

Monitoring Brief

Monitoring Brief 3/11
27 May 2011

The Impact of the Authority's Monitoring and Assessment Function

The Authority's assessment function examines the extent of compliance with the *Code of Practice for Official Statistics*. The first assessment report was published in July 2009 and by March 2011 we had produced over 100¹. Under the legislation that created the Statistics Authority, we expect to produce 150 or so further reports to complete the initial programme of reviewing all existing National Statistics. Whilst assessment is the core of the Authority's scrutiny role, there are many other outputs including Monitoring Reports and Briefs, correspondence and statements.

This Brief considers, from the perspective of the Authority's own staff, the emerging evidence about the impact of these strands of work. Many of the examples are drawn from assessment², reflecting the statutory nature of the function. It is not a formal review; rather a collection of observations that will be updated periodically to inform the management of the work. The focus of all monitoring and assessment activities is to help ensure that the statistical outputs of government meet users' needs, are created using appropriate methods, and are explained clearly and helpfully. They also serve to provide objective reassurance to Parliament and the public about the generally high standards of statistical practice in all four UK administrations.

Findings

It is not always clear precisely what part assessment has played in stimulating improvements. Some will be clearly identifiable as the direct result of an assessment report; others will be driven by messages emerging from a series of reports, or will be made in anticipation of future assessment. In some cases assessment may simply accelerate an improvement already in hand. Nonetheless, in considering the practical value of the monitoring and assessment functions, it is necessary to look for evidence, and make some judgements, about the beneficial impact.

Our current view is that assessment is beginning to have a beneficial effect. There are some early signs that assessment has been beneficial in terms of:

- enhancing evidence and understanding about the use made of statistics;
- improving engagement between producers and users of statistics outside their own organisations; and
- the quality and accessibility of statistical releases – these are the 'shop window' of the statistical service, and central to the way that the work of statisticians is perceived externally.

Monitoring and assessment work has also contributed to creating a statistical system that is more assertive of its standards:

¹ <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/index.html>

² Monitoring Brief 4/2011 [<http://www.statisticsauthority.gov.uk/assessment/monitoring/monitoring-briefs/monitoring-brief-4-11---implementation-of-authority-recommendations.pdf>] provides further information about the extent to which the Authority's recommendations in Monitoring Reports and Briefs, and correspondence, have led to change.

- the Authority's various public interventions have reminded the news media and public that the statistical service is independently 'regulated';
- the position of statistics professionals working in departments has been strengthened, in response to this regulatory environment; and
- there is growing international recognition of the strong system of statistical oversight in the UK.

At the same time, monitoring and assessment work has helped the statistical service to share a common interpretation of the expectations of the Code.

To continue to increase the impact of assessment, the Authority will:

- Review the Code of Practice to ensure its continuing relevance (paragraph 16)
- Review the way that we assess those sets of statistics that raise few issues of risk or materiality (paragraph 16)
- Work with the National Statistician's Office to help communicate the lessons from assessment to the bodies that produce official statistics (paragraph 19)
- Work with a group of statistical Heads of Profession from across government who are able to lead improvements (paragraph 24)
- Engage more systematically with 'opinion formers' both in the UK and internationally, partly to describe our work and partly to better understand others' concerns about the statistical system (paragraph 25)
- Describe our roles and responsibilities, our priorities and our objectives, and our governance arrangements more clearly, so that others can make informed judgements about our effectiveness and our independence (paragraph 25)
- Seek further views from users of statistics on the perceived changes to the statistical service over time (paragraph 25)

External views

In September 2009, the Authority commissioned Ipsos MORI to conduct research to explore opinion formers³ views of official statistics, including views of the Authority's work to date and the difference that it has made. The research indicated that knowledge about the Authority was varied, being closely related to the frequency of use of statistics. However, many of the high-profile interventions that the Authority had made were widely recognised. The independent scrutiny role of the Authority was seen as crucial to improving the trustworthiness of, and trust in, official statistics. Some respondents felt that this independence needed to be reinforced and emphasised further to the outside world.

The House of Commons Public Administration Select Committee, to which the Authority formally reports, has held six hearings at which the Authority has been represented. Two of these hearings related to monitoring and assessment issues – in February 2009, on the release of knife crime statistics, and in March 2009, on the publication of migration and workforce statistics.

We have also prepared a report, at the invitation of the House of Commons Transport Committee, on the apparent divergence in trends between the numbers of people killed and seriously injured in road accidents. This followed oral evidence by the Authority's Director General for Monitoring and Assessment in November 2009.

