

Response to the Independent Review of the UK Statistics Authority

4 September 2024

The Independent Review of the UK Statistics Authority by Professor Denise Lievesley is a timely and welcome report on the strengths and challenges in the UK's official statistics system. The UK Statistics Authority is grateful to Professor Lievesley, her Review team, and all those who contributed their time and expertise.

As the Review makes clear, an independent, accountable, outward-looking and properly resourced statistical system is an indispensable part of the civic realm, empowering informed decision-making across society. The very wide range of respondents to the Review – each with their unique requirements and perspectives – is a testament to this breadth of purpose. It is heartening then that public trust in official statistics has remained high in recent years (as measured in the recent Public Confidence in Official Statistics 2023 survey), but we know that there are challenges ahead. In considering the future of the UK's statistical system, four major themes emerge from the observations and recommendations of the Review:

- engagement and communication with users of statistics;
- the need for more sharing of data across government;
- keeping technical capabilities up to date with new technologies; and
- the coherence of official statistics and data across the UK.

While the Review does not claim to have all the answers to these challenges, its clear articulation of the choices before us will serve as a catalyst for dialogue and improvement. The Authority Board has considered the 19 recommendations made in the Review and accepts their principles, noting that some require long term work to address completely. A detailed response, including commitments for future work, is set out below against each recommendation by both the production and regulation arms of Authority. The Authority will also engage with the Government on recommendations regarding data sharing and UK-wide data. All this work will be guided by the views of users of statistics as expressed in the Statistics Assembly and the wider public represented there.

Finally, the Authority Board is grateful to all of those who work within the Authority (across the Office for National Statistics (ONS) and Office for Statistics Regulation (OSR)) and the wider Government Statistical System. This Review rightly recognises the outstanding professionalism and dedication of all who contribute to the mission set by Parliament: to promote and safeguard official statistics that serve the public good.

Governance

Recommendation 1: UK Statistics Assembly

The Authority will establish a UK Statistics Assembly to first meet on 22 January 2025, bringing together the widest possible community of users and producers across all sectors to discuss and give advice on the UK's needs for statistics. The insights from the Assembly will be drawn together in a published report, indicating potential priorities and data gaps. This will inform delivery planning for the ONS and other official statistics producers in government departments and public bodies, as well as the Authority's next strategy. The Assembly's discussions will also provide valuable insights on areas of user concern on the quality of statistics and data gaps that can contribute to shaping the OSR's regulatory work programme. It may also identify fresh opportunities for non-official statistics to be used to complement official ones for the public good. The ability of official statistics producers to implement proposals arising from the deliberations of the Assembly will of course depend on the availability of resources in each case.

Work on the composition and arrangements for the Assembly has been carried out in partnership with the Royal Statistical Society (RSS) and further details will be published shortly.

As Professor Lievesley has pointed out, there is no existing template for such an exercise in other countries, so the Authority will consult stakeholders about the structure and cost-effectiveness of the first Assembly after the event in considering how to develop it in future.

The Chair will give an annual public lecture setting out the progress of the statistical system and priorities, drawing on the insights of the Assembly and the OSR's annual State of the Statistical System report.

Recommendation 2: Director General for Methodology

The Authority agrees with the Review on the importance of technical methodological advice being considered at a senior level, and the need to collaborate with academic and international partners in this area. The Authority recognises that in light of current resource constraints and headcount restrictions, ONS does not currently plan to recruit an additional director general, but as part of routine long term succession planning will conduct an exercise to identify options for more effective representation of methodology within the senior leadership team. This will involve the ONS consulting other national statistical institutes (as identified by the Review) and professional groupings within government such as the Chief Scientific Advisers Network. ONS will also be informed by the outcome of Recommendation 8, whereby the Authority and the Cabinet Office will be considering the role and delegated responsibilities of the National Statistician. ONS will continue to draw on international experts as methodology advisors in the meantime, which will ensure robust and high quality methodological advice and bolster engagement with senior methodologists in other national statistical institutes.

