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**Chair of the UK Statistics Authority, Sir David Norgrove**

Sir Bernard Jenkin MP  
Chair, Public Administration and Constitutional Affairs Committee  
House of Commons  
London  
SW1A 0AA

09 September 2019

Dear Bernard,

I write to offer the UK Statistics Authority response to the Public Administration and Constitutional Affairs Committee report on '*Governance of official statistics: redefining the dual role of the UK Statistics Authority; and re-evaluating the Statistics and Registration Service Act 2007.*'

The Authority thanks the Committee for this report and its recommendations. The following note lays out our response and appended to this are two further responses: one from Ed Humpherson, Director General for Regulation, on behalf of the Office for Statistics Regulation (OSR), and another from Jonathan Athow, interim National Statistician, on behalf of the Government Statistical Service (GSS) and Office for National Statistics (ONS).

The Committee's report comes at an exciting time for the Authority, with the newly-appointed National Statistician, Professor Sir Ian Diamond, due to take office on 22 October. In parallel, the Authority is also developing its next strategy, to follow on from *Better Statistics, Better Decisions (BSBD)*, and which we intend to launch next year. As we do so, Sir Ian, the Board and I will consider the conclusions and recommendations of the Committee very carefully.

As set out below, we will continue to keep the Committee updated on our work, and specifically on the progress made against these recommendations.

Yours ever,



**David**

## Introduction

The Authority's response considers the Committee's recommendations around understanding demands for data and leadership on data; on separation of functions, reporting to Parliament, transparency and the role of the non-executive directors; and the latest update on the Retail Prices Index (RPI).

### Understanding demands for data

*(Recommendations 1,2,3,4,6,38)*

As the Authority makes clear within its Code of Practice for Statistics, users of statistics and data should be at the centre of statistical production; their needs should be understood, their views sought and acted upon, and their use of statistics supported.

During early discussions on the Authority's forthcoming strategy, Board members have agreed that this principle will continue to be at the heart of our work over the coming five years. With that in mind, the Authority leads the way by planning an ambitious programme of work to improve the statistical system's collective understanding of demands for statistics across the UK.

During the initial phase of this work, staff from across the Office for National Statistics (ONS), the Office for Statistics Regulation (OSR), and the Government Statistical Service (GSS) are identifying what sources of intelligence already exist about demands for data (including, as the Committee suggests, the Institute for Government's report on data gaps). This work will be followed by a range of events with users of statistics including policy-makers, Parliamentarians and expert users, as well as members of the public in a series of regional road-shows. As the appended note from the National Statistician illustrates, many gaps have been identified and filled following conversations with users, but there is still more to do.

This exercise is intended to not only provide a clearer picture for the statistical system of demands and current data gaps, but also to forge links with users of statistics across the UK. It is important to respond to the needs and diverging policy demands across the UK, keeping in mind that the Authority is accountable to all four legislatures. We look forward to working closely with the Committee as part of this work.

Further detail on the Committee's recommendations on sector-by-sector reports, and ongoing user engagement, are contained within the appended notes from the OSR and the National Statistician respectively.

### Leadership on data

*(Recommendations 36,37)*

The Authority agrees with the Committee's recommendation that our responsibility for the statistical system necessitates a leading role across areas such as technology, data science, data sharing and linking and data ethics. Improved access to administrative data in particular remains key to delivering improvements for users of statistics, and we continue to drive work to make best use of the gateways established in the Digital Economy Act.

As set out in further detail in the National Statistician's response, the Authority's ambition is to be a leader in the use of official statistics and government data both domestically and internationally, by developing world-class technical skills underpinned by a robust legal and ethical framework. The role of the ONS in the United Nations (UN) Global Working Group on Big Data for Official Statistics provides a clear example of the strength and potential in the UK statistical system.

### Separation of functions

*(Recommendations 13,14,15,16,17,18,26)*

The Authority recognises the challenges created by its statutory responsibility to oversee both the production and regulation of official statistics but agrees with witnesses to the Committee that legislative change is unnecessary.

In recent years, the Authority has enhanced separation between its regulatory and production responsibilities by establishing a distinct executive office for regulation, the OSR. These arrangements provide the OSR with full decision-making autonomy from the ONS, but we accept that this separation can be made more visible to those outside the statistical system.

With that in mind, the Authority Board has considered the Committee's recommendations at length, and have decided to introduce the following changes to its policies and practices:

- The Regulation Committee terms of reference will be updated to reflect the Committee's responsibility for overseeing the budget of the OSR.
- Further, the Authority will explore arrangements whereby the Head of the OSR could be appointed as a Secondary Accounting Officer for the Department in respect of its regulatory responsibilities.
- The Authority will publish an updated framework document, setting out these roles and responsibilities and those across the statistical system more broadly, within its forthcoming strategy.
- The Authority is also exploring options for developing its website, to emphasise and make clearer the separation that exists between the ONS and the OSR.
- And we will continue to publish a separate Annual Report for the OSR distinct from the work of the ONS.

