

To: Clerk of the Public Administration and Constitutional Affairs Committee

11th September 2025

Further Evidence for the Inquiry into the work of the UK Statistics Authority
– commentary on Improved Transparency and Accountability for UKSA

Prepared by Better Statistics CIC

Better Statistics CIC (BSC) welcome the intention that PACAC should ensure improved transparency and accountability within our National Statistics, as recently expressed by Mr. Hoare in an article for the Financial Times. Our interest in the issues date from the pandemic and BSC was founded at the start of 2021 because of major concerns with ONS statistics, which had included the [value of ESCoE](#), the conduct of the [Covid-19 Infection Survey](#), the [Business Impact of Covid Survey \(BICS\)](#) and the [Consultation on the Reform to Retail Prices Index \(RPI\) Methodology](#).

The Devereux Report follows from the Bean Report of 2016, the PACAC Report of 2019, and the Lievesley Report of 2024, each of which conveyed the same message that our National Statistics were not in a satisfactory state, although they failed to define what a satisfactory state would be. Unfortunately, the same is true of the Devereux Report, despite its focus on the culture at the Office for National Statistics.

Our purpose with this letter is to express our opinions of the requirements to achieve Mr. Hoare's objective, through consideration of the cultural issues identified by the Devereux Report and how future accountability might be achieved through a stronger emphasis on the public good.

In our opinion, the appearance of Sir Ian Diamond before PACAC on Tuesday failed to provide any further information on the cultural issues exposed by the Devereux Report. Accordingly we are emboldened in our view that the cultural difficulties arise from the implications of the phrase used by PACAC when announcing the inquiry into UKSA; namely "*lies, damned lies and statistics*". BSC believe that, to overcome the implications of that phrase, UKSA has encouraged the ONS to project a degree of certainty to their estimates which is not justified by the processes available to them. This desire to indicate an exceptional reliability has led to a culture that has suppressed dissent, delayed and bowdlerised the minutes of meetings and even allowed the publication of known inaccuracies without warning of the errors. Understandably, the morale within the ONS is low because a culture of concealment and control contrasts with the open minded approach required for a person to do the job properly. The reality is that almost all statistics are an approximation of the true value and are subject to uncertainty. In the main, we accept that approximation as being '*good enough*' for the use we wish to make. Thus, the value

associated with a statistic is entirely defined by the confidence that we place in that phrase ‘*good enough*’.

Politicians and policy makers all need to understand that the statistics provided by the ONS are not really very different from bona fide opinion polls. They are all subject to confidence intervals to some degree and occasionally, even error may be introduced by a bias that was not foreseen. The recent controversy correcting the CPI error from the published 3.2% increase to 3.1%, was a clear example of ‘*no real difference*’ and should have been understood accordingly. Of all the difficulties recently experienced with ONS data, this must have been the least important.

It is therefore BSC’s opinion that the demand for increased transparency must be accompanied by the expectation for more debate and consideration of alternative approaches to determining the ‘best’ estimate. Transparency, needs to extend beyond the how or what has been done, to consideration of why it was done and what alternatives were considered. Without that wider consideration, we cannot have the confidence that the system is working effectively.

To illustrate this aspect we attach a letter BSC recently sent to the Director General of the OSR. Ironically, this was sent the same day as the OSR published their [Compliance review of Consumer Prices Index \(CPI\) and the Consumer Prices Index including owner occupiers’ housing costs \(CPIH\)](#). It should be noted that this review does not include any evidence independent of that provided by the ONS and it illustrates the restricted coverage the OSR often considers appropriate for their reviews. As a result, many users do not accept that they act with the independence from the production that is claimed.

Whilst we consider that all such reviews should be more comprehensive in their coverage of the issues, hopefully reflecting a less deterministic approach to the production of statistics, the question of accountability remains to be resolved.

Our criticism of the CPI and CPIH measures of inflation is not only due to the conceptual errors in their calculation but also results from the failure to explain the public good associated with their use. BSC consider that improving accountability must begin with some interpretation of that phrase, the lack of which has caused some of the difficulties now faced.

We have suggested to UKSA that the following definition should be applied to support the accreditation of a National Statistics:

1. The statistic should have been defined for a specific, useful purpose which needs to be stated as the objective.
2. It has been created by a transparent, replicable procedure to the level of reliability suitable for the proposed purpose.

