

Statistics Commission



Report No. 40
A Candid Friend:
Reflections on the Statistics
Commission 2000-2008
March 2008

Statistics Commission

Report No. 40

**A CANDID FRIEND:
Reflections on the Statistics
Commission 2000-2008**

March 2008

“When you can measure what you are speaking about and express it in numbers, you know something about it; but when you cannot measure it, when you cannot express it in numbers, your knowledge is of the meagre and unsatisfactory kind”.

Lord Kelvin

"I gather, young man, that you wish to be a Member of Parliament. The first lesson that you must learn is, when I call for statistics about the rate of infant mortality, what I want is proof that fewer babies died when I was Prime Minister than when anyone else was Prime Minister. That is a political statistic."

Winston Spencer Churchill

CONTENTS

Foreword by Professor David Rhind

1. Introduction
2. Looking back
3. In the beginning
4. Matters of principle
5. People and profile
6. A candid friend?
7. Engaging stakeholders
8. Developing the research programme
9. Census, population and migration
10. Selected research topics and reports
11. Code of practice
12. The road to legislation

References

Annexes

- A: Responsibilities
- B: Commission members
- C: Publications

Foreword

by Professor David Rhind

Over the eight years since the June 2000 *Framework for National Statistics* was launched - the years during which the Statistics Commission existed - there have been many improvements to the statistical service itself and to the arrangements which define its relationship with government and users of statistics.

The range and quality of UK statistics has improved steadily particularly as a consequence of the better exploitation of administrative records relating to schools, hospitals, benefits claimants etc.

Public awareness of the importance of official statistics has risen perceptibly, as have public expectations as to their quality, topicality and relevance. The news media have played an important role in this development.

We now have some objective measures of public trust in official statistics and are monitoring how this evolves and reporting the results openly.

The transparency with which statistics are created and disseminated is somewhat better than hitherto though, as we indicated in one of our recent reports, there is still some way to go. As a consequence of greater transparency, the role of government ministers and advisers in taking decisions about statistical services has become clearer – and this has helped propel new legislation.

The governance of official statistics is set to be transformed and put on a firm statutory footing through the Statistics and Registration Service Act. The Statistics Commission welcomed the Act as a major step forward whilst having some concerns about specific parts of it, not least its treatment of access to statistics before their publication.

Recognition and understanding of the big issues in official statistics is much better, for example the nature of the problems with migration statistics and why this is a matter of national importance. There is also much greater recognition at a political level of the inter-dependencies between the statistical activities of different government bodies, particularly in the case of some key statistical series, though the need for pan-government statistical planning has not yet been fully realised.

These developments have complex histories of their own. But the Statistics Commission has been an influential player in all of them. Our research and 40 resulting reports – aided by the fact that we could, as an independent body, concentrate on important issues rather than, as is so often the case with bodies inside


government, dealing with pressing operational matters and fire-fighting – have been widely used by Select Committees and members of both Houses of Parliament. The news media have also often headlined our findings; and a surprising number of our recommendations have been implemented, albeit sometimes quietly and occasionally after a lengthy pause.

Perhaps our most influential work has been in triggering the discussions in 2004 and 2005 that led to the new legislation, the first of its kind in the UK; our 2004 report *Legislation to Build Trust in Statistics* set out the case for such legislation which the then Chancellor ultimately accepted towards the end of 2005. Perhaps unusually, this case included a proposal for our own abolition – thereby contradicting Ronald Reagan's dictum in his 1964 speech *A Time for Choosing* that "a government bureau is the nearest thing to eternal life on earth"!

I am proud of the Commission's achievements, made possible by the efforts of Commission members and staff, with the support of friends in government, the media, academia, business and elsewhere. On a number of occasions we have found ourselves in open and lively debate on particular issues but I believe it to be true that our analyses have rarely, if ever, been challenged successfully.

These are my views as the outgoing chairman. I know that all eleven of us who were ever members of the Commission will be sorry to see it pass into history. I am sure the same is true of the 24 staff who worked at one time or another within our secretariat. But we have achieved much that we set out to achieve and have left a legacy of highly relevant and constructive reports and recommendations for those who will now take forward our role of scrutiny and reporting on the quality and integrity of UK statistics.

The rest of this report relates the work and issues that filled our eight-year history, written by the members and staff of the Commission. From time to time, however, it leaves the firm ground of fact and offers some opinion and reflection. I hope the reader will forgive us this indulgence.



Chairman

1. Introduction

This report is about the Statistics Commission which existed from June 2000 to March 2008. It is not so much a sequential history of events as a mix of factual information about what the Commission was and what it did, and why, interspersed with some opinions and reflections of people who were directly involved. Perhaps another group of authors would tell a slightly different story but, as will be seen from the copious references at the end of the report, there is plenty of documentary evidence to support our account.

Chapter 2 looks back over the work of the Commission and picks out four ways that its work might leave a lasting legacy. This, of course, is opinion. Others might argue. We are sure though that the new arrangements, building on the Statistics and Registration Service Act 2007, would not have come about without the influence of the Commission.

Chapter 3 - *In the beginning* - tells the story of the statistical service from its beginnings up to the creation of the Commission and why it was set up in the way that it was.

Chapter 4 – *Matters of principle* - reflects on the evolution of some of the key ideas that drove the Commission's thinking. Concepts such as integrity, quality, trust, public value and communication were central to this.

Chapter 5 – *People and profile* – the Commission's approach was driven by its members and their concerns. This chapter looks at how the Commission viewed its role and set out to build its influence.

Chapter 6 – *A candid friend?* – considers the sometimes tense but productive relationship between the Commission and the National Statistician and, more generally, with the Office for National Statistics, Treasury and statisticians in government departments.

Chapter 7 – *Engaging stakeholders* – recounts how the Commission sought to build its dialogue with many key groups, including users of statistics, Ministers and Parliament.

Chapter 8 – *Developing the research programme* – reflects on the influences which shaped the Commission’s research over the years.

Chapter 9 – *Census, population and migration* – these issues, relating to the fundamental problems of measuring the population and changes to it, were a perennial theme of the Commission’s research.

Chapter 10 – *Selected research topics* – this chapter looks more closely at some of the other themes in the Commission research.

Chapter 11 – *Code of practice* – discusses the role that the National Statistics Code of Practice played in the work of the Commission and the role the Commission played in revision of the Code.

Chapter 12 – *The road to legislation* – is about the long but ultimately productive debate about the need for a statutory framework to govern statistical work in the UK.

The extensive papers and correspondence of the Commission will remain available on our website until 2010 at least and from the National Archives thereafter.

2. Looking back

Looking back on what the Statistics Commission did and what it achieved, many individual pieces of work could be mentioned – some of these were research projects and some cases where the Commission had investigated complaints made by experts or the public and sought to ensure that the problems did not recur. Several of these are discussed later in this report. However, a few things stand out above the specific projects as likely to leave a lasting impression on the statistical service.

Firstly, the Commission established beyond further argument that there is a place in the governance of UK official statistics for people who care about the statistical service but are not themselves either statisticians or customers of the service. The members of the Commission brought an external expert perspective – external to government for the most part as well as external to statistical work. And they were expert in many walks of life to which official statistics are relevant. They showed that a dispassionate external perspective can be helpful, particularly to the user of the service.

It is true however that many other countries' statistical systems have a substantial role for non-statisticians and indeed some of the world's leading statistical offices are headed by people who are not themselves statisticians. So the principle, it might be argued, was established long before the Commission arrived; but at least in the early years of the Commission there were voices raised against the involvement of people who, it was assumed, would not understand or respect the values of the service. Perhaps the decentralised nature of the UK system, which only acquired a strong central office (in the form of the Office for National Statistics) in 1996, contributed to a feeling of vulnerability and the need to protect that which was held dear. There certainly was not the century-long history of an independent central agency, protected by legislation, that some of the leading statistical offices around the world enjoy. Those agencies may feel more able to involve the outsider precisely because the insider is already well protected against inappropriate influence.

If that was the case, then the Statistics and Registration Service Act may serve as much-needed reassurance to the statistical community in the UK. The Act signifies both the importance and distinct identity of the service and does so in terms which are not liable to change at the whim of the administration of the day. And it can now

embrace the – largely non-executive, largely non-statistician – UK Statistics Authority without fear that the core values of the service will be threatened.

For reasons that may be linked to the insecurity of the service at the time, the Statistics Commission was established in a way that was in practice more determinedly independent than most, broadly comparable, bodies in other countries. This was partly down to the choice of individuals selected to serve on the Commission and partly to its position outside the civil service (the Commission had a **.org.uk** extension to its online identity rather than the usual **.gov.uk** - a powerful signifier of its independence). It was not required to behave like a government office and did not. It was required to be highly transparent in all its activities and was. So the decision to keep the Commission at arms length from the service – unlike in other countries – had the perhaps unexpected benefit of making it more influential once it worked out how to make the best of that relatively distant location.

Secondly, the Commission made the case for statistical legislation more persuasively and in more detail than others had done before it. Whilst the Commission's views on this issue were quite close to those of most other credible commentators, the Commission was able to press the case over a period of years and, in some degree, orchestrate the other influential voices. The fact that the Commission had been invited to look at the question of legislation in its original terms of reference clearly helped.

So too did its decision to work within the parameters of advice from experts from Treasury Solicitors. These legal advisers are the key experts in matters of constitutionally complex legislation and the Commission realised quickly that what was going to be needed in terms of a statutory framework was going to sail close to some fundamental principles affecting the conduct of business that straddles different government departments and the boundary between the four UK administrations. In essence, the accepted principle is that ministers in charge of a government department are completely and personally accountable for everything that happens in their department and thus have equally complete authority within the department. Officials in one department cannot therefore be given authority over officials in another department as this would undermine the long established accountability to, and of, the relevant minister. And these lines of accountability are even more firmly demarcated in the case of the devolved administrations.

Thus any legal framework that was going to tie together the widely distributed statistical functions of government would need to do so without creating a central command and control system. The possibility of moving further statistical functions out of departments and into a larger central office was discussed but ruled out on grounds of practicality – there had already been substantial transfers of this kind through the 1990s. These considerations pointed strongly to a model based on a clear Code of Practice enforced by independent audit and reporting to Parliament. But there was one big presentational problem. No other statistical system in the world (with the partial exception of the USA where there are some parallels) was structured like this and the case would therefore have to be argued without reference to international precedent. This was the more awkward as most national models do conform fairly closely to one of a small number of well-established precedents, a situation actively promoted by the United Nations Statistical Commission and the other leading voices in the international statistical community. The UK Statistics Commission would not have navigated these difficult waters without the specialist legal advice to which it had access.

Thirdly, it showed that a process of independent review of the issues confronting the statistical service can produce valid and valuable recommendations. Again, this was no surprise to most commentators but still needed to be demonstrated. In doing so, the Commission often publicly drew attention to the strengths as well as the weaknesses of the service but, as it will ever be, good news is no news - and the reporting of the Commission's findings was almost always more critical than its own words. Unsurprisingly, we were often less than popular with government departments. Despite all this, the Commission was sometimes able to offer a measure of support when the service or department were under fire.

One aspect of the Commission's review process was controversial, at least inside government, but was vital to its influence. The Commission often decided what to review on the basis of dialogue with external commentators and user interests rather than with the service itself. So if an issue was attracting concern in Parliament, the press or academic circles, the Commission might decide to pick it up and do some research on it – leading to public comment and in some cases to more substantial reports.

However reasonable this approach might seem to the independent observer, some people inside government perceived it as the Commission allowing itself to be led by

the views of ill-informed commentators to the detriment of the statistical service. The Commission took the view that to ignore the issues of public concern in favour of routine reviews of large tracts of statistical work would be to miss the point of having independent oversight. In fact, the Commission did carry out some very broad reviews – on health statistics and school education statistics for instance, but these tended to produce fairly predictable and generic conclusions at the end of long and expensive research projects. More focused reviews had more point and more influence and helped to build public trust in the existence of an independent scrutiny body and, in that sense, in the statistical system as a whole.

Fourthly and finally, the Commission developed a set of closely argued positions on why official statistics are important to society; what meaning we should attach, in the statistical context, to concepts such as public value and trust and how the service might act to enhance them; the role for a code of practice and other central guidance; the part that users should play in planning and shaping the service; and many other fundamental issues. Again, the Commission's views on these matters were, for the most part, neither unique nor much of a surprise to onlookers. But the Commission enunciated them clearly, repeatedly, publicly and in a disinterested fashion. And it was prepared to defend them in a variety of contexts such as in front of select committees of Parliament, committees of local government, academic and business forums.

In particular, the Commission's later reports – perhaps especially its report *Official Statistics: Value and Trust* - linked together a way of looking at the value of official statistics to society; the need for a new approach to planning for the future; the role of governance, the code of practice and assessment; the part that the user community should play; and ways to build trust in the service.

It is fair to say that not all the Commission's views are universally accepted inside or outside government. But the purpose of engaging in public debate on these matters was not solely to win an argument; it was to prompt thoughtful dialogue that would lead to progress. This we believe we did.

3. In the beginning

The history of the modern statistical service dates back to the establishment in 1941 of the Central Statistical Office. The then Prime Minister, Sir Winston Churchill, wanted the war Cabinet not to have to argue about which statistics to use as a basis for decision-making. That worthy goal still has resonance today and is perhaps even more of a challenge now.

In the 1960s a Parliamentary Committee made far-reaching recommendations for reform and the new Head of the CSO, Sir Claus Moser, was given the task of leading the reforms; bringing into being the Business Statistics Office and the Office of Population Censuses and Surveys (OPCS), and enhancing the role of the CSO in managing government statistics. As part of these changes the idea of the Government Statistical Service (GSS) was introduced, developing as a cadre of professional statisticians across government. Sir Claus, now Lord, Moser presided over a period of expansion during the 1970s and as recently as 2007 was a tireless and influential supporter of the statistical service, playing a prominent role in debates in the House of Lords on matters relating to official statistics.

The Thatcher Government brought with it a mandate to stop civil service growth. One of a number of reviews led by Sir Derek Rayner recommended in 1980 that official statistics should be viewed as being produced primarily by government *for* government [3]. The Rayner reviews of statistical services were largely about making cuts to those services that were not seen as critical to the aims of the government of the day. The proportion of statistical posts to be abolished was much the same in each government department. The effects on the GSS were severe, involving a sharp fall in staff numbers in key areas and a rise in problems of quality. It would be some ten years before the Rayner ethos was overturned. After major problems with key economic statistics affected the 1988 Budget, the Government took a fresh look at the issues, culminating in the Pickford Review [4]. An expanded CSO was established in July 1989, though the then Chancellor, Nigel Lawson, was still sufficiently concerned about the quality of the statistical base to complain to Parliament and in May 1990 his successor, John Major, announced new resources to improve quality. The Pickford Review, whilst only part of a bigger rethinking of the statistical service, can be seen as the turning point after which the service started to evolve in important and beneficial ways. However memories of the 1980s and the associated damage to the UK's

statistical reputation internationally continued to shape developments throughout the 1990s.

November 1991 saw the launch of the CSO both as an executive agency and as a department responsible to the Treasury. The *CSO Agency Framework Document* [5] gave force to this and outlined arrangements to ensure the integrity and validity of UK official statistics. The re-focussing on the requirement to serve the public good, rather than just the administration of the day, was expanded in the 1993 White Paper on *Open Government*:

“Official statistics ... are collected by government to inform debate, decision-making and research both within government and by the wider community. They provide an objective perspective of the changes taking place in national life and allow comparisons between periods of time and geographical areas.

Vital as this is, open access to official statistics provides the citizen with more than a picture of society. It offers a window on the work and performance of government itself, showing the scale of government activity in every area of public policy and allowing the impact of government policies and actions to be assessed.

It is the responsibility of government to provide [reliable social and economic statistics] and to maintain public confidence in them. “ [6]

This ethos was further enshrined in the *Official Statistics Code of Practice* [7] which was adopted in 1995 – a forerunner to the National Statistics Code of Practice which was later to be introduced. A further move to enhance the central control of the statistical service, and to improve quality, involved the merging of the CSO and the OPCS in 1996 to form a stronger central in the Office for National Statistics (ONS). It was envisaged that the new arrangements would make it easier for the Head of the Government Statistical Service to influence standards, classifications and practices and that management and co-ordination of the GSS would be facilitated.

Towards the *Framework for National Statistics*

Unsurprisingly, it was opposition politicians rather than those in power who called most loudly for change in the arrangements under which the statistics were produced. In its

1997 manifesto, the Labour Party pledged itself to "...an independent National Statistical Service". [8] (It is worth noting that the Conservative Party, after several years in opposition, made its own radical proposals for independence of official statistics in its 2005 manifesto.) Once in power the Labour administration followed through with a series of consultation papers leading to the 2000 *Framework for National Statistics*.

