

**Response by the Census and Geodemographics Group (CGG) of The Market Research Society to the HM Treasury consultation 'Limiting pre-release access to statistics'.**

2<sup>nd</sup> March 2008

**Executive summary**

The consultation document is concerned primarily with limiting the privileged pre-release access of official statistics to ministers and other individuals.

The principal concern of the Census and Geodemographics Group relates to the possible knock-on effects of more restrictive pre-release regulations, and in particular upon the quality assurance processes applied to government statistics. Early pre-release of statistics to expert users for quality control purposes is essential, and should not be affected by tighter restrictions on pre-release of publication-ready statistics. If shorter release time periods are adopted, there is a possibility that the quality assurance processes which are permitted or which government agencies perceive are permitted before publication of data will be restricted. There is a specific risk, if quality assurance processes are not explicitly considered in drawing up the pre-release regulations, that restrictions on quality control may be inadvertently imposed and that there may be consequential damage to the quality of official statistics.

Where large volumes of detailed statistics are also published in electronic format, it is important that users are able to receive test files as early in the process as possible in order to ensure that their computer systems will read and process the data correctly, and that the detailed data meets user requirements.

The publication of the 2011 census statistics is of particular interest. Historically, the 1991 census results were published on a county-by-county rolling basis, while the Key Statistics and other products of the 2001 census were each published on a single day. While it is not in the scope of this consultation to argue this case one way or the other, it would be unfortunate if the result of new regulations were to inadvertently exclude the possibility of rolling publication of the 2011 census data, even if it were otherwise considered that there would be a public-interest case for such an approach.

The Treasury must take a balanced public-interest approach to the new regulations which take into account both the core issues of privileged pre-release and any consequential effects the regulations may have on quality control or of flexibility of publication of government statistics.

**The Market Research Society and its Census and Geodemographics Group**

The Market Research Society (MRS) is the world's largest association representing providers and users of market, social, and opinion research. The MRS 2007 annual survey of the UK market research industry showed that total industry revenue increased by 2.4 per cent during 2006 reaching a value of £1.353bn. The UK is the second largest market and social research market in the world.

Full details on MRS and its activities are available via: <http://www.mrs.org.uk>

Geodemographics can be defined broadly as 'the analysis of people by where they live', and involves analysing demographic data within small geographical areas to serve a wide range of clients in the public and private sectors. The annual turnover of geodemographic activities in the UK has been estimated at £200 million. The Census and Geodemographics Group (CGG) is an MRS Advisory Board which was founded in 1989 to represent the interests of researchers in census and related population statistics, and to advise MRS on such issues. The CGG has specialists in market research, retail site location, market and database analysis, as well as census distributors and academic researchers.

The CGG is involved with government statistical services through representation on the ONS Business and Professional Interests Advisory Group, and through membership of the Statistics User Forum as well as through an extensive network of contact in the market research industry

### **Further discussion**

The Statistics and Registration Act 2007 defines 'pre-release access' in relation to official statistics as 'access to the statistics in their final form prior to publication'.

It could be argued that to be effective the regulations on pre-release access should also apply to statistics in draft or preliminary form. The pre-release of draft statistics might in some circumstances have a similar degree of sensitivity as the pre-release of statistics in their final form. While the former may offer less scope for the preparation of argument, defence or explanation, it creates the risk of a perception of undue influence if the final statistics differ from the draft versions, even if such a perception has no basis in fact.

Any consequential restrictions on the release or circulation of draft statistics have the potential of affecting quality control processes.

Quality control procedures are expected to be well-defined and to operate within the boundary of confidentiality for statistics which are produced on a regular basis. However for less regularly produced statistics – e.g. the census – a need may be identified for wider consultation or for quality control which goes beyond those individuals originally identified as being within the boundary of confidentiality. This may conceivably also happen for regularly produced statistics if, for example, some change is made to the method of collection of one or more of the inputs.

Although the difference between wider quality control consultation and pre-release is intuitively clear, there is a possibility that if quality control is not taken into account in drafting the regulations, they may be worded in such a way to inadvertently restrict its effective operation.

It is possible, particularly for infrequent statistics and most particularly the census of population, that quality control which goes outside ONS or GSS (or other producer) may be of value. There have historically been cases where census figures have been disputed, such as in Westminster and Manchester following the publication of the 2001 census, and which have sometimes led to revisions.

In the case of the census there are also practical issues concerned with transporting and loading the large volumes of detailed small-area data into users' computer systems for timely and effective use. Much of the value of the census, both in the public and private sectors and particularly in respect of the targeting of services and interventions, is derived from analysis of these detailed statistics. It is important for these purposes that users are able to receive test files as early in the process as possible in order to ensure that their computer systems will read and process the data correctly, and that the detailed data meets user requirements.

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