The Royal Statistical Society (RSS) plays an active part in commenting and advising on matters relating to official statistics. The RSS's public statements have been supportive, whilst arguing that the Authority should comment further on controversial topics such as the merits of different measures of inflation.

The Authority's monitoring and assessment work is also the subject of comment by organisations with a campaigning role:

³ Opinion formers for the purposes of the research included journalists, parliamentarians, analysts, regulators, trade and business representatives and academics.

- *Straight Statistics* - a campaign group established by journalists and statisticians to improve the understanding and use of statistics by government, politicians, companies, advertisers and the media. It seeks to expose bad practice while rewarding good with a general aim of restoring public confidence in statistics. It has covered a number of issues about which the Authority has made public statements, including the suitability of different measures of price inflation for different purposes, trust in crime statistics, road traffic casualties, and migration statistics.
- *Full Fact* – an independent, non-profit organisation campaigning for greater transparency and accountability in the public debate. In November 2010 the Chair of the Authority replied to a letter from Full Fact regarding the release of official statistics in two Department for Work and Pensions press releases in September 2010.

In its latest annual report⁴, the European Statistics Governance Advisory Board has drawn positive attention to the UK's statistical governance arrangements, saying that it “encourages (the) establishment of suitable Code-monitoring mechanisms in all ESS (European Statistical System) countries”. As far as we know, the UK is the only ESS country with a fully developed system of this kind.

Producer views

While the Authority was developing the Code and the assessment processes, some statisticians in government seemed to be concerned that the new arrangements would be burdensome or a distraction. We think that there is now an increasing understanding about what the Authority is aiming to achieve, and how assessment is contributing to this.

Nevertheless, some government statisticians:

- continue to argue that independent scrutiny, particularly where it shines a light on areas of relative weakness, will diminish public confidence in statistics, and thus undermine the objective of building trust; and
- are concerned about the perceived burden of both the process of assessment and the ongoing work required to be Code compliant.

Authority perspective

Responding to the views of government statisticians

Members of the Authority Board have met senior officials during the year, both to explain the Authority's priorities and to understand better the statistical activity of government departments. The monitoring and assessment team has sought to engage with statistical staff in a wide range of producer bodies – for example, by speaking at a range of events. And we have modified the Assessment processes to try to reduce the demands on producers in terms of contributing to the reviews. We have also set work in hand to review the Code of Practice in order to ensure the continuing relevance of all its specific requirements. We will also look again at how we plan to assess those sets of statistics that seem to raise few concerns. If practicable we will reduce the work involved in these assessments.

We will also try to make clearer what we mean in assessment reports when we require producers to ‘document the uses made of a set of statistics’ and ‘provide better statistical commentary’. To help with this we have published on the Authority's website a proposed framework for describing uses of statistics⁵, and guidance about preparing statistical releases⁶.

⁴ http://epp.eurostat.ec.europa.eu/portal/page/portal/eshgab/documents/EN_ESGAB%20report%202010_FINAL.pdf

⁵ <http://www.statisticsauthority.gov.uk/assessment/monitoring/monitoring-briefs/monitoring-brief-6-2010---the-use-made-of-official-statistics.pdf>

⁶ <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-releases.html>

We will also continue to emphasise the extent of good practice we have identified, both in individual assessment reports and in the 'Findings from Assessment' summaries that we have published⁷, in addition to identifying broad areas requiring further development.

The Authority's view of the impact of assessment so far

We see signs that user engagement is improving in many producer bodies. And there have been some substantive examples of improvements to the written commentary that accompanies statistics at the time of their release. These are however only early signs and there is still a question over how far the agenda of change has been accepted and internalised. Looking to the future we will work with the National Statistician's Office (NSO) to help communicate both the specific and strategic lessons from assessment to the producer bodies.

We have observed good practice in a number of different contexts, for example:

- Statisticians in Scotland have shared information on improvements from several assessments, assisted by a group of staff from Scottish Government, the Information Services Division of NHSScotland, and the General Register Office Scotland (now National Records Scotland).
- In Northern Ireland, the Department for Health, Social Services and Public Safety applied the lessons from the assessment of statistics about Children Looked After to other statistics produced within the department. This included improvements to the website, and to user engagement.
- Welsh Assembly Government statisticians have improved their population and demography statistics on the basis of action taken in response to previous assessments of other statistics.
- Statisticians in HM Revenue and Customs (HMRC) have actively shared the lessons from assessment, and this has contributed to a significant improvement in the quality of the commentary in HMRC statistical releases.