The Committee also recommended that the OSR consider changing location. As Mr Humpherson explains in his appended note, the OSR is currently considering the business case for such a move and will keep the Committee apprised of its conclusions.

### Reporting to Parliament

*(Recommendations 11,14,22,23,24)*

The Authority is happy to continue and expand on its engagement and reporting to Parliament and this Committee, and indeed is grateful to the Committee in its continued support of the Authority's independence.

The Authority is always content to appear in front of the Committee, including at an annual hearing following the publication of its annual report and accounts. The OSR will continue to publish an annual report which will contribute to this hearing, which is discussed in the appended note from Mr Humpherson.

The Authority will give updates at these annual evidence sessions of the progress of implementation of the recommendations in this report. The Authority is also aware of the recommendation to report annually on progress in implementing other recommendations, of

both external reviews and parliamentary select committees, and would be happy to do this via the annual hearing with this Committee and regular correspondence from the Chair.

Regarding more frequent correspondence with the Committee, the Director General for Regulation and the Chair of the Authority will inform the Committee when making a significant intervention in the statistical system. As the appended note from Mr Humpherson explains, the OSR will increase their engagement with departmental select committees as another means to ensure Parliament is aware of data and statistical issues. This is in addition to the Chair's established updates to this Committee which will continue with regular frequency.

### Transparency

*(Recommendations 11,14,20,25,26,34)*

The Authority is committed to transparency. In response to the Committee's recommendations, we will ensure Authority Board minutes are published in a timely fashion following their approval, and that they capture the key points of non-executive discussion. In future we will also publish the Authority's Regulation Committee minutes.

Following approval at the next Regulation Committee meeting in October, July's minutes and agenda will be published on the Authority's website. The Committee's Terms of Reference will be updated accordingly. The Authority website will also be updated to include future meeting dates for the Regulation Committee, along with those for the Authority Board.

### Non-Executive Directors

*(Recommendations 20,25,34)*

The Authority's non-executive directors play a crucial role in the work of the Board and in the exercise of the Authority's statutory duties. Non-executive directors also sit on the Authority's sub-Committees and will continue to do so in future.

In addition, in recent years the Authority's non-executive directors have increasingly played a role outside the Boardroom, regularly attending sessions with staff to offer support and challenge on key programmes of work, including the 2021 Census, changes to the National Accounts, challenges in accessing administrative data and the work of the OSR. This is alongside planned external engagement activities: for example an event in September to engage with members of the Senedd in Cardiff, and we would be pleased to update the Committee on this too.

The Authority expects there to be a competition for new non-executive directors later this year, and in the course of this process, we can consider the case for increasing the number of working days for non-executive directors.

### RPI

*(Recommendation 30)*

As the Committee are aware, the Authority published its response to the report '*Measuring Inflation*' of the House of Lords Economic Affairs Committee on 4 September. This included the Authority's proposals for the Retail Prices Index (RPI). As noted in our response, the Advisory Panel on Consumer Prices provided advice to the National Statistician on the composition of the RPI in light of the Economic Affairs Committee report. Taking account of that advice, the then National Statistician concluded that the current position was unsatisfactory and put options for the future of the RPI to the Authority Board on 26 February 2019.

After receiving this advice, the Chair of the Authority wrote on behalf of the Board to the previous Chancellor of the Exchequer on 4 March 2019 with the following recommendations:

- That the publication of the RPI be stopped at a point in future.
- In the interim, the shortcomings of the RPI should be addressed by bringing the methods of the CPIH into it.

In his response to the Lords Economic Affairs Committee, the Chancellor announced his intention to consult on whether to bring the methods in CPIH into RPI between 2025 and 2030, effectively aligning the measures. The Authority will consult on the method of making this change.

The role of the Authority is to promote and safeguard official statistics. We have been clear that the RPI is not a good measure, at times significantly overestimating inflation and at other times underestimating it, and have consistently urged all – in Government and the private sector – to stop using it. However, the RPI is unique as we need consent from the Chancellor to make certain changes, such as the one we have proposed.

Although we regret that no change will occur before 2025, we welcome the Chancellor's intention to consult on resolving current issues with the RPI. We continue to urge the Government and others to cease to use the RPI. It would be wrong for the Government to continue to use a measure of inflation which it itself accepts is flawed, where it has the opportunity to change.

Looking ahead to the proposed consultations in January 2020, the Authority looks forward to both Committees' continued engagement on this matter.

## **Office for Statistics Regulation response**

### **Introduction**

This response focuses on the aspects of the Committee's report that relate to the Office for Statistics Regulation (OSR). Overall, the Committee has recognised the importance of OSR's role, endorses a strong, separate identity for OSR as the Authority's regulatory arm, and ultimately provides a basis for enhancing OSR's role and identity.

