

Sent by email

21 March 2024

Dear Baroness Neville-Rolfe,

**Re. Independent Review of the UK Statistics Authority, conducted by Professor Denise Lievesley**

We are writing in response to the recent independent review of the UK Statistics Authority (UKSA) and the Cabinet Office response to it.

The Royal Statistical Society is a charity which promotes statistics, data and evidence for the public good; we are one of the world's leading learned societies and the only UK professional body for all statisticians and data professionals. We engage closely with UKSA and have taken a keen interest in both Professor Lievesley's review and the Cabinet Office response.

First, we would like to express gratitude both to Professor Lievesley and the Cabinet Office team who supported the Review. Taken together the recommendations of the review have the potential to further strengthen the UKSA – enabling it to more effectively engage with a wider range of users and improve data sharing. Improvements in these areas, we believe, would cement the reputation of the UKSA as a world-leading producer of national statistics.

We are also pleased that the Cabinet Office response accepts so many of the review's recommendations. It is especially welcome to see your commitment to preparing a more detailed response to recommendation six on data sharing and to exploring approaches to address declining response rates to surveys.

However, there are two parts of the Cabinet Office which raise important questions. First, in the response to recommendation 1, it is stated that government needs (especially economic needs) take precedence over wider user needs. In your appearance at the Public Administration and Constitutional Affairs Committee last week, it seemed as though you did not fully support this statement. We would be grateful to have clarification of your position on this in writing: if the current published response is an accurate reflection of the government's position it seems to go against the spirit of the 2007 Statistics Act. The RSS is strongly supportive of the recommendation for a Statistical Assembly and would like to see UKSA properly supported by Government to deliver it. We are concerned that the Cabinet Office response to the recommendation suggests that the government is not vested in providing this support and may not take outputs from the Assembly seriously.

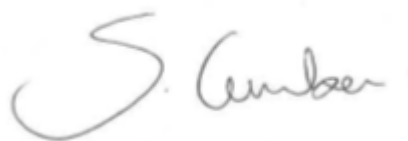
Second, we are disappointed by the Cabinet Office response to the recommendation around pre-release access. The RSS has long argued that pre-release access to statistics has a harmful impact on our political system and that abandoning the practice could improve public confidence in official statistics. The idea that governments need to see statistics early to prepare their response to them is harmful for two reasons. First, it means that when the public see a department's statistical release it comes with a pre-prepared press line – the public are sensitive to this spinning of information, and it risks breeding mistrust in the statistics themselves. Second, it helps to perpetuate the impression that ministers control data and its release. There is an opportunity for Westminster to set a good example to the other nations of the UK on this matter and we would urge you to consider taking it.

We attach a short statement setting out our response to the review in more detail. If it would be helpful, we would welcome the opportunity to discuss this with either yourself or your team.

Yours sincerely,



Dr Andrew Garrett  
President



Dr Sarah Cumbers  
Chief Executive



## **RSS STATEMENT ON THE LIEVESLEY REVIEW OF THE UK STATISTICS AUTHORITY AND THE CABINET OFFICE RESPONSE TO IT**

21 March 2024

### **1 Summary**

- 1.1.1 The Royal Statistical Society warmly welcomes the recommendations of the [2024 Independent Review of the UK Statistics Authority \(UKSA\), conducted by Professor Denise Lievesley \(the Lievesley Review\)](#).<sup>1</sup> Taken together this set of recommendations has the potential to further strengthen the UKSA – enabling it to more effectively engage with a wider range of users and improve data sharing. Improvements in these areas, we believe, would cement the reputation of the UKSA as a world-leading producer of national statistics. The RSS is separately preparing a prospectus for public statistics – which intersects with a number of Lievesley’s recommendations – to deliver statistics for the public good.
- 1.1.2 While welcoming the Lievesley Review, there are some elements of the [government response to the recommendations](#) that we would question. The statement that government needs for statistics take precedence is potentially troubling and would benefit from clarification. We also regret the government’s reluctance to follow ONS’s best practice on pre-release access to statistics.
- 1.1.3 In this paper we highlight the recommendations of the Lievesley Review that we think are especially important and set out how the RSS may support UKSA in implementing them. We also address the Cabinet Office’s response and set out where we would like to see them reconsider their approach.

