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RE: INDEPENDENCE FOR STATISTICS: A CONSULTATION DOCUMENT

I am writing on behalf of the Government Social Research service with feedback in response to your consultation document on Independence for Statistics.

We broadly support the general proposals for legislation to underpin the independence and quality control arrangements of national statistics. As the consultation document points out, it is crucial that there continues to be movement of statisticians and statistical expertise (but also the other analytical groups currently represented in ONS) across government departments and are therefore pleased to see that staff in the statistics office will retain their civil service status and that professional accountability will remain to the Chief Statistician.

However, there are a number of general issues where we would like to see further clarification:

- a) The consultation document fails to recognise that GSS and ONS are part of a broader analytical community in government that includes economists, social researchers and operational researchers. Having different arrangements for statistics has the potential for undermining public confidence in other parts of the system, which may be seen as playing to different rules.
- b) Linked to the previous point, the proposal to make the statistical office 'arm's length' from government (including the proposed physical relocation of ONS and the GSS professional unit) together with the statutory focus on statistics and strong drive for efficiency are likely to militate against collaboration at the strategic level. We need to ensure that statisticians continue to work with other analytical professionals across government if the Coordination of Research and Analysis Group (CRAG) agenda and other initiatives to embed and evidence-based approach to policy making are to

be taken forward. We would like to see specific proposals to address this – e.g. Board to include members of other disciplines as well as statisticians and/or specific role of board and/or Chief Statistician to ensure appropriate collaboration with other analysts. Our understanding is that the devolved administrations recognise this point and that the emphasis of proposals to reform the production of statistics in Scotland is more on strengthening the integration of analytical service within the Executive rather than transferring the production of statistics to an independent body.

- c) It is important to recognise that much of the statistical system falls outside National Statistics and is therefore not subject to the same quality control, which has the potential to undermine confidence of the public (who won't make the distinction between National and other statistics produced by departments). While routine enforcement might need to be limited to National Statistics, the Code of Practice ought to be the gold standard for all statistical production.
- d) Further clarification would be helpful on the role of the board in protecting confidentiality vis-à-vis responsibilities set out in data protection legislation. Our understanding is that specific responsibilities are given to data owners, producers and processors, many of who will be in departments. This is likely to mean the Board can quality control, but not hold ultimate responsibility.
- e) There appears to still quite a lot of accountability to Ministers rather than parliament, but the reasons are not clear. Why, for example, does the board report to ministers (rather than parliament) on coverage and quality issues? Shouldn't parliament have a role in scrutinising, or even determining, what counts as National Statistics?

In addition to our general comments above, we offer the following responses to the three specific questions on which stakeholder views were sought:

- i) *Legislating for wider access to administrative data.* We would welcome greater accessibility of data and are keen that this is considered as broadly as possible both in terms of the types of data that are shared (not confined to National Statistics or data produced in ONS) and who has access (across government and beyond). There is already a plethora of initiatives underway tackling this issue across government and we think the proposed Board ought to be given a clear lead both to ensure these are co-ordinated and consider the case for primary legislation. There would, of course, need to be a clear mechanism established to ensure that all the relevant analytical groups would be consulted in reaching a view. It would also need to be made clear that the Board has a wider responsibility for setting the framework for data access issues to encourage wider use, while also protecting individual confidentiality.

- ii) *Separating civil registration and responsibility for NHSCR from ONS* This could potentially represent a backwards step in making the most of administrative data. We are not persuaded there is a real need to move these, and suggest that any proposal to do so should be considered alongside any proposals to facilitate data sharing/access.
- iii) *Pre-release arrangements.* The current arrangements appear to work well for National Statistics, but there is a question about whether the principles should also apply to other analytical outputs (statistical series that are not National Statistics, outputs of social and economic research and analysis). Whatever the conclusion, we would want to ensure that similar standards applied across analytical disciplines.

I would be grateful if you could ensure that you keep me, and the heads of other analytical professions across government, involved as more detailed proposals are worked up so that we can consider the implications for our respective services.

Sue Duncan

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