The National Statistician continues to take expert technical advice from the Authority's Methodological Assurance Review Panel (MARP) and the role of this group has grown in recognition of the demands discussed in the Review. In 2023, the Panel's remit was formally expanded beyond research related to the census, to include change programmes across ONS. MARP has since provided advice on novel methods relating to statistics on excess deaths, on travel and tourism, and on labour market surveys. MARP co-opts additional subject matter experts as required, drawing on the advice generously given by the professional statistical community in the UK and internationally (for example, recent work by

Australian experts Professor Ray Chambers and Professor James Brown on methods underpinning the Transformed Labour Force Survey).

Recommendation 3: Statistical legislation

Legislation is a matter for the Government and Parliament.

The Authority welcomes Professor Lievesley's recognition that the Authority's governance is working well and that the two executive arms (the ONS and OSR) are sufficiently operationally independent in practice. Reflecting this more clearly in the Statistics and Registration Service Act 2007 would be desirable, but legislative change is not a priority for the Authority. Should the Government and Parliament wish to revisit the legislation, the Board would of course work closely with them to ensure any changes were appropriate and helpful.

To increase public understanding of the *de facto* distinction between the arms of the Authority, OSR will publish a statement on the operational separation between ONS and OSR. This will cover OSR's separate business plan; separate Accounting Officer and arrangements for budgeting; and separate reporting lines to the Chair, the Regulation Committee, and Parliamentary Select Committees.

Recommendation 4: Pre-Release Access

The Authority supports the recommendation to the Government and devolved administrations to amend the pre-release access process. Equality of access to official statistics is a fundamental principle of statistical good practice, and the existence of pre-release access undermines trust in the official statistics system.

Pre-release access to ONS statistics ended in 2017. The ease with which Ministers and Departments adapted to this change shows that equality of access is practically achievable and need not limit the use of official statistics to support political communication.

Recommendation 5: UK-wide data

Full data harmonisation can only be achieved with input from the UK Government and the Authority will continue to work collaboratively with Cabinet Office, the Ministry of Housing, Communities and Local Government, the Department for Science, Innovation and Technology, and other departments. The Authority also agrees with the Review that improvements in UK-wide data cannot be achieved without continuous collaboration with the devolved administrations to align priorities.

The Authority agrees with the Review's assessment of the longstanding barriers to producing UK-wide data and their persistence. The Review rightly identifies that the roots of such barriers often arise naturally through the nature of devolved responsibility. The Concordat on Statistics has been vital to ensuring co-operation across both devolved and reserved statistics.

As noted by Professor Lievesley, a significant barrier to the GSS creating harmonised data is resourcing and funding of devolved administrations to collect data that they do not require for their own needs. Therefore, the Authority will make the case for funding arrangements that better support the development of UK-wide coherence in the next Spending Review. This will be inclusive of advocating for better arrangements on how statistics development in the devolved administrations is funded, to ensure that sufficient resources are available to make data comparable. Additionally imperative to achieving coherent UK wide data is the ability to share data across administrations. The Authority's full position on the importance of data sharing is addressed under Recommendation 6.

In driving forward UK-wide data, the Authority is committed to collaborating with the devolved administrations and will make use of the existing mechanisms. Setting common standards is an important role already played by the Authority, however, the Authority recognises the importance of exploring with the UK Government and the devolved administrations an expansion of this remit to bring the setting and development of common standards to the fore of the UK-wide strategy involving all four nations, subject to funding.

A specific priority for co-operation and harmonisation will be the future production of coherent and comparable statistics on population and migration. The ONS will continue to share the methods and innovations it is developing and work in partnership across the UK to ensure the potential for more frequent and up-to-date population statistics is not limited to England and Wales.

The Code of Practice for Statistics sets out the need for statistics that are comparable between geographical areas. When producers develop new statistics, the OSR expect producers to build in user needs for UK-wide coherence from the outset, working in partnership across all parts of the UK. Through its regulatory work, the OSR will continue to call for producers to provide information to aid comparison across the UK and, where there is a clear user need, call for producers across all four nations and the GSS to develop comparable statistics.

