



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

8th June 2006

Dear Sir

INDEPENDENCE FOR STATISTICS CONSULTATION

Thank you for inviting ARCS (The Association of Registration & Celebratory Services) to respond to the above consultation as a stakeholder.

Our members as citizens generally welcome the broad thrust of these proposals for reform as they ensure that national statistics will be regarded with respect and integrity and separated from any political interest.

The issues in the Consultation Document are wide-ranging but the specific ARCS interest is very limited and relates to the situation of *GRO* within government.

We accept the view proposed in the Consultation Document that since most of the functions of the registration service will be by necessity politically directed, *GRO* must sit within a ministerial department rather than within a NMD. Our area of concern is that the local registration service will continue to be a major contributor to the official statistics produced by the new NMD and therefore must be properly funded and supported by the ministerial department within which it sits to ensure that the statistics produced are beyond political or financial manipulation

The local registration service depends increasingly and by design on local authority involvement. Above all we are a citizen-orientated service which must take local needs into account in delivery to the public. It is therefore important that the department within which *GRO* sits has efficient and well-established links with local government

A number of obvious possibilities present themselves - Department of Constitutional Affairs, Home Office, Department of Communities and Local Government, Department of Health and The Treasury.

Of these, the Department of Communities and Local Government is perhaps the most obvious candidate although other departments also have substantial and well-tested connections with local government - the DCA with the Coroners Service; HO with Citizenship and identity issues; the DoH with NHSCR and social care; and The Treasury since GRO has been within the remit of this department since 1996 when ONS was formed.

There is also the dimension that the agenda of Registration Modernisation is in progress and that continuity may be important in carrying forward the proposals to completion. It would be a great shame if modernisation were stalled due to lack of ministerial direction or impetus.

The DCA is not favoured since of the five options it appears to have least well-established links with local authorities.

HO and DoH are seen as enormously large departments within which GRO would easily be "lost" and our interests be a long way down the agenda for the responsible minister. It has to be said also that recent adverse press surrounding these departments disinclines our members from seeking association with them - such is human nature!

Our best "fit" would probably be within the Department of Communities and Local Government. We have however found Treasury helpful and constructive in understanding the issues and consider continuity important in the present context of modernisation so would also see some benefit in remaining with The Treasury

We hope you will find these comments useful

Yours faithfully

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Mrs Val Gilfillan
Chair of ARCS