3. It is supported by some corroborative evidence (or certainly does not conflict with other evidence).

To date we have received no comment on this suggestion, nor has an alternative been offered as clarification of the objective provided in the Statistics and Regulation Act of 2007.

If the above, or something similar, were to be accepted as a definition then the intention of UKSA to rebadge the CPIH as the RPI in 2030, should not be accepted as in the public good. The RPI was originally established as a measure of inflation as experienced by an average UK household, whereas the CPIH is based primarily upon the CPI, which is a '*whole economy*' inflation measure used for international comparison purposes. Whilst, it may be satisfactory as an inflation target for the Bank of England it is not an appropriate measure for domestic inflation purposes.

In our view, consideration of the public good must largely define how accountability is to be determined. In the evidence we had earlier provided to this Inquiry we had suggested that there should be an independent **Committee for Evidence Based Policy (CEBP)**.

On reflection we believe that the committee drawn from members of the House of Lords and the Commons, as suggested by the PACAC review of 2019, could fulfil this role. In particular the publicity associated with such a committee could help overcome the user engagement deficit that has arisen from the cultural problems identified by Devereux. If the committee were to encourage public interest this could replace the limited set of 'users' the ONS regularly consults.

To facilitate the evolution of such a Committee, BSC would be willing to fund or partially fund an All-Party Parliamentary Group (APPG), should PACAC wish to promote the idea.

We hope these thoughts will be of value to PACAC in its further deliberations.

Meanwhile, we consider that Sir Ian's recent evidence exposed a misunderstanding of past performance that some members of the committee also share. In his evidence Sir Ian explained how proud he was of ONS's performance during the Pandemic. Also, Members of the Committee referred to the 'excellent work' done by the ONS during that period, which was also praised in the Devereux Report.

There will not be a full understanding of the problems with UKSA, and the ONS in particular, until it is understood that these '*successes*' are a chimera and that both the Covid-19 Infection Survey (CIS) and the Business Impact of Covid-19 Survey (BICS) were less reliable than was claimed. As a result many millions of pounds was spent to provide doubtful results, whilst creating the seeds of the serious difficulties that became evident a very few years later.

Whilst we can accept that Sir Ian may have sought to encourage more openness between colleagues, we consider it evident that this did not extend to discussions with users. Instead there was a culture of secrecy, which was leavened by a healthy PR campaign supported by compliant OSR reviews that lacked true user engagement. As a result the myth of Truth, Quality and Value rolled on, until the facts became too evident to ignore. The truly appalling response rates Sir Ian speaks of were at least partly fuelled by ONS's misguided attempts to achieve unnecessarily large samples and a failure to use more cost-efficient sample methods.

It would be of immense interest to hear from any politician or policy maker that benefitted from the data provided by the ONS at that time and perhaps an APPG, as suggested above, could investigate this.

Yours faithfully

Tony Dent
Better Statistics CIC
CC Mr. Simon Hoare, Chairman, PACAC

Copy of email sent to: Humpherson, Edward <ed.humpherson@statistics.gov.uk>

From: Tony Dent <tony@betterstats.net>

Sent: 04 September 2025 12:08

Cc: DG Regulation <dg.regulation@statistics.gov.uk>; Kent-Smith, Rob <robert.kent-smith@statistics.gov.uk>; Iain MacKay <iain.mackay@x-mr.com>; Phyllis Macfarlane <phyllis@betterstats.net>

Subject: Meeting follow up



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Mr. E. Humpherson
Director General for Regulation

Dear Ed,

Thank you and Rob for the recent discussion, it was gratifying to hear that the OSR has valued some of our commentary. However, without wishing to carp in any way, I

continue to believe our contribution would have been greater had there been a clearer understanding of the structure and purpose of the various elements of UKSA. We have frequently commented on how our 'outsider' perspective differs from your 'insider' view and we believe the difference results from the failure of UKSA to communicate its activities effectively.

There are many examples of the difficulties created by poor communications but, probably, none are more significant than the fact that Better Statistics CIC do not understand how the CPI and the CPIH retain their status as Accredited Official Statistics, given the many errors we and others have exposed. Moreover we fail to understand how they can be considered to be “*statistics for the public good*”.