Efficacy

Recommendation 6: Data sharing between departments

The barriers to data sharing within government are well understood: data owners are not currently incentivised to share data. The Authority agrees with the Review, and with the recent report by the Public Administration and Constitutional Affairs Committee (PACAC) on 'Transforming the UK's Evidence Base', that a drive from the centre of government to change this dynamic, utilising or refining the existing legal gateways and bringing about culture change, is essential. As noted by Professor Lievesley, departments including the Cabinet Office and the Department for Science, Innovation and Technology should work, with the support of HM Treasury to remove the barriers to data sharing and hold other departments to account when they are not sharing data. This should drive a resolution to the barriers that exist and set an agreed and consistent cross-government security position regarding the linking of personal data.

PACAC's recent Inquiry recommends that the Cabinet Office works with ONS to develop a comprehensive new programme to improve data sharing for statistical and research purposes which allows for external scrutiny.

The delivery of the Integrated Data Service (IDS) is a key enabler of the National Data Strategy to enable better government policy and decision making through rapid analysis of integrated data from across government. The success of IDS, and a Future Population and Migration Statistics (FPMS) system based on administrative data, are only possible if Departments overcome the system-level barriers to sharing data identified in the Report. As set out in the ONS FPMS consultation, data sharing is fundamental and will lead to its success or failure.

The OSR will continue to promote data sharing across government as part of its regulatory work. This includes a recent update to its report '*Data Sharing and Linkage for the Public Good*', which made 16 recommendations to help government confront ingrained challenges.

Recommendation 7: Integrated Data Service

The Integrated Data Service (IDS) brings together ready-to-use data to enable faster and wider collaborative analysis for the public good. The ONS is leading the delivery of the IDS in collaboration with partners across government.

The IDS is creating a central hub of high quality, accessible data that will retire legacy government data systems and remove boundaries to data sharing within government. By transforming government's use of data, the IDS will unlock timely and impactful insights that will enable key decisions to be made at pace, thereby improving policy outcomes and public services.

As a secure, cloud-native analytical platform that is accredited as a Trusted Research Environment under the Digital Economy Act (2017), the IDS is underpinned by a commitment to ensure data are handled safely and securely, and data owners will always determine who has access to their data, and for what purpose.

Since the publication of Professor Lievesley's review, the IDS has refreshed its approach to communications and engagement, setting out objectives to clarify the purpose of the IDS and its scope. This renewed approach, which has been agreed with partners across government, will allow challenges and blockers to data sharing to be surfaced more quickly, thereby better ensuring that the needs and concerns of departmental data owners are sufficiently understood.

Recommendation 8: National Statistician role

This is a recommendation for the Cabinet Office to commission a review by the Authority Chair.

The National Statistician role is defined as both the Board's principal advisor on statistics and the Board's chief executive, by sections 30 and 31 of the Statistics and Registration Service Act 2007 respectively. In creating this dual role, Parliament recognised the importance of both statistical expertise and effective leadership of the organisation, with the National Statistician also having cross-Whitehall responsibility and input as a member of the permanent secretary community. The Board remains of the view that the Authority needs these skills at the top of the organisation, whether in one individual or more.

The Authority welcomes the proposed review of the challenges of recruiting to this role, given the technical expertise and leadership skills required. As Professor Lievesley notes, the options in future appointments depend significantly on whether the legislation remains as now or is amended. Any review should consider how to ensure the salary and recruitment process are in line with comparable senior specialist roles across academia, international peers, and government (for example, the roles of Chief Medical Officer, Chief Scientific Adviser, and Chief Trade Negotiation Adviser), drawing on the experience of testing these job markets recently. The Authority will, as recommended, consult with HM Treasury about the remuneration necessary to attract candidates with suitable experience, including leadership of other national statistical institutes globally. As the Review notes, it is also important that the Board and the Cabinet Office identify ways to strengthen appropriate talent pipelines, to ensure a high quality pool of candidates from within the GSS and analysis professions.

The Authority will agree with the Cabinet Office the timelines of the Chair's proposed review. The current National Statistician's term runs until April 2028.

Recommendation 9: ONS Communications

The Review raises important issues about meeting the needs of users and reliability of the ONS website. ONS has a good understanding of the challenges that users face when

navigating the website. Over the last year, ONS has prioritised available resources to focus on addressing performance and stability, particularly during the spikes in traffic for key statistical releases. Measurable improvements have been seen and work will continue.

