

Monitoring Brief

Monitoring Brief 4/11
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Implementation of Authority Recommendations

This Brief identifies a number of steps that have been taken by government departments to implement the recommendations made in Statistics Authority reports published during its first three years of operation – up to April 2011.

All of the Authority's recommendations to the bodies that produce official statistics are rooted in the statutory objective to promote and safeguard the production and publication of official statistics that serve the public good. In practice this involves looking in detail at all stages in the 'value chain', from the decision to produce statistics on a topic through to their eventual use in ways that deliver public benefit. Where the Authority sees scope to enhance the value of the statistical service in a cost-effective way it makes appropriate recommendations. Many of these have related to the form of the finished statistical outputs and the manner of their delivery to those who may be able to use them; and the related dialogue with, and support to, the users. These are the areas where the beneficial impact of official statistics can be most readily enhanced. Recommendations that relate to data collection or methods of compilation have been less common. This reflects, at least in part¹, the generally high professional standards found in all areas of UK official statistics.

Findings

Assessment Reports

In the case of the specific recommendations (called Requirements²) made in statutory assessment reports, the body responsible for the statistics is required, under the provisions of the *Statistics and Registration Service Act 2007*, to take appropriate steps to strengthen compliance with the *Code of Practice for Official Statistics*. However, there is some leeway given in terms of timing and detail so that implementation can be taken forward as efficiently as possible. Over 100 assessment reports were completed in the first three years of the Authority's existence, containing some 600 Requirements. To date we estimate that around half have been fully or largely met and the rest are in train. An analysis of the types of Requirement included in these reports can be found in the Monitoring Brief *Findings from the First 100 Assessment Reports* which the Authority published in March 2011.

Evidence from the 100 assessment reports that the Authority has published to date indicates that producer bodies implement Requirements more readily if:

¹ Assessments of compliance with the Code of Practice do not review aspects of statistical methods in depth – the Code requires producers to use appropriate methods, and to seek to achieve continuous improvement in statistical processes. This may in part explain why we have made few recommendations about methodological issues.

² In addition to Requirements, assessment reports also contain 'Suggestions' for improvement - these address aspects of the set of statistics that might be strengthened in order to improve public confidence in their production, management and dissemination. They address matters that are beyond the provisions of the Code. Producer bodies are not under any obligation to implement the suggestions.

- The recommendations are straightforward to implement – for example, publishing existing background documents required by the *Code*;
- They are already aware of the issue and have taken steps to make the required improvements;
- Statistical Heads of Profession have initiated organisation-wide changes, such as improving the presentation and layout of statistics publications;
- There are other corporate developments in train, such as improvements to organisations' websites, which producer teams have been able to use as the basis for improving user engagement and the accessibility of their statistics.

In the case of other recommendations and suggestions including in other types of Authority report and correspondence, there is no formal requirement on government departments and other bodies that produce official statistics to respond positively unless the recommendation relates directly to a set of National Statistics and is grounded in the *Code of Practice*. In that case, compliance with the recommendation is required by legislation.

Monitoring Reports

As of March 2011, the Authority had published four Monitoring Reports³ on statistical topics⁴, the most detailed and substantive form of report it prepares:

- *Migration Statistics: The Way Ahead?* (published July 2009);
- *Pre-Release Access to Official Statistics - A Review of the Statutory Arrangements* (published March 2010);
- *Overcoming Barriers to Trust in Crime Statistics - England and Wales* (published May 2010); and
- *Strengthening User Engagement* (published June 2010).

The evidence we have seen indicates that the responsible organisations have made at least some progress in implementing the recommendations in three of these reports:

- In response to recommendations in the **Migration Statistics** report, the Office for National Statistics (ONS) has improved the quality assurance methods and explained these to users, and has published a range of reports on the progress of the Migration Statistics Improvement Programme. ONS has also taken steps to implement the other recommendations in the report although these have only been partially achieved or are still ongoing;
- Following publication of **Overcoming Barriers to Trust in Crime Statistics**, the National Statistician was invited to lead a review to decide which body should be given this responsibility and to oversee the implementation of recommendations in the Authority's report. The review will also look for cost-effective ways to improve the coverage and coherence of crime statistics;
- The publication of **Strengthening User Engagement** has led to various improvements – for example: the Royal Statistical Society (RSS) is developing an online discussion forum for users and producers; ONS is developing its new website and the National Statistician has established groups to improve the commentary in statistical releases and to coordinate user engagement across government departments. However, there are some areas where tangible progress has yet to be made, such as reviewing how best to use

³ <http://www.statisticsauthority.gov.uk/assessment/monitoring/monitoring-reports/index.html>

⁴ Other Monitoring Reports have focused on the Code of Practice, and those official statistics that might be designated as National Statistics

web technology in enhancing accessibility of statistics and improving communication between statistical experts and journalists.

In its other report, the Authority reviewed the **statutory arrangements for Pre-Release Access to official statistics** in the four UK administrations and recommended several amendments to the Official Statistics Orders to tighten up these arrangements, supported by collaborative work involving the four UK administrations. Each of the administrations subsequently reviewed its Pre-Release Access arrangements and proposed no changes. The Authority has commented frequently on the risks and disadvantages of the present situation and will continue to seek reductions in Pre-Release Access to the minimum, consistent with the principles of equality of access and with the need to restore public confidence.