The first of these consultation papers in 1998, *Statistics: A Matter of Trust* [9] presented the Government's ideas for enhancing integrity, both actual and perceived, through improvements in the overall framework. It was this consultation document which first formally proposed - at least as far as government documents were concerned - an independent statistical commission as one component of the future governance of official statistics. This model then gained the most support from respondents to the consultation (70% of those who gave a view).

The document also provided the first references to the concept of 'National Statistics' as opposed to 'official statistics'. As defined, National Statistics would refer to statistical work "...relating to the production and release of statistics that Parliament and the wider community rely on to assess the state of society and the performance of government." It is worth noting that this definition included not just the figures themselves, but also the organisations and the activities involved in production - something that led to a lingering confusion which the Statistics Commission would later address.

At that stage it was expected that *all* official statistical publications and public access databases would fall within the scope of National Statistics. Respondents to the consultation supported this but, in the subsequent 1999 White Paper *Building Trust in Statistics* [10], the Government was more cautious: "...too ambitious a programme could pose considerable practical difficulties". Whilst all ONS publications would be within the scope of National Statistics, it would be up to ministers in each department to decide which of their departmental publications would be covered. This less clear-cut approach was of concern to the Royal Statistical Society and some disappointment was expressed by MPs in a House of Commons debate in October 1999.[11] It was an issue which the Statistics Commission would take up repeatedly but at the end of the Commission's life had still not been resolved fully.

Building Trust in Statistics may have been less radical in tone and content than the earlier Green Paper, but it paved the way for the *Framework for National Statistics* in 2000 (another White Paper but one signed by Ministers on behalf of all four UK administrations and with the status of formal agreement). This governed the production of official statistics for the next eight years.

Whilst the consultations on the various documents shaped the *Framework for National Statistics*, it was not the only influence. The consultation process was slowed down to allow account to be taken of other developments. For example, the Treasury Sub-committee (of the House of Commons Treasury Committee) reported on its inquiry into the Office for National Statistics (ONS), [12] which included an examination of ONS's ability to ensure the integrity of the statistics it produced, the way they were presented and the uses to which they were put. Also, an efficiency review of ONS around the same time considered the scope for savings which would free funds to improve the range and quality of its statistical outputs.

The other major influences, particularly on quality management, were the Turnbull King *Review of the Revisions to the Average Earnings Index* (AEI) [13] and a further review by the National Institute for Economic and Social Research commissioned in 1999 by the Chancellor of the Exchequer following suspension of the index. The AEI was, and still is, used by the Monetary Policy Committee of the Bank of England as one of its key indicators. Concerns about the reliability of the AEI threatened public confidence in official statistics, just at a time when the Government was pulling together its latest initiative to improve trust. The 37 main recommendations of Turnbull King were accepted by the then National Statistician, Tim Holt, and many had an impact on official statistics more widely – so much so that reviewing their implementation was one of the first activities undertaken by the new Statistics Commission.

The June 2000 *Framework for National Statistics* included provisions for the establishment of the Statistics Commission. The Framework was introduced on a non-statutory basis though it contained a reference to the possibility of legislation at a later date. So the Commission was established as a non-statutory advisory body, formally beginning its life on 7 June 2000. The Framework document indicated that the Commission would be “independent of both Ministers and the producers of National Statistics”. As an advisory non-departmental public body, it would be funded by grant-in-aid from the Treasury and would report – in a formal sense - to the Chancellor of

the Exchequer in his capacity as Minister for National Statistics. In practice, the House of Commons Treasury Committee (in the form of its sub-committee chaired by Michael Fallon MP) took on a more direct oversight of the Commission's work and over the coming years would take a more direct hand in influencing the Commission's priorities.

The Statistics Commission was to "act as a guardian of statistical integrity" [1]. As part of what the Government of the day described as "the biggest overhaul of official statistics for over 30 years", it would play a key role in: "advising on the quality assurance and priority setting for National Statistics and on the procedures designed to deliver statistical integrity, to help ensure National Statistics are trustworthy and responsive to public needs."

Although the 1998 Green Paper was the first sign of official enthusiasm for a Commission, proposals for such a body dated back at least ten years earlier and drew inspiration from various broadly analogous models around the world. Perhaps the single most influential voice was the Royal Statistical Society (RSS) which in 1989 set up a working party "to provide an independent review of the criteria and mechanisms for monitoring the integrity and adequacy of, and public confidence in, official statistics". Its reasons for taking this step can be traced back to the problems which followed the cuts associated with the Rayner reviews of the early 1980s. Key recommendations included the setting up of a Statistical Commission and proposals for a UK Statistics Act.

As a footnote here, the Statistics Commission - in the form it eventually took - may have been rather different to that envisaged by the RSS working party in 1990 [2]. The new Statistics Board (now UK Statistics Authority) established under the Statistics and Registration Service Act 2007 arguably bears a stronger resemblance to the model in the RSS report. But the purpose of this history is not to argue the merits of different concepts of statistical governance but rather to tell the story of the Commission.

The widely perceived need to build public confidence in official figures, underlined in the RSS report, was an issue that would reverberate throughout the life of the Commission and was one of the drivers in the thinking behind the Statistics and Registration Service Act. Indeed, the Foreword to the 2000 *Framework* states that: "The new arrangements will provide a statistical service that is open and responsive to society's needs and the public agenda: better and more reliable official statistics that

command public confidence.” It is worth noting here that the words suggest that it was an improved statistical service that was expected to command greater public confidence. The Commission shared that view - building confidence in the service was primarily a matter for the service itself and the Commission’s role was to help point to areas in need of improvement and make suggestions. In doing so, it accepted that not all its advice would serve to enhance public confidence in the product as it then stood: the price of enhancing the medium and longer term situation could sometimes be to draw attention to short term shortcomings.

4. Matters of principle

The June 2000 Framework for National Statistics said that the Commission was to:

“...play a key role in advising on the quality, quality assurance and priority setting for National Statistics, and on the procedures designed to deliver statistical integrity, to help ensure National Statistics are trustworthy and responsive to public needs. .” [13]

The Commission was thus required to check that the National Statistician had proper processes in place for quality assurance and user consultation and that these delivered appropriate products. Similarly, the Commission was required to comment on the annual High-Level Work programme and on the draft National Statistics Code of Practice which was to be produced by the National Statistician.

Early days

Guided by the Framework requirements, the themes of integrity, quality and relevance/user responsiveness ran through the Commission's early thinking. One of its first annual reports sought to define the concepts:

Integrity: Integrity, and the perception of integrity, are vital. Public confidence that no-one is ‘fiddling the figures’ is of course essential, but more than that is required. The process by which decisions on collection and dissemination of statistics are made must also be totally transparent.

Quality: To be trusted and trustworthy, statistics must also be accurate enough, and based on the best available methodology. The former is not an absolute standard, and data may have multiple uses, some of which require very precise figures whereas others just need a broad indication of the trend or relative magnitudes. Quality involves ensuring that users have the information to decide whether the figures are fit for a specific purpose.

Relevance: Most of all, trustworthy but irrelevant statistics are of no use. The data collected must take account of the needs of users – all users, not just those in government.” [16]

An early task was to work out what the Commission was expected, or indeed allowed, to comment on and what it wasn't, both in terms of the different UK administrations and in relation to statistical products. The first of these was resolved by May 2001,

with all three devolved administrations inviting the Commission to relate to them in broadly the same way as it did to the UK Government and Parliament (see Chapter 3). In the years that followed this proved problematic in practice. The Commission secretariat was not large enough to keep up with statistical developments in all four administrations and, except for some brief forays, did not pay as close attention to the devolved administrations as it did to Whitehall.

The coverage in terms of statistical products was less easily settled. In 2003 the Commission raised the need for clarity in the use of the label 'National Statistics'. The Commission's formal remit only covered National Statistics but the term was used in official documents and statements in several different ways – and even in the Framework for National Statistics it was used in about four different senses. It could mean those statistics produced in accordance with the Code of Practice; or statistics that ought to conform to the Code; or statistics produced by an organisation that was covered by National Statistics principles (regardless of whether the statistics conformed to the Code); or it could refer more loosely to the concepts and principles in the Framework. It was used both as a trademark – statistics produced by an NS body - and as a kitemark - statistics produced in accordance with the Code of Practice - without clear distinction.

The Commission took the firm position that the term should be used only for those official statistics which conformed to the Code of Practice. In that sense it should be a kitemark of quality for the underlying processes. Although there seemed to be wide support for this simple definition, government departments did not adopt this usage to any great extent. Underlying the government view was resistance to the idea that all official statistics should conform to the same rules. It was, and apparently remains, the view in departments that some statistics are not of sufficient public interest to warrant oversight or the application of a Code of Practice.

The Commission, on the other hand, wanted to remove the need for some statistics to be identified as 'National Statistics' and the rest to be classed as 'other official statistics'. The problem with having both National and 'other' statistics was partly that there were no agreed rules covering the non-National ones; a point the Commission made frequently. In the event, the Commission increasingly ignored the distinction, arguing that there was a greater likelihood of problems with data that didn't conform to a code of practice than with those that did and that the Commission's fundamental responsibility was to look after the public interest.

Questions of trust

Concern about low levels of public trust in the statistical service had been a thread running through the Commission's work, but until 2004 there was no hard evidence of the actual level of that trust – other than a steady rumble of negative media comment. Following discussion at a Treasury Sub-committee hearing in 2003 about whether the Commission actually knew what the level of trust was, the Commission began work with ONS to try to establish an initial benchmark. ONS concentrated on assessing the views of the general public through the Omnibus Survey and focus groups, partially funded by the Commission, whilst the Commission addressed the perceptions of prominent individuals were likely to influence public opinion.

An initial report on the Omnibus Survey findings was published in October 2004. [37]

Among the key findings were:

"the majority of respondents believed official figures were changed to support a particular argument (68%), that there was political interference in their production (58%) and that mistakes were suppressed (69%)."

Also, the majority of respondents (59%) "did not agree that the Government uses official figures honestly when talking about its policies".

The Commission's own complementary report *Official Statistics: Perceptions and Trust* [38], published in early 2005, considered findings of interviews with 36 of the 'opinion-formers' - people who, through their various roles and public comments, influenced a much wider body of opinion. Their views were sought as the best way to secure a rounded picture of the issues that affected trust and to identify measures that these people believed would give them more confidence in the statistical outputs of government.

The main messages that the Commission took from the interviews were:

- On the whole, the interviewees believed that the quality of UK official statistics was up with the best in the world but there was a recognition that scope still existed for improvement.
- There was a widely-held view that there needed to be greater distance between the producers of statistics and government, possibly with an independent regulatory body which would monitor the use of official statistics.

- Growing emphasis on performance indicators and targets had meant that official statistics were perceived as sometimes being pushed too far, beyond what they were capable of measuring.
- There was a need for a greater range of comparable statistics for the four countries of the UK.
- Government statisticians could improve their communication with users, for example being clearer about the reasons for revisions and providing a fuller explanation of the figures. The media could also play a more constructive part in interpreting data.

These findings both confirmed that the Commission was on the right track with its recommendations for improving public trust and informed its later research and advice. They were widely reported and used in political debate, probably influencing the Conservative 2005 election manifesto and the Chancellor's own proposals for legislation later that year.

Implicit in the Commission's approach was a realisation that the opinions of the general public, as gathered in surveys, might not prove to be a sensitive measure of trust – in the sense that any such measure would likely be slow to respond to positive steps and might be overly influenced by individual news stories and unbalanced reporting. Using an approach based on the views of opinion-formers - whilst less easy to quantify – was more likely to give an indication of whether trust was improving or not and also give an insight to the nature of the concerns. It also had the real benefit that asking the right people to explain their concerns could be the first step in resolving those concerns. So the research itself could help to build confidence over time.

ONS subsequently set up a cross-departmental steering group on which the Commission was represented and a draft GSS-wide strategy to improve public communication and public confidence was drawn up in 2006 but was then somewhat overshadowed by the development of Government plans for legislation.

The Commission did not repeat the survey of opinion-formers. It had originally planned to do so but so much was changing through 2006 and 2007 that it seemed best to leave this to the new bodies that were to be set up under the Statistics and Registration Service Act. However, the Commission did develop its thinking on the steps that could be taken to address trust among the opinion-formers and ultimately among the general public. It gathered together its views on this in the report *Official Statistics: Value and Trust*, published in January 2008 [70].

Views on value

The emphasis placed on communication fitted with the development of the Commission's views on public value. In a presentation in 2005 at the National Institute for Economic and Social Research, the Chairman of the Commission articulated the view that official statistics only delivered their potential value when they were used to influence decision-making, but that this decision-making could be at any level of the economy or society – governmental, corporate or individual. It followed that official statistics needed to be communicated in ways that would maximise their beneficial influence on decision-making, not only in ways which would suit experienced users within government.

The Commission's views on this and many other broad questions of principle were brought together in the report *Official Statistics: Value and Trust* in early 2008. This valedictory report developed the theme of public value and ties it to the long-standing Commission interest in how the service can enhance trust in itself. The report reiterated an argument that became central to the Commission's thinking in its latter years - that trustworthiness is not only to be pursued for its own sake but because trusted statistical advice will be more widely and confidently used in decision-making. This will give a better return in terms of public value and thus a better return the investment made in producing the statistics in the first place.

Communicating statistical messages

Improving communication between producers and users of statistics was a regular theme running through the Commission's research and investigations. A specific aspect of this was the need to make the commentary accompanying the figures more informative for a wide range of users. The Commission noted in its earliest discussions that it was important for users to understand the limitations of the data they were using and judge whether they were fit for specific purposes.

In the course of its various investigations, the Commission often found no fault with the statistics themselves but concluded that a better explanation could have mitigated concerns. The classification of Network Rail was perhaps the most high profile case of this but there were many others. The *Reliability Study Report* [52], published in December 2003, called for:

- statistical outputs containing concise statements, written by government statisticians, on their understanding of the uses to which the data could safely be put and any observations on the limitations of the data in relation to those uses
- statisticians commenting directly, and independently of government policy advisers, on the policy inferences that could be safely made from the available statistics and the pitfalls of interpretation that needed to be avoided
- more work to highlight existing good practice in relation to communicating reliability.

The Commission welcomed the ONS work on general ‘usability statements’, initially for the national accounts, and encouraged other government departments to follow suit.

Also in 2003, in the wake of the concern about the classification of Network Rail (see Chapter 6), the Commission shifted its emphasis towards highlighting matters of statistical communication. The aim was still “helping to ensure that official statistics are trustworthy and responsive to public needs” but increasingly focused on three questions:

- Are appropriate data collected?
- Are appropriate messages communicated?
- Are appropriate procedures followed to ensure: openness, impartiality, use of best methodology, rapid and universal availability, and meaningful analysis?

Whilst only one of those questions relates directly to communication, the other two are dependent on good communication. In 2005 the three points were restated in a form that remained central to the Commission’s position thereafter and put the stress more firmly on matters of communication:

“We need to ensure:

- Effective and transparent statistical planning that engages with the needs of all decision-makers
- Independent frank commentary and analysis to accompany figures
- Improved communication with users.” [21]

There were many examples in the Commission’s work where these themes resurfaced. As one example, investigation of the Retail Prices Index (RPI) [53] threw up a specific example of where better commentary was needed. The Commission looked at the methodological changes to the RPI announced in 2004, at the handling of that announcement, and at the special governance arrangements that exist for RPI.

In view of the special importance of the RPI, there was a strong case for clear and open announcement by ONS of any methodological changes. The Commission believed ONS could do more to draw attention to changes, and to explain them to the media and other interested parties. It also commented on the need for a clear statement as to what was meant by 'scope and definition' of the index (at that time the responsibility of the Chancellor) and by 'methodology' (the responsibility of the National Statistician).

In another example, the Commission's 2003 report *Forecasting in the National Accounts* [54] recommended better monitoring of the performance of forecasting models but it also called for better communications with users about the role of forecasts in producing national accounts estimates, and the release of more information about the models used.

Separation from policy comment

Whilst statistical releases and reports are required to provide independent commentary, messages in ministerial and departmental statements (which are often released alongside the statistical release) will normally promote a particular policy line. The need to ensure clear separation – and distinction in the mind of journalists etc - between these two types of statement from government departments was a matter that concerned the Commission throughout its existence. A couple of examples from the field of health statistics are:

- In April 2002 the NHS chief executive published his report to the NHS including unaudited waiting list figures based on management information. When the official statistics were subsequently published they painted a less favourable picture and were given less prominence on the Department of Health website. (The NHS report now has a professionally produced statistical supplement.)
- The Royal Statistical Society raised concerns about the presentation of figures for smoking against government targets (not a statistical release) compared with the ONS General Household Survey figures (a statistical release). The Commission's investigation found that the presentation was technically correct but could have given a misleading impression.