For 2024/25, ONS is prioritising resource on wider website improvements to address feedback from users on clearer navigation around the site, delivering thematic products more efficiently, and serving a wider range of users through automation and APIs. A plan is in place to build a new open-source website platform in 2024-25 and to start migrating new releases in early 2025 using a new content management system that enables increased flexibility of content.

ONS has made progress with addressing performance issues with its website, stabilising access to the site at busy times. ONS has also begun to introduce a more concise and clearer way of presenting outputs, starting with the Retail Sales publication in February 2024. Building on the success of the innovative dissemination techniques pioneered in Census 2021, ONS has continued to develop new web-based tools to facilitate access to statistics, such as the 'Explore Local Statistics' tool launched in March 2024 to enable users to compare and visualise statistics about places in the UK. ONS is now working urgently to upgrade its technology, modernise data dissemination and further transform the publication of data and insight to better meet the needs of users. Any requirement for further investment will be reviewed following the detailed design phase.

Through the introduction of a new communications and dissemination model, ONS is taking a user-centred approach to increase the impact of its activity and help people find, understand, explore and act on the range of statistical and analytical outputs. ONS has developed specific content to build understanding and trust in how it uses data for the public good. This content is focused on data, benefits, assurance, education, and engagement and debate, including how uncertainty and revisions are communicated. Communications to highlight and explain where uncertainty exists have been developed for specific releases (GDP, for example) and further work is underway to engage external experts on the best approach to increasing public understanding. Furthermore, the Authority Board intends to recruit a non-executive director with experience in communications.

To extend the reach of statistics and data to audiences with whom ONS traditionally has had less engagement, ONS is working with other organisations to help disseminate its outputs as well as inform the design of communications. Examples include working with business and trade bodies and community and faith groups and collaborating with the Association of Colleges and BBC micro:bit to develop education programmes. ONS has also delivered a media briefing in partnership with the Science Media Centre and will undertake further activity with communications experts to help ensure it is meeting the wider needs of users.

Recommendation 10: Board non-executives

The Authority Board has usually had non-executive directors (NEDs) with professional backgrounds in the media and communications, and has benefitted greatly from their advice.

The last vacancy of this type arose from a preference by the previous Government not to reappoint sitting NEDs. The subsequent recruitment campaign did not succeed in appointing a candidate with similar communications experience. In February 2024, an advert was launched for three new NEDs to replace extant and upcoming vacancies, with communications skills listed in the person specification. This recruitment process was paused during the pre-election period. Following the election this process will resume with a view to appointing a candidate who can meet this need. In making its report to Ministers, the Advisory Assessment Panel will have regard to the Review's recommendation that NEDs should serve on the Board for longer than three years, to enable appointees to build their

understanding of the complex statistical system and to have greater impact. Under the Authority's founding legislation and the Governance Code on Public Appointments, NEDs may serve on the Board for up to two terms of five years each.

Recommendation 11: Advisory groups

The Authority relies extensively on the work of external experts across many fields and in many different fora. The breadth of this advice is reflected in the number of different teams across the organisation responsible for engaging with expert advisers, and this has resulted in some diversity of practice. Some flexibility in operating different types of groups is necessary and desirable, but the Review raises a welcome opportunity to be more open and transparent with the governance of the National Statistician's advisory groups.

The recent advertisement for membership of the National Statistician's Expert User Advisory Committee, for example, was published on the UK Statistics Authority website and social media channels. The Authority will extend this approach to other committees and panels, through the Authority, ONS, or OSR websites, as appropriate.

The recommendation to review the style, design and attendance of these groups and will be taken forward in line with best practice and the organisation's executive governance structures.

Recommendation 12: User engagement

The Authority is firmly committed to the role of users within statistical decision making. OSR is currently refreshing the Authority's Code of Practice for Statistics. The new edition of the Code will emphasise the need to engage and listen to the views of users when seeking to change or stop official statistics. Stakeholders will have opportunities to comment on all proposed changes to the Code through a consultation that OSR will open in autumn 2024.

ONS works to promote best practice in user research and engagement across government through the Analysis Function and the GSS. ONS resources published recently include a toolkit for stakeholder mapping from the Engagement Hub, and posters on challenging common assumptions about users from the Data Quality Hub. Continued cross-government leadership by ONS is necessary to make sure that the statistical system is one that listens and explains clearly and transparently what it is doing and why.