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<sup>1</sup> This was an independent review of UKSA commissioned by the Cabinet Office. The RSS was pleased to be one of the organisations included in Professor Lievesley’s extensive stakeholder engagement (as detailed in Annex B of her report). Professor Lievesley is a member of the RSS and is a former President of the RSS (1999-2001).

## 2 The Lievesley Review – key recommendations

2.1.1 In this section, we highlight the recommendations of the Lievesley Review that we think are especially important, explain why we want to see them taken forward and highlight ways in which the RSS might support UKSA in doing so. We fully support all the recommendations of the review – the four highlighted in this section are those where we think the RSS is best positioned to support or those that we think are especially time sensitive. For ease of reference a full list of the review’s recommendations is give in §4.

### 2.1 *Recommendation 1: Statistics Assembly*

2.1.1 There is a significant challenge for the UKSA in determining how the statistics that it produces best serve the public good. UKSA manages a complex range of users with differing needs – some of which can be quite specific. With limited resources, there is an understandable tendency to privilege government users, where statisticians can be confident that in doing so their work will feed into the evidence base for policy decisions. However, UKSA also has an important duty to provide information that other users need – including on issues that are not of interest to the government of the day or that might allow the public to effectively assess the government’s performance on key areas.

2.1.2 We believe that a Statistical Assembly can play an important role in helping UKSA to balance wider user needs with those of government. The Assembly could bring a welcome focus to UKSA’s engagement work – enabling them to identify gaps and emerging needs, to develop a proposal for their statistical priorities over a three-year period and evidence demand for a range of statistics to government. With that said, it is important to recognise that conducting this type of consultative and outreach work effectively is time-consuming and resource intensive. The Assembly should not just be a one-off meeting of stakeholders every three years to determine priorities there should be a framework in place to ensure that engagement continues between meetings of the Assembly to monitor progress against agreed priorities and identify short-term needs (which would be important, eg, in the event of another pandemic). We would like to see this implemented as an on-going process of consultation with stakeholders to feed into an appropriately constituted Statistical Assembly in a way that ensures that a wide range of user views are heard and fairly prioritised. We would encourage



UKSA to think creatively about the consultation methods that they use – there are a growing range of consultative tools that could be used to effectively support the participation of a wide community of users.

- 2.1.3 Another potential benefit of the Assembly is that it may help UKSA to maximise the value of available data. Increasingly data is being produced by the private sector and this could potentially be used by UKSA to inform its work. If the Assembly ensures that it properly consults stakeholders from the private sector, there are opportunities to identify new ways in which existing data might help provide a richer picture of life in the UK.
- 2.1.4 The RSS is looking forward to supporting UKSA in this work. We will engage with the design of the Statistical Assembly -- working to ensure that the agreed approach has the widest range of support from the statistical community. There is also a role for the RSS in promoting the Assembly's work to ensure that a wide range of users of statistics can contribute. It is important that the new user engagement landscape is designed holistically so that the Statistical Assembly fits in naturally with the rest of UKSA's engagement work – this may mean thinking about how the Assembly relates to the existing engagement themes. This is an area where the RSS can support. We recognise that UKSA currently has limited resources with which to support the running of an Assembly – it is important for the wider community to engage constructively with the emerging process so that a case can be made to increase funding for this type of outreach work.
- 2.1.5 In recent years the RSS's focus in our engagement with UKSA has been to advocate for the approach of public statistics – an approach which starts from identifying the questions that need statistics to help answer them (rather than starting from the available statistics) and emphasises the role in drawing statistics from a wide range of sources to deliver the public good. We see the Statistical Assembly as a means to deliver on this by: 1) engaging a wide range of users to identify needs and gaps in the data; 2) developing priorities for a three-year statistical work programme; and, 3) engaging producers from a public and private sectors to identify where there is existing data that can help fill gaps. We will soon publish a prospectus for public statistics that will set this out in greater detail.