The news media works fast and will tend to use the material that is easiest to understand and is presented with a strong story. If a ministerial press release on the

figures provides more helpfully packaged information than the corresponding statistical release then reporters may ignore the statistical report – even more so if journalists are allowed an embargoed copy of the ministerial statement before the release of the statistics, as sometimes happened (we think this practice is rare now). The Commission questioned the probity of departmental embargo arrangements – for example in relation to the Home Office’s release of crime statistics in 2005 - and their impact on public confidence. Examples such as this influenced the Commission’s thinking on pre-release access arrangements and its recommendations to Parliament in relation to the Statistics and Registration Service Bill.

5. People and profile

The Commission's first Chairman Sir John Kingman, who was appointed in March 2000, was at that time vice-chancellor of the University of Bristol and had for many years been a leading academic mathematician and statistician. He had been President of the Royal Statistical Society in 1989 during its discussions with the Cabinet Secretary and the Permanent Secretary to the Treasury on the erosion of public confidence in official statistics. He was joined on the Commission by seven members selected by open competition from both private and public sector backgrounds.

External commentators saw the Commission as a strong and experienced group of individuals although some within the statistical world questioned the preponderance of non-statisticians in the mix – the majority of the Commission members had no direct experience of statistical work. The appointment of these members represented the first occasion in the history of the government statistical service when people who were not themselves statisticians were given positions of potentially strong influence. Whilst disquiet about this rumbled on for years, particularly within the Office for National Statistics, the principle of involving senior and experienced individuals who were not professional statisticians gradually became accepted. This is witnessed by the fact that the appointment of the new Statistics Board, with a comparable composition, in January 2008 drew no audible criticism of this sort.

A small secretariat was initially led by chief executive Gill Eastabrook, who was an experienced government statistician seconded from the Department of Health. The Commission did not have the power to employ its own staff so all the staff were seconded from other departments or organisations, some on short term contracts. In time the secretariat would grow to a complement of 12 staff in 2006 before declining again as the closure of the Commission became more certain.

Sir John Kingman's period of tenure came to an end in 2003. The chairman for the rest of the Commission's life was Professor David Rhind, who had been a Commission member from the beginning, and was also Vice-Chancellor of The City University and a former director-general of Ordnance Survey. The new chairman was supported by a new chief executive, Richard Alldritt, a former head of the statistical office in the Welsh Assembly and, before that, of the strategic planning unit of the Central Statistical Office.

Developing a public profile

The June 2000 Framework document placed a commitment to openness on the Commission:

“It will operate in a transparent way with the minutes of its meetings, correspondence and evidence it receives, and advice it gives, all normally being publicly available for scrutiny” [13]

This obligation to openness and transparency was taken to heart. Papers were made available on the website as quickly as possible and, increasingly, correspondence and other advice was simply added to the website after a short interval to allow recipients to see letters etc before they were published.

However, openness does not necessarily mean a high public profile. In the early days, the Commission had deliberately refrained from rushing into print or public advice. While the news media wanted quick responses to their enquiries on topical issues, the Commission decided not to go down that road, at least initially, preferring to give each issue careful study before offering views. It issued press releases to announce publication of reports but these were fairly low-key. The website was the main focus of communication and much was done over the years to improve its accessibility and usability.

Both the Treasury Sub-committee and users at the Commission’s Open Meeting in 2002 commented on the low profile. This spurred the Commission to become more proactive. The presentation of the annual report was improved and its distribution significantly expanded. The Commission’s review of press coverage about its own work in 2005 (described further below) showed a significant increase in press interest. The Commission’s profile in the media was growing too, not just through radio interviews and press comments on Commission pronouncements, but also through acceptance of articles in the broadsheets: for instance, David Rhind and Dame Patricia Hodgson wrote articles on public trust in the *Times* [34] and *Financial Times* [35] respectively in 2005 and Ian Beesley wrote in the *Guardian*’s commentary section in 2006 [36].

Self-assessment

Having proposed in 2004 that it should be replaced by a statutory body, as time went on the Commission had to decide whether to defend its achievements as evidence of its effectiveness or to point to them in less positive terms as evidence of the need for

something stronger. With that dilemma in mind, the Commission set out in 2005 to gauge its own impact and to seek the views of stakeholders on its effectiveness. The report *Perceptions of the Statistics Commission* was made public in February 2006 but only as an 'internal report' [39] because the Commission did not want its main report series to appear self-absorbed. Whilst preparation of the report was in train, the Chancellor of the Exchequer announced in November 2005 his intention to introduce legislation to establish a Statistics Board. The report was then developed with an eye to the research findings having messages for the new body.

The research had three strands: a survey of stakeholders, an analysis of press coverage and an assessment of the take-up of recommendations.

The survey of stakeholders involved a questionnaire sent to some 243 individuals and organisations, both inside and outside government. This showed that most respondents (80 per cent) agreed that the Commission recommendations were useful and a majority (85 per cent) were satisfied with the contact they had had with the Commission. However 80 per cent thought that the Commission should have had more of an impact and just over a third suggested a different role for the Commission. Suggested priorities included: ensuring the quality of official statistics; addressing the governance of official statistics; building public trust; and representing users' needs. The Commission saw this as evidence that it was on the right track but not yet having enough impact.

The analysis of press coverage 2002-2005 looked at the extent to which the media mentioned and followed up issues raised by the Commission. Press coverage rose sharply between 2002 and 2003 – at the time the Commission started to take a more pro-active approach with journalists – and remained at about the same level thereafter. Many of the news articles mentioned the Commission in the headlines and frequently quoted Commission members or referred to publications. This suggested that issues raised by the Commission were often noted by the press and that the Commission was, increasingly, seen as an authoritative voice – at least from a public interest perspective. This was demonstrated by the rise in broadsheet articles that just referred to the Commission by name without further explanation, assuming readers would be sufficiently familiar with it.

The analysis of government responses to the Statistics Commission suggested that those recommendations directed at the Office for National Statistics most often prompted a positive response, particularly methodological recommendations, but some

recommendations to other Whitehall departments and devolved administrations had prompted little identifiable response. Recommendations aimed at stimulating joined-up action across government had also proved problematic. However there had been signs of a growing acceptance that the recommendations addressed valid concerns, for example the need for: better interpretation/explanation of statistics for different user groups; improved website design; better user consultation; and the need for increased public trust in official statistics. The Commission view was again that it was pushing at the right doors but in many cases they were not opening.

As well as confirming that the Commission's reading of its position in the eyes of stakeholders was broadly right, the research was also important in giving a steer to Commission priorities. In the light of the findings, the Commission started to look for new ways to raise its profile with Parliament, central and local government agencies and the media, and develop its engagement with devolved administrations and build alliances with other organisations. The research showed considerable support for a statutory scrutinising body answerable to Parliament. The themes in the research about the need for better statistical planning, better communication and better consultation, as well as consistency across the UK where appropriate, were consistent with current Commission priorities but there was also a feeling among respondents that it should follow up its recommendations more systematically.

As it turned out, external developments were gathering pace. Shortly after the internal report was published in February 2006, the Government issued *Independence for Statistics: A Consultation Document* about the shape of future legislation. This document, though its focus was elsewhere, effectively announced the end of the Commission and so the action plan following the research lacked the momentum it might otherwise have had. Still as 2006 progressed, and not without a little irony, the government consultation on legislation itself opened up new opportunities for the Commission to do exactly what its internal report had recommended it should do – raise its profile with Parliament and the media and express its views forcefully.

This assessment of government take-up of Commission recommendations was updated in March 2007 and showed little further progress with recommendations made before 2005, although the five research reports between March 2005 and March 2007 were favourably received, by both government departments and the National Statistician, and there were some signs of a growing acceptance that the arguments

the Commission was putting forward reflected valid concerns. The Commission took the view that the lack of progress with implementation of earlier recommendations highlighted the need for a statutory framework including a stronger role for the National Statistician across government. We also recognised however that it would probably take a long time for these governance changes to be recognised having led to a better service.

6. A candid friend?

The June 2000 press release from the Treasury announcing the creation of the Commission described it as a 'watchdog' and it is a term that the Commission used of itself from time to time. Arguably though it gives an inaccurate impression - that the Commission was a regulatory body rather than an advisory one. The Commission did not have powers to regulate, and crucially its only, partial, sanction was public comment. Sir John Kingman referred to the role of the Commission as being that of 'a candid friend' to the statistical service. However as time passed, the Commission's position was increasingly that of a candid friend to the *user* of statistics; looking to see if users needs were being identified and addressed, and being frank in its comments when it felt there was a need for improvement in this respect.

By 2003 the Commission's public pronouncements were becoming more confident. With a range of published work under its belt it became more proactive and assured. This greater assurance gained it some respect in the media and in the wider statistical community but did not always win it friends in government departments.

This tension would not prove easy to resolve. Whilst the Commission would often make positive comments about the statistical service, it was noticeably cautious in its public praise for specific developments in statistical work; and this caution led to further differences of view between the Commission on the one hand and the National Statistician and the Treasury on the other.

The Commission's own perspective was that it rarely knew enough of the detail of statistical developments, and how they would be received by the external user of statistics, to make sweeping statements endorsing everything that was being done. The Commission was also wary of being seen too much as a cheer-leader for the service – a role that, in the Commission's view, some boards and commissions in other countries seemed to have taken on. It wanted instead to be, and be seen to be, looking out for the public interest, identifying areas in need of improvement and making constructive suggestions.

Len Cook, the National Statistician for much of the life of the Commission, no doubt conscious of the warm words rained on statistical offices abroad by their non-executive boards, wanted the Commission to act in a similar way and thus help directly in

building confidence in the service, not least to strengthen his hand in his dealings with Ministers and Parliament. The Commission though saw itself as serving a different purpose from its supposed counterparts in other countries.

Meanwhile, the Treasury urged the Commission to find positive things to say but without bringing any pressure to bear. Whilst it never once increased the Commission's annual funding, neither did it cut it (the Commission operated within the same cash budget throughout its lifetime except for a one-off increase associated with relocation of its offices). And the Commission continued to express its thoughts freely on matters that it identified as being of public concern.

As has already been mentioned, the Commission did in fact make many positive comments about the statistical service in its reports and statements; on occasion defending the service from unfair media criticism on matters including the size and number of revisions to the National Accounts. The text of a letter from David Rhind published in the Financial Times in October 2003 is reproduced below. Of course, supportive comments have little news value and tend not to be picked up or repeated.

LETTER TO FINANCIAL TIMES 10 OCTOBER 2003

Sir, The Office for National Statistics and some other producers of UK statistics have been lambasted for announcing large revisions to key figures such as gross domestic product, imports and population estimates. Is this evidence of errors and a failure to get it right? Or is something less obvious going on?

Revisions to statistics are a necessary if unwelcome part of the process of finding out what is really going on. The reasons for them are honourable enough. Official statistics, for the most part, are estimates rather than hard facts. Of necessity, they are commonly based on less than complete information. The need to get the figures published reasonably quickly means judgments have to be made.

Many key economic and social indicators are produced by stitching together information from different sources. Often these estimates prove good enough. Sometimes new information or research shows that the estimates can be improved. When information on VAT fraud was uncovered, the trade figures had to be changed. Improving the methods used to estimate GDP in line with international practice bumped the figures up.

What matters is that when official data are revised, we understand why, we understand what prompted the revision (has new data come to light or have we changed the method of calculation?) and we are not taken by surprise. The idea that revisions always mean "something has gone wrong" misses the point. It would be folly for statisticians to stick to estimates they know to be incorrect just to keep the rest of us happy.

Producers of official statistics must make it clear what degree of reliability can be attached to individual statistics; just why revisions have occurred; and they must communicate changes in a timely, clear way. They should not be surprised if a furore breaks out after a revision to an important series if they have not carried out these steps.

More immediately, we need to know whether recent revisions arose from introducing better methods, new information or error – or some combination of these. For this reason the Commission is launching a review of recent revisions.

David Rhind,
Chairman of the Statistics Commission

In similarly supportive tone, the report which followed the review mentioned in the letter above – *Revisions to Economic Statistics: Vol 1* – said that “one of the main conclusions of this report is that much of the public criticism that such revisions have recently stimulated is unfair. The business of collecting data, generating estimates and publishing the consequent statistics and advice is a skilled professional activity that deserves greater recognition and respect than it is afforded. Nonetheless, procedures for making revisions are not perfect and should be subject to continuous review and improvement.” That was, and remains, fair comment.

The early years

In the first few months of its existence, the Commission mainly had dealings with the Office for National Statistics, and with the new National Statistician, Len Cook. Len Cook attended an early Commission meeting and he would later be invited to other Commission meetings and events, but most contact was through bilateral meetings between him and the chairman – a pattern which would continue for the next six years. The tension about the apparently negative stance of the Commission initially coloured the relationship, but both individuals shared a goal of wanting to improve the service and in private there was often agreement about weaknesses in the system if not what to say about them publicly.

The Commission members’ first visits to statistical offices were to the three ONS sites, and these were followed by a programme of visits to other government departments each year. The Commission members found that these visits gave them an insight into the work of government statisticians and they nearly always came away genuinely impressed by the commitment and knowledge of the staff.

At the same time, they were often left with an impression that the statistical offices of the major government departments were under the thumb of the department - doing the work the department wanted and only engaging with external users of statistics to the extent that this accorded with departmental wishes. As individuals, the Commission saw government statisticians as able professionals but loyal to their

employers, mostly the departments of government, rather than to the National Statistician or the ideals of the Code of Practice.

There were however some occasions when a senior departmental statistician would stand his or her ground on a matter of principle regardless of pressures within the department. Where the Commission detected such cases, it did what it could to offer support without trampling too obviously into the civil servant's relationship with his or her employer. Whilst the Commission would raise such matters with ONS and the National Statistician, any action taken by ONS officials was regarded as a private matter within the civil service and, more often than not, the Commission was not told what, if anything, had been done, or what the outcome was. The sense of being kept on the outside was something the Commission had to learn to live with as part of the price of its independence from government.

Despite various efforts to build good relations with statistical offices, the Commission often had difficulty in getting answers to its queries. Indeed its first annual report highlighted its concerns about whether the National Statistician could provide enough resources for Commission requests to be addressed. Perhaps in response, the National Statistics and Policy Division of ONS was strengthened in 2003 and this helped to establish a better dialogue. However the often lengthy delays in getting responses from departments remained a problem which the Commission, as a non-statutory body, could do little about.

A turning point

As the Commission's work programme developed, there were clearly many areas where there was considerable agreement between government statisticians and the Commission about what improvements needed to be made. However one particular episode, the classification of Network Rail, would come to be seen as a powerful example of the difficulty in getting the right balance between positive and negative comment (see box below for details). Because of widespread media comment suggesting political influence on the National Statistician's classification of Network Rail as a private company for the purpose of the National Accounts, the Commission would have lost credibility if it hadn't investigated. However the then National Statistician believed that the very fact of the Commission's involvement weakened his position, even though it found no fault with his decision.

The truth remains elusive. It is possible that officials within the Treasury wanted to influence the decision and that journalists caught wind of this. Or, possibly, the basis on which Network Rail was established in the first place was designed to pitch it just within the private sector boundary for National Accounts purposes and this was known, or at least suspected, in some corners of the news media. But, whatever the full story, the Commission was content that, regardless of any such pressures, the Office for National Statistics had interpreted the existing international statistical guidelines correctly (whether those guidelines were satisfactory is a different question). Matters were however then substantially complicated when the National Audit Office concluded that, on the basis not of statistical practice but of accounting practice, Network Rail should be treated as being in the public sector. In fact, odd as it seems, both decisions can be correct at the same time but that point would have required more careful public explanation than it received.

As so often in the Commission's investigations, the conclusion was the need for a better *explanation* of the statistical decision, particularly why it differed from that of the National Audit Office. Whatever the rights and wrongs of the investigation, the Commission put its collective head above the parapet on a controversial issue for the first time and thereafter continued to do so throughout its existence.

Network Rail

In 2002, when Network Rail was being set up as a successor to Railtrack plc, it was necessary to decide how this new organisation – which had some features of both the public and the private sector – should be classified in the National Accounts. ONS decided that Network Rail should be treated as a private sector company and the Strategic Rail Authority's (SRA) guarantees treated as contingent liabilities and so not shown as government debt in the National Accounts. This was based on the European System of Accounts (ESA95) rules, which the UK is obliged to follow to provide a consistent basis for international comparisons. The judgement was challenged by a number of commentators, especially once the National Audit Office – using commercial accounting standards as applied to government – concluded that Network Rail should be accounted for as a subsidiary of the SRA.

