



Statistical Reform Team  
Room 3/07  
HM Treasury  
1 Horse Guards Road  
London  
SW1A 2HQ

12 June 2006

Dear Sir/Madam

I am writing as Chair of the Royal Statistical Society's Census Study Group in response to "Independence for Statistics: a consultation document". The Census Study Group aims to draw together the Society's census interests in the run-up to the censuses planned in each part of the UK in 2011. This response has been assembled by myself in consultation with the study group committee which includes statistics user representatives from academic, commercial and voluntary sectors and central and local government organizations.

We broadly welcome the proposal for greater statistical independence from government and the introduction of new statistics legislation. We note that although the census will need to be funded separately, through the usual spending review process, that preparation and completion of the census will still remain the responsibility of staff in the statistical office. It will be important to ensure that, despite the necessarily different funding arrangements, the census operation be subject to the same level of statistical independence to be entrenched in the new legislation for other areas of National Statistics.

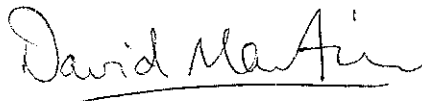
It is proposed that the statistics office be established as a non-ministerial department, reporting directly to Parliament and overseen by a new independent Board. It is a matter of concern that this board will be responsible both for the production and quality assessment of National Statistics and no provision is made for a separate quality assurance body, closer to the role of the current Statistics Commission. Nor is there any clear articulation of the way in which the Board will exert its independent influence over those statistics which continue to be produced within the many government departments outside the statistical office. We welcome the proposal that the board should have a strong non-executive presence and would particularly urge that this encompass statistics users across all sectors. Further, we would welcome additional measures to ensure the continued engagement of statistics users in the operation of the Board and the statistical office.

The consultation document considers that it will be a matter for the Devolved Administrations to decide what action they might take with respect to their own

responsibilities given the proposed reforms. Although census users acknowledge the need for some differences between censuses in the in different countries of the UK, it is of considerable concern, particularly in the commercial and academic sectors, that a wide range of comparable UK statistics be available at the small area level. Further, there is an urgent need for use of consistent policies and methodologies, for example in the area of disclosure control, across the UK. The current proposals make insufficient provision for UK-wide consistency in statistical methodology and outputs, while the 2001 census experience demonstrates that there is a strong need to work more closely together rather than to create scope for further divergence.

The consultation document asks for specific views on matters of data sharing and data access. In an age of increasing challenges to enumeration and with regard to the government's own aspirations to reduce response burden while increasing data quality, we consider it to be of great importance that the new governance structure provide a framework for deeper data sharing between government departments than is currently the case, and would support the right of access by the statistical office to administrative data held by other departments for the purpose of enhancing data quality and the creation of timely statistical information. The achievement of high-quality census enumeration and the resolution of quality concerns in published outputs are highly dependent on the ability to bring together administrative data sources held by different departments. We do not consider that such access rights need in any way breach individual privacy rights, and we note the legislation which permits such data sharing for statistical purposes in many other countries which are also bound by European Convention on Human Rights respecting personal privacy.

Yours sincerely

A handwritten signature in cursive script that reads "David Martin". The signature is written in dark ink and is positioned above a thin horizontal line.

David Martin  
Professor of Geography, University of Southampton and Chair, Royal Statistical  
Society Census Study Group