## **2.2 Recommendation 4: Pre-Release Access to official statistics**

- 2.2.1 The RSS has long campaigned to end the practice of pre-release access to statistics. In 2017, we were delighted that UKSA removed pre-release access to their statistics in all but exceptional circumstances. We regard this as best practice and think it is important that all government departments and all the UK nations' statistical offices follow UKSA's good example. It is very welcome to see this recommendation in the Lievesley Review and we urge all the UK's governments to take it up.
- 2.2.2 We believe that pre-release access to statistics has a harmful impact on our political system and that abandoning the practice could improve public confidence in official statistics. Governments have often taken the view that they need to see statistics early in order to prepare their response to them. This is harmful for two reasons. First, it means that when the public see a department's statistical release it comes with a pre-prepared press line – the public are sensitive to this spinning of information, and it risks breeding mistrust in the statistics themselves. Second, it helps to perpetuate the impression that ministers control data and its release.
- 2.2.3 Clearly governments might be reluctant to give up what they see as an advantage – seeing data before other political parties, institutions or journalists and being prepared for any questions is clearly beneficial. But at a time when misinformation is rife and public confidence in politicians is low, a move towards ending the practice of pre-release access to statistics could be an important step towards improving the health of our political system.

## **2.3 Recommendation 6: Data sharing**

- 2.3.1 The emphasis on improving data sharing between government departments is very welcome. Improved data sharing between government departments has the potential to dramatically improve the efficiency of public service delivery – in the current economic context this is especially vital. As the review indicates, this is something that it is very hard for UKSA to do alone and it requires real commitment from the Cabinet Office and Treasury both to remove barriers to data sharing and hold departments to account when they are not sharing the information that is required by law. We fully support the review's call for the Cabinet Office to identify and remove barriers to data sharing not only between government departments but



also drawing on non-government sources. (Recommendation 7 is also important here, in raising awareness and usage of the Integrated Data Service, including by non-government users).

2.3.2 In the past, the RSS has made recommendations that might help improve data sharing. First, in our [evidence to the Covid Inquiry](#), we proposed widening the use of personal identification numbers to improve record linkage. This would be intended to more easily identify individuals – in an anonymised way – across government services. In our [response to the Science and Technology Select Committee's inquiry on the right to privacy](#), we also highlight the role of data protection officers. These individuals have an important role to play in safeguarding data but too much emphasis is placed on the consequences of breaching the information governance rules. For data protection officers in the public sector, we would like to see the emphasis shift in these roles towards enabling the appropriate sharing of information where it can improve outcomes – while maintaining adequate controls.

#### **2.4 Recommendation 14: Mandatory completion of the Labour Force Survey**

2.4.1 The Labour Force Survey (LFS) is the source of some of the most important information about the UK workforce – it informs headline employment and unemployment rates and gives insight on the differing outcomes for different groups of people. However, [recently the ONS has had to delay release of LFS data due to concerns about the quality of the survey](#). This is a substantial problem because this data is needed, eg, by policymakers at the Bank of England who use it to inform their judgements about the strength of the labour market which feeds into decisions around interest rates. The problem is that response rates to the LFS have fallen to the extent that it complicates the production of key statistical indicators.

2.4.2 It is very welcome that the Lievesley Review engages with this important problem. We support the call for the UKSA and the Cabinet Office to work together to explore the consequences of making completion of the LFS mandatory – as is the case in other countries. This would be, in some respects, an undesirable move but it may be necessary in order to safeguard the quality of our workforce statistics.

2.4.3 The LFS is not unique in seeing a decline in completion rates. In the longer term it might be useful to consider whether there are any other surveys which are sufficiently important as to also be candidates for mandatory completion if the benefit of this is realised for the LFS.

### 3 The Cabinet Office response

3.1.1 We are pleased that the Cabinet Office response accepts so many of the review's recommendations. It is welcome to see that the Cabinet Office is committed to preparing a more detailed response to the recommendation on data sharing. We also welcome their commitment to addressing the falling response rates to surveys. We hope to constructively engage with the government around both those points in particular.