The Commission considered the issues and concluded that the ONS had done an honest and rigorous job in working within the ESA95 rules. But it called for a single, clear public explanation of the reasons for the different approaches.

The joint statement¹ produced by the National Audit Office and the Office for National Statistics did not meet the whole of its request. It therefore pressed for an overall and public reconciliation of the impact of the two different treatments, including a transparent statement of when and why one rather than the other should be used. Following a request to the Cabinet Secretary, it obtained a clarification from HM Treasury and the Department for Transport. This consolidated note confirmed that,

¹ <http://www.statistics.gov.uk/pfdir/network1002.pdf>

although Network Rail was classified as private sector in the National Accounts in line with international conventions, there was a significant potential liability which could fall on the taxpayer.

The Commission was pleased that Treasury Committee of Parliament endorsed its concerns when it said: “We agree with the Statistics Commission that in these circumstances, where two different processes based on the same facts appear to have produced contradictory results, namely whether Network Rail is in the private or the public sector, the onus is on the parties concerned to align their different positions and explain the rationale for them to the public.” [20]

2005 onwards

Len Cook’s term as National Statistician ended in 2005. The Commission’s Chairman paid tribute to him as “a tireless advocate of the importance of statistics and statisticians to the cause of democracy. ...”. [26] The new National Statistician, Karen Dunnell, had been a senior member of the ONS staff and was welcomed with her wealth of experience of UK official statistics. It was clear that the years ahead were going to be challenging, particularly in relation to maintaining statistical quality whilst implementing a large technical modernisation programme, managing the relocation from London of several hundred jobs to Newport in South Wales and preparing for the 2011 census.

The mood was uneasy but relations between the Commission and the new National Statistician were cordial if a little distant. Before Karen Dunnell took up post there were some discussions between ONS and the Commission about whether she might be routinely invited to attend Commission meetings but she preferred to keep the relationship as an arms-length one and once, a few months later, the Chancellor announced plans for legislation that would incidentally lead to the end of the Commission, ONS withdrew from regular dialogue at the top level – perhaps to reassure ministers and the Treasury that it was not party to any position that the Commission might take as the legislative process moved forward. Whatever the exact reasons, high level communication between ONS and the Commission was relatively sparse and formal.

Despite its continuing programme of visits to statistical offices, the Commission was aware, at least from early in 2005, that communication between it and departmental heads of profession for statistics was not good and that the lack of high level dialogue with ONS was probably adding to the sense of distance. Because of the way the civil service is structured and operates, a departmental statistician is expected to speak both for his or her department and for the National Statistician in any dealings with

external bodies such as the Commission. As the Commission was likely to have a particular interest in precisely those matters on which the department and National Statistician might not see eye to eye, most departmental heads of profession chose discretion in their dealings with the Commission.

In May 2005, heads of profession for statistics were invited to the Commission's offices to help the Commission gain an understanding of the views and issues which were common across departments and get a feel for the areas where they as a group thought the Commission could play a useful role.

Whilst this meeting proved highly constructive, the dialogue continued to be inhibited by the mood of caution and perhaps by some degree of collective indifference to the views of the Commission. The absence of any formal authority was a constant weakness in the Commission's position. Departmental statisticians could be forgiven for asking themselves why they should risk the displeasure of their employers by talking to the Commission when it had no formal authority to require them to do so. And the fact that the Commission was likely to use whatever leverage it had with Parliament and the media to improve matters for the user community and public good in general no doubt added to anxieties about the consequences of unauthorised dialogue.

Nonetheless, the Commission's influence was growing at a political and public level. It had meetings with various Ministers and their senior staff, though less often than it might have wished. There were, for instance, productive meetings with the Home Secretary to discuss crime statistics, with the Minister for Local Government and the Regions on the need for a National Address Register to support Census work, and with the Chief Executive of the NHS on health statistics. And outside government, the Commission was expanding its dialogue with Opposition and backbench Members of Parliament and other influential voices. So whilst it was forced to stick more closely to being 'candid' than 'friend' to the statistical service, its commitment to promoting the public interest was well understood.

7. Engaging stakeholders

In formal terms, the Commission was responsible for ensuring that National Statistics were responsive to public needs. However, in practice this meant trying to find out first of all whether users of statistics - outside government - regarded the service as responsive. The focus on external users was partly because the Commission had little chance of getting users of statistics inside government to comment on the service they received – indeed it tried once or twice to little effect. The mantra of collective government responsibility meant that officials would not openly criticise the work of ONS (another department), let alone the work of statistical offices within their own department. In any case, it was assumed that government users of statistics were well placed to make their views known directly, if privately, to the producers of statistics. In the course of these discussions, the Commission came increasingly to suspect that the external users were being largely ignored in the debate on statistical priorities.

A complicating factor was that the Commission felt it was important not to duplicate or obstruct direct GSS consultation with external users where this took place. Rather it needed to gain an understanding of user perspectives and check whether the formal consultation mechanisms were working effectively.

The initial focus was on the more professional users. Getting the perspective of the general public was difficult – both in practical and conceptual terms - and the Commission tended to look instead to Parliament and the media to reflect the views of the general public. It is a moot point whether Parliament and the media can really be seen as proxies for the general public – one might argue that the media shape public concerns rather than reflect them, and this might be even more true of politicians. But the importance of parliamentary and media opinions in their own right is beyond question.

Specialist user groups already existed under the umbrella of the Statistics Users Council (SUC) and the Commission was soon in regular contact with them. It was not within the Commission's remit to finance new groups, but in due course it financially supported user group conferences and regular meetings were held between commissioners and user group chairs until SUC was replaced with the Statistics Users Forum, linked to the Royal Statistical Society, in 2004. These meetings proved helpful to the Commission in understanding user needs and helped the groups themselves to

focus on common ground. The sense of shared, constructive purpose between the Commission and a variety of user interests was a strong theme in the latter years of the Commission's existence.

User Group priorities

At its regular six-monthly meeting with chairs of statistics user groups in December 2003, the Commission invited the groups each to draw up a list of priorities for improvements to government statistical services that were practicable, cost-effective and would do the most to meet user needs. During 2004 the responses were co-ordinated and the chairman wrote to the Financial Secretary to the Treasury in November 2004 as part of the Commission's response to the *National Statistics Annual Report 2003-04*. He sought support for the user group priorities, to:

- create 'statistics access teams' to help users
- address the need for UK-wide consistent statistics
- identify an approach to geographic coding which overcomes data confidentiality concerns and code all records accordingly
- improve statistics on income
- ensure sensible restrictions that protect confidentiality, but that allow information to be used appropriately, including sharing data across different agencies.

The Statistics Users Forum

These priorities were pursued by the new Statistics Users Forum which had been set up in association with the Royal Statistical Society (RSS) and with funding from the Economic and Social Research Council (ESRC) to encourage and facilitate user consultation. The Commission was a keen supporter of the forum, providing financial backing for its conferences, discussing with the RSS and ESRC how the long-term future of the Forum might be secured, and generally trying to ensure the Forum was seen to be an important grouping of user bodies that could be developed over time.

The Commission's annual Open Meetings were also useful in gauging user views. From 2004 the format was expanded to include discussion of matters of statistical governance – including from the new National Statistician in 2005 and from the Financial Secretary to the Treasury in 2006, coming hotfoot from the Queen's Speech announcement of the Statistics and Registration Service Bill.

The Commission also carried out some research on user perspectives. Between 2004 and 2006 three studies considered user needs in relation to health, school education and crime statistics. While each of these areas threw up specific concerns, the research also pointed to common strands concerning the comparability of data, the demand for statistics for localities and the need for a diversity of products to reflect the fact that users are heterogeneous. A study of the use made of official statistics, published in 2007, concentrated on corporate users outside central government, and again highlighted the diversity of uses and hence needs. These projects are described in greater detail in Chapter 10.

Devolved Administrations

The June 2000 *Framework for National Statistics* had set aside, to be addressed later, the Commission's role in relation to the devolved administrations. However, by 2001 all three administrations had agreed, bilaterally with the Commission, that it should engage with them in much the same way as it engaged with the Westminster parliament and Whitehall departments. In 2004, recognising that devolution raised some important issues for official statistics, the Commission set up its Regional and Devolved Administrations Sub-committee under the chairmanship of Janet Trewsdale to co-ordinate its work in this area. Visits to statistical departments in each administration were supplemented with various meetings with key players to get a better grasp of the differing issues facing each country. These were followed up with lunchtime seminars in Cardiff [27] and Edinburgh [28] in 2006 which looked at the data requirements for understanding the local economies. These events informed the Commission's views about meeting the needs of users for local data as well as for harmonisation of statistics across the four countries. However, as has been noted earlier, the Commission's engagement with statistical work in the devolved administrations lacked resources and was inclined to stop and start as other work allowed.

International perspectives

The UK doesn't produce statistics in isolation. Other countries influence our statistical work, and we theirs, in many ways – through international standards for the National Accounts etc, other international agreements and conventions, models of good practice and European legislation. The Commission therefore sought at various points over the years to draw on experience elsewhere, both in Europe and more widely. Research into statistics legislation and governance arrangements in other countries

formed part of the Commission's review of the need for statistics legislation and influenced the Treasury's March 2006 consultation paper *Independence for Statistics*.^[32]

European legislation requires governments to provide data to Eurostat, the European statistical office, on a regular basis. This requirement places a burden on the Government Statistical Service but it also results in comparable data across Member States which is vital for both academic and government research on European issues. Another stimulus for engaging with Eurostat was the development of a new European statistical advisory committee. Prior to a visit to the director-general of Eurostat in September 2005, the Commission prepared a note outlining the particular characteristics of the UK's experience which would inform thinking in relation to the proposed European body.^[31]

To get first-hand experience of the issues affecting statistical governance in other countries, the Commission had a series of meetings from 2005 with senior staff from statistical offices in Canada, the US, Australia and the chief executive attended the United Nations Statistical Commission in 2006 and 2007, contributing to a paper presented by the National Statistician. This expansion of international contact bore remarkable fruit with overseas responses to the Treasury consultation on statistics legislation and the Commission's own consultation on a new draft Code of Practice.

Ministers and Parliament

Although officially reporting to the Minister for National Statistics – in practice a Treasury minister – the Commission was also regularly invited to give evidence to the Treasury Sub-committee of the House of Commons. During the passage of legislation the Commission had a good deal of contact with ministers, with MPs of all parties and with members of the House of Lords.

In September 2005, the Commission wrote to the Financial Secretary to the Treasury setting out its views in anticipation of a review of the *Framework for National Statistics*. This formed part of its response to the *National Statistics Annual Report 2004/05*. In fact no formal review of the framework ever took place because of the announcement of plans for legislation in November 2005. The Commission's concerns in the September letter touched on clarifying the roles of the main players; the authority of the National Statistician across government; tightening and enforcing the Code of

Practice; use of the term 'National Statistics'; statistical planning; meeting the public interest; and improved communication of statistical messages. The Commission was disappointed when the Treasury announced in March 2006 that it had 'completed' a review of the framework without consulting anyone outside government – in fact it had merely sidestepped the need for a review. However the Commission's consideration of the issues that should have been considered in a review of the framework fed into its response to, and briefings on, the Government's proposals for legislation which were published in a Green Paper in March 2006.

In 2007 the Commission wrote to the minister again about its concerns that the confluence of pressures on ONS (including the requirement for efficiency savings, the transfer of its main business to South Wales and the new arrangements arising from legislation) might prove overwhelming.

Throughout the life of the Commission, the Treasury Committee of the House of Commons took an active interest in its work and the Treasury Sub-Committee (essentially the same body) took evidence annually on the Commission's annual report.

The TSC was particularly interested in issues of quality and public trust and the Commission was also able to offer evidence for the sub-committee's investigations into Network Rail, the 2011 Census, the Government's proposals on statistics legislation and, in 2007, the assessment of progress on the efficiency programme in the Chancellor's departments – in particular the impact of the relocation of ONS functions to Newport on the quality of statistics. More generally, close questioning by the TSC was to prove an important influence on the Commission's priorities and ways of working.

The House of Lords Economic Affairs Committee also invited the Commission to give evidence in 2003, prompted by the Commission's plans to review revisions to economic statistics.

MPs from all the major parties contacted the Commission at different times in its life and the opposition front bench consulted the Commission in 2004 on its own plans for statistics legislation. In the House of Lords debate on official statistics in February 2005 Lord Moser said of the Commission "It does a first class job. Its publications – now some 20-odd reports – are of the highest order." And Lord Oakeshott of

Seagrove Bay agreed that: “The Statistics Commission has, so far, done a robust, independent job in pressing for improvements in official statistics.” But he recognised that the Commission could only advise and commended to the House “last year’s excellent report” *Legislation to Build Trust in Statistics*. [33]. These and other kind words convinced the Commission that it had a sympathetic ear in Parliament and encouraged it to make the most of its parliamentary influence to promote the public interest.

8. Developing the research programme

In this chapter we look at the themes and ideas that shaped the Commission's programme of research. In devising its first programme in 2000-02, the aim was to achieve a balance between different statistical subject areas, between technical issues and those more directly related to public policy, and to respond to issues raised directly with the Commission. Where the subject matter was specific, the aim was to draw out more generic points (for example work on the *NHS Cancer Plan* [15])².

In the first few years, different approaches were tried to see what worked best, for example producing scoping studies as an initial step. The topics eventually chosen for review came from a variety of sources: there were some unsolicited representations - the first being on the treatment of third generation mobile phone licences in the National Accounts; ideas also came from meetings with user groups and other commentators; sometimes press coverage prompted investigations (for example over revisions to economic statistics); and the Commission also tried to look forward to what would be important in the future. Some of the work was done in-house and some by external researchers, depending on the expertise required and the expertise available in-house – initially not much but by 2004 the Commission had an effective research team of three experienced individuals.

In the early days, the Commission was surprised how much of its time was taken up with getting a reply, any reply, from government departments to users' queries – not a problem which was envisaged in the Framework document.

The following matters were identified early on in the life of the Commission but pointed the way to messages that would be expounded during its later years:

- *Reliability*: the Commission wrote to the National Statistician arguing that users needed better information about the reliability of National Statistics.
- *Providing good explanations to users* more generally. This would come up particularly in *Household Tax Credits* and *Network Rail* discussions.
- *The Population Census*, which would be a major issue in the coming years.

² All references are included in the list on paperXX

- *Planning system for National Statistics*: Commenting on how well this was working was integral to the Commission's obligations under the *Framework for National Statistics*.
- Checking implementation: The *Review of the Revisions to the Average Earnings Index* had been a major influence on the development of the new National Statistics arrangements. It made a number of recommendations which had wider implications for official statistics so the Commission put considerable energy into investigating progress [18].
- Measuring performance: Measurement of targets and performance arose in investigations of statistics on: removal of asylum applicants; key stage results; hospital waiting lists; reduction of child poverty; and participation rates in higher education. The Commission's work over the years on performance measurement would culminate in a detailed study of the use of official statistics to measure Public Service Agreement targets. [19]

Expansion of research

As the Commission's research programme began to gather momentum a Research and Review Sub-committee, chaired by Commission member Martin Weale, was set up in 2003. At the same time the internal research team was strengthened with the appointment of Allen Ritchie, an experienced Treasury economist, as head of research. Formal project boards were also brought in to oversee most projects at about the same time. The Commission invited representatives of the relevant government departments and outside experts to serve on or advise these boards which did much to help secure quality and credibility.

With a higher media profile came more approaches from various correspondents, some of which simply required getting an answer from a government department, some leading on to more detailed work, such as on literacy standards in primary schools. In other instances, prompted by media comment and speculation, the Commission undertook significant reviews. An example was the Review of revisions to economic statistics which the Chairman announced in an interview on BBC Radio 4 in 2003 (see page 32). The fact that the chairman was being invited to comment on Radio 4 was itself an indication of growing recognition of the Commission as an authoritative voice.

Details of the major strands of research and investigation are in the next section. They can be summed up here as:

- *Quality of official statistics*: looking at problems with the quality of individual data series and technical issues, but also taking a broader look at potential changes to the statistical system to improve the quality of official statistics
- *Population and Census-related issues and reports*: analysing the running of the 2001 Population Census, responding to user concerns about potential undercounts in certain areas and measures to preserve confidentiality; raising issues to be addressed for the next Census in 2011
- *Measurement of government performance*: following up numerous concerns from users and media comment about the use of statistics in targets and league tables; responding to the Royal Statistical Society Working Party on Performance Measures; and a detailed evaluation of the use of statistics to measure compliance with the Public Service Agreement targets associated with the 2004 Spending Review
- *User perspectives*: the Commission was increasingly focussing on how well official statistics were meeting user needs. As a result, three reviews of specific areas of official statistics – health, school education and crime – concentrated on the user perspectives. These were to be supplemented with research into the use made of statistics and accessibility of data series
- *Communication issues*: the Commission considered how messages from the data could be improved: providing more information about the reliability of the data for different uses, giving better explanations as to why things had been done in a certain way, presenting the data in a way that was helpful to the media and clearly seen to be independent from the messages that ministers were conveying about the figures – all vital to improving public confidence in the statistical system.

