

**From P J Wormald, Director of the Office of Population Censuses and Surveys  
and Registrar General for England and Wales, 1990-1996**

12 June 2006

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

Dear Sir or Madam

Independence For Statistics: Consultation Document

1. I am writing in my erstwhile capacity as above and as joint author, with Mr W McLennan, the then Director of the Central Statistical Office, of the original "prospectus" for the Office for National Statistics in 1995.
2. My background is as a career administrative Civil Servant. I am not competent to comment on the current proposals from a professional statistical standpoint. Mine is basically administrative and political, but of course informed by my years in charge of OPCS and, as such, of the 1991 Census of Population.
3. I strongly support the stated objectives of the Consultative Document (CD). It will, however, be essential to the success of the proposals that the independence to be given to the Statistical Office (SO) should be substantial, genuine and widely perceived to be genuine, and should be conducive to improved statistics, published or not. While the CD's proposals have many merits, I am not convinced that they meet these criteria as fully as they could or should. Following are my comments and suggestions on these and other matters raised by the CD.

Title of Head of Statistics Office

4. In these comments I shall refer to the Head of the Statistics Office as the "National Statistician" (NS), which I think should continue to be the title. The title "Chief Statistician" is the traditional title for the head of a statistical division (Civil Service Grade 5) and would not carry the appropriate weight. Indeed the suggested change risks being seen as downgrading the post.

## Management and accountability

5. Para 4.12 suggests that the Board should have “ultimate executive responsibility” for the Statistics Office; and para 4.30 that the Board should have “a strong non-executive presence”, the implication of the latter being that some of the members would be executive. Some clarification is needed of the respective roles of the Board and the NS. Following are the principles which I suggest should apply. Some supplementary fine print would be needed.

6. Operational management of the SO should be the responsibility of the NS, subject to the oversight of the Board. In that sense the Board and all its members should be non-executive. (See also para 10 below.)

7. The NS should be accountable to the Board (Accounting Officer responsibilities apart) and the Board to Parliament for the organisation and management of the SO, for the satisfactory identification and meeting of user requirements, for the content and discharge of the SO business plan, for the timely delivery of the SO publication programme, and for the discharge of the NS’s responsibilities as Head of the GSS. If this is what is meant by the Board’s having “ultimate executive responsibility”, I have no quarrel with it.

8. The NS should be independently and directly accountable to Parliament for the quality and integrity of the statistical output, and should have a right of direct access to Parliament on those matters. The Board should monitor, and advise Parliament as appropriate.

9. The NS should also have a right of access to Parliament if he/she considers that he/she is being prevented by remediable circumstances from presenting a sufficient corpus of statistical output of proper quality, or if he/she perceives any threat to integrity. See also para 23 below.

## Status, structure and membership of the Board

10. Since the NS will be accountable to the Board, he/she should not be a member of it. Nor should any other member of the SO’s staff. The NS should have a right to attend and speak at meetings, except when his/her performance is being discussed.

11. As already indicated, the Board members should be wholly non-executive. Otherwise I agree with para 4.30 of the CD. In view of the important statistical functions which the Board will have to discharge, a sufficiency of statistically competent members needs to be guaranteed. (I emphasise “guaranteed”.)

12. Para 4.31 gives the Chair responsibility for some matters which should, in the first instance at least, be for the NS, particularly the development of stakeholder management strategy. I do not, however, wish to dispute the importance of the Chair’s contribution on such matters. Indeed, a supportive and effective Chair and good Chair/NS teamwork will be essential to the success of the NS and of the proposals generally.

### Appointments

13. It is not in anyone's interests, least of all Ministers', that persons appointed to the Board and as NS should be perceived as Ministers' placemen.

14. I see no reason why Ministers should play any part in the appointment of the NS. This should be done by the Crown (as proposed) on the advice of the CPA and/or the Head of the Civil Service. At most Ministers should be consulted.

15. Ministers should also have the minimum unavoidable influence over and involvement in the appointment of the Board members, including the Chair. There are many possible alternatives to the CD proposals.

### User interests

16. The CD is lamentably weak on user interests. There remains a widespread perception, rightly or wrongly, that ONS pays insufficient regard to user interests. There should be strengthened arrangements for consulting users and ensuring that their interests are properly reflected in ONS/GSS plans and products.