Since giving evidence to the Committee alongside Sir David Norgrove and John Pullinger, we have published "OSR's vision: what we do and how we do it"<sup>1</sup>, which resonates closely with many of the findings and recommendations outlined in the report. The essence of OSR's vision is that statistics should serve the public good, and that in a world of abundant data, we want people to have confidence in statistics produced by the public sector. In order to realise this vision, our work focuses on three key themes:

- Upholding the trustworthiness, quality and value of statistics.
- Protecting the role of statistics in public debate.
- Developing and leading a better understanding of the public good of statistics in collaboration with others.

These themes will underpin OSR's approach to delivering the recommendations outlined by the Committee. This note presents OSR's response and details plans for driving improvements in these areas. It confirms OSR's ambitions to enhance its regulatory role and identity. These ambitions can be achieved by enhancing work already underway; immediate implementation of some of the Committee's recommendations; and evaluating options for more significant growth in OSR's remit and resourcing.

### **Actions already underway**

Many of the Committee's recommendations speak to areas in which OSR is already operating and has an active role. Those relating to conducting user research, carrying out sector by sector reviews, identifying data gaps and reviewing quality information are of particular relevance to OSR's current and planned regulatory activity. In this regard, this inquiry has provided a platform for the importance of OSR's work, and for raising these important issues with the wider Authority which will support and strengthen OSR's work across the Government Statistical Service (GSS).

### **Upholding the trustworthiness, quality and value of statistics** *(Recommendations 1,6,7,37)*

OSR will continue to uphold the trustworthiness, quality and value of statistics and drive improvements to statistics through its regulatory work programme of assessments and compliance checks. OSR's current regulatory work programme has an emphasis on statistics that have the greatest public value. It considers the key policy debates and where there may be data gaps or a lack of coherence or insight in statistics which support these areas. Our work programme will continue to be informed by stakeholder discussions, as well as internal expertise, and by monitoring new areas for future inclusion. The ongoing delivery of OSR's regulatory work programme will support several of the Committee's recommendations.

The Code of Practice highlights the importance of the role of Chief Statistician/Head of Profession across producers of official statistics. It makes clear their role in upholding and advocating the standards of the Code, stating that they should strive to improve statistics

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<sup>1</sup> <https://www.statisticsauthority.gov.uk/osr/our-vision/>

and data for the public good, and challenge inappropriate use. The Code also emphasises the responsibility of organisations to consider the views of its statistical leadership in all matters relating to data and statistics. We have recently started a systemic review to understand characteristics of strong statistical leadership in government. We will be working with Heads of Profession and others with a view to supporting and strengthening their contribution to upholding trustworthiness, quality and value. The review will look at factors that currently support effective statistical leadership and the development of future leadership.

OSR is seeking to expand the growing list of organisations<sup>2</sup> that have made a public commitment to adopt and apply the pillars of the Code of Practice for Statistics voluntarily. The adoption of the Code of Practice's pillars of trustworthiness, quality and value for data presented as evidence in public debate (e.g. management and performance information, social research) has the potential to offer significant benefits. It can raise standards of analysis and dissemination among organisations that use it and demonstrate transparency to users of these statistics and data used as evidence. Continuing to promote and grow this area of regulatory work will address the Committee's recommendations and extend them to data and statistics from outside government.

#### *Providing guidance and advice on data quality and appropriate use*

OSR fully supports the Committee in highlighting the importance of producers providing guidance and advice to users on the strengths and limitations of statistics, and their appropriate use. OSR will continue to raise this with producers as part of regulatory work, and will monitor and challenge if progress is slow. Since high-profile concerns relating to police recorded crime were raised at the Public Administration Select Committee and the Home Affairs Select Committee, and following the Bean review in 2016, OSR's assessments have had a stronger focus on quality and quality assurance. OSR will continue to:

- Review, develop and promote its guidance on the *Quality Assurance of Administrative Data (QAAD)* (first published in 2015)<sup>3</sup>.
- Work with producers to further emphasise the need for understanding the natures of data sources, as well as the methods and processes for producing the statistics.
- Regulate in accordance with the pillar of Quality in the Code of Practice for Statistics<sup>4</sup>.

#### *Identifying and addressing data gaps*

A prominent feature of OSR's regulatory work is identifying gaps where public debate is not well-informed by statistics. OSR will continue to expand this area of research and regulatory activity. Two current areas in which OSR is investigating the information needs of users and other stakeholders are adult social care and policing, with other topics planned to commence in the next year. These reviews seek to improve the evidence base for public debate across the UK.