We have noted that it is a particular challenge to spread the lessons of assessment in a department where statisticians sit in separate divisions, have less daily contact with each other, or have little incentive to respond to the Authority's agenda.

We have seen some departments engage with the NSO once an assessment has started (and also after requirements have been published in assessment reports). There have been examples of producers proactively seeking advice from the National Statistician, prior to assessment, to ensure that they are able to comply with the Code or at least are aware of areas that need improvement.

We think that the improvements made by producers to their statistical releases stem from:

- the leadership provided by the National Statistician's Office;
- the publication by the Authority of guidance, developed with input from the Government Statistical Service (GSS), about 'good statistical commentary';
- the practical support provided by a GSS taskforce on dissemination; and
- the genuine commitment and professionalism of many in the GSS to improve their statistical outputs.

Looking to the future we will work with a group of statistical Heads of Profession (including from ONS) who want to be at the forefront of developments that support the improvements needed. ONS has told us that it wishes to be at the forefront of the GSS in terms of Code compliance and sharing lessons from assessment; it has recently detailed the benefits that it has identified from

⁷ see for example <http://www.statisticsauthority.gov.uk/assessment/monitoring/monitoring-briefs/monitoring-brief-4-2010--findings-from-the-first-50-assessment-reports.pdf>

adopting a more co-ordinated approach to assessment, and the specific corporate actions it has taken to strengthen Code compliance.

The Authority's contribution to 'trust'

The monitoring and assessment function of the Authority is itself part of demonstrating the trustworthiness of the UK's statistical system – in the sense that the system is seen to be independently observed and regulated. But if users of statistics and the public are to trust the regulatory function they may need more understanding than they currently have of our work. We may thus need to build on steps already taken to engage more systematically with 'opinion formers' both in the UK and internationally, partly to describe the Authority's work and partly to better identify and understand any concerns about the statistical system. There may be scope to describe our roles, responsibilities, priorities and objectives more clearly, so that others can make informed judgements about our effectiveness and our independence. And we will seek further views from users of statistics on the perceived changes to the statistical service over time.

ANNEX Evidence and analysis

Improved value of particular sets of statistics

Specific improvements – often quite small ones to do with improving documentation but sometimes of more substantial impact – have been made following every completed assessment to date. In some cases these have been made during the period of an assessment - there is informal feedback at the early stages of assessment, where the assessment team provides comments on a particular statistical release, or some aspects of process or governance, before the assessment report is published. For example:

- The Department for Regional Development (Northern Ireland) made various improvements to its annual transport compendium publication in response to the Requirements in the draft assessment report. These changes included: drawing readers' attention to possible shortcomings of the road casualty data; providing links to the source data used for the compendium publication; including information on the uses of the statistics; and improving the presentation of the statistics to aid understanding. As a result of these improvements, the final assessment report included fewer Requirements.
- Comments provided to the ONS team responsible for the Business Register and Employment Survey on their new draft statistical release, and reference to the Authority's statement on standards for statistical releases, resulted in them producing a release that was much improved compared with the one that we initially commented upon.

More commonly we have seen specific improvements being made to each of the sets of statistics that have been assessed to date in the course of implementing the Requirements in assessment reports. For example:

- The Department of Energy and Climate Change (DECC) has made significant changes to its website, and has published a particularly good quality statement, to help users understand the characteristics of the statistics.
- The Department for Transport has published a best approximation of the total number of road casualties, based on various sources of data and assumptions about their quality.
- The producers of statistics about school exam results in Wales, Scotland and Northern Ireland have agreed that the availability of school level information should be highlighted in the relevant statistical releases, and that the information will be made available in accessible formats, on request.

Engagement with users

We have seen evidence that departments accept the importance of meeting users' needs and have taken steps to increase the effectiveness of their user engagement:

- The Department for Communities and Local Government (DCLG), the Ministry of Justice (MoJ), and the Home Office (HO) have run public consultations about future statistical activities.
- The Information Services Division (ISD) of NHSScotland plans to issue an expanded version of its current annual survey to gather users' views on organisational issues and more specific feedback on the content, quality and presentation of statistics on individual topic areas. ISD also plans to revamp its website to give users the opportunity to provide feedback on specific aspects of individual statistical releases.
- Statisticians at the Department for Environment, Food and Rural Affairs (Defra) recently held an internal 'user engagement event'. The day had some more 'traditional' elements (such as presentations, brainstorming, action planning), and a task (based on television's *The Apprentice*) which allowed new approaches to user engagement to be assessed through hands-on experience.
- The GSS Theme Group for Agriculture and Environment, which includes representatives from Defra, the Devolved Administrations and Arm's Length Bodies, recently held a

workshop on 'Effective User Engagement'. Particular emphasis was given to the use of the internet and working with the media.

