ROYAL STATISTICAL SOCIETY'S CONTRIBUTION TO THE UK STATISTICS AUTHORITY'S FUTURE STRATEGY

The Royal Statistical Society welcomes the opportunity to contribute to the shaping of the forthcoming strategy for the UK statistical system.

The strategy 'Better Statistics, Better Decisions', covering the five years up to 2020, set an ambitious direction for official statistics. We acknowledge the good progress that has been made, especially by the Office for National Statistics (ONS), and also the expanded role of the Office for Statistics Regulation which has gained in influence. Now, with a new National Statistician, and with last year's report from the Public Administration & Constitutional Affairs Select Committee (PACAC), is a good time to take stock.

The RSS regards itself as a close critical friend of the statistical system. The success, development and growth of official statistics is fundamental to professional statisticians whether they produce them, use them, or comment on them.

In this contribution we follow the questions that the Authority has posed to stakeholders, building on issues raised by our National Statistics Advisory Group. Before that, there are four important points to make about the scope of the strategy.

Firstly, we note that it is a strategy for the UK statistical system, which includes the statistical operation across all government departments as well as those directly controlled by the UK Statistics Authority (UKSA) in ONS.

Secondly, it will important to anchor the strategy in the legislation (principally the Statistics and Registration Services Act) to ensure that it is clear how the functions and duties set out in that legislation are being taken forward.

Thirdly, the period of this strategy falls within a time when the UK will be adapting to life outside the EU. For many official statisticians, the European Statistical System has provided opportunities for learning and also to influence. The UK is active in other international bodies such as the United Nations and Organisation for Economic Cooperation and Development and the new strategy should reflect on how the UK plans to take advantage of its new international position, as well as how its statistical products will adapt outside the constraints of EU regulations.

Fourthly, the strategy should be seen to drive the work plan, and work plans should be transparent and discussed with users. The current three-year high-level business plans give a good sense of direction for the ONS, but there is no published annual work plan for the development of specific sets of statistics that can be discussed with users.

1. What do you see as the key priorities for the UK statistical system over the next five years?

Developing capable leadership

Effective decision-making is dependent on good leadership at all levels, and a culture that is aligned with the strategic direction. A key task is to ensure that the statistical system has the leadership and culture it will need to meet the challenges it faces. This is true for all statistical leaders working at all levels. Do they have the skills not just to produce the numbers, but to build relationships with policymakers and other users, talk to the media, help their colleagues innovate, etc.? Do we see a generation of potential statistical leaders growing from within the

system? How has the relocation of ONS outside London affected this? We think there is a systemic capability challenge which ought to be a key part of the next strategy.

Statistical leadership needs to be strengthened across official statistics. We would suggest a leadership academy be developed to help statisticians develop the wider skills they need. The RSS would be willing to help with this if that was appropriate.

Maintaining a sustained focus on the comprehensiveness of statistics (as required by the Statistics and Registration Services Act) and how far they meet user needs.

This requires looking at the big picture and proactive landscape scanning, as well as reacting to events. The GSS provides an important opportunity to assess the statistical needs and implications of policy decisions, and statisticians in departments need to be sufficiently senior and well positioned to be able to do this effectively.

Strengthening innovation for data science

There is a danger that the statistical system could get left behind by developments in data science. The establishment of the Data Science Campus has been a major step forward: however, we now need to see a more rounded plan and clear engagement with users on the next steps, both to help inform what questions could be asked using which data, and to provide a more focussed timeline and milestones towards effective use. The Campus could be tasked with building the capacity of the wider statistical system to become innovative and capable of managing new data sources, not just running its own projects, and becoming almost an internal consultancy unit across government

Greater use of administrative data is welcome, but needs to be stepped up, and needs greater involvement from users at an earlier stage. We also note that the Digital Economy_Act provides ONS with a gateway to access administrative data from Government Departments for data sharing but does not help improve data sharing between Departments, which means than non-ONS outputs cannot benefit from the same opportunities. Academic researchers are also interested in whether the ONS might now help improve access to administrative data for research purposes. The ONS involvement in the Administrative Data Research Partnership provides opportunities here.

Maintaining confidence in the system including through good data governance, ethics and public engagement.