Common themes were emerging from this research, themes that would inform the Commission's advice to government and the statistical service. In only a few instances were improvements recommended for the production of actual figures, eg pensions data, asylum and migration figures and Census estimates in hard to count areas. The majority of important recommendations related to improvements needed in the system as a whole if it was to better serve users, particularly those outside government, and thereby improve public confidence.

The Commission also accepted as time went on that it was not generally best placed to comment on matters of statistical method or process. ONS, or the relevant government department, normally had access to more methodological expertise than the Commission. However, there were occasions, including the review of the 2001 Census and the revisions to economic statistics, when the Commission felt it necessary to review what might be seen as questions of methodology, not in order to offer a more expert view but simply to offer an independent one. With those exceptions acknowledged, the research work focused increasingly on whether the needs of users of statistics were being identified and met. To the extent that they were not, the Commission would make suggestions but these rarely crossed the line into proposing how to do the statistical work better. Recognition of that boundary served to mark out more clearly the ground on which the Commission could comment with confidence.

9. Census, population and migration

Population estimates are the bedrock of every national system of official statistics. As well as measuring the most fundamental characteristics of society, they underpin other key statistics from macro-economic indicators, such as GDP per capita, to small area statistics such as unemployment rates or crime rates. They are used as the core component in statistical formulae that allocate very large sums of public money to the devolved administrations, to local government, the health service and public services. They are also the basis for projections such as forecasts of household numbers and life expectancy, which influence assumptions about housing demand, social care and pensions. To the extent that population estimates are inaccurate or misunderstood they have the potential to undermine administrative processes, invalidate research findings and policy decisions, and reduce the value for money of public services.

All official population estimates have their roots in the results of the decennial Census. Initial results of the 2001 Census were published in September 2002 and were probably the statistics that aroused the most general interest during that year. The Commission's research in this area grew rapidly after that.

The Commission was approached in 2002 by the City of Westminster local authority which believed that the marked decline in its Census population (compared to previous estimates) was an error. This was echoed by some other local authorities which similarly pointed to the disparities between the Census estimates and the mid-year population estimates for the year before. The Commission discussed these concerns with ONS and with a number of independent experts. It concluded that the results of the 2001 Census in Westminster were less reliable than suggested by the published confidence intervals. But it also concluded that 2001 Census was conducted overall according to the best methodology available for a conventional census. The problem was that this methodology failed to cope adequately in the most hard-to-count areas such as Westminster.[42]

On a different aspect of the Census figures, the Commission made representations to ONS in 2002 following approaches from a number of expert users about late changes made to the methods for producing small area statistics so as to be certain to avoid disclosure of any personal information. Users were concerned that the proposed adjustment or suppression of detailed data to protect against disclosure risked

compromising the value of the Census data. Beyond limiting what could be interpreted, the newly arisen difference in approach between England and Wales and Scotland made trans-border comparisons more difficult. The Commission recognised the difficult technical decisions involved but urged ONS to prioritise user needs in deciding how best to tackle the problem.

In 2004 the Commission followed up its interim report on the 2001 Census in Westminster with another report *Census and Population Estimates* [43], which looked at population statistics more widely and revisited its recommendations. These included:

- government departments, local authorities and other public bodies should commit to working more closely together in the planning and execution of the 2011 round of Censuses
- targeted studies or surveys should be pursued in selected areas ahead of 2011 with a view to improving population estimates for the most problematic areas
- improvement of the quality of migration data should be addressed urgently by the Home Office and the Office for National Statistics (ONS) together
- the creation of a robust and continuously updated National Address Register should be a priority for Government
- government departments should assess more systematically and publish their own requirements in relation to the Census.

The response to these recommendations in the following years was patchy and towards the end of 2006 the Commission started an independent assessment of progress with planning for the 2011 Census, highlighting issues on which more might be done by government to help assure success. The review found that whilst there had been some progress on its previous recommendations, there remained areas of concern:

- various initiatives to produce a definitive National Address Register for England and Wales had failed after five years of studies and discussion
- improving the quality of information about migration had been addressed to some extent but it was now unrealistic to expect major progress ahead of 2011
- there was little public evidence that government departments had thoroughly researched their own data requirements though it was understood that ONS was engaging them on this

- whilst sources and methods for making population estimates had improved, there was scope for greater sharing of information between public authorities to this end. [44]

A meeting of experts, held as part of the review, agreed that the 2011 Census was likely to be the most challenging for many decades. Contributory reasons were the high rate of population mobility and migration, the levels of illegal residency, changing household structures and an increase in the number of second homes, reluctance to complete official questionnaires, and the growth of 'gated' residences in already hard-to-count areas such as Westminster.

The Commission published *Counting on Success: The 2011 Census – Managing the Risks* [77] in November 2007. The title refers to the fact that many public bodies are counting on the success of the Census, but success is far from being a certainty. Indeed there had been little public discussion about what would actually constitute success. The report concluded that high-level discussions about what will replace, or at least supplement, censuses after 2011 need to be taken forward in parallel to work relating to 2011.

In evidence to the Treasury Sub-Committee in November 2007, the Commission noted that it had been impressed by the cost savings, and quality improvements, that have been made in several Scandinavian countries that now rely mainly on registers of population, households and businesses. And also by the advantages, but lesser cost savings, of moving to a short census form supported by a large continuous survey, as in the United States. It argued that whatever future path is determined for the UK, 2011 should be the final Census of its traditional kind and planning for the longer term, at the top level of government, should start straight away.

Migration

There are two main components of change in the population, natural change (births and deaths) and migration. Over many years, migration has been the dominant influence on population change in the UK. At the level of local authority population figures or for smaller geography, the migration component is more dominant still. And the dominance of the migration component is bigger again in the most 'hard to count' areas as identified for census purposes. So, for those areas which present the greatest challenge statistically, much of the challenge relates to migration (international and internal within the UK).

In 2006, the Commission set out in a letter [78] to several government ministers the consequences of not having adequate population and migration data. It noted that the 2011 Census might be left vulnerable if the migration estimates in the years prior to 2011 were not robust. Essentially, the danger is that if the Census appears to contradict earlier estimates, as happened in 2001 in some areas, there will be a loss of confidence in Census data itself.

The response to that and subsequent letters was essentially that the Government recognised the need to improve migration statistics but no specific commitments were made. Ministers did however stress their support for the Inter-departmental Task Force on Migration Statistics [79] set up by the Office for National Statistics in 2006 and the *Improving Migration and Population Statistics* (IMPS) research programme. The Commission took the view that the report of the Inter-Department Task Force presented broadly the right path ahead but noted that it was one that required substantial commitments from other government departments – as the Chairman of the Commission pointed out in a letter to the Times newspaper in May 2007:

LETTER TO THE TIMES – 15 MAY 2007

Sir, It is certainly true that there is a real problem with statistics of migration into and around the country (*Town halls to lose £40m in migrant numbers row, 15 May*). The Statistics Commission has been arguing for four years for action on this matter. An interdepartmental report in December 2006 confirmed that government recognised that much needs to be done to improve estimates of migration and population.

The leaders of London councils, who have recently expressed their concerns about migration numbers in strong terms, may well have reason to complain. But they are wrong simply to blame the Office for National Statistics (ONS).

National sample surveys of the kind ONS can undertake will not adequately capture information on the short-term migrants who are the heart of local authorities' concerns. Local surveys are not a satisfactory answer either; they are unlikely to be widely trusted and can probably not be built into a national picture.

To produce better estimates, ONS will need to receive raw information on people moving into and around the country from the big Whitehall departments: Home Office, the Department of Work and Pensions, the Department of Communities and Local Government, HM Revenue and Customs, and the Department of Health among others.

What is needed therefore is a sound administrative system for recording numbers of people entering the country and their immediate and subsequent destinations. This has data protection and technical implications; any data on individuals would obviously have to be kept totally confidential.

Fortunately, the Statistics and Registration Service Bill which is now before Parliament contains provisions that might ease some of the barriers to the statistical use of administrative data in

order to create better migration data. But improvement also depends upon several departments acting in concert. It is impossible for ONS to produce the desired answers on their own.

David Rhind,
Chairman of the Statistics Commission

At the end of the life of the Commission, this was still the position. The challenge of producing better migration statistics, both migration into the UK and between areas, remained to be resolved and the various hazards facing the 2011 Census still loomed. There were however a number of encouraging signs. ONS had put a lot of work in hand, the Treasury Sub-committee was preparing a report, and Ministers were involved in discussions about the problems of measuring migration. The Commission may have only stirred the debate but it was one that needed to be stirred and it did so to some effect.

10: Selected research topics and reports

The Commission's work in relation to the Census and population statistics is discussed in Chapter 9. Some of the other more significant investigations are described below. This is not intended to be a comprehensive list but rather to give a flavour of the Commission's work. A fuller account of research reports can be found in Annex A to *Official Statistics: Value and Trust* [70]

Managing the Quality of Official Statistics

In October 2005 the Commission published its review of the arrangements for statistical quality management across government, which it had undertaken in conjunction with ONS.[40] The report concluded that a clear, strong statement of the National Statistician's authority in respect of quality assurance and management would be helpful in enhancing public trust in official figures. An audit-based approach to quality reviews was recommended, with the National Statistician taking a central role in setting the agenda and guiding the programme of reviews.

The Commission came across relatively few instances of "mistakes" but it spent considerable effort following up various anxieties about the quality of statistics raised by the media or by correspondents. Here are a few examples:

Revisions to economic statistics

In April 2004 the Commission reported on its review of revisions to economic statistics [41] following media criticism and concern about the impact on the work of the Monetary Policy Committee of the Bank of England and the City. One of the main conclusions was that much of the public criticism was unreasonable. Revisions were inevitable if initial estimates of key economic figures were to be available sufficiently early to those who needed them to make policy or take decisions. Routine and pre-announced revisions that incorporated updated information were the norm and should not be confused with the correction of errors. It was noted that whilst some of the underlying statistical processes could have been improved, this would not have had a major effect on the scale of revisions.

Pension fund statistics

Statistics of pension contributions were the subject of much public comment because of concerns that some financial transfers *between* companies that manage pension funds may have been reported to the Office for National Statistics as if they were *new*

contributions. This had the potential to influence substantially the debate on the use of private pension schemes and this, in turn, was important in the context of pensions policy. The National Statistician commissioned a series of reviews of ONS Pension Contribution Statistics which first reported in October 2002. As well as chasing progress with the resultant action plan, the Commission discussed the issues with the Pensions Commission and the Association of British Insurers.

Value added measures in school performance tables

Following expressions of concern from a leading academic about the quality and presentation of value added measures in school performance tables, the matter was taken up with the Department for Education and Skills (DfES). The Commission was pleased that DfES piloted a model for 'value added' between Key Stages 2 and 4 in the 2005 tables which was designed to take account of contextual factors outside the school's control, such as gender, mobility and levels of deprivation which may have a further impact on pupil results, even after allowing for prior attainment.

Targets and performance measurement

In the course of the Commission's work, various instances were noted where National Statistics were not adequate to monitor government targets. Sometimes it was not obvious why targets were set in one form, when good statistics existed for a slightly different formulation. For example targets for numbers of (unsuccessful) asylum seekers removed were reformulated to include dependants, not just the primary applicant. As it turned out Home Office statisticians were able to enhance the data they collected pretty quickly to ensure that these could be monitored while also ensuring that data comparable with previous periods were maintained. But the Commission was concerned to make sure that this was actually done.

At other times targets were set without clear information to support assessment of progress towards their achievement. For example in its work on the NHS Cancer plan the Commission found that some of the targets set could not be monitored from National Statistics or from other data which were regularly and publicly available. It was the Commission's view that it should be the norm for targets to be monitored with National Statistics and pressure from the Commission led to the setting up of a GSS group to examine some of the issues involved.

PSA Targets: The Devil in the Detail

The new Public Service Agreement targets associated with the 2004 Spending Review highlighted some of the difficulties with statistical targets. Whilst keeping in touch with the work of the National Audit Office and others – submitting evidence to the Royal Statistical Society Working Party on Performance Monitoring in the Public Services, and to the Public Administration Select Committee for its report *On Target? Government by Measurement* [45] – the Commission decided to undertake its own in-house assessment of whether the statistical evidence used to support Public Service Agreements was adequate for the purpose. *PSA Targets: The Devil in the Detail* [46] was initially issued in draft form in October 2005 and detailed comments were incorporated into the final version in March 2006.

Each of the 109 individual targets were reviewed and it was recommended that government departments follow up concerns relating to specific targets. The Commission also made a number of more general recommendations:

- ‘Technical Notes’ should be developed into more comprehensive Target Protocols which would also cover broader issues.
- A brief record should be kept by departments of the more substantive decisions that had been influenced by the monitoring of each quantified PSA target.
- A robust cross-government planning system for official statistics was needed so that future data requirements (to support the setting of targets) could be picked up at the earliest possible stage and fed effectively into the allocation of departmental resources.
- Government departments should pay more attention to data quality issues.

Measuring Standards in English Primary Schools

Professor Peter Tymms of the Curriculum, Evaluation and Management (CEM) Centre at the University of Durham asked the Commission to consider his concern that Key Stage 2 (KS2) test scores were not suitable for monitoring trends in standards over a period of years. The Commission concluded that the improvement in KS2 test scores between 1995 and 2000 (particularly in relation to English) overstated the improvement in attainment in primary schools over that period, but there was nevertheless some rise in standards. [47] This conclusion was not popular with some government officials who had been relying on the KS2 scores as evidence of the success of government policy. This episode provoked some antagonism towards the Commission but also established it firmly as an independent commentator.

Other uses of official statistics in the measurement of targets and performance were brought to the Commission's attention, for example:

- *hospital waiting statistics* were considered, including the dip in the series just before the general election
- the media accused Ministers of requiring changes to the methodology for producing *star-ratings* in order to create more politically acceptable results
- targets to reduce *child poverty* put greater emphasis on low income household statistics which used to become available over a year after the period to which they applied
- a press article claimed that ministers selected the way *poverty* was measured so that targets would be easier to achieve
- plans to increase participation rates raised questions about the precise *definition of the higher education sector*.

The use of National Statistics (and other official statistics) in league tables raised two additional questions: firstly, the use of geographically disaggregated or individual unit level data from statistical systems designed primarily to produce reliable data at an aggregate level raised questions of fitness for purpose; secondly, even if the data were perfect, the random variation involved in, for example, rates based on small numbers of events, meant that care was needed in interpretation.

User perspectives

With its focus on the public interest in official statistics, the Commission increasingly undertook research into the user's perspective. Three major reviews between 2004 and 2006 looked at an entire field of official statistics: health, school education and crime. These were chosen because they encompassed a large proportion of the figures that had featured in media debate and because the three subjects were fundamental to citizens' interests. In each case an external consultancy was commissioned to undertake a review which was supplemented with the Commission's own view on the issues. The findings reinforced the Commission's main messages about the need for transparent planning, independent frank commentary and improved communication with users. Statistical consistency across the four countries of the UK was also a common theme.

Enhancing the Value of Health Statistics: User Perspectives [48]

The first of the user perspective projects looked at health statistics and made a small number of high-level proposals which had wide relevance. In addition to points about improving consultation, communication and consistency, proposals specific to the health sector related to the needs for health data for small geographical areas and the importance of identifying systematically the use made of health statistics in decision-making across the UK.

School Education Statistics: User Perspectives [49]

The second review found that official education statistics had improved substantially in recent years and there was now a wealth of valuable data available for people who required such information to guide their decisions. However some users of statistics needed more guidance and support. Specific proposals for school education statistics included:

- producers should re-assess whether the scope and nature of existing statistical databases, reports and other outputs were likely to meet the needs of the full range of potential users
- the four UK administrations should each make a commitment to ongoing participation in international comparative studies of education performance
- a consistent approach should be taken across the UK to the publication of examination and test results for individual schools.

