

**Ed Humpherson, Director General for Regulation**

Rt Hon Greg Clark MP  
Chair, Science and Technology Committee  
House of Commons  
London  
SW1A 0AA

08 April 2022

Dear Mr Clark,

On 2 March 2022, I gave oral evidence to the Science and Technology Committee. In my evidence in response to a question about the approach to measuring excess deaths I referred to the Office for National Statistics (ONS) approach, stating that: *“For the five-year rolling average excess deaths, ONS has decided for 2022 to drop 2020 from the five-year calculation... It is 2016, 2017, 2018, 2019 and 21, and it has dropped 2020 because 2020 had such an unusual peak of deaths.”*

I wanted to clarify that there are a number of ways to measure excess deaths, that is, the difference between the expected number of deaths and the actual number of deaths in a given period of time. The ONS headline approach, shown in the weekly deaths publication is as I described above and has been agreed across the devolved administrations. ONS publications also refer to excess deaths based on the five-year average from 2015 to 2019. ONS has published a blog<sup>1</sup> explaining more about its choice of five-year average.

As the ONS blog notes, more complex methods can also be used to calculate expected deaths. The Office for Health Improvement and Disparities (OHID) uses a more sophisticated modelling approach, taking into consideration the ageing population, differing mortality trends in subgroups of the population and variation in registrations around bank holidays. OHID developed a different method to that of ONS because it needed more accurate data for operational decision making during the pandemic. OHID continues to use the years prior to the pandemic (2015-2019) as the five-year baseline for its measure of excess deaths<sup>2</sup>.

I would be happy to discuss this further if you would find it helpful.

Yours sincerely,



**Ed Humpherson**  
Director General for Regulation

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<sup>1</sup> <https://blog.ons.gov.uk/2022/01/12/understanding-excess-deaths-during-a-pandemic/>

<sup>2</sup> <https://www.gov.uk/government/statistics/excess-mortality-in-england-weekly-reports>