

Efficacy

UKSA has a unique responsibility in respect of equality because of the duty to represent the total UK population in many of its population surveys. The efforts taken to ensure that the Census provided coverage of the total population, are not replicated by similar procedures for other population studies, a fact that demonstrates that the ONS is aware of the issue and yet fails to deal with it on a consistent basis. This is one example of the lack of a suitable performance indicator.

A further example of a lack of coverage in ONS statistics concerns measures related to the UK's economic performance. Better Statistics began as the Campaign for Better Business Statistics because of the failure of the ONS to reflect the contribution of microbusiness to the UK economy. The Bean report of 2016 also highlighted this issue in respect of the gig economy. The BICS surveys demonstrated how little the ONS has progressed on this matter since 2016, despite the introduction of ESCoE into the system.

BSC are unable to comment on how well UKSA serves government, although to read UKSA's own documents you would believe the service to be excellent. In our opinion, however, the real issue is not that of the balance between quality and value but rather between risk and value. There does not seem to be any strategic review of the functions of UKSA that consider the risk of misleading data. An example of the lack of understanding of the risk associated with misleading results is the experience of Coventry et al in respect of inaccurate midyear population estimates. A further example results from the failure to ensure inclusiveness in surveys leading to decisions that can impact badly on unrepresented communities and create further problems for society. Probably the biggest example of this was the failure of government to anticipate the Brexit vote in 2016, there was therefore no preparation for the actual outcome of that vote with consequences that continue to reverberate, however no lessons seem to have been learnt.

UKSA is extremely poor at communicating to the public. It appears to believe that executive appearances on Radio 4, represent adequate communications. There seems to be little genuine training on interpreting results with the majority of the reporting concentrating on "the majority" and describing the average, as if the average size of household ever illustrated anything, there is little attempt to understand diversity and variance, The analysis function is new and is welcomed but we understand it to be largely a GSS activity. We suggested to the OSR recently that all reports should include a statement of the objectives behind the work, a suggestion that was welcomed as a '*good idea*'.

The ONS are making consistent progress with accessing new sources of data but there is a lack of any 'good practice' guide for analysing administrative data and relating it to survey information. There should also be more effort to encourage innovation by making anonymised data more accessible.

Governance:

In our view there is evidence that the OSR fails to provide a sufficiently independent oversight of the ONS. In particular it lacks the methodological skills sufficient to question the techniques used by the ONS; the regulations are also devoid of any penalty for failures to adhere to the code of conduct. We therefore believe there is a strong case for the regulatory regime to be entirely separate and we concur with PACAC's conclusion in 2019 that "*the dual role of the UK Statistics Authority in both producing and regulating official statistics has compromised its ability to ensure statistics serve the public good*".

Furthermore, the growth of the use of administrative data, increasing reliance on other 'real time' data sources, the use of modelling and Artificial Intelligence implies the requirement for more aggressive oversight across the complete domain of generating, publicising and usage of statistics. Other aspects of the 2007 legislation that requires reconsidering are the role of the National Statistician and the concept of a National Statistic. Certainly we believe that this latter concept needs a clearer definition and wider understanding.

There is also a need to review the independence of the devolved nations in respect of our National Statistics. The difficulties created by the separate conduct of the Scottish Census will remain with us for years and the 'devolved' designs for the Covid-19 Infection Survey contributed to the failure to consistently provide UK wide data.

The review also questions UKSA's arrangements for determining whether our statistics can be improved to better suit the circumstances of the UK and BSC are unaware of any such arrangements. To us it seems that UKSA is more concerned that our statisticians should contribute to the definition of international 'standards' and that our data shall be 'comparable'; a matter that is often illusory because different definitions are often applied across different countries. Clear examples are the decision to rename CPIH as the RPI in 2030 and the manner in which student numbers are included in migration statistics, neither definitions are suitable to the needs of our society and both are used to ensure a somewhat spurious international comparison.