OSR will continue to learn from and build on previous successes in identifying data gaps and working with producers to address them. For example, following a series of interventions from OSR highlighting the need for a trustworthy source of statistics on school funding, the

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<sup>2</sup><https://www.statisticsauthority.gov.uk/code-of-practice/voluntary-application-of-the-code/list-of-voluntary-application/>

<sup>3</sup><https://www.statisticsauthority.gov.uk/osr/what-we-do/systemic-reviews/administrative-data-and-official-statistics/>

<sup>4</sup> <https://www.statisticsauthority.gov.uk/code-of-practice/the-code/quality/>

Department for Education has recently committed<sup>5</sup> to publishing a comprehensive set of official statistics on this topic.

Through a new series of reports called 'Insight', OSR will deliver lessons and insight to a wider audience in an accessible way. Following OSR's first report on Coherence<sup>6</sup>, published shortly after the PACAC inquiry hearing, the next instalment will focus on identifying and addressing data gaps.

#### *Improving data sharing*

Data linkage has great potential to address data gaps and provide additional or new insights to users. Following OSR's data linkage review<sup>7</sup> which highlighted concerns around the barriers to using linked data effectively, OSR will monitor progress in data sharing and access and will continue to strongly advocate for the wider use of linked data under appropriate conditions.

OSR will continue to collaborate with key organisations in the data landscape, convening workshops involving the Information Commissioner's Office, the Centre for Data Ethics and Innovation and the Royal Statistical Society. OSR will also commit to reviewing, developing and promoting its regulatory guidance<sup>8</sup> for statistics producers on handling data in ways that are transparent and accountable. These will help establish a common understanding of issues such as data ethics, data ownership and data access, and provide reassurance to the public that their data are safe.

#### Protecting the role of statistics in public debate (Recommendations 1,4,11)

Under the Statistics and Registration Service Act 2007, there is a statutory requirement to promote, monitor and safeguard the production and publication of official statistics that serve the public good. OSR's casework function plays an important role in building public confidence in the production and use of official statistics, intervening when there are significant or persistent issues with how statistics are being used. OSR will commit to developing our casework function further, while noting that we are already proactively monitoring how statistics are used in public debate by initiating a sizeable proportion of cases internally, and are developing automated tools and dashboards to provide intelligence on significant uses.

In the interests of providing greater transparency around the casework process, the Authority and OSR published an Annual Review of Casework<sup>9</sup> in 2018. Seeking to provide further insight to users, the Annual Review of Casework will be published in September 2019 and builds on the quantitative information by including additional commentary and evidence of the impact of the Authority and OSR's work. We will send a copy of this to the Committee separately. OSR and the Authority will continually review and develop the transparency and effectiveness of its casework function in line with the Committee's recommendations.

#### Developing and leading a better understanding of the public good of statistics in collaboration with others (Recommendations 1,4,6)

In line with the Committee's recommendations, to develop a better understanding of how valuable statistics are in supporting key policy decisions made by public bodies, as well as

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<sup>5</sup> <https://www.statisticsauthority.gov.uk/correspondence/department-for-education-funding-statistics/>

<sup>6</sup> <https://www.statisticsauthority.gov.uk/publication/osr-insight-coherence/>

<sup>7</sup> <https://www.statisticsauthority.gov.uk/publication/joining-up-data/>

<sup>8</sup> <https://www.statisticsauthority.gov.uk/publication/guidance-data-governance/>

<sup>9</sup> <https://www.statisticsauthority.gov.uk/publication/annual-casework-review-20172018/>



by a much wider range of people in society such as businesses, charities and community groups, OSR will commit to delivering work in three key areas:

- Identifying and sharing details of research on the public impact of statistics.
- Developing a framework for judging whether statistics have been used in a misleading way.
- Investigating the understanding among producers, users and other stakeholders, of the role of National Statistics designation in conveying the value of individual sets of statistics.

We recognise that this is a gap in OSR's past work and filling it will help demonstrate the value of statistics to society.

We note the concerns of the Committee in wanting to see the results of effective engagement in shaping improvements to the nature and content of official statistics. In this vein, OSR will continue to seek to better understand the views and experiences of users, potential users and other stakeholders through its systemic review programme<sup>10</sup>. This programme provides an opportunity to convene mixed groups, involving producers, users and other stakeholders, to facilitate a common understanding of information needs and the challenges in meeting them. More importantly, they provide a means for solutions to be identified and collaborations forged. OSR will continue to drive progress in this area, for example by making additional recommendations to producers for the long-term strategy for improving engagement – a need that is common across the statistical system.

We are also currently in the early stages of a review of public and user engagement that will help inform the preparation of regulatory guidance to push for progress among producers.

#### Short-term actions

*(Recommendations 11,16,17,18,22,23,26)*

In addition to the work already underway, OSR will commit to delivering some of the Committee's recommendations in the short-term and will begin work to address them immediately. These largely focus on transparency, including publishing OSR's annual report separately and reporting to and engaging with parliaments across the UK.