The abolition of pre-release access to ONS official statistics in mid-2017 was a welcome assertion of the independence of the Statistics Authority. We believe, however, that this reform needs to be taken further. There remains an enormous amount of pre-release access to official statistics more widely in the Government Statistical Service (GSS) and Scotland is far out of line with good practice. We would like to see an active strategy for abolishing pre-release access across the GSS. We suggest that UKSA collates and publishes data on the average number of people with pre-release access, for each Department, and updates this annually to establish what if any progress is being made to reduce the extent of pre-release access across government.

The Authority regularly writes public letters to politicians where they have made a public statement which the Authority believes undermines public confidence in official statistics. This has been a welcome contribution to maintaining trust in the statistical system. However, the interventions have limited power – they partly depend upon moral authority as there is no formal sanction for statistical misuse.

The new strategy should consider how the Authority wants to pursue the issue of sanctioning those individuals in public life or organisations who take actions likely to reduce trust in official statistics, such as repeated incorrect use of figures. This could include measures such as requesting apologies to Parliament, or publishing lists of those sent letters by the Authority, or strengthening the Ministerial Code so that Ministers are not only required to be mindful of the Code of Practice, but required to observe it, including in how they present and use data. The same requirement could also be included in the Special Advisors' Code of Conduct.

There are many events and debates going on within the UK relating to data governance and data ethics. The UKSA needs to consider whether it wishes to step up to being a leader in this area. If so, it needs to become much more engaged with these debates. The UK Centre for Data Ethics and the Ada Lovelace Institute are both now established, recognising the increased emphasis needed on issues around data ethics. The RSS has established its own Special Interest Group on Data Ethics and we are engaging very positively with individual GSS members but would be pleased to collaborate more substantially. The National Statistician's Data Ethics Advisory Committee (NS-DEC) has established a set of ethical principles that it is using to review projects. Given the risks of data linkage, UKSA could raise the profile of this work to take more of a lead in working with outside organisations to promote data ethics principles more generally.

This will help safeguard public trust, in particular in relation to the census. As the ONS becomes increasingly a data hub across government, it may be called upon to take on more ethically tricky areas.

Providing clear strategies to develop price statistics, regional statistics and the Census.

We will not generally comment on different topic areas, except for these three. The current plans for the Retail Prices Index (RPI) are disappointing and we are concerned they will not meet user needs. The new strategy takes us through a period when the RPI will still be in existence (and not tied to CPIH), and the Household Cost Index will still be under development. We hope that the new strategy will continue to give priority to price index number development, so that the current difficulties can be resolved.

A good understanding of regional economies can be fundamental to improving the prosperity of the nation as a whole. The repeated changes in geographies of interest to policymakers over the last few decades have been accompanied by frequent changes to the resources made available for sub-national statistics. In recent years there has been further devolution of powers to the devolved governments/ administrations in Scotland, Wales and Northern Ireland, together with the introduction of elected city Mayors. The Bean Review of 2016 again highlighted the need for better regional statistics. ONS has responded to this by developing its "Devolution programme" aimed specifically at producing a lower geographical breakdown of economic statistics. However, much of this work is being conducted without significant additional resources. The new government's policy of 'levelling up' is likely to increase the priority given to regional statistics. A long-term commitment to a policy of producing statistics at the lowest geography possible would enable many geographies to be supported. A sustainable solution is required that provides a long term statistical infrastructure rather than one that serves current purposes only.

The key test in the upcoming period will be the delivery of the new census. The Census is the most important statistics gathering exercise people engage with, and we wish the 2021 census well. It is good that the planning for this is being used to redevelop ONS systems and

technology. The Census, with on-line data capture and linkage to administrative records, lays the foundation for a future strategy that should enable this to be the last traditional census. There will be important development work which will need to involve the academic community and users more generally as this is take forward.

2. Beyond producing and regulating statistics and analysis, are there other services that the UK statistical system should be providing?

A key test of the statistical system is whether users find the statistics they need easily and in the format that they want. Whilst the ONS website has improved, it is still clunky in parts and can be hard for non-experts to easily find articles on specific topics, within the more general themes.

One of the fundamental tests for the official statistics system is whether the public has the information that it needs. It's not clear that the system currently meets that test. How can information be developed in a way that is usable, and makes sense to non-expert users? In a world that is concerned with misinformation and so called 'fake news' the official statistics system needs to cut through and give people and local communities the information they need, in a format they find helpful.