As an aside, we question the efficacy of the processes applied by the Cabinet Office on appointments to the board of UKSA because one of BSC's directors has applied twice for positions and heard nothing after receiving an acknowledgement of the application. It therefore appears that the procedures defining the review of candidates and the selection process are not actually followed.

Accountability:

We lack sufficient knowledge of the duties of the cabinet office to comment beyond the above observation on appointments. The relationship with PACAC is, however, more clearly evident to the outsider because of the public meetings, although there is no evidence of any genuine working relationship between the parties. For example the PACAC report of 2019 confirmed that *"UKSA needs to take a more strategic approach to engaging with users"* and the report provided plenty of evidence that users were dissatisfied. However PACAC did not prescribe how UKSA might improve user engagement and it was not until early 2021 that a process for building a new system of user engagement was started. This process culminated in the body established on 22 March 2022 as the National Statistician's Expert User Advisory Committee ([NSEUAC](#)). In the PACAC review of UKSA conducted on 23rd May 2023, Sir Ian Diamond had described the creation of this committee in the following terms *"One thing I did was bring the chairs of all those committees together into what we call an expert users advisory committee. Professor David Hand, a former nonexecutive director, chairs that committee for us. The committee not only gives us advice but brings in outside speakers."* Better Statistics are not the only organisation to consider that this committee is not independent of UKSA and does not provide the serious level of user engagement requested in the PACAC review of 2019.

Whilst we see and understand the reasons underlying the creation of UKSA as a non-ministerial government department we consider that reporting to PACAC has resulted in a significant democratic deficit. In 2019, PACAC had promoted the idea of a standing committee of members from the commons and the lords having direct oversight to UKSA and certainly we believe that our National Statistics requires a more consistent democratic oversight than is provided by the present system.

A serious concern for Better Statistics has been the lack of genuine oversight of the conduct of the Covid-19 Infection Survey, a project that has cost more than £1 billion. Very surprisingly, senior executives at the ONS had denied a request for information from BSC on the basis of an incorrect interpretation of the contract between the ONS and IQVIA. Subsequently they have informed BSC that *“the ONS is unable to release further detail because both benchmarking and continuous improvement would require the release of commercially sensitive information. We recognise arguments in favour of transparency and accountability regarding the suppliers contracted with public authorities, and we have demonstrated our commitment to this interest by releasing the bulk of the contract we have with IQVIA, and also by actively publishing our payments to suppliers over £25,000 . This adheres to the inherent public interest in the spending of public money.”*

Notably this response fails to recognise that the public interest is not in what was spent, but what it was spent for!

Efficiency

Whilst we recognise that the majority of the staff across UKSA work hard, we believe there are significant efficiencies to be gained by providing a tighter framework for their work and concentration of efforts on priorities, particularly within the ONS. As outsiders it is difficult to identify particular examples, but we consider the following to be areas where efficiencies may be achieved, if they have not already been identified in the recent spending review:

Inflation and Prices: Aside from the necessary ongoing production of the monthly figures for RPI, CPI and CPIH there has been considerable experimental work by the ONS much of which we believe belongs with academia rather than a government agency. The programs reported include: Household Cost Indices; Producer Price Index; Investigations of web-based price scraping (cars etc); Definition and analysis of ‘core inflation’; examining the effects on the measures by removing outliers (two methods examined - this has been reported separately from core inflation). We believe there are other investigations in progress including experiments with AI processes using web scraping of pricing data.

Classification Systems: In our opinion there is an urgent need to rationalise and simplify most of the classification systems in use by UKSA (e.g. COICOP; CPA; CDID (?); SIC; SOC: etc), many of which do not assist with understanding what is going on in UK Business and the economy. In our opinion there is an overwhelming need to classify business more effectively in relation to ownership, whether UK owned or owned overseas and which country. We are aware that work was undertaken in this area years ago, but have heard nothing recently.