We welcome the Committee's call for greater transparency in OSR's regulatory decision making and agree that this is a priority. In future, more information will be made available about Regulation Committee meetings, such as the schedule, agendas and minutes.

As part of OSR's efforts to demonstrate a clearer separation from the rest of the Authority, we will launch our own Twitter account. This visible separation of public communication channels will reinforce OSR's independence and contribute further to the strengthening of our own distinct voice.

This year OSR sought to more clearly illustrate independence from statistics production by publishing a report summarising our work in 2018-19 as an annex in the Authority's Annual Report and Accounts. We will commit to separately publishing an Annual Review for 2019/20. This will be laid before Parliament as recommended, as well as other OSR reports that highlight specific concerns in statistical practice.

In addition, we note the Committee's recommendation to ensure that Departmental Select Committees are appraised of OSR's findings regarding statistical issues that are relevant to their areas of activity, and will write to the Committees to draw their attention to immediate matters of concern.

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<sup>10</sup> <https://www.statisticsauthority.gov.uk/osr/what-we-do/systemic-reviews/programme/>

OSR will support the Authority as it compiles a framework document that clearly describes the roles and responsibilities of the various parts of the statistical system.

#### Longer-term developments

*(Recommendations 13,14,15,16,22,38)*

OSR is considering the means for further physical separation from the rest of the Authority and the potential regulatory benefits from an increase in resource. We will be ambitious in our thinking and will report back to the Committee in early 2020.

#### *Premises and location*

OSR is considering future office locations and will evaluate a range of options – based on an identification of the costs and benefits, risks and opportunities – from maintaining the current situation through co-location with other government organisations to completely separate premises at all chosen locations.

OSR will take into account the varying experiences of the three sites, which include: existing separation from statistical producers (Edinburgh); sharing a building with other areas of the Authority including ONS, taking into account the different historical arrangements for provision of space in those offices (London and Newport); and location within a national capital city (London and Edinburgh) or otherwise (Newport).

#### *Resources*

Ambitious proposals will be developed that reflect a range of options for OSR with a doubling or tripling of resource. These will be developed with input from a range of stakeholders in the Authority and beyond. Lessons from previous business planning and engagement activities will be incorporated, as well as the approaches taken by other regulators.

With a strong focus on how to better deliver OSR's vision, a range of means to deliver independent, effective, cost efficient, proactive and comprehensive regulation will be considered. These may include, for example: the expansion of OSR's regulatory teams; extension of its research programme; and the potential development of data-driven technology tools to support regulatory decision-making. The impact of the options on location will also be considered.

#### *Other actions*

There are a number of other areas in which OSR will seek to further demonstrate its independence. The feasibility of establishing a separate website for OSR, as well as the value of having one or more external members to the Regulation Committee (that are not non-executive directors of the Authority) to provide further challenge on regulatory judgments will also be considered to make clearer the separation of OSR from the rest of the Authority.

#### Conclusion

OSR's ambition is clear: we want to enhance public confidence in statistics and data, and we will do this by:

- Upholding the trustworthiness, quality and value of statistics.
- Protecting the role of statistics in public debate.
- Developing and leading a better understanding of the public good of statistics in collaboration with others.

We welcome the Committee's report and see it as a tremendous opportunity to enhance our profile and strengthen our delivery as the regulator of official statistics. As mentioned throughout our response, we will continue to keep the Committee updated on our work.

**Ed Humpherson, Director General for Regulation  
Office for Statistics Regulation  
September 2019**

## **Office for National Statistics and Government Statistical Service response**

### Introduction

The Office for National Statistics (ONS) and Government Statistical Service (GSS) response notes the recommendations of the Committee and details further its work on user engagement and accessibility of outputs; on statistical leadership; and regarding making greater and ethical use of data, and data capability and innovation.

### User engagement and data requirements (Recommendations 2,3,6)

Users of data and statistics are at the centre of statistical production. The Code of Practice makes clear that statistics and data need to be useful, easy to access, remain relevant, and support understanding of important issues. This includes improving existing statistics and creating new ones through discussion and collaboration with stakeholders, and being responsible and efficient in the collection, sharing and use of statistical information.

The ONS and wider GSS does and will continue to play active roles in engaging users of statistics, including policy makers, Parliamentarians, academics, expert users and members of the public to better understand user needs and demand for data.

We recognise that the economy and society is ever changing, and in many domains (notably environment) what it is possible to measure is changing too, which is shaping user requirements and expectations. New policies and initiatives are constantly being developed, driving new demands for data and statistics to inform policy, evaluate outcomes and help the public understand trends and hold decision makers to account.