Monitoring Briefs / M&A Notes

The Authority has commissioned its Monitoring and Assessment (M&A) team to produce short reports in response to matters of interest relating to a particular statistical series or statistical issue. Publishing these "Monitoring Briefs"⁵ (earlier ones were called "M&A Notes") has enabled the Authority to respond to issues as they arise. In considering whether a Brief should be published the Authority considers the significance and topicality of the issue, the link between the issue concerned and trust in the statistical service, and whether there are messages from the issue that could relate to other statistical producers or products.

Monitoring Briefs draw attention to issues of concern and have also helped to raise public awareness of the Authority's independent voice. By March 2011 the Authority had published 10 Monitoring Briefs and M&A Notes. Whilst these rarely contain formal recommendations, they have pointed to the desirability of various changes in the way that organisations produce and publish official statistics:

- A Note on the **volatility of the Retail Sales Index (RSI)** considered unexpectedly large estimates of month-on-month changes being reported by ONS for the volume of retail sales in Great Britain. ONS has since calculated standard errors for the RSI to inform users about the accuracy of published figures and published a paper⁶ on this issue in its journal *Economic and Labour Market Review* in February 2011.
- Following the Public Administration Select Committee's consideration of a review of the Home Office's **knife crime statistics** against the Authority's Code of Practice, the Cabinet Secretary, Sir Gus O'Donnell, issued new guidance to the Civil Service regarding good practice in relation to official statistics and the role of government statisticians.
- A Note on **gender pay gap figures** led to discussions between ONS and the Government Equalities Office (GEO) on the most appropriate way to present figures on the gap. GEO has since modified the way it presents gender pay gap figures in its publications.
- The Monitoring Brief on the **use made of official statistics** suggested that statisticians might consider the use made of their statistics in the context of a 'generic framework' and might provide a summary of how the statistics are (or might be) used. The monitoring and assessment team has promoted the use of this framework to statistics producers as part of the assessment process. There is some evidence that producers are taking steps to develop their understanding of how their statistics are used and in some cases they have published this information for the first time.

⁵ <http://www.statisticsauthority.gov.uk/assessment/monitoring/monitoring-briefs/index.html>

⁶ <http://www.statistics.gov.uk/articles/elmr/elmr-feb11-winton.pdf>

However, the proposals made in some Monitoring Briefs have yet to be fully addressed – for example, the Authority published a statement on **Standards for Statistical Releases**, and the monitoring and assessment team has since encouraged bodies that issue official statistics to refer to this statement when developing their publications. However, we have seen little evidence to date that producer teams are systematically using it to improve their releases.

Correspondence

The Authority has initiated or responded to correspondence on a range of statistical issues. Again, these rarely involve formal recommendations but often point to the need for action of some kind – for example:

- Following a suggestion by the Authority in 2008, the Cabinet Secretary confirmed to the Authority Chair in June 2010 that the **Ministerial Code** would be revised to include **guidance about statistical propriety**;
- The Authority published a Note on **trends in violent crime** in response to concerns that public statements about trends in violent crime did not take account of changes in the recording system. In early 2010 the Authority Chair subsequently exchanged correspondence with the then Home Secretary and Shadow Home Secretary. In July 2010, following the election of a new UK Government, the Authority Chair responded to queries from the former Home Secretary about whether the statistics were being used in a misleading way. In his response (which was copied to the Prime Minister), the Chair reiterated the Authority's view that the British Crime Survey provided a more reliable measure than police recorded statistics of the national trend in violent crime.
- In June 2010 the Authority offered to the Cabinet Office that ONS could help to widen the scope and range of the government's **public sector employment statistics**. The Authority also set out its views that such statistics, published by a government department and concerning issues of major political importance, are clearly official statistics, and should therefore conform to the Authority's Code of Practice;
- In 2010 the Authority set out its view that it would be helpful if, in future, the Home Office published the statistics derived from administrative records on the **Points Based migration system** in as accessible a way as possible treating them, wherever appropriate and possible, as official statistics.
- Following comments made in March 2010 by the then Prime Minister in a podcast about **immigration statistics**, the Authority Chair wrote to the Prime Minister about using non-comparable data for political purposes.
- In March 2011, the Authority Chair wrote to the Secretary of State for Health to express concerns about the NHS Information Centre's proposal to **withdraw its funding of the General Lifestyle Survey** which is conducted by ONS. The Authority highlighted the value of the survey in monitoring key trends in public health and the importance of consulting users about possible alternative sources of this information. The Authority Chair urged the Secretary of State to reject the Information Centre's proposal.
- In March 2011, the Authority Chair wrote to the Mayor of London to criticise a press release on **crime across the London transport network** in which Transport for London (TfL) statistics were published ahead of their normal release date, alongside political comment by the Mayor. Although TfL is not a producer of official statistics, the Authority Chair drew attention to the fact that both these practices contravene the *Code of Practice for Official Statistics*. The Chair also wrote to the Minister for the Cabinet Office to request that TfL statistics be classified as Official Statistics.

Future action

With a view to ensuring that its recommendations are implemented by producer organisations, the Authority will:

- Continue to monitor progress in implementing recommendations, including publishing and regularly updating a full list of formal recommendations made, and progress in implementing them;
- Support the National Statistician's Office in its work to co-ordinate and strengthen the UK statistical service;
- Support producers of official statistics by:
 - Continuing to identify and promulgate examples of good practice in statistical activity and statistical governance which producers might adopt and benchmark against;
 - Producing and promoting further statements (such as *Standards for Statistical Releases* and *The Use Made of Official Statistics*) to explain the basis of the Authority's thinking about good statistical practice, and to provide producers with practical guidance on how to improve specific aspects of their statistics; and
- Strengthen engagement with 'opinion formers', drawing attention to and explaining better the Authority's objectives and priorities, and how particular recommendations support these.