Recommendation 13: Eurostat and international relations

The UK Statistics Authority has negotiated a draft Memorandum of Understanding (MoU) with Eurostat under the Trade and Cooperation Agreement (TCA) between the UK and EU, and is due to sign this in October. It makes provisions under Article 714 (UK participation in EU programmes) and Article 730 (general statistical cooperation with Eurostat).

The Review recognises the importance of strengthening the Authority's cooperation with international counterparts, both bilaterally and through multilateral institutions. The current five-year GSS strategy, *Statistics for the Global Good*, is due to be updated by the Authority at the end of its 2020–2025 period. This updated strategy will include an analysis of successes, such as the Authority's increasing profile within multilateral institutions such as the OECD and IMF. The updated strategy will also include lessons learned on Authority interactions globally and explore future ambitions. Its development will be conducted with input from across the GSS. The Review highlights eight countries (the Netherlands, Canada, Ireland, Sweden, New Zealand, France, Australia, and the USA) with particular strengths from which the UK statistical system can benefit. The Authority has strong bilateral links with peers in each of these countries, regularly sharing work and hosting and fielding study visits. The Authority will continue to build on these relations to ensure that the UK remains at the forefront of innovation in official statistics internationally, and will explore further opportunities

for staff loans and secondments, as recommended by the Review. This will involve producers of official statistics in all different organisations and parts of the UK, through the Authority's leadership of the GSS and its International Liaison Officer Network.

Furthermore, the Review encourages the Authority to engage internationally on the development of statistical standards and methodologies, building on the work carried out by the National Statistician's Committee for Advice on Standards for Economic Statistics (NSCASE) which provides advice to the National Statistician on the suitability of current standards across ONS economic data whilst ensuring international comparability. NSCASE is approaching its two-year anniversary and is now a well-established mechanism to provide advice on which standards the UK should adopt in order to meet specific measurement needs of the UK economy. For example, the Committee has recently been reviewing the United Nations' 2025 update to the System of National Accounts and its suitability for the UK.

The Review also notes the opportunities in working with international peers to explore common challenges and opportunities to embrace new technology and reduce reliance on legacy systems. This is an area in which the Authority is collaborating with international peers through the UN High Level Group for the Modernisation of Official Statistics, leading initiatives to explore the future shape of national statistics institutes and to produce applied statistics using data science and alternative data sources.

Recommendation 14: Survey mandation

Statistics institutes around the world have for some decades now experienced a steady decline in public willingness to participate in surveys. For the ONS Labour Force Survey, the reintroduction of face-to-face interviews, a larger sample size and greater financial incentives for respondents have driven an increase in responses in recent months, after an earlier decline that was accelerated by the Covid pandemic. However, the long term challenge of falling response rates remains. The Authority therefore welcomes the Review's consideration of measures to increase response rates, including both mandatory and non-mandatory options. Currently, the Census is the only survey which households are required by law to complete. Any move to extend this requirement to other surveys such as the Labour Force Survey would be a major change and would need to follow careful consideration of the consequences for statistical quality and the burden imposed on respondents, as well as the risk of damaging the relationship between ONS and the public.

The Authority will engage with the Cabinet Office and other stakeholders to explore proposals for mandatory completion of household surveys. Following the consultation carried out in 2023, the Authority will also be making recommendations to government and Parliament on how ONS should produce population statistics for England and Wales. Ultimately, mandation requires legislation and this is a matter for the Government and Parliament.

Accountability

Recommendation 15: Relationship with Parliament and devolved legislatures

The Authority is committed to continued engagement with Parliamentarians and Select Committees and continues to contribute proactively to these. The Authority's Parliamentary Unit provides evidence to Select Committees regularly, encompassing the full span of the Authority's remit in producing, safeguarding and regulating statistics for the public good.

To increase the exposure of Select Committees to data and analysis produced by the ONS, the Authority's Parliamentary Unit identifies key releases for the month ahead that may be of interest to specific Committees, aligned with their portfolios. With the launch of the 'Explore Local Statistics' portal the ONS has improved its available online tools to make data more easily available at parliamentary constituency level, a common topic of interest in Parliamentary Questions.

