



12th June 2006

Statistical Reform Team
Room 3/207
H M Treasury
1 Horse Guards Road
London SW1A 2HQ

Dear Colleagues

**Independence for statistics: A consultation document
Response from the FDA**

Introduction and background

The FDA represents civil servants across government at grade 7 equivalent and above, and the “feeder” grades to these. This includes Statisticians, Assistant Statisticians and Statistical Officers working for the Office for National Statistics, and across the Government Statistical Service.

This response draws on the views of statistician and other members within the Office for National Statistics, and elsewhere in government service following consultation directly with FDA members.

The FDA welcomes this review and the opportunity to respond to the consultation. In particular, the FDA welcomes the recognition that the new office should remain within the civil service, but independent of Ministerial control by becoming a Non-Ministerial Department.

The FDA Branch in ONS has contributed to the joint submission which was sent to the Treasury by the Departmental Trade Union Side, which dealt with, amongst other things, our concerns about the need to protect our members’ terms and conditions. This response, therefore, concentrates on the wider issues and the professional aspects of the production of statistics.

The FDA believes that the statistics produced by professional staff within government are subject to rigorous integrity and quality standards. However, statistics are often produced under tight time and resource constraints.

There is often a balance to be made between improving the quality of statistics whilst considering the burden placed upon data suppliers. We believe that the proposed changes must, as a minimum, secure the continuation of the current high standards, while recognising the burdens on data suppliers, and enhance the public's confidence in government statistics.

The FDA recognises that the new ONS and its head will have duties both to Ministers and to the wider public consumers of statistical information to ensure the quality and timely and impartial production of that information. The FDA believes that the relationship between the head of the new ONS and Ministers needs to be clearly set out to ensure this in relation to all government statistics, particularly since there will be Ministers in government departments potentially seeking to develop their own statistical needs. It is clearly important that the head of ONS should have sufficient authority and confidence to be able (if circumstances were to require it) to stand up to Ministers, to guarantee the quality, impartiality of, and thus public confidence in, all government statistics. He or she will similarly need executive authority to manage the Office without external interference.

The FDA notes the proposal that the ONS be established as a Non-Ministerial Department (4.11, 4.12, 4.13).

An NMD would provide continuation of existing Civil Service terms and conditions, including access to the PSCPS. We strongly support this arrangement which would also help to underline the independence of the data produced through the Office, while maintaining necessary links with data analysts, producers and users elsewhere in government service. An NMD should maintain the trust of suppliers and users of statistics. Suppliers trust government departments with their information. The ONS have wide-ranging collection of data from businesses, households, local authorities and other bodies. Where businesses provide data, this is almost always under statute that places an obligation on the ONS to maintain the confidentiality of the data. As a result there is strong evidence that response rates are far higher for statutory collection by government departments compared to non-statutory data collection.

Moreover, staff in government departments, including the Office for National Statistics, are experiencing a period of considerable uncertainty that is affecting morale. The creation of an NMD would allow mobility for staff between the new office and government departments.

We note that the government plans to maintain the decentralised nature of the UK system (4.8) and that statisticians will continue to be employed by government departments (4.36 and 4.37).

The FDA welcomes the retention of the link via professional accountability between all government statisticians and the new Chief Statistician, although we are unclear as to how this will be effected. We believe that, as now, the Heads of Profession across government, along with the Chief Statistician as the Head of the GSS, should form the management of the GSS.

One of the strengths of the current statistical system is that it provides mobility for professionals through the Government Statistical Service (GSS). This process both benefits individual members of staff and enriches the pool of experience in the GSS. It often starts with recruitment of assistant statisticians and continues through developing their careers. The continuation of this central recruitment provision is essential in order to attract and retain the talent that is required to support statistics. In the subsequent selection of statisticians, government departments would need to consider applications from staff in the new office on an equal basis to those in their own and in other government departments. Consistent recruitment, selection and promotion standards should be maintained to allow free movement of staff around the Government Statistical Service.

In response to the issue of **strengthening the functions of the GSS (4.36)**, the FDA believes that the role of the GSS needs to be further developed to reflect the need to maintain mobility, transfer skills and develop statistics for government. We recognise the need to attract professionals beyond the recruitment of assistant statisticians and to provide opportunities for statistical staff to gain experience outwith government. This is not a new function of the GSS but, in recent years, the resources put into the GSS and its roles have decreased. The FDA believes it is important that the GSS should be fully resourced in order to provide professional and other support to individual statisticians, and to develop links with other professional groups within government. Failure to do so would risk undermining the planned benefits from the proposed change.

The issue of maintaining mobility and professional development is also key for economists, who, although only relatively small in numbers in the existing ONS, provide essential skills to complement those of the statisticians. The ONS gets new assistant economists through the Government Economic Service (GES). If transfers to and from the new office were not possible, recruitment of these professional staff would be much more difficult.