3.1.2 However, the government's response to the recommendations around the Statistical Assembly and pre-release access to statistics raises some important questions. Regarding the Statistical Assembly, the RSS is concerned that the government's view is stated as being that the statistical needs of the government (particularly economic) "take precedence" over wider user needs. This statement goes against the spirit of Section 7 of the 2007 Statistics Act – which emphasises that the role of UKSA is to safeguard the production and publication of official statistics that serve the public good. This is clearly intended to be wider than governmental need. Baroness Neville-Rolfe in [evidence to the Public Administration and Constitutional Affairs Select Committee](#) (Q204) seems to have somewhat distanced herself from this statement – but we would urge the Cabinet Office to issue a written clarification of its position on this point.

3.1.3 Related to this is the question of resources for the statistical system. As we have stated above (§2.1.2) the type of engagement required for the Statistical Assembly to be a success is time and resource intensive. We are concerned, especially given the statement about government needs taking precedence, that the government is not vested in properly supporting UKSA to effectively deliver the Statistical Assembly. We urge the government to ensure that this activity is suitably funded and to take seriously the proposals that it produces at Spending Reviews.

3.1.4 On pre-release access to statistics we are disappointed to see that the government rejects this recommendation. It is especially disappointing that it is rejected explicitly on the grounds that pre-release access provides time for departments to have a considered response to official



statistics. It is precisely this approach that harms public confidence in official statistics and we would urge the government to reconsider its position. We hope that the governments of Wales, Scotland and Northern Ireland take a different view of this matter and implement the recommendation for the statistics produced by their national statistics offices.

## 4 Recommendations of the review

4.1.1 For brevity, we have explicitly highlighted just four of the Lievesley Review's nineteen recommendations. We fully support all the recommendations of the review: they address long-standing concerns such as cross-UK comparability, greater collaboration with other organisations, and greater transparency in UKSA processes and procedures. We would like to see UKSA report annually on its progress towards implementing all of them.

4.1.2 For ease of reference, we include a full list of the recommendations here.

**Recommendation 1:** The UK Statistics Authority (UKSA) should lead the establishment and delivery of a Triennial Statistical Assembly. This Assembly should involve key organisations inside and outside Government and across the four nations, with the remit of determining the UK's needs for statistics through a wide consultative process. This should include the private sector, government departments, local government, academia, think tanks and media representatives.

The UKSA will then respond to this by producing a proposal for the statistical priorities for the next three years, thus identifying data gaps and ensuring that users can hold the statistical system to account on the delivery of the programme of work. It will also enable other producers of statistics to complement the work of the official statistical system and factor this work into annual budget allocation processes.

To respond to the Statistical Assembly and to supplement its findings, an annual public lecture from the Chair of the UKSA should be delivered to provide an update on the work of the statistical system and priorities for the year ahead. This should build on the OSR's annual State of the Statistical System report. The lecture would raise the profile of the Board, further user engagement and establish the UKSA's leadership role in the statistical space.

**Recommendation 2:** The Review recommends that the expertise of the senior staff of the Office for National Statistics (ONS) would be greatly enhanced by the appointment of a Director General for





Methodology who would be a focal point for the improvement and communication of data quality, and who would foster engagement with senior methodologists in other national statistical offices and in academia.

**Recommendation 3:** The Government should amend the statistical legislation so that the Act reflects current practice, taking the opportunity to make clearer the practical operation of the UKSA. For example, that the Office for Statistics Regulation (OSR) reports separately to UKSA, not via the National Statistician, and that the Director General of the OSR is an Accounting Officer and is expected to report separately to PACAC.

**Recommendation 4:** The inconsistent application of Pre Release Access to official statistics across the UK statistical system has the potential to undermine trust. The Cabinet Office and devolved legislatures should amend the relevant secondary legislation for each nation at the earliest opportunity to follow the approach to Pre Release Access taken by the ONS in line with the Code of Practice for Statistics.