We are already active in this space, reacting to complex user demands, including those of Whitehall, devolved administrations and the public to bring new data and statistics online and fill data gaps. Over the last two years the ONS has helped inform Government-led strategies on loneliness, produced highly impactful data on the deaths of homeless people and student suicides, worked across the GSS to improve housing statistics, and has recently provided analysis at micro-geographies concerning the health of specific high streets and over 1,000 towns in England and Wales.

Moreover, the ONS has made significant progress in the reporting and analysis of the Sustainable Development Goals (SDGs), sourcing the appropriate UK data for the global indicators, putting that data into context and making that data available to everyone. The UK is one of a few countries to report data on 75% (182) of the global indicators as of September 2019, and over 70% of the 182 reported global indicators have data for at least one disaggregation such as sex, age, or geographic location, illustrating our progress in filling these data gaps.

This builds on both the Economic Forums and Population and Public Policy Forums, which meet on a regular basis to present new data and listen to user feedback on where the ONS and GSS should invest resource to bring new data and insight. These bring together central and local government, academics, think tanks, journalists and charities; recently a panel of young people gave an assessment of the data they need to make informed choices about their futures.

Much of our focus is to address data gaps, topics and themes where limited or no data or statistics are currently collected and disseminated, using discussions internally and with external users to identify these. We acknowledge the need to increase our user engagement and find innovative ways to engage members of the public on their needs and requirements.

Alongside data gaps, attention needs to be given where users require more granular data, for example by protected characteristic, geography or sector, and where different data needs to come together to give insight on the relationship between different sets of statistics.

Following the Committee's recommendations, we will develop a stakeholder engagement strategy and implementation plan with Heads of Profession (HoPs) from across the GSS. This strategy will cover GSS capability in user engagement, identifying best practice, statistical coherence and presentation of statistics in the digital age. This work will be undertaken as part of a co-ordinated programme of user engagement by the Authority, and will look at innovative digital means of engagement as well as traditional means.

#### Accessibility of outputs (Recommendations 4,5,7)

Building on the user research and feedback the ONS receive, a number of improvements have been made to our statistical bulletins and analytical 'ad hoc' articles, with more planned. We have worked hard to ensure statistical bulletins are concise, with commentary throughout, and clearly outlining the merits and limitations of certain datasets and statistics, plus how they should be used and interpreted.

We have also introduced short, highly visual and often interactive analytical articles on key themes and topics. These are produced in collaboration between statistical analysts and a team of data journalists to improve our reach and impact with the general public through the media. We plan to continue to review and improve our publications and how they are presented.

The ONS has a wide range of users, from members of the public looking for a particular statistic through to expert users. Meeting all these needs remains a challenge.

We acknowledge that non-expert users can find it difficult to find basic core statistics. We are pleased that witnesses noted to the Committee that the ONS website has improved, and will continue to work with users and the public to ensure they are able find what they are looking for with minimum effort.

For researchers, the ONS and GSS have made more micro-data available through the Secure Research Service (SRS), allowing academics, institutions, think tanks, central and local government the ability to conduct their own research and analysis with the necessary security and procedures in place to protect individuals and businesses. Demand has significantly grown and includes requirements to access Government administrative data. In 2018 the SRS increased its capacity, utilising investment from UK Research and Innovation (UKRI), with further improvements underway to meet the increasing demand. The ONS continues to work with Economic and Social Research Council (ESRC) to acquire data from a number of data suppliers.

We recognise we can help users better by bringing data and content together around themes. The ONS have established a number of Centres of Expertise to draw together statistics, analysis and articles on particular topics. These are: Equalities and Inclusion; International Migration; Crime and Justice; Ageing and Demography; and Subnational Analysis. We have also created an Economic Statistics Centre of Excellence to provide analysis of emerging and future issues in measuring the modern economy. We have more to do to ensure that all users, from the general public through to academic experts, know where to go for trusted statistics and robust analysis. We will continue to review progress, and if they prove successful, will bring new areas online subject to user need.

In addition, we are investigating how a modern format consistent with accessing data via the internet meets user needs and requirements, while allowing related data to be found which are not limited to ONS statistics.

The ONS also recognises that the media is often the way in which people hear about our statistics. We have invested in media training for statisticians and analysts, both so we provide a better service to journalists and for statisticians who give interviews to press, TV and Radio. Moreover, we have developed a number of secondments into media organisations to help data and fact checking teams, for example with the BBC.

### Statistical Leadership (Recommendations 32,34,38)

The ability to attract, develop and retain leaders of the future is a key area of priority, both for the GSS and for the wider Analysis Function. The GSS People plan was launched in April 2019 and aims to increase capability and promote a more inclusive working culture. It provides clarity about the strategic direction of the GSS and Government Statistician Group (GSG) profession. The talent management and leadership objective set out work to ensure a clear succession plan for identified critical roles is held, regularly reviewed and updated so that the profession can attract, develop and retain talented individuals with the right skills and leadership capabilities for now and the future.