The FDA notes that the government will ensure, where appropriate, existing legislative powers on statistical matters are transferred (4.52) and that the new office will have the same access to data as ONS currently has (4.28).

The new office will need access to much data within government departments and other bodies, some of which is particularly sensitive. We are pleased that it has been recognised that this would be more difficult if the new office were not part of the Civil Service.

In response to the request for views on **increased data access (4.29)**, the FDA believes that legislation creating the new office must not be limited to the existing provisions for data access. While recognising data protection and wider issues of confidentiality, in principle the new office should not be prevented from having access to any data within government being used for a statistical purpose. We believe that it would not be sensible simply to specify

in primary legislation certain categories of data to which access would be provided because demands for statistical information are constantly changing, while to leave this to secondary legislation could bring statistics into the realm of political controversy which we believe would be undesirable and counter-productive.

The FDA notes that Ministers will remain responsible for statistics produced by their departments where these are not National Statistics (4.15).

We are concerned at the recommendation that Ministers will still be able to decide whether departmental statistics should become National Statistics, and therefore subject to the scrutiny attached to this, and believe that there is the need to establish a clear relationship between departments producing statistics and the Board of the new office, including on assessment and quality of statistics produced.

The FDA believes that allowing Ministers alone to decide which statistics fall within the remit of National Statistics would undermine attempts to build a clear identity for independent statistics. It would either lead to confusion and add to lack of public confidence in the statistics published or it would create a two tier regime for government statistics which is undesirable and could potentially create difficulties for the government of the day.

Published government statistics should not be subject to different levels of scrutiny and assessment to ensure their quality and integrity. The FDA believes it would help if the board had the power to determine which statistics should fall within their remit.

The FDA believes that this is important, to ensure that the proposed changes make a visible difference to the perception of independence to the 'outside world', and build confidence in the independence and integrity of statistics produced across government.

That said, it remains important that a close relationship exists between producers and government users of National Statistics to ensure continued value and relevance of the statistics and good working relationships. We therefore wish to avoid artificially institutionalising a split between staff carrying out data compilation and staff engaged in policy, briefing or operational management work.

The FDA notes that the existing National Statistics Code of Practice will be retained and developed (4.21)

The FDA is concerned at the lack of detail within the consultation document as to how the quality of National Statistics will be assessed or guaranteed. Paragraph 4.21 states that these processes are for the board to determine, but the FDA believes that this needs to be developed, as the current National Statistics quality reviews are not seen to be effective, nor consistent in terms of quality/depth/scope or at building public confidence in statistics. We are disappointed that the consultation document does not set out specifics of the

quality assessment process. The FDA urges the government to develop an objective process for assessment and approval of National Statistics and urge the government to make such a process public, so that, from an early stage, stakeholders understand the plans for robust processes to ensure quality. This is a fundamental reason for the review and for the movement towards perceived independent production of statistics.

The FDA believes that an important benefit from this development in statistics would be if it successfully managed to increase the public confidence that statistics are produced independently from government and Ministerial 'interference'. We do not believe the current proposals are sufficiently clear about achieving this; partly because of the vagueness of the plans for quality assessment (and lack of detail otherwise in these proposals), but also missing other opportunities for making changes to current processes.

An example is the publication of National Statistics. It could enhance confidence in independence and increase public awareness of the National Statistics banner if, for example, all National Statistics are published by ONS, on the National Statistics website or at least jointly e.g. appearing on National Statistics and departmental websites simultaneously.

The FDA notes that the government proposes to consider how pre-release access may operate in the future, but has not yet reached any conclusions.

The FDA believes that, as is common practice elsewhere, access to statistics pre-release should be more limited than is currently the case. In order to be clear that National Statistics are fully independent of Ministerial interference, it is important that Ministers do not have access to statistics unnecessarily or inappropriately. However, in the case of some management information which will be released later as part of a National Statistics release, the FDA recognises that there may be a case for early access for business management purposes.

Clearly there is a variety of statistical outputs produced by government. These range from compilations of data from various sources or research findings, to government performance measures and market sensitive releases. More clarity is needed over how far release practices relate to different outputs.

Funding and Regulation

A critical factor in the setting up of the new body is that of how it will be funded and regulated, and to whom it will be directly accountable. There is a clear need for proper resourcing to ensure the new body is able to fulfill its functions properly, including that of assessment and quality control of all National Statistics outputs. It is also important that the GSS is fully and appropriately resourced.

The FDA believes there is a need for the new body to demonstrate its commitment to equality, which has not always been evident in the production

and dissemination of statistics. The FDA is disappointed that this was not referred to in the consultation document, and urges the government to ensure this is taken into account in the next stages.

Yours sincerely

Jonathan Baume
General Secretary