
Ed Humpherson, Director General for Regulation

Mr Chris Giles
Financial Times
(by email)

28 February 2019

Dear Chris

You contacted us about the status of ONS's migration estimates by quarter in November, and we discussed the issue in early February. This letter sets out my conclusions following our discussions.

The background is that ONS published data on migration by quarter¹ in response to user requests. In publishing the data, ONS stated clearly that these data should not be regarded as official statistics.

My conclusions are based on the analysis conducted by my team, included as an Annex to this letter. In summary:

- Whether the data by quarter are classed as official statistics is a matter of judgement for the producer of the statistics. ONS has considered the National Statistician's guidance² on this matter in order to form its view.
- In reviewing the ONS's judgement we considered each of the areas set out in the National Statistician's guidance: materiality, public interest, regularity, methodology, coverage and publication. We consider that data by quarter meet these criteria with the exception of methodology and coverage.
- The data by quarter are based on a smaller sample and the complete methodology³ cannot be applied. As explained in the Annex, for these reasons we consider that ONS's approach is justified.
- We consider that the intention to not class these as official statistics was to provide a clear indication to users of the associated quality issues and the limitations of the data by quarter.
- ONS has provided some commentary to users to support user interpretation, but a lot of weight is being placed on user understanding of the term "official statistics", which may not be familiar to all users.

¹ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/datasets/estimatesoflongterminternationalmigrationbyquarterderivedfromtheinternationalpassengersurvey>

² <https://www.statisticsauthority.gov.uk/wp-content/uploads/2016/06/National-Statisticians-Guidance-Management-Information-and-Official-Statistics.pdf>

³ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/methodologies/longterminternationalmigrationestimatesmethodology>

I therefore consider that the ONS's decision not to classify as official statistics is defensible by reference to the relevant guidance. But it is not the only or best way to signal to users that they should treat the data by quarter with caution. We note that ONS did provide some guidance to users, but consider that ONS could have done more to support understanding of these data. We have asked ONS to:

- provide guidance to users on the quality of the estimates and how they should interpret the data. These data are of high public interest and some users are likely to pay close attention to them, so fuller guidance on what can and cannot be inferred from them is important;
- be clearer about how it reached its judgement that the estimates should not be published as official statistics;
- more clearly demonstrate how it is applying the Code of Practice for Statistics in the production of the data by quarter. A statement of compliance with the Code would demonstrate which aspects of Trustworthiness, Quality and Value have been met and which have not, and therefore provide greater assurance around the production of these estimates and associated limitations.

ONS has sought to respond to these expectations in its February Migration Quarterly Statistics report⁴, by including clearer information on how they reached the decision on the official statistics status of these estimates and updating the commentary on how the estimates should or should not be used.

These quarterly data are of interest because of the public interest in migration more broadly. The robustness and value of migration statistics remain a key area of focus for OSR. Our focus on migration statistics is reflected in our recent work:

- Measuring migration using the International Passenger Survey has well known limitations, some of which we highlighted in our report on student migration statistics⁵ in July 2017, which effectively led to the removal of the National Statistics designation from the student emigration statistics. ONS no longer publishes a headline figure for net student migration.
- We wrote to the National Statistician⁶ in March 2016 highlighting the importance of explaining the differences between estimates of migration produced by ONS and administrative data on the issuance of National Insurance numbers to non-UK individuals.
- In October 2018, we published a review⁷ of the way ONS handled changes to the data collection approach for the International Passenger Survey.

ONS and other migration statistics producers are currently working together on a planned transformation programme⁸ which involves drawing on a wider range of government administrative sources beyond the International Passenger Survey to improve the quality and value of migration estimates. On 30 January ONS published an update on progress on the transformation journey⁹.

We welcome this update from ONS. It will be essential to keep users engaged on developments. We will continue to monitor progress on migration statistics as part of our work programme for 2019-20, including reviewing whether the ambitions set out in the transformation programme are being met in an effective and timely way and are supporting users of the statistics.

