

**Response submitted by Heads of Profession for Statistics and Economics in the  
Health and Safety Executive  
to the consultation “Independence for statistics”  
published in March 2006 by HM-Treasury**

Overall we welcome the proposals made in “Independence for statistics: A consultation document”. The role of high quality statistics within evidence based policymaking, academic research and business planning can not be underestimated. High quality statistics also help government departments such as the HSE to develop performance measures and an evidence base to ensure public accountability.

**Decentralized structure of the GSS**

HSE supports the proposal under paragraph 4.7. in the consultation document for keeping in place the decentralized structure of the statistical service allowing statisticians to gain insights into policy development and allowing policy makers to have access and understanding of the available data.

**Data sharing**

The consultation states in paragraph 4.24 that the “National Statistician is required to minimize the burdens on those who supply data for National Statistics or other statistical purposes. The Government proposes a similar statutory objective for the new board.” We support this proposal.

Closely linked to the minimization of the burden of producing statistics on business, the need for high quality data being able to reflect the complex structure of UK economy and society, and the independence of National Statistics, is the proposal for increased data sharing. As paragraph 4.25 points out, “data sharing among government departments has been recommended as one way to reduce the burden of regulation on business and individuals.”

To ensure a minimization of the burden there is a clear need to be able to “join up” ONS statistical data with other data sources, statistical, administrative or commercial, for evaluation and research purposes. ONS and non-ONS datasets are usually linked and subsequently analysed within the secure environment of the ONS’s Business Data Laboratory (BDL). HSE welcomes the progress ONS has made in developing the BDL and facilitating such analysis, but the scope for such work could be extended if the legal basis for statistical use of data sets held across government could be strengthened and clarified. A specific problem arises when there are constraints upon both the datasets to be merged. One example is the wish to merge export data, held by HMRC, with business performance data, held by ONS. If neither party is permitted (or prepared) to allow the other party access to the data, the datasets cannot be merged and analysis is impossible. This can in turn lead to demands for what amounts to duplication of data collection. In any case, the value that could be derived from the existing data – without risk of harm or prejudice to anyone – is foregone.

Wider benefits could be achieved if these powers also covered the exchange, for statistical purposes, of data between Government departments. This is in some sense analogous to access to ONS data but the barriers to this are different and will need to be addressed. The opportunity should be taken within the independence legislation to lay down general principles governing statistical access for departments to other

departments' microdata, with a presumption in favour of access. We would argue that these provisions should be framed in a way that included the HSE (a Crown non-departmental public body). This might be achieved by using the legislation to formalise the status of the GSS within departments, or by giving powers to the proposed board to authorise arrangements for handling individual data for statistical purposes within departments. Again, there would be little point in specifying particular data sources, as the topics of interest change over time.

### **Research and access to data**

The consultation document does not mention the role of research, apart from briefly stating the importance of high quality statistics for academia. Currently ONS performs high quality analysis of the available data and methodological research. We propose that such a function should be made explicit in the statutory high level objectives of the board as set out in paragraph 4.17 and the use of data as set out under 4.27 and 4.28.

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