At the most senior level, we will continue to explicitly emphasise the importance of the role and responsibilities of the Statistics HoPs, while noting that they are fully empowered within their organisations. We will make the case for HoPs in all departments to be at a suitably senior grade, reflecting both the value HoPs provide for their department and their wider responsibility towards the credibility and leadership of the statistical system. As an immediate step, within ONS the responsibilities of HoP will be transferred to a Director General role. In addition, the National Statistician and leadership team will set up career development discussions with all HoPs.

This will support and complement the development of the broader Analysis Function Talent strategy. The National Statistician is not only the head of the GSS, but is also the most senior analyst in Government and head of the newly established Analysis Function. The Analysis Function Strategy was launched in June 2018 to produce “better analysis, better delivery” and set out the key aspiration of the Function: how analysis adds value, the importance of using analytical standards and what good analysis looks like. It also has four skills objectives which are being progressed during 2019/20:

- Build the learning and development programme capability across the Function and within allied Functions and Professions.
- Engage partner Functions to increase the integration of analysis and radically improve the Civil Service Capability in Analysis and Data Science.
- Strengthen the Function’s management models and career pathways to support multidisciplinary teams.
- Build analytical specialist and leadership roles and to develop a supply of talent that delivers Civil Service Leadership and Diversity objectives.

The ability to join up across the analytical professions and have a collaborative approach to talent management creates a wider pool of both talented people and available interventions. The aim of this is to deliver inspiring, confident and empowering leaders that

we need now and in the future. We will identify people showing the highest leadership potential and provide programmes to accelerate their development across the Analysis Function, identifying critical roles and ensuring all have succession plans.

#### Making greater use of data (Recommendations 36,37)

We welcome the Committee's recommendations which align with our drive to increase the scope of data sets we can access and use to inform better decisions. The ONS regularly receives and uses hundreds of datasets each year, from public and private sector organisations. ONS data acquisition plans and priorities reflect the needs of our users to either develop new statistics that better reflect our society and economy or to maintain the quality and relevance of our existing statistics.

We have identified many new datasets with the potential to enable new or improved statistical outputs, and we continue to make good progress towards accessing them for statistical purposes, with appropriate safeguards to protect the security and confidentiality of individuals' data. In the past year or so, we have acquired many datasets for the first time, including: Higher Education Statistics Agency Student Record data, Hospital Episode Statistics and Improving Access to Psychological Therapies (IAPT) mental health data from NHS Digital, VAT re-supply from HMRC's new system, Valuation Office Agency private rental data, and a number of commercial organisations to support our economic statistics transformation and Census transformation plans.

While the legal right of access to data is an important enabler, many prospective data suppliers face challenges and difficulties associated with the provision of that data, especially when datasets are to be shared first-time around. The ONS actively supports data suppliers and works with them to explore all options through collaboration and engagement. There are a number of challenges to data sharing that are experienced by most data suppliers: risk appetite; capacity; and legal clarity (including General Data Protection Regulation (GDPR)). Most government departments, public bodies, and commercial organisations present an element of some of these obstacles.

Our experience to date has underlined the need to develop strong and ongoing relationships with other government departments. Data standards and quality vary considerably between datasets and departments, as do security, sensitivity and ethical considerations. We therefore need a tailored approach to acquiring data already collected and using it to produce the best available evidence in the public good.

#### Ethical use of data (Recommendations 36,37)

Public trust in how the statistical system uses data sits at the heart of our work, and we have robust processes and practices for responsible and safe use of data. The National Statistician's Data Ethics Committee (NSDEC) was established in 2015 as an independent committee, chaired by Dame Moira Gibb, that provides independent and transparent assurance to the National Statistician that the use of data for research and statistical purposes is ethical and for the public good. NSDEC consists of expert members in research ethics, statistical research, data and information law, data science and data protection. To ensure external perspectives and challenges to the uses of data for research and statistical purposes, the majority are independent members. A lay member also sits on NSDEC to provide a valuable non-expert perspective to its discussions.

Over the last four years NSDEC has considered the ethics of projects from across the GSS and Analysis Function, academia and from researchers from the commercial sector who

want access to Government data. The minutes of NSDEC meetings are published on the Authority website and record the projects considered by the Committee and its deliberations on each. It routinely considers project proposals from, and provides advice to, a wide range of different organisations beyond the ONS, both within Government and the wider public sector, and indeed beyond.

As an organisation, we also play a significant role in the wider conversation on data ethics both domestically and internationally. We are working with colleagues across the UK to develop and promote ethical approaches to innovative uses of data, including developing public case studies with the Centre for Data Ethics and Innovation (CDEI). To further promote a culture of ethics by design, we have developed an ethics self-assessment tool for the research and statistical community, providing guidance, training and specialist user support. We also lead the delivery of ethics training for Social Researchers across Government.