The GSS produces an enormous amount of data, and its value comes from being curated and digestible, making sense of the key issues. What matters is that the picture being created uses the most relevant data, whether they are official or not, and the GSS needs to take on a wider remit on this, using non-official data where they meet the necessary quality standards. There needs to be greater emphasis on longer run trends, counterbalancing the media focus on short run changes in newly released data, often within the margins of error of the statistics. UKSA has a role to 'promote and assist statistical research' and we would welcome its developing a UK data hub, for analysis and research, which could also provide data access for non-ONS official data under secure conditions.

The UKSA could and should take much more of a role in promoting and enhancing statistical literacy among the public. RSS work with Ipsos MORI has shown there are many areas where the public understanding is very different to what official statistics show (e.g. levels of teenage pregnancies). The UKSA might consider striving to increase what Hans Rosling called 'factfulness': public understanding of facts through effective communication of statistics. We recognise that UKSA is starting to do some small pieces of work across government. The UKSA could, however, do more to ensure that the information that is needed by its audiences is better reflected and clearly communicated. This will help to avoid misinterpretation, misunderstanding and mistrust of statistics.

3. How does the UK statistical system need to adapt over the next five years?

The GSS was at its inception mostly decentralised, with statistics produced mainly by government departments. Over the years most economic statistics, and most surveys, have been transferred to the ONS, leaving the rest of GSS producing mainly official statistics from administrative sources. Many of these sources are also management information systems used by ministers to manage aspects of their departments, so there tends to be a strong interface, and sometimes some tension, between policy managers and their statisticians. The role of the National Statistician as Head of the GSS has weakened over the decades.

The decentralised part of the GSS has some clear strengths, in terms of the development of policy analysis skills and the ability to work closely with policy professionals, although this might be at the cost of methodological development and serving the needs of a wider group of non-government users.

While it is not easy to tell from the reports that UKSA publishes, our impression is that most of the breaches of the Code occur outside the ONS - in the wider GSS. For example, the discharge of the National Statistician's functions through the ONS has been more effective than in the rest of the GSS (see later) where the National Statistician has little direct management control. Many of the issues are around the dissemination and communication of GSS statistics. The new strategy needs to set out ways in which the GSS can build on its strengths, and these issues can be tackled.

4. How do you think collaboration can improve between the UK statistical system and external individuals, organisations and bodies?

While we acknowledge the often expressed commitment of the former National Statistician on the need for users to be at the heart of all the GSS does, the place for users in the UK statistical system was not explicit in Better Statistics, Better Decisions. Experience shows that user engagement practices across ONS and the rest of the GSS are patchy, and the new strategic approach gives the opportunity for the contribution of users to be made more explicit.

We note the requirements of the Code of Practice: "Users of statistics and data should be at the centre of statistical production; their needs should be understood, their views sought and acted on, and their use of statistics supported. Statistics producers should maintain and refresh their understanding of the use and potential use of the statistics and data. They should consider the ways in which the statistics might be used and the nature of the decisions that are or could be informed by them."

We urge the Authority to produce a strategy for improving user engagement across the GSS, to meet the needs of all users, including unmet demands and potential new users and to put into effect the promise that users will be at the centre of the production of UK official statistics. Official statisticians need models of good practice they can use, and the resources and time to engage with users fully.

Statisticians need to develop more understanding of the use of their statistical products, through user engagement and by outreach to prospective users. To take forward a user engagement strategy, we would suggest that UKSA undertake a quick mapping exercise across all GSS producers, to gain a better understanding of current users and user engagement practices. We would suggest that a central user engagement and insight team in ONS is enabled to encourage, support and share good practice in the user engagement of every team producing official statistics.

Developing statistical literacy and analytical skills more generally in the population and in decision makers will require closer working with the education sector, which the RSS is well placed to assist with.

The RSS has a good working relationship with official statisticians and with the UKSA, which brings benefits to the official statistics system, and is valued by the RSS. The Official Statistics section of the RSS provides opportunities for professional meetings. The RSS will continue to provide support and advice to help official statisticians promote and safeguard the production and publication of official statistics that serve the public good.

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