OSR, in its remit as the regulatory arm of the Authority, is regularly called to give evidence at a range of Committees, advising on the quality of data pertaining to Committee inquiries and helping to identify data gaps for Parliamentary scrutiny.

The Authority has in the past had less opportunity for parliamentary engagement with the devolved legislatures, and intends to undertake more such outreach. Noting the Review's suggestions about making the most of the Board's meetings in Scotland, Wales and Northern Ireland, the Authority will explore opportunities to combine Board meetings with occasions for engagement with devolved parliamentarians. As recognised in the Authority's Code of Practice, statistics are part of the lifeblood of democratic debate. We all benefit from the championing by parliamentarians of the good use of statistics in their work as well as the relevance of statistics to parliamentarians' interests.

Recommendations 16 and 17: Relationship with Cabinet Office

The staffing and resourcing of the Authority's sponsor team is a matter for the Cabinet Office but the Authority would welcome any increase in resources that it could be given.

The Memorandum of Understanding (MoU) covering the sponsorship arrangements between the Authority and the Cabinet Office was signed in 2020. It is consistent with HM Treasury's guidance and the provisions of the Statistics and Registration Service Act 2007 regarding the Authority's status as an independent statutory body operating at arm's length from government and reporting directly to Parliament.

The offices of the Chair and the National Statistician will work with the Authority's sponsorship team in the Cabinet Office to review the MoU and ensure it remains fit for purpose, with any changes to be approved by the Board.

Efficiency

Recommendation 18: Ad hoc statistics

Responding to requests for new statistics and analysis has always been an integral part of the Authority's duty to assist in the development and evaluation of public policy. Maintaining a flexible resource to adapt quickly to changing analytical priorities is essential to continue to meet the diverse demands and needs of users.

In April the Authority published its Strategic Business Plan for 2024-25, setting out more detail on its approach to prioritisation in a constrained financial environment. The Business Plan makes a commitment to securing the stability and quality of its core statistical outputs across five priority areas. In taking on additional work, ONS will seek to align its resources to activities and programmes where it is uniquely placed to deliver, and that have the highest impact on the strategic priorities.

The existing ONS Prioritisation Framework within the ONS allows for resource allocation towards the highest priority work first. For ad-hoc commissions, this framework is considered but also extended to assess the public or policy interest and whether the commission resolves evidence gaps.

The UK Statistics Assembly, to be established as per Recommendation 1, will be used to support the openness with which the Authority communicates UK needs. As recommended by PACAC in their inquiry into Transforming the UK's Evidence Base, such an assembly should be used to identify the benefits new evidence would bring, determine UK needs for evidence as well as research on data gaps and public understanding.

Recommendation 19: Partnerships outside of government

The Authority will work to strengthen its partnerships outside of government and continue to build on the successes of existing relationships, subject to resources available.

ONS depends on close collaborations with external organisations for sharing data, delivering training and apprenticeships, researching methods, and advising on the needs of researchers. Well established partnerships and arrangements for secondments include those with financial institutions (like Visa, Pay.UK, Vocalink, and the Bank of England), with universities (including Southampton, Cardiff and Cardiff Metropolitan, which are near the Authority's largest sites) and with research institutes such as the Alan Turing Institute, the Wellcome Trust and the Economic Statistics Centre of Excellence (ESCoE). ESCoE, sponsored by ONS and hosted by King's College London, brings together leading UK and international institutions, academics and researchers in the UK's first dedicated academic centre of expertise for economic measurement.

The Authority also sees its role through championing data sharing and improving access to data as being a crucial component to building long-lasting partnerships outside of government and supporting research. Accredited researchers from academic institutions and think tanks use the globally recognised ONS Secure Research Service (SRS) to securely and ethically access a wealth of de-identified official data for their research projects. The success of this model in enabling academic partners to carry out research for the public good is a key motivation for expanding the capabilities and datasets available in the SRS through transition to the Integrated Data Service. The IDS will offer a more advanced data analysis platform for existing partners and ONS is working closely with them to ensure their needs are met by IDS.

The ONS continues to take opportunities to work closely with users and producers across the statistical community, including collaborating with the Royal Statistical Society on the design of the UK Statistics Assembly.