Crime Statistics: User Perspectives [50]

In this final report of the series the Commission addressed official statistics on crime, considering who uses the statistics, for what purposes, whether the available statistics meet those purposes, and whether further statistical sources or outputs might need to be developed. The recommendations followed five main themes:

- structural separation between Home Office policy functions and the compilation and publication of crime statistics
- improved communication with users through clearer statistical presentation at the time of publication
- better, more consistent crime data for small areas, through more systematic exploitation of existing local police data sources
- further technical research on options where the existing statistics do not fully meet demand – including the best measure of ‘total crime’

- improved comparability of crime statistics between UK administrations.

Use Made of Official Statistics

Building on this work in specific subject areas, the Commission took a broader look at the use of official statistics by private and public sector organisations and the extent to which those statistics influenced decision-making. *The Use Made of Official Statistics* [51], published in March 2007 considered the public value derived from these uses and the implications for statistical planning and governance. The timing was right to identify issues for consideration by the new Statistics Board in relation to planning, user consultation and communication, and enhancing accessibility. The National Statistician welcomed the report's recommendations and undertook to disperse its messages across the Government Statistical Service. The Commission itself developed its thinking on accessibility in its report June 2007 report *Data on Demand - Access to Official Statistics* [80].

These substantive research projects were complemented by a range of investigations into the use, usability and availability of statistics which arose from approaches by users. For example:

- A local authority approached the Commission with a complaint about the number of forms they were now required to complete in order to gain access to data from the Inter-Departmental Business Register. ONS subsequently streamlined its procedures.
- The Association of Census Distributors complained about the cost of licences for access to boundary data which provided a necessary context for official statistics. To the extent that geographical information from government agencies is not currently freely available to users for this purpose, the Statistics Commission wanted to see this matter explored and resolved.
- The Commission was contacted by an expert user regarding changes to the Department of Health website which had apparently resulted in less information being available.

11. Code of Practice

Since the Commission was tasked with scrutinising the quality assurance of National Statistics, and the Code of Practice serves as the primary benchmark of statistical practice, the Code was always important to the Commission's work. The 2002 version of the Code, heralded in the 2000 Framework, was compiled by ONS. However in its last year the Commission itself drafted a revised and simplified version and commended its adoption to the incoming Statistics Board.

In the early days of the Commission there was some frustration that the draft and final versions of the National Statistics Code of Practice, which was to be published in stages from 2002, took so long to appear. The draft had been expected soon after publication of the Framework but it took until December 2001 before it was published, together with the first two protocols in draft form. However the Commission welcomed the Code when it arrived and congratulated the National Statistician on getting the whole of government to sign up to it, which must have added substantially to the delay.

The main part of the Code [17] and the first two protocols were published in final form in October 2002 and took account of several Commission comments. The Commission was particularly pleased that the devolved administrations had all adopted the same release practices as the Whitehall departments - something it had flagged up in its response to the arrangements for the Scottish Executive (which had wanted even longer access to the figures prior to publication). In the event however, departmental release practices soon exploited the latitude in the Code and did not in reality conform to a consistent model.

The amount of pre-release access afforded to ministers and others was, and has remained, a controversial issue. Britain is unusual in allowing ministers and advisers pre-release access to official statistics, and is exceptional in the length of this access – up to 5 working days has been the norm up to the time of writing. The National Statistician was personally not in favour of allowing any such pre-release access but ministers had become used to getting their position established before publication of good or bad news. The Commission was however pleased that there was more transparency in the final version of the protocol on release practice than in the draft. It hoped this would put a stop to 'trailing' in the media but unfortunately this was not to be and the Commission gradually hardened its view. One of the concerns that the Commission had with the Statistics and Registration Service Bill was that it prescribed

that pre-release access should be determined by ministers, not the National Statistician or the Statistics Board. As Chapter 12 notes, the power of determination remains with ministers, though the Board is given more influence than in the first draft of the Bill.

The Commission was disappointed that a clarification of the role of the Chancellor in relation to the *Retail Prices Index* had not been included in the *Protocol on Consultation Arrangements between the National Statistician and UK Government Ministers*. It continued to push for the scope and definition of the index, a National Statistic, to rest with the National Statistician, not the Chancellor, and this matter was eventually resolved in the 2007 Act which redrew the responsibilities of the various parties.

Once the Code and its related Protocols were published, in stages from 2002, the Commission's attention turned to how they were being implemented. Concern over the way the Code was drafted soon proved justified as ambiguities became apparent and the Commission's interpretation of the meaning of the Code sometimes differed, fairly fundamentally, from that of government departments. A few parts of the Code were very specific, making it easy to say whether practices were compliant. The number of clear-cut breaches was however very small (though the statistical system was seen by the Commission as having weaknesses in areas where the Code was non-prescriptive and compliance could not be measured). It was this uncertainty which prompted the Commission to draw up proposals for a more tightly-worded Code as part of its advice to the new Statistics Board (now named the UK Statistics Authority) in 2007.

Casework on the Code of Practice was a considerable part of the Commission's activities. The Office for National Statistics regularly made the Commission aware of possible breaches of the Code that had been notified to it. Usually the relevant head of profession would already have taken steps to prevent recurrence. In most cases these identifiable breaches were not perpetrated by statisticians but rather by those in departments and elsewhere who had access to the figures before publication. Departmental 'statements of compliance' with the Code stated who had pre-release access and the Commission was concerned about the length of some of the lists. Some departments collected and processed data from outside organisations to produce National Statistics, for example data from police authorities, which accounted

for the large number of those individuals with early access to figures. The Commission was keen that data of this kind should also be covered by the Code of Practice.

The Commission reported on breaches it had been notified about in its annual report, from where they were picked up by the Treasury Sub-committee and the media and so entered the public domain. If the Commission was particularly concerned about an apparent breach it would take its own action, for example writing to the Scottish First Minister about non-compliance with the Code and to the Home Office about pre-release of gun crime statistics by a third party. But it would also sometimes ask ONS to investigate circumstances that might or might not be breaches – an example was a Minister speaking about certain statistics on the Radio 4 *Today* programme before they were published. In such a case there can be room for uncertainty as to whether a comment is prompted by prior knowledge of the unpublished statistics or not.

One case that prompted a lot of comment at the time was reported in the Commission's 2006-07 Annual Report:

“There was extensive media interest in, and comment about, the breach of the Code of Practice associated with remarks by the Prime Minister at the TUC conference on 12 September 2006. In response to a question, he had outlined the latest unemployment figures prior to the statistical release set for 13 September. The Commission responded to press inquiries and concluded that this appeared to be a breach of the Code of Practice. The National Statistician wrote to the Cabinet Secretary who acknowledged the breach and said steps would be taken to prevent a recurrence. The Commission issued a short press notice, welcoming the swift conclusion. It is a fundamental principle that all political interests should have an equal opportunity to comment when figures are released. That is why the Code of Practice does not permit even very general comments to be made about statistics before they are published.”

Revised Code of Practice

Under the Statistics and Registration Service Act all the bodies that produce official statistics are expected to observe a revised Code of Practice. The Act provided for the new Board to have statutory authority over the content of the Code and also authority to assess and report publicly on compliance with it. In anticipation of the oversight role moving from the Commission to the Board, the Statistics Commission established an internal working group in the summer of 2006 to consider the Code and the Protocols and concluded that the proposed statutory arrangements would require a Code that, whilst covering much the same ground as the existing one, should be

shorter, simpler, more imperative in style and more suited to supporting the processes of assessment.

With the agreement of the UK Parliament, Government and National Statistician, a revised draft of ten principles was developed which drew on the existing UK National Statistics Code of Practice and also the UN Fundamental Principles of Official Statistics and the European Statistics Code of Practice. The aim was to help the Board become operational and effective quickly. To establish as much consensus as possible, *A Code of Practice for National Statistics: Interim report for consultation* [71] was issued in December 2006 which invited comments from interested parties by the end of February. All 18 responses – many from key players in this country and abroad - were published and an updated text formed another plank in the Commission's advice to the new Statistics Board (UKSA).

12. The road to legislation

The Statistics and Registration Service Act received Royal Assent on 26 July 2007. The Commission was a party to a lot of the discussions that led up to the introduction of the Bill in 2006 though its role was perhaps more that of provocateur than architect. The Commission was asked at its own inception in 2000 to look at the case for statistics legislation after two years (ie in 2002), which it did. The 2004 report on this work, *Legislation to Build Trust in Statistics*, drew heavily on the advice of the Treasury Solicitors which is the key source of expertise on questions relating to legislation where that legislation has, as in this case, some constitutional complexity. Despite its name, the department is not within the Treasury and was willing and able to offer advice independently to the Commission. The Commission's report described three workable legislative models and recommended a particular one. But perhaps its most influential aspect was that it demonstrated that there was a spectrum of different statutory models, each of which would be viable. This ultimately proved to give Treasury ministers and officials the room for manoeuvre to create a statutory framework that contained elements of the Commission's proposals but was different in ways that would make it more acceptable to the big Whitehall departments.

Initiating the review

The Government's intentions in inviting the Commission to review the need for legislation were indicated in the 1999 consultation document *Building Trust in Statistics*:

"It is essential that the proposed new statistical framework, once established, should itself remain free from political interference. Neither should the arrangements be gradually eroded over time. The Government acknowledges the arguments for legislation but has decided to implement the new arrangements on a non statutory basis in order to secure the benefits as soon as possible..... The Government has however already indicated that it will consider the case for statistics legislation if necessary and appropriate.....".

[55]

The statement that 'the government acknowledges the arguments for legislation' is revealing. This would not have been said unless there was already a substantial lobby for a statutory framework within government. In retrospect, the move towards

legislation looks to have been slow but almost inevitable; though that gradual drift had stalled between 2000 and the Commission's report in 2004. Nearly all advanced countries have some sort of overarching statistical legislation and the arguments against in the UK were more pragmatic than principled. Indeed, again with the benefit of hindsight, the June 2000 Framework for National Statistics has the hallmarks of a holding operation, designed as much to obstruct a rapid move to legislation as to take forward the cause of improving the statistical service.

In March 2001 the Commission took its first look at the case for and against legislation on the basis of existing evidence and at that time the balance of arguments pointed strongly to legislation. However it recognised that more detailed work was needed in the light of experience of the National Statistics regime. It was clear though that the wind was strongly in favour of legislation with the Royal Statistical Society and opposition political parties unequivocal in their views.

Equally the Treasury Sub-committee, in its January 2001 report on National Statistics, stated: "The oral evidence we heard in November 2000 has confirmed our initial opinion that legislation is necessary, particularly because we detected a lack of clarity in some aspects of the Framework document. Legislation would establish more clearly the specific responsibilities of Ministers, the National Statistician, the Statistics Commission and others in relation to National Statistics, and guard against political interference and backsliding in future". [56]

In 2002 the Commission undertook fact-finding research to identify international and other comparators and to identify existing relevant legislation. To complement this, the Royal Statistical Society organised a meeting with a number of international experts in such matters. The workshop threw up significant differences between countries, reflecting differing histories, governance, size and resourcing arrangements, but the need to ensure trust and trustworthiness were the uniting threads.

The Commission also consulted widely on the most important issues for the review to consider. The aim was to identify all the relevant issues, rather than seek substantive views. The general view was that the Commission had the issues broadly right. The most important were considered to be: safeguarding recent improvements; consolidating and updating the National Statistics arrangements; improving the Framework and the Code; and updating existing legislation. The Royal Statistical Society submitted both extensive comments and a paper by Tim Holt which was

included as an annex to the Commission's main report in 2004. In its comments, the RSS stated: "Given that the basic objective of the Government's policy has been to increase public confidence and trust in National Statistics, this should be the most important criterion to be applied to the question of whether legislation is needed" [59].

Tim Holt's paper on behalf of an RSS working group was influential in its arguments as to why legislation would make a difference. Although the Commission took a different stance on the form of legislation that should be pursued, it accepted and adopted the RSS views verbatim on *why* legislation would make a positive difference. This was one example - among many - where the Commission and the RSS views were close enough to make it possible to bury differences and present a united front. In the latter years of the Commission's existence this was increasingly to become the norm. The RSS and Commission did still disagree on some things but became more adept at exploiting their common ground.

To gain a deeper understanding of current issues relating to statistical legislation, three reports were commissioned:

- *Statistics Legislation*, by Ian Maclean and Ulric Spencer [60], examined the arrangements for official statistics in a number of other countries and some aspects of the international arrangements. It also looked at UK governance frameworks for certain professions and organisations.
- *Effect of the Statistical Legislation Framework in the UK on the Work of the Government Statistical Service*, by Georgina Fletcher-Cooke [61], commented on the strengths and weaknesses of the existing UK legislative framework for statistical work.
- *International Developments in Statistical Organisation*, by Graham Mather [62], presented an overview of the international regulatory framework for official statistics with particular reference to the United Nations and European Union. It also drew out a number of messages relevant to consideration of the need for UK legislation.

Subsequently (in January 2004) the Phillis Review [22] into government communications (to which the Commission gave evidence) reinforced the mood in favour of legislation. Phillis observed that legislation "would underline the independence from political interference of the Statistics Commission and the the National Statistician". [57]

Legislation to Build Trust in Statistics

The case for statistics legislation, in some form, was widely supported. But there was far less agreement on the form it should take. Following discussion of the responses, in February 2003 a sub-committee chaired by commissioner Patricia Hodgson took the review forward. The Legislation Sub-committee commissioned the Treasury Solicitor Department to come up with possible models of governance that would be achievable through legislation, would promote statistical independence from government and enhance public confidence in the statistical system.

Legislation to Build Trust in Statistics [63] was published and submitted to Ministers in May 2004. It concluded strongly in favour of legislation and recommended a particular statutory model (though it discussed the merits of three). All three of the models the Commission then put forward assumed the Commission itself would be replaced. This willingness to propose its own abolition turned out to be a strong card. It gave the Commission's proposals added credibility with many commentators.

The Commission's preferred model focused on a new, more robust, statutory code of practice – to be developed by the National Statistician – binding on all government departments, and some other bodies which collect or use statistics. It would be enforced by a new Commission accountable to Parliament, replacing the existing one. The new Commission would approve the new Code of Practice and would have powers to obtain information in pursuit of its enforcement. It would be supported by an Advisory Panel reflecting wider stakeholder interests.

There was also thought to be a case for new statutory provisions to clarify the powers of, and obligations on, the Office for National Statistics (ONS) in relation to accessing administrative records (tax records for example) for statistical purposes, and for updating existing legislation which provides powers to collect and manage data.

External support for the Commission's proposals was soon forthcoming; the Liberal Democrats accepted the Commission's proposals and the Conservatives included radical proposals in their 2005 election manifesto. However, there was no response of any kind from the Government until November 2005 when the Chancellor announced that the Government intended to bring in legislation to create a new Governing Board for ONS with responsibility for the integrity of the statistical system as a whole (see box). This announcement contains early indications of a fairly deep misunderstanding

about official statistics. It seemed to assume that all, or nearly all, official statistics are the responsibility of the Office for National Statistics – an impression that might have been given erroneously by the June 2000 *Framework for National Statistics* which is less than frank about the limited nature of the central authority of ONS. In reality many of the most controversial statistics are the direct responsibility of the big departments of state which apparently had little warning of the Chancellor's announcement before it was made. Indeed it is not clear that ONS had more than a token warning that it was coming. Whatever the roots of the misunderstanding, the government proposals had to be substantially developed, and negotiated with Whitehall, as the draft legislation was developed.

28 November 2005

Extract from a speech by the Rt. Hon. Gordon Brown MP, Chancellor of the Exchequer, at the CBI Annual Conference in London

“Having reviewed the framework for national statistics, I propose to legislate to make the Office for National Statistics independent of government, making the governance and publication of official statistics the responsibility of a wholly separate body at arms length from government and fully independent of it.

So that as with the Bank of England, we will legislate for the creation of an independent governing Board for the Office for National Statistics, with delegated responsibility for meeting an overall objective for the statistical system's integrity;

As with the Bank of England, we will legislate for the appointment of external members to the board, drawn from leading experts in statistics and including men and women from academia and business;

As with the Bank of England, we will legislate for a new accountability to Parliament through regular reporting by the Board to explain and to be questioned by the Treasury Select Committee on their performance.”