⁴<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/bulletins/migrationstatisticsquarterlyreport/february2019>

⁵ <https://www.statisticsauthority.gov.uk/publication/the-quality-of-long-term-student-migration-statistics/>

⁶ <https://www.statisticsauthority.gov.uk/wp-content/uploads/2016/03/Email-from-Ed-Humpherson-to-John-Pullinger-230316.pdf>

⁷ <https://www.statisticsauthority.gov.uk/publication/ips-compliance-check/>

⁸<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/articles/migrationstatistics/transformationupdate/2018-05-24>

⁹ <https://www.ons.gov.uk/releases/updateonourpopulationandmigrationstatistics/transformationjourneyaresearchengagementreport>

I am copying this letter to Iain Bell, Deputy National Statistician with responsibility for migration statistics.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ed Humpherson', written in a cursive style.

Ed Humpherson
Director General for Regulation

ANNEX – Summary of OSR judgement on the status of ONS estimates of Long-Term International Migration by individual quarter

Background

1. On 29 November 2018, ONS published estimates of [long term international migration by quarter](#) as part of the Migration Statistics Quarterly Report (MSQR) for the first time, this followed publication of these data in December 2017 as an ad hoc request.. This was in response to user requests for this information to provide an early indication on changing migration patterns following the EU referendum. ONS stated at the time of the release that the statistics were not official statistics and were instead a 'by-product of our annual IPS processing.'
2. This annex summarises OSR's conclusions regarding ONS's decision not to designate its Long-Term International Migration statistics by individual quarter as official statistics, following correspondence to OSR about ONS's decision.
3. The correspondent asked OSR to confirm:
 - whether this decision by ONS is compliant with [published GSS guidance](#) on what constitutes an official statistic and the 2007 Statistics and Registration Services Act (the Act); and
 - whether public debate would be better informed if these were handled as official statistics
4. The correspondent felt that allowing ONS or any producer of official statistics to arbitrarily designate important information as not official statistics undermines trust in figures that help inform decisions in society, and this would not serve the public good.
5. In a follow-up conversation with OSR's Director General for Regulation, the complainant questioned why ONS's Long-Term International Migration statistics by individual quarter would not be official statistics while ONS's monthly Labour Force Survey and the Retail Sales Index statistics are published as official statistics.
6. The areas raised by the correspondent are considered in turn below.

Guidance on identifying official statistics

7. The [National Statistician's Guidance, Management Information and Official Statistics](#), published in June 2016, provides the latest guidance on deciding what should be published as official statistics and supersedes previous 2011 guidance as referenced by the complainant. The 2016 guidance is more explicit about the distinction between statistics and other quantitative information, which is relevant to this situation.
8. The Act does not specify the types of data that constitute statistics. The guidance states that decisions on whether data are published as official statistics remains a matter of judgement, and that decisions should be made on a case-by-case basis by the relevant Head of Profession for Statistics (or Lead Official) or based on their advice.
9. The guidance highlights a set of considerations, covering materiality, public interest, regularity, methodology, coverage and publication, see Figure 1, though it is not a requirement that all of them are met. Furthermore, it states that 'Sometimes the Statistics Authority may take a different view from the organisation that produced the figures and in some circumstances the Authority may consider them to be official statistics, in line with the recommendations of the [Bean review](#).'

Figure 1: GSS guidance criteria used to identify official statistics

Materiality. Whether or not the data is used publicly in support of major decisions on policy, resource allocation or other topics of public interest. This might include:

- a. monitoring government performance;
- b. supporting the formulation, implementation or evaluation of policy;
- c. serving the public good by helping businesses, academia, citizens etc.; and
- d. information which is market-sensitive.

Public interest. Whether or not the data has a high public profile or attracts controversy when published and public debate would be better informed if the figures were, in future, handled as official statistics.

Regularity