**Recommendation 5:** The UKSA should build on existing work and lead discussions between the four nations and strengthen the Concordat to encourage more UK wide data by creating common standards and improving harmonisation where appropriate and mutually agreed. HM Treasury should ensure that funding is available to support the harmonisation of key data.

**Recommendation 6:** The centre of government, led by Cabinet Office and HM Treasury, must actively work to resolve the systemic, often cultural, barriers to data sharing between departments. All government departments, particularly those who own significant amounts of data, must prioritise data sharing for statistics and research purposes and support the development of programmes such as the Integrated Data Service to enable greater sharing of data across government for statistical and research purposes.

**Recommendation 7:** The IDS is critical in facilitating the greater use of administrative data and bringing greater efficiencies to statistical analysis and decision making across government and academia. The Review therefore recommends that the ONS takes action to ensure that the purpose, scope and requirements of the IDS are clearly communicated and that the needs and concerns of departmental data owners are sufficiently understood.



**Recommendation 8:** Regarding the National Statistician role, Cabinet Office, working with the UKSA Board should:

- Commission a review of the role of the National Statistician well ahead of the next recruitment campaign, examining the many component parts of the National Statistician role in order to decide whether to propose changes to the role and what this may look like. This should also identify where changes to the Act may be required to facilitate the delegation or sharing of the National Statistician’s responsibilities; and
- Examine the talent pipeline and talent development structures it has in place across the Government Statistical Service (GSS) to ensure that those with potential to be future applicants for the National Statistician post and other senior roles in the statistical system are identified and nurtured.

**Recommendation 9:** Within ONS a suite of actions relating to communications should be adopted, including:

- Urgently improving the website so that it meets user requirements more effectively;
- Ensuring that there is a better understanding of the levels of uncertainty around specific official statistics, particularly economic, to reduce public (and government) surprise to revisions; and
- Building partnerships with organisations that foster relevant communication expertise to improve engagement with the wider needs of users.

**Recommendation 10:** The Authority Board should look to appoint a Non-Executive Director with relevant communications experience to advise and support the UKSA.

**Recommendation 11:** The Advisory Groups working with the National Statistician should become more formal: recruitment should be open and be clearly advertised to encourage applications. The style, design and attendance at the meetings should also be reviewed to ensure that they facilitate frank constructive sharing of views and feedback.

**Recommendation 12:** To demonstrate the commitment to user engagement and remind producers of its importance, the reference to ‘consult users before making changes that affect statistics or publications’ in the UKSA Code of Practice should be reinstated so that users are consulted before producers make substantial changes to statistical data collection or outputs.



**Recommendation 13:** Internationally, the UKSA should:

- In consultation with His Majesty's Government, prioritise the establishment and signing of a Memorandum of Understanding with Eurostat in line with the option provided in the Trade and Cooperation Agreement; and
- Update its international strategy, Statistics for the Global Good, to provide more detail on how it will engage and lead within key global organisations, including the OECD and IMF.

**Recommendation 14:** The UKSA should engage with the Cabinet Office to explore the consequences of mandatory completion of the Labour Force Survey.

**Recommendation 15:** The UKSA should build on its work engaging with Parliamentarians and Select Committees of both Houses and devolved legislatures further. It should continue to seek out opportunities to proactively add insights and value to the work and interests of the Select Committees. Equally, Select Committees should actively seek to use ONS data and analysis.

**Recommendation 16:** The Cabinet Office should look to supplement the existing sponsor team with resource to give the support and resilience required.

**Recommendation 17:** The Memorandum of Understanding between the UKSA and Cabinet Office as Sponsor Body should be reviewed by both organisations to ensure that it reflects the requirements in the HM Treasury Framework Document Guidance for Arm's Length Bodies mindful of the UKSA's statutory independence.

**Recommendation 18:** The UKSA should develop a framework to follow when considering ad-hoc commissions for statistics in order to be open about the opportunity costs of such work.

**Recommendation 19:** The UKSA should step up efforts to build partnerships outside of government, particularly with universities and think tanks, given the clear economic and social benefits to this collaboration.