### "National Statistics", Departmental statistics and data access

17. When Mr. McLennan and I wrote the initial prospectus for ONS we debated at some length what statistics might with advantage be transferred to ONS from other Governments Departments in order to enable ONS to fulfil the role which we envisaged. The only essential candidate was employment statistics, which in the event were transferred to ONS for other reasons. There were other candidates of varying strengths, but we recognised that there was a continuing need for statisticians within Departments and that Departments would continue to publish many statistics. Our key objectives in this field (though they were not published in this form) were that

- (a) ONS should be responsible for ensuring the production, itself or by others, of a comprehensive statistical picture of the UK and its affairs.
- (b) These and other regularly produced Government statistics should ultimately be produced to common standards and definitions and should be readily accessible to all users, subject to necessary confidentiality constraints. In today's parlance, all regularly produced Government statistics would become National Statistics.
- (c) We recognised, however, that Departments sometimes need, and may need to publish, statistics to standards which meet their own legal and administrative imperatives. In those circumstances ONS might need to publish statistics on the same subjects, but to "national" standards and definitions.
- (d) For this and possibly other purposes (eg where Departments do not publish in any form) ONS should have access to Departmental data in the form and to the standards needed for incorporation in its national picture.

- (e) To assist user access an up to date index of available statistics should be published, in electronic as well as printed form.

The foregoing has much in common with the "National Statistics" arrangements introduced in 2000, but goes further.

18. We saw that these ideals could only be attained as new computer systems were developed, that even then there might be cost constraints, and that there would need to be top level commitment and good will between Departments. (Permanent Secretaries did give that commitment at the time – I was present at the meeting at which they did so – but it was always going to be difficult to secure delivery.)

19. I would like to think that the ideals could still stand. One important reason is that the publication of any Government statistics whose quality is suspect may adversely affect the credibility of Government statistics generally.

20. These suggestions do not necessarily imply greater centralisation of the production of statistics. However, the loss of seniority and standing among Departmental statisticians is a poor omen. I fear that we may be approaching a situation where greater centralisation is the only way of achieving the desired ends, whether those in the CD or those which I have suggested.

21. Certainly the matter needs to be re-addressed, as is recognised – though not in my terms – in the CD. Some consultees may suggest that this should be done as part of the immediate package. This would be my ideal, but I have reluctantly concluded that to attempt it would unacceptably delay legislation.

22. Fortunately much of what I would like to see can be achieved without legislation.

23. I do, however, suggest that some provision should be made to guarantee the integrity and quality of Departmental statistics, whether kite-marked as National Statistics or not. Para 4.37 of the CD does not go far enough, since the NS has no sanctions. One possibility would be to give the NS the right or responsibility, in the last resort, to report publicly to Parliament.

24. It is clearly necessary that the Board should approve any designation as "National Statistics". It might, however, improve public confidence if the decision rested with the Board rather than with Ministers (para 4.15).

#### Prior access to publications

25. The present arrangements produce, and are widely seen to produce, advantages for Government which are not compatible with the objectives of the CD. A new regime is needed. Whitehall should have no greater privileges than Parliament, the Press and other key stakeholders, certainly as regards ONS publications and in my view Departmental ones also.

Registrar General (RG)

26. It was always going to be difficult for the NS/RG to afford enough time for registration, but there was no good alternative in 1996 but to combine the roles. It now makes sense to divorce them. This will mean unscrambling a lot of legislation.

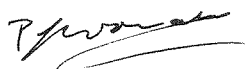
27. The RG will presumably be left with no statistical responsibilities other than to provide essential data to the SO. This may not be wholly straightforward: new confidentiality safeguards may be needed.

28. I see no reason why the RG should not continue to manage NHSCR on behalf of Dept of Health, so long as NHSCR is still needed. GRO and NHSCR are co-located and jointly staffed and managed. To separate them would be administratively inconvenient, and costs would probably rise.

29 The best line of accountability for the RG might be to the Minister for Constitutional Affairs. (I was myself accountable to the Secretary of State for Health, but this was more a matter of historical than current logic. The Home Office or the Department responsible for Local Government were sometimes suggested as alternatives, but I have never favoured either.)

30. The RG is RG for England and Wales, Scotland and N Ireland having their own. The Welsh position needs to be considered. I see no objection in principle and some political and practical advantages in the creation of a separate post of RG for Wales. Some extra cost would no doubt be incurred.

Yours faithfully



P J Wormald