#### Data capability and innovation (Recommendations 36,37)

The Committee's views align with the Authority's ambition to strengthen the wider leadership role for ONS in building Data Capability across Government. In ONS, the Data Capability group consists of three directorates: Methods, Data and Research (MDR); Digital Services and Technology (DST); and the Data Science Campus. Since the Data Capability group was formed in 2015, we have significantly strengthened our national and international leadership role and support for technology, statistical methods, data science, data ethics and data sharing.

In technology, DST is creating the modern data infrastructure required by government to make better use of data. The infrastructure underpinning the Census 2021 data collection and processing has been completely redesigned for cloud use to be highly scalable and secure. It also forms the basis for the transformation of technology across all ONS outputs and analysis.

The ONS has taken a leading role in developing the statistical methods required to utilise administrative data for the production of official statistics. This is a significant global challenge for National Statistical Institutes (NSIs), and the Authority are playing a leading role. Examples include:

- National Statistics Quality Review into Privacy and Confidentiality Methods. The Government and the ONS are committed to protecting the privacy of those supplying data. Deidentification and disclosure control provide important building blocks but increased computing power, more accessible data across the entire world and the motivation of some external players mean that aside from security, we must use cutting edge methods to prevent reconstruction and reidentification. This is an ever-evolving science which will continue to develop. The ONS has invested in this area and is committed to working with global experts, leading NSIs and Government alike.
- An ambitious Administrative Data Methods research programme which is bringing together academics, government and private sector expertise. The use of administrative and transactional data is central to both Government's and our ambitions. However, these data cannot and will not replace survey data like for like. The purpose of the programme is to develop new methodology that enables use of these data in production of reliable, reproducible official statistics.
- Leading the work on Government Data Architecture and Standards. Data Architecture is a relatively new area of focus for many Government Departments. IT



systems supporting transactions with citizens have developed organically and in silos meaning that linking it for statistical (and indeed operational – although that is not our interest) purposes is difficult. We initiated and now take a leading role in a cross-government network of data architects and engineers. The intention is to share best practice and agree standards.

- An Economic Microdata Research team to acquire and analyse new data sources, develop and improve methods for incorporating administrative and commercial data into official statistics, and create new linked and longitudinal datasets for analysis and research.
- The GSS Harmonisation Team, based in ONS, are leading work across the GSS to harmonise data and statistics, making these more comparable, consistent and coherent. We have recently published a harmonisation strategy and implementation plan covering the harmonisation of question wording used in questionnaires, interviews and administrative data collection, and the coherence of official statistics outputs. The implementation of this plan will be led by the GSS harmonisation team but all statistical producers and data owners will play a part in the success of this strategy.

The ONS also plays a leading role in using big data and data science for developing official statistics and are happy to provide updates to the committee on our progress. We are pleased that witnesses noted to the Committee the work of the Data Science Campus, which has demonstrated our ability to deliver important data science projects and develop new tools with multiple applications across government. The demand from across government for these projects and capability-building programmes far exceeds the available Campus support at current funding levels. We will explore the potential for additional funding for example to:

- Scale-up the Campus, building on the proven delivery of its data science projects to strengthen the UK's evidence base further.
- Explore the development of new centres of data science expertise across the UK.
- Expand capability-building programmes to enhance data science skills and development pathways across the civil service Analysis Function, including Data Science Fellowship.
- Contribute more widely to Government policy development and delivery in Artificial Intelligence (AI), data ethics and geospatial analysis.
- Invest in a programme of project delivery combined with knowledge exchange to embed data science capability throughout the rest of the ONS and across UK government.

Internationally, the ONS is active in the United Nations (UN) Global Working Group on Big Data for Official Statistics, including leading the UN Global Platform technology task team pilot to provide infrastructure, data and methods to use global big data sources for official statistics. The success of the ONS's work in the pilot led to the UN Kigali Declaration (June 2019) which confirmed support for the next phase of the programme as an independent Global Platform Institute and series of regional Hubs under the UN umbrella to take this work forward for NSIs globally.

The ONS welcomes the opportunity to build on this leadership role, working in partnership with other key stakeholders, to continue to develop a cohesive, cross-government approach to the innovative use of data and data science to support the needs of policy makers. We work closely with colleagues across government to strengthen the UK's data capability. Together with Government Digital Service (GDS) and GO Science we operate the Government Data Science Partnership, and closely engage with the key cross-government Data Advisory Board and Data Leaders groups. Working alongside the Department for Culture, Media and Sport (DCMS) and GDS, we are exploring further work to strengthen the support for data use across government.

**Jonathan Athow, Interim National Statistician**

**Office for National Statistics**

**September 2019**