the public record. Archived 'snapshots' relating to this particular area of interest are available to view at https://webarchive.nrscotland.gov.uk/*/https://www.nrscotland.gov.uk/covid19stats. These will be available to permanently view online in the NRS Web Archive, even if associated live content on the NRS website were to be retired over time.

Right to appeal

If you are unhappy with the outcome of this review you have the right to appeal to the Scottish Information Commissioner about our decision within 6 months of receiving this letter. Information on how to make an appeal, along with an application form, is available on the Commissioner's website at: <http://www.itspublicknowledge.info/YourRights/Unhappywiththeresponse/A>

[ppealingtoCommissioner.aspx](#). You can also contact the Commissioner at:

The Scottish Information Commissioner
Kinburn Castle
Doubledykes Road
St Andrews
Fife
KY16 9DS

E-mail: enquiries@itspublicknowledge.info

Telephone: 01334 464610

Should you then wish to appeal against the Commissioner's decision, there is a right of appeal to the Court of Session on a point of law only.

Yours sincerely,

Liam Cavin
Statistician