- DECC conducted a user engagement survey in 2010; it received 170 responses, and the findings have been published. The report demonstrates the extent of user satisfaction, and areas that users would like DECC to work on further. DECC has said that it will establish a new user panel, to provide a focus for the development and use of its statistics. We think that this is a significant innovation.
- The Ministry of Justice's consultation on criminal justice statistics (launched in November 2010) focused on: consistency of definitions and clarity of concepts; simplification where multiple measures exist; and the introduction of new bulletins to improve transparency and timeliness. In order to try to reach all stakeholders, including 'silent' users, Ministry of Justice statisticians developed a comprehensive stakeholder engagement plan, including press notices, a twitter feed, letters to known stakeholders, emails to specialists, and information on the home page of the Ministry of Justice website. We were told that the consultation garnered far more responses than is usual, and that many youth offending teams expressed interest in being involved in the transition to a new re-offending measure.

Improved commentary

A good example of the positive way in which statisticians have responded to assessment is the Department for Health's improvements to its presentation of statistics on waiting times from referral to treatment (RTT), and also waiting times for cancer treatment. Both outputs were very limited in their presentation of the monthly or quarterly data, with unclear labelling, unclear metadata and limited commentary explaining the statistics. Immediately on receiving feedback from the assessment team the RTT statisticians began addressing the weaknesses. They developed a new annual statistical release that presented an overview of waiting times over the previous year, commentary to explain the main trends and issues, and use of charts. The statisticians responsible for cancer waiting times also developed a new annual summary publication with, for the first time, commentary and time series analysis; they also published a series of background documents on methods, quality, and confidentiality; prepared a detailed plan for engagement with a wide range of users, including patient groups; and halved the number of people with pre-release access to the statistics.

Until recently, the annual child benefit statistics produced by HM Revenue and Customs (HMRC) contained no information about trends or changes to the statistics since the previous release. Following the assessment HMRC has made a range of changes, including more detailed commentary accompanying tables and charts in the release, the inclusion of a section giving details of future publications within each release, and information about gaps in the backseries. HMRC statisticians have committed to continue to develop this commentary to ensure that it assists users' understanding of the statistics.

Ministry of Justice statisticians improved their publication of criminal justice system statistics in the reports *Criminal Statistics* and *Sentencing Statistics* by presenting the commentary in greater depth and relating the statistics to the broader criminal justice system context. They also simplified the explanations about the data, extended the time series comparisons and included new charts to illustrate the main findings, and they have developed an interactive online guide to the criminal justice system, explaining the process and flagging the relevant statistics.

The NHS Information Centre (NHS IC) reviewed its publication on statistics about uses of the Mental Health Act. The latest publication contains more context and clear messages, more consistent charts and display tables, reference tables in Excel format rather than PDF, more time series analysis, and more interpretation. According to the statisticians, the changes have resulted in a surge of interest in the publication following its release.

Independence and political impartiality

Sir Gus O'Donnell's guidance⁸ to all civil servants about the use of statistics had a significant operational impact, and has, for example, led to a strengthened role for the statistical Head of Profession in the Home Office. In a similar vein, as a direct result of an assessment, we have received Ministerial confirmation that the Head of Profession in the Department for International Development has sole responsibility for the content, format and timing of statistical releases.

Other developments

The material above relates to a few specific parts of the Code. A few other developments illustrate the breadth of impact that assessment has had:

- In looking at Defra's agricultural statistics, we noted that the main driver for collecting many of these statistics were a number of EU regulations. To better understand the use that the EU make of these data, the Chair of the Authority wrote to the relevant European Commissioner. We are told by Defra that this engagement has helped reinforce existing work to reduce the burdens on national data collectors, and on farmers.
- We have asked producers to provide us with information about their compliance with the Code in relation to each set of statistics and (separately) in relation to their organisation of statistics as a whole. For those producers whose statistics were not assessed early on, we reviewed their 'organisational' material, to provide them with our informal views prior to a formal assessment. In the case of the Home Office, for example, this has led to them updating the National Statistics Publication Hub with lists of forthcoming releases, improved links on their website, and improved documentation (revisions policies, compliance statements and their Statement of Administrative Sources).

⁸ <http://www.parliament.uk/documents/upload/letter-brennan-090227.pdf>