The precise motivation for the Chancellor's announcement at that time remains a little hazy. However it came in the wake of many public references to the findings of the ONS Omnibus Survey³, part-sponsored by the Commission, regarding the low level of trust in statistics. Another clue is to be found in the repeated reference to an assumed analogy with the degree of independence given to the Bank of England when Gordon Brown became Chancellor in 1997. There is, in fact, very little substantive analogy between the steps taken in relation to the Bank at that time and proposals in relation to the statistical service put before Parliament ten years later, though the Chancellor's advisers may have thought otherwise. The two initiatives did have some

³ The Omnibus Survey results showed that trust in official statistics was very low and that a large majority thought that the government interfered in their production.

features in common though; they were both unheralded political initiatives in a spirit of letting experts do their jobs under the guidance of a lay board; both were claimed to be a big step forward in terms of independence; and both were widely welcomed. And of course both were the initiative of the same Chancellor of the Exchequer. So, to the extent that the analogy had resonance at a political level, that worked in favour of laying the ground for statistical legislation

The Government's proposals

The Commission chairman wrote to the Permanent Secretary to the Treasury in January 2006 to welcome the Chancellor's announcement and to reinforce its views on key factors to ensure success:

- arrangements should relate to *all* official statistics
- there should be a binding, statutory Code of Practice that defined the practices which government departments and other relevant bodies must follow in collating and disseminating official statistics
- the Code should be drafted by the National Statistician and approved by the Governing Board and/or an appropriate Parliamentary Committee
- the funding arrangements for ONS needed to be more transparent than at present
- the Governing Board should be able to commission investigations and to audit compliance with the Code of Practice as it saw fit *anywhere* in government and report to Parliament at its discretion
- the Governing Board would need the authority, subject to Parliamentary accountability, to approve or reject annual plans covering *all* the statistical activities of government
- to perform these functions the Board would require support staff dedicated to the oversight and compliance role and personally accountable to the Board, even though they may sit within ONS for convenience.

The Government proposals that came out in March 2006 in the Green Paper *Independence for Statistics: A Consultation Document* [64] did not accord closely with the Commission's views but did certainly draw on the Commission's various reports and letters, as well as some further work on statistical frameworks in other countries which the Commission had prepared in response to a specific request from the

Treasury. The views of the Royal Statistical Society, Treasury Sub-committee and the Phillis Review were also taken into account. The Government's proposals would:

- introduce direct reporting and accountability to Parliament, rather than through Ministers
- place a statutory duty on the Board to assess and approve all National Statistics against the Code Of Practice (not all official statistics as the Commission wished)
- make key appointments to the Board though open and fair competition
- and make the combined Board Office for National Statistics, a single Non-Ministerial Department with special funding arrangements.

From Green Paper to Bill

To stimulate public debate and encourage interested parties to respond to the Government consultation, the Commission organised a seminar on the Future Governance of Official Statistics in May 2006 [65]. Over 140 delegates, from central and local government, academia, the media and the wider community of users of statistics heard and discussed the views expressed by nine leading commentators, including the Financial Secretary to the Treasury, Lord Moser and Baroness Onora O'Neill. Lord Moser also instigated an influential debate in the House of Lords on statistics legislation on 15 June 2006.

The Statistics Commission's own response to the government proposals was informed by the seminar but largely reflected the comments already made in its letter in January. Along with the earlier concerns, it agreed that:

- the institutional arrangements between the Board and the statistical work in other parts of government; and between the ONS and Government departments must be clear and give the Board sufficient powers to exercise its responsibility for promoting trust in official statistics
- the Board should not only have the right to decide that any output is inadequate in relation to the Code but also to suggest to ministers additional outputs that should be covered by the Code
- there should be statutory recognition of the National Statistician's role in the development and deployment of professional statistical staff across government
- there must be transparency in funding and planning arrangements

- the devolved administrations should be drawn in to the new arrangements.

The Treasury Sub-committee undertook its own investigations in considering the government proposals and published its own report, *Independence for Statistics* in July 2006 [66]. In its press release responding to the report, the chairman took the opportunity to press home the Commission's message, including:

- Clear separation is needed between the role of the National Statistician in the executive delivery of statistics and the new Board's responsibility for oversight and scrutiny
- Ministers should not be free to place important departmental statistics outside the ambit of the new statutory arrangements.
- Pre-release access to statistics should be further restricted though we support the case put forward by the Treasury Sub-committee for the introduction of very limited pre-release access for opposition spokespeople.
- The concordat on statistics between the four UK administrations should be reviewed and revised to ensure closer co-ordination.
- There is a need for a strong presumption in favour of statisticians having access to administrative data for statistical purposes.

The Government's response to the consultation was published as a White Paper [67] on 15 November 2006, just as the intention to legislate in the next session of Parliament was announced in the Queen's Speech. Later the same day, and by coincidence of timing, the Financial Secretary to the Treasury addressed the Commission's annual open meeting to explain the key points:

- Statistics matter; they are central to the business of government and an important public good.
- The legislation would devolve full responsibility for the scope, methodology and definition of the Retail Price Index (RPI), to the independent Board, with a limited safeguard – based on the judgment of the Governor of the Bank of England – to reduce the risk that any changes may damage the interests of holders of index-linked gilts and the public finances.
- The Board's remit to monitor and report on concerns on official statistics would include devolved statistics; ministers in Scotland, Wales and Northern Ireland would be able to nominate devolved statistics for the Board's assessment and approval as National Statistics.

- The new arrangements would reinforce the role of the National Statistician, and this title would be retained; the role will be a statutory post and the incumbent would be a full member of the Board, responsible for the executive delivery of statistics, the running of the Office for National Statistics and reporting to the Board, not ministers.
- A specific and separate scrutiny function would be spelled out in legislation, led by a head of assessment who will also be a statutory post holder, reporting directly to the Board and who would be, together with all assessment staff, operationally independent of the statistical production function.
- The Board would have a non-executive majority membership set out in legislation.
- The Board would be required to produce a Code of Practice for National Statistics, and there would be independent assessment and approval by the Board of all current National Statistics against the Code, and of all additional statistics nominated by departmental ministers for approval as new National Statistics.
- The legislation would include provisions to allow for increased data sharing between departments and the Board for statistical purposes only.
- Comprehensive safeguards for confidentiality of personal data would be set out in the primary legislation, with criminal penalties for unlawful disclosure.
- Pre-release arrangements would be given a special status in the new system; these would be set out in secondary legislation, proposed by ministers and approved by Parliament. The arrangements would place a statutory duty on the new Statistics Board to access and report on ministers' and officials' compliance with the new rules.
- There would be a separation of the General Register Office (GRO) and NHS Central Register (NHSCR) from the current ONS, their functions to be retained under ministerial responsibility.
- The Bill would establish proper employment status and rights for registrars in England and Wales, as local authority employees.

From Bill to Act

The Commission found much to welcome in the Government proposals for a new Statistics Board but also thought that the proposals side-stepped some of the Commission's concerns.

Whilst welcoming the intent of the Bill, the Commission remained of the view that it did not secure a sufficiently clear separation of executive and independent scrutiny roles. It felt that it also:

- failed to give the Board or National Statistician any direct authority over the 80 per cent of official statistics produced by government bodies other than ONS
- failed to establish an explicit obligation to observe the Code of Practice
- gave Ministers – rather than the Board – a statutory authority to determine the rules for access to statistics before they are published. [68]

This last point became the subject of ‘ping-pong’ disagreement between the Lords and the Commons. While the Lords pre-release amendment, which would have made the board responsible, was subsequently rejected in the Commons, amendments were agreed which clarified the role of the National Statistician, enabled the board to recommend the initiation of assessment for any official statistics and gave the board greater influence, if not power, over pre-release arrangements.

The legislation received Royal Assent on 26 July 2007. While not drafted quite as the Commission would have liked, the Act was still a big step forward and the Commission gave itself an explicit objective for the final months of its existence of helping to ensure the successful implementation of the new arrangements. It did this by offering advice, both formally in reports and letters and less formally in dialogue with the officials involved in setting up the new UK Statistics Authority.

The role the Commission played through the evolution of the legislative proposals was that of an independent commentator. The Commission was in regular contact with the officials leading the work but remained firmly outside the process. Whether the draft legislation might have been crafted any more clearly if a wider base of advice had been available is debatable. There remains some confusion in the wording of the Act but its central elements were clarified during its passage through Parliament.

In its final year, the Commission adopted an aim to do all it could to ensure that the new statutory arrangements got off to the best possible start and, for the most part, did not continue to press its concerns about the lack of clarity in some parts of the Act. One exception to this was the Commission’s views on the subject of pre-release access to statistics. The Act contains provisions for the arrangements for access to statistics in their final form prior to publication to be set out in secondary legislation. In

December 2007 the Government issued a consultation document setting out proposals for the content of that secondary legislation. The Commission's response to that consultation [81] indicated its continuing concern that to see the arrangements tightened up more than the Government was proposing. At the end of the Commission's life the results of the consultation - and the final form of the secondary legislation - had still to be announced.

The Commission leaves behind its best wishes with all those who will continue to wrestle with this complex issue.

References

- [1] *Framework for National Statistics* (2000). London: TSO. 34p. ISBN: 185774-382-2. http://www.statistics.gov.uk/about_ns/downloads/FrameDoc1.pdf.
- [2] 'Official Statistics: Counting with confidence', *Journal of the Royal Statistical Society. Series A (Statistics in Society)*, 154 (1), 1991. pp.23-44.
- [3] *Government Statistical Services*, Cmnd 8236. Her Majesty's Government (1981). HMSO.
- [4] S. Pickford et.al. (1989) *Government Economic Statistics: A Scrutiny Report* (Pickford Review). London, HMSO.
- [5] *CSO Agency Framework Document*. (1991). CSO.
- [6] *Open Government* (1993), Cmnd 2290. London, HMSO. 93p.
- [7] *Official Statistics Code of Practice*. (1995). CSO.
- [8] *Labour Party Manifesto* (1997). <http://www.psr.keele.ac.uk/area/uk/man/lab97.htm>.
- [9] *Statistics: A Matter of Trust, a consultation document* (1998). London: The Stationery Office. Cmnd 3882. ISBN: 0-10-138822-5. <http://www.archive.official-documents.co.uk/document/ons/govstat/report.htm>.
- [10] *Building Trust in Statistics* (1999). London, The Stationery Office. Cmnd 4412. 21p. ISBN: 0-10-144122-3. http://www.statistics.gov.uk/about_ns/Understanding.asp#documents.
- [11] 'Office for National Statistics', House of Commons *Hansard*, 19 October 1999, Column 287. http://www.parliament.the-stationery-office.co.uk/pa/cm199899/cmhansrd/vo991019/debtext/91019-16.htm#91019-16_head0.
- [12] *First Report from the Treasury Committee, Session 1998-99, Office for National Statistics*. HC 43, 1998. ISBN 0-10-201599-6. <http://www.publications.parliament.uk/pa/cm199899/cmselect/cmtreasy/43/4301.htm>
- [13] *Review of the Revisions to the Average Earnings Index* (Turnbull King Report), HM Treasury, 1999.
- [14] *Framework for National Statistics*. *Op.cit*.
- [15] Janet Trewsdale and Gill Eastabrook, *National Statistics to Monitor the NHS Cancer Plan: report of a scoping study*. Statistics Commission Report No. 7, February 2002. http://www.statscom.org.uk/C_448.aspx.
- [16] *Statistics Commission Annual Report 2000-01*. The Stationery Office, July 2001. http://www.statscom.org.uk/C_456.aspx.
- [17] *National Statistics Code of Practice: Statement of Principles* (2002). London, TSO. 35p. ISBN: 0-11-703077-5. http://www.statistics.gov.uk/about_ns/cop/default.asp
- [18] *Implementation of the Review of Revisions to the Average Earnings Index Report: Statistics Commission's consideration of the ONS progress report*. Statistics Commission Report No. 5, January 2002. http://www.statscom.org.uk/C_450.aspx.

- [19] *PSA Targets: the Devil in the Detail*. Statistics Commission Report No. 29, March 2006. http://www.statscom.org.uk/C_467.aspx.
- [20] *National Statistics: The Classification of Network Rail*, HC 154, January 2003. ISBN 0-21-500746-8. <http://www.publications.parliament.uk/pa/cm200203/cmselect/cmtreasy/154/15402.htm>
- [21] Statistics Commission promotional leaflet 2005-06.
- [22] *An Independent Review of Government Communications* (2004). Chaired by Bob Phillis. (Phillis Review) Cabinet Office. 38p. <http://www.gcreview.gov.uk/news/FinalReport.pdf>
- [23] *Legislation to Build Trust in Statistics*. Statistics Commission Report No. 18, May 2004. http://www.statscom.org.uk/C_411.aspx.
- [24] *Independence for Statistics: A Consultation Document*. HM Treasury, March 2006. 35p. http://www.hm-treasury.gov.uk/budget/budget_06/other_documents/bud_bud06_odstatistics.cfm.
- [25] *Independence for Statistics: The Government Response*. HM Treasury, November 2006. 35p. http://www.hm-treasury.gov.uk/media/EB1/CD/ons_government_response.pdf
- [26] *Statistics Commission Chairman Responds to the National Statistician's Announcement*. Statistics Commission Press Release, SC/PR/2005/02, 21 January 2005. http://www.statscom.org.uk/uploads/files/pressreleases/scpr2005_02.pdf.
- [27] *Data to Understand the Welsh Economy: A record of the seminar, Cardiff, 17 February 2006*. March 2006. http://www.statscom.org.uk/C_468.aspx.
- [28] *Data to Understand the Scottish Economy. A record of the seminar 6 September 2006*. October 2006. http://www.statscom.org.uk/C_1067.aspx.
- [29] Christopher Allsopp (2003), *Review of Statistics for Economic Policymaking: First report to the Chancellor of the Exchequer, the Governor of the Bank of England and the National Statistician*. Norwich, HMSO. 171p. ISBN 0-947819-77-0. http://www.hm-treasury.gov.uk/consultations_and_legislation/allsop_review/consult_allsopp_back.cfm#first_report.
- [30] *Impact of European Demands on the UK Statistical System*. Statistics Commission Report No. 28, February 2006. http://www.statscom.org.uk/C_469.aspx.
- [31] *Statistical Governance and Legislation*. Letter to Günther Hanreich, Eurostat, 20 September 2005. <http://www.statscom.org.uk/uploads/files/correspondence/Letter0275.pdf>.
- [32] *Independence for Statistics: A Consultation Document*. Op.cit.
- [33] 'Official Statistics', House of Lords *Hansard*, 23 February 2005, Column 1271. http://www.publications.parliament.uk/pa/ld200405/ldhansrd/vo050223/text/50223-15.htm#column_1274
- [34] David Rhind, 'Keeping Politics Out of Statistics', *Public Finance*, August 5-18, 2005, p.17.
- [35] Patricia Hodgson, 'The First Step in Restoring Public Trust in Statistics', *Financial Times*, 1 December 2005, p.23.

- [36] *Gordon's vital statistics*, Ian Beesley, *The Guardian* commentary section, 14 December 2006.
- [37] Omnibus Survey: Initial findings on public confidence in official statistics. ONS, October 2004. www.statistics.gov.uk/about/data/public_confidence.asp
- [38] *Official Statistics: Perceptions and Trust*. Statistics Commission Report No. 24, incorporating *Trust in official statistics: MORI Report on Behalf of the Statistics Commission*, February 2005.
- [39] *Perceptions of the Statistics Commission*. Internal report. Statistics Commission, February 2006.38p.
- [40] *Managing the Quality of Official Statistics*. Statistics Commission Report No. 27, October 2005. http://www.statscom.org.uk/C_396.aspx.
- [41] *Revisions to Economic Statistics*. Statistics Commission Report No. 17, in 3 volumes. Volume 1: *Report by the Statistics Commission*. Volume 2: *Review by the National Institute of Economic and Social Research*. Volume 3: *Annexes to the Review by the National Institute of Economic and Social Research*. April 2004. http://www.statscom.org.uk/C_412.aspx.
- [42] *2001 Census in Westminster: Interim report (2003)* London, Statistics Commission. 58p. http://www.statscom.org.uk/media_pdfs/reports/Census_2001.pdf
- [43] *Census and Population Estimates and The 2001 Census in Westminster: Final Report*. Statistics Commission Report No. 22, January 2005. http://www.statscom.org.uk/C_403.aspx.
- [44] *Preparing for the 2011 Census – Interim Report*. Statistics Commission Report No. 32. February 2007. http://www.statscom.org.uk/C_1119.aspx
- [45] *On Target? Government by Measurement*. Fifth report of the Public Administration Select Committee, 2003. HC 61. ISBN 0-21-501204-6. <http://www.publications.parliament.uk/pa/cm200203/cmselect/cmpubadm/62/6202.htm>
- [46] *PSA Targets: the Devil in the Detail*. Op.cit.
- [47] *Measuring Standards in English Primary Schools*. Statistics Commission Report No. 23, February 2005. http://www.statscom.org.uk/C_402.aspx
- [48] *Enhancing the Value of Health Statistics: User Perspectives*. Statistics Commission Report No. 21, incorporating *Review of Health Statistics* by York Health Economics Consortium, October 2004. http://www.statscom.org.uk/C_406.aspx.
- [49] *School Education Statistics: User Perspectives*. Statistics Commission Report No. 26, Incorporating: *Review of Schools Education Statistics* by National Foundation for Educational Research, June 2005. http://www.statscom.org.uk/C_399.aspx.
- [50] *Crime Statistics: User Perspectives*. Statistics Commission Report No. 30, September 2006. http://www.statscom.org.uk/C_1054.aspx.
- [51] *The Use Made of Official Statistics*. Statistics Commission Report No. 33, incorporating *Use Made of Official Statistics Report* and a literature review by Ipsos MORI, March 2007. http://www.statscom.org.uk/C_1145.aspx.
- [52] Mary Sweetland, *Reliability Study Report*. Statistics Commission Report No. 11, December 2003. http://www.statscom.org.uk/C_420.aspx.

- [53] *Changes in the Calculation of the RPI and RPI Governance*. Statistics Commission Report No. 20, September 2004. http://www.statscom.org.uk/C_407.aspx.
- [54] *Forecasting in the National Accounts at the Office for National Statistics*. Statistics Commission Report No.12, with an annex by Michael P. Clements and David F Hendry, December 2003. http://www.statscom.org.uk/C_418.aspx.
- [55] *Building Trust in Statistics*. Op.cit. pp.9-10.
- [56] House of Commons Treasury Committee (2001), *National Statistics, Second Report*. London, The Stationery Office. 67p. ISBN: 0-10-203301-3. HC 137. <http://www.publications.parliament.uk/pa/cm200001/cmselect/cmtreasy/137/13702.htm>
- [57] Phillis Review .Op.cit.
- [58] *RSS International Experts Meeting 21 June 2002*. November 2002. http://www.statscom.org.uk/C_438.aspx.
- [59] *The Need for Statistics Legislation: a consultation document* (2002). London: Statistics Commission. 9p. http://www.statscom.org.uk/media_pdfs/consultation/NeedForStatisticsLegislaton.pdf
- [60] Ian Maclean and Ulric Spencer (2002), *Statistics Legislation*. Statistics Commission Report No 10. http://www.statscom.org.uk/media_html/reports/report_ms.asp.
- [61] Georgina Fletcher-Cooke (2003), *Effect of the Statistical Legislation Framework in the UK on the Work of the Government Statistical Service*. Statistics Commission Report No. 13. http://www.statscom.org.uk/media_pdfs/reports/StatsLegAndGSS.pdf.
- [62] Graham Mather, *Comparators to the Statistics Commission*. Statistics Commission Report No. 14, December 2003. http://www.statscom.org.uk/C_416.aspx.
- [63] *Legislation to Build Trust in Statistics*. Op.cit.
- [64] *Independence for Statistics: A Consultation Document*. Op.cit.
- [65] *Future Governance of Official Statistics – report of a seminar 17 May 2006*. June 2006. http://www.statscom.org.uk/C_464.aspx.
- [66] *Tenth Report of the Treasury Committee, Independence for Statistics*. HC 1111, July 2006. <http://www.publications.parliament.uk/pa/cm200506/cmselect/cmtreasy/1111/111102.htm>.
- [67] *Independence for Statistics: The Government Response*. Op.cit.
- [68] *Statistics and Registration Service Bill: Statistics Commission Briefing – Revised March 2007*. <http://www.statscom.org.uk/uploads/files/other/SC%20Stats%20Bill%20Brief%20March%202007.pdf>.
- [69] ‘Statistics and Registration Service Bill’, House of Lords *Hansard*, 2 May 2007, Column 1074. <http://www.publications.parliament.uk/pa/ld200607/ldhansrd/text/70502-0003.htm#07050230000004>.

- [70] *Official Statistics : Value and Trust*. Statistics Commission Report No 38. January 2008.
<http://www.statscom.org.uk/uploads/files/reports/Report%2038%20Value%20and%20Trust.pdf>
- [71] *A Code of Practice for National Statistics – Interim Report for Consultation*. Statistics Commission Report No. 31, December 2006.
http://www.statscom.org.uk/C_1096.aspx.
- [72] *Crime Statistics: User Perspectives*. Op.cit.
- [73] Adrian Smith et.al. *Crime Statistics – An Independent Review, carries out for the Secretary of State for the Home Office*. Home Office, November 2006. 35p.
<http://www.homeoffice.gov.uk/rds/pdfs06/crime-statistics-independent-review-06.pdf>
- [74] *The Use Made of Official Statistics*. Op.cit.
- [75] *Preparing for the 2011 Census – Interim Report*. Op.cit.
- [76] *Risks to the 2011 Census: a record of the seminar, 20 January 2007*. February 2007.
http://www.statscom.org.uk/C_1121.aspx.
- [77] *Counting on Success: the 2011 Census – Managing the Risks*, Statistics Commission Report No. 36. November 2007
<http://www.statscom.org.uk/uploads/files/reports/Report%2036%20Census%202011.pdf>
- [78] *Statistics of International and Internal Migration*, letter to the Minister of State at the Home Office and others, 8 May 2006,
<http://www.statscom.org.uk/uploads/files/correspondence/Letter0300.pdf>
- [79] *Report of the Inter-departmental Task Force on Migration Statistics*, ONS, 15 December 2006
<http://www.statistics.gov.uk/about/data/methodology/specific/population/future/imps/updates/downloads/TaskForceReport151206.pdf>
- [80] *Data on Demand - Access to Official Statistics*. Statistics Commission Report No 34. June 2007.
<http://www.statscom.org.uk/uploads/files/reports/Report%2034%20Data%20on%20Demand.pdf>
- [81] Commission response to Government consultation document Limiting Pre Release Access to Statistics
<http://www.statscom.org.uk/uploads/files/correspondence/Letter0410.pdf>

Annex A: Responsibilities

Extract from the Framework for National Statistics:

4.2 Responsibilities of the Statistics Commission

4.2.1 The Statistics Commission will play a key role in advising on the quality, quality assurance and priority setting for National Statistics, and on the procedures designed to deliver statistical integrity, to help ensure National Statistics are trustworthy and responsive to public needs. It will be independent of both Ministers and the producers of National Statistics. It will operate in a transparent way with the minutes of its meetings, correspondence and evidence it receives, and advice it gives, all normally being publicly available for scrutiny.

Appointment and terms

4.2.2 Members will be appointed by the Chancellor, as Minister for National Statistics, in accordance with the Code of Practice published by the Commissioner for Public Appointments. Appointment will take into account the need for the Commission to be independent, command authority, reflect the views of users and information providers of National Statistics and demonstrate a good understanding of statistical issues and the value of trustworthy statistics in democratic debate. The members need not be professional statisticians. Initial appointments will usually be for three years although terms of different lengths may be offered to ensure continuity. Any subsequent re-appointments may be offered in line with prevailing guidance issued by the Commissioner for Public Appointments.

Functions

4.2.3 The main function of the Statistics Commission is to give independent, reliable and relevant advice on National Statistics to Ministers and, by so doing, to provide an additional safeguard on the quality and integrity of National Statistics. In discharging its responsibilities, a key requirement will be to establish itself as a source of high quality and independent advice on statistical issues. Its advice will be made available to the wider public who must be able to rely on it as both considered and impartial.

4.2.4 The Statistics Commission is independent and, as such, has freedom in the way it operates, subject to the requirements laid down in this Framework Document and any framework document specific to the Commission. This includes flexibility to determine how it spends its resources, and how it selects and deploys its secretariat.

4.2.5 The Statistics Commission will ensure that satisfactory systems are in place for the effective delivery of its role in monitoring and advising on the quality and integrity of National Statistics. It will operate in a transparent and open way - making its operations publicly available for scrutiny. It will be responsible for the use of its resources. In conducting its work programme it will:

Improving Quality and Relevance of National Statistics

- (a) ensure that it is able to assess the needs of users;
- (b) consider and comment to Ministers on the high-level programme for National Statistics, drawing on the views of users and suppliers, taking account of:
 - (i) the resources available for National Statistics;

- (ii) the compliance costs of providers of raw data; and
- (iii) the management needs of organisations required to supply raw data. Proposals by the Commission for modification of the National Statistics programme will be accompanied by a compliance cost assessment;
- (c) advise Ministers of areas of widespread concern about the quality of official statistics, so that Ministers can take these considerations into account in determining priorities and making decisions about National Statistics;

Improving Public Confidence in National Statistics

- (d) comment on the application of the National Statistics Code of Practice and other procedures designed to promote statistical integrity;
- (e) comment, as necessary, on the arrangements for promoting professional standards across all official statistical work;
- (f) comment on the quality assurance processes of National Statistics, as well as being able to carry out spot checks on departmental or other audits of National Statistics, to advise the National Statistician of any areas of concern that merit review and if necessary to carry out or commission its own audits;
- (g) respond to ad hoc requests from the Minister for National Statistics for advice on any matters related to National Statistics subject to resource constraints;
- (h) review the need for statistical legislation after two years and report back to the Minister for National Statistics, and keep the legislative framework under review thereafter;

Operate Efficiently

- (i) take account of compliance costs of responding to statistical enquiries and the need to secure value for money when commenting on the proposed annual statistical work programme;

Co-ordination with Government

- (j) secure effective communication channels between the Commission and the Minister for National Statistics, and between the Commission and the National Statistician;

Devolution

- (k) advise Ministers on the effectiveness of the arrangements to ensure the consistency and co-ordination of statistics on a UK-wide basis following devolution, as appropriate, and establish working relationships with devolved administrations as it, and they, see fit.

Performance Reporting

- (l) submit an annual report to the Minister for National Statistics commenting on the annual report of the National Statistician and on the way the Commission has fulfilled its remit.

Annex B: Commission members

Biographies of Commission members can be found at Annex D of *Official Statistics: Value and Trust*, published January 2008

Chairmen

Sir John Kingman (2000–03)
Professor David Rhind (2003–08)

Members

Sir Derek Wanless (2000–2008) (vice chairman 2004–08)
Ian Beesley (2004–08)
Colette Bowe (2000–08)
Sir Kenneth Calman (2000–07)
Joly Dixon (2006–2008)
Dame Patricia Hodgson (2000–05)
Dr Isabelle Low (2006–08)
Janet Trewsdale (2000–08)
Martin Weale (2000–08)

Chief Executives

Gill Eastabrook (2000–03)
Richard Alldritt (2003–08)

Committees

Audit Committee

Sir Derek Wanless (chairman) (2002–08)
John Gant* (2004–2008)
Glenn Hull *(2002–04)
Linda Mister* (2004–2008)
John Smock *(2002–04)

Devolution and Regional Sub-committee

Janet Trewsdale(chairman) (2004–08)
Sir Kenneth Calman (2004–07)
Dr Isabelle Low ((2006–08)
Sir Derek Wanless (2004-08)

Research and Review Sub-committee

Martin Weale (chairman) (2003–08)
Colette Bowe (2003–08)
Carolyn Sinclair* (2003–05)

Legislation Sub-committee

Dame Patricia Hodgson (chairman) (2003–04)
Colette Bowe (2003–04)
Sir Kenneth Calman (2003–04)
Jane Hill* (2003–04)
Graham Mather* (2003–04)
Professor David Rhind (2003–04)

* not members of Commission

Legislation Working Group

Professor David Rhind (chairman) (2006–07)
Joly Dixon (2006–07)
Sir Derek Wanless (2006–07)

Annex C: Publications

This is a list of the main reports issued by the Statistics Commission. These and many other published papers can be found at www.statcom.org.uk.

Building Links with Stakeholders: our general approach and report of progress so far. Statistics Commission Report No. 1, December 2000.

National Statistics to Monitor the NHS Cancer Plan: report of a pre-scoping study. Janet Trewsdale and Gill Eastabrook, Statistics Commission Report No. 2, May 2001.

Report of a Scoping Study on Seasonal Adjustment Methods at the Office for National Statistics. Kenneth F. Wallis, Statistics Commission Report No. 3, June 2001.

Statistics Commission's Views on Topics to be Covered in the Office for National Statistics Review of Regional Accounts. Malcolm Jones, Statistics Commission Report No. 4, September 2001.

Implementation of the Review of Revisions to the Average Earnings Index Report: Statistics Commission's consideration of the ONS progress report. Statistics Commission Report No. 5, January 2002.

Access to National Statistics on Transport via the Web. Steer Davies Gleave, Statistics Commission Report No. 6, January 2002.

National Statistics to Monitor the NHS Cancer Plan: report of a scoping study. Janet Trewsdale and Gill Eastabrook.. Statistics Commission Report No. 7, February 2002.

Does the GHS Now Meet User Needs?: report of a scoping study Lovedeep Vaid
Statistics Commission Report No. 8, June 2002.

Price Indices and Deflators Produced at the Office for National Statistics: report of a scoping study. Malcolm Jones. Statistics Commission Report No. 9, August 2002.

Statistics Legislation. Ian Maclean and Ulrich Spencer. Statistics Commission Report No.10, December 2002.

2001 Census in Westminster: Interim report. Statistics Commission Report No. 15, October 2003.

Report of July 2003 Seminar on Health Statistics. Statistics Commission Report No. 16, November 2003.

Reliability Study Report. Mary Sweetland,. Statistics Commission Report No. 11, December 2003.

Forecasting in the National Accounts at the Office for National Statistics. Statistics Commission Report No.12, with an annex by Michael P. Clements and David F Hendry, December 2003.

Effect of the Statistical Legislation Framework in the UK on the work of the Government Statistical Service. Georgina Fletcher-Cooke, Statistics Commission Report No. 13, December 2003.

Comparators to the Statistics Commission. Graham Mather, Statistics Commission Report No. 14, December 2003.

Revisions to Economic Statistics. Statistics Commission Report No. 17, in 3 volumes. Volume 1: *Report by the Statistics Commission.* Volume 2: *Review by the National Institute of Economic and Social Research.* Volume 3: *Annexes to the Review by the National Institute of Economic and Social Research.* April 2004

Legislation to Build Trust in Statistics. Statistics Commission Report No. 18, May 2004.

Report of June 2004 Seminar: School Level Education Statistics. Statistics Commission Report No. 19, July 2004.

Changes in the Calculation of the RPI and RPI Governance. Statistics Commission Report No. 20, September 2004.

Enhancing the Value of Health Statistics: User Perspectives. Statistics Commission Report No. 21, incorporating *Review of Health Statistics* by York Health Economics Consortium, October 2004.

Census and Population Estimates and The 2001 Census in Westminster: Final Report. Statistics Commission Report No. 22, January 2005.

Measuring Standards in English Primary Schools. Statistics Commission Report No. 23, February 2005.

Official Statistics: Perceptions and Trust. Statistics Commission Report No. 24, incorporating *Trust in official statistics: MORI Report on Behalf of the Statistics Commission*, February 2005.

Revisions to Public Sector Finances: Estimates of Depreciation for the Road Network. Statistics Commission Report No. 25, June 2005.

School Education Statistics: User Perspectives. Statistics Commission Report No. 26, Incorporating: *Review of Schools Education Statistics* by National Foundation for Educational Research, June 2005.

Managing the Quality of Official Statistics. Statistics Commission Report No. 27, October 2005.

Crime Statistics: User Perspectives. Statistics Commission Interim Report, December 2005.

Perceptions of the Statistics Commission, Internal Report. February 2006 (http://www.statscom.org.uk/uploads/Perceptions_internalreport.pdf)

Impact of European Demands on the UK Statistical System. Statistics Commission Report No. 28, February 2006

PSA Targets: the Devil in the Detail. Statistics Commission Report No. 29, March 2006.

Crime Statistics: User Perspectives. Statistics Commission Report No. 30, September 2006.

A Code of Practice for National Statistics – Interim Report for Consultation. Statistics Commission Report No. 31, December 2006.

Preparing for the 2011 Census – Interim Report. Statistics Commission Report No. 32. February 2007.

The Use Made of Official Statistics. Statistics Commission Report No. 33, incorporating *Use Made of Official Statistics Report* and a literature review by Ipsos MORI, March 2007.

Data on Demand - Access to Official Statistics. Statistics Commission Report No 34. June 2007.

Proposals for a Code of Practice for Official Statistics. Statistics Commission Report No 35. October 2007.

Counting on Success: The 2011 Census - Managing the Risks. Statistics Commission Report No 36. November 2007.

Tax Records as a Statistical Resource - A Review. Statistics Commission Report No. 37: November 2007.

Official Statistics - Value and Trust. Statistics Commission Report No. 38. January 2008.

Releasing Official Statistics: A review of Statistical First Releases. Statistics Commission Report No. 39. March 2008

A Candid Friend: Reflections on the Statistics Commission 2000 – 2008. Statistics Commission Report No. 40. March 2008