Whilst we recognise that the OSR’s role as the assessor of the efficacy of these measures must be influenced by the two [Advisory Panels on Consumer Price Statistics \(APCP\)](#), we have no explanation as to how the various parties actually inter-relate to achieve a co-ordinated opinion. In our view this lack of clarity contributes to the confusion evidenced by the public’s inability to recognise UKSA's opinion of the value and purpose of these measures. A confusion recently highlighted by the BBC announcer who said that “*most households*” would be experiencing a higher inflation rate than the July rate published by the ONS. This dissonance, between personal experience and the ONS measures, lies at the core of the mistrust which many people have with our statistics. A mistrust that long preceded the controversies of the past year or two, with consequences that UKSA continue to ignore.

Turning to the wider issue of our economic statistics, we note that the web-site announcement of the OSR’s [State of the UK Statistical System 2025](#), includes the assurance that “*In our view, the Office for National Statistics (ONS)’s recently published [plan for economic statistics](#) provides the right foundations to restore confidence in ONS*”, however we fail to see how that view is supported by the publication. Have we missed something? To us, the plan lacks explanation as to how the ambitious series of deadlines for improvements across every area will be achieved, even considering the additional ONS [Survey Improvement and Enhancement Plan](#) for Economic Statistics. Both plans appear to lack the details required to explain how resources will be deployed, with the main plan lacking explanation as to the objectives of, or reasons for, many of the activities.

See for example: “*A2.3 Sustainable operation:*

We are planning to extend the coverage of our Large Case Unit and our Account Management Units, and so extend their proven impact on data quality and simplify engagement with more businesses. We plan to expand their combined coverage from 150 today to:

- *around 850 business units this year (2025 to 2026)*

- *increasing to in the region of 1,800 business units in 2026 to 2027*
- *rising to a combined total of around 4,000 business units by the end of 2027 to 2028.*

BSC would prefer to see some explanation for these numbers - specifically what benefits are expected from the increased sample sizes? We would also prefer to see consideration of alternative approaches, such as the use of cluster sampling to reduce Household survey costs and a trial of mix-mode data collection to include alternative methods such as time use surveys. We consider that the latter would more readily capture the details of those persons seeking to hold down two or three jobs, or others with complex lifestyles. However, although the OSR is charged with preparing the annual reports on the state of the UK Statistics System, we understand that comments such as those above are not within your purview.

Meanwhile we welcome the ambition of the ONS for a “*Refreshed Citizen Relationship – to improve trust, brand recognition and understanding of the importance of our surveys*” and we hope that this will encourage more urgent consideration of the inflation measures as mentioned above. Also, we hope that the ONS now accept that not all citizens listen to radio 4! The frequent mentions of ONS activities on the Today Programme had been evidenced by the ONS as sufficient publicity, when BSC had suggested advertising the Covid-19 Infection Survey to improve the response rate from the lamentable 11% of households sampled.

Anyway, to return to our recent meeting. I am sure you will recall our opinion that the provision of prompt and informative minutes of the Advisory and Main Board meetings would greatly improve UKSA's communications. It being expected that such meetings should be more robust in considering statistical details, because a statistic is a relatively ephemeral, point in time, estimation that, normally, will be different on another occasion. It is NOT immutable and one would expect the relative advisory boards to be more open in their discussions as to the level of reliability required and the methods used.

The current suppression of any disagreement is actually anathema to a healthy statistical operation, which should be more concerned with discussion of the policy risks associated with unreliable data. Public discussion of the important issues underlying such matters can only be for the public good. One clear recommendation we would make to improve public trust would be to provide a conduit for users to communicate their concerns directly to the appropriate advisory committee, particularly the two committees advising on inflation measurement. The SUN platform could be used for this purpose, were it to be more concerned to encourage public participation, instead of controlling it.

I hope you will give these remarks further thought and, possibly, discuss them with your colleagues. In particular, BSC would appreciate a direct answer as to the accreditation of the CPI and CPIH and, accordingly, we propose to publish this letter in due course.

Finally, we have given further thought to the proposed seminar "[Growing the UK Economy – how can business contribute?](#)". That seminar was partly inspired by the fact that the business community was not well represented at the Assembly earlier this year, nor is business much engaged with the Government Statistical System in general.

We had hoped to make a contribution to a '*refreshed citizen relationship*' with this seminar and we'd like to discuss that with you at your convenience.

With all good wishes,

Tony

On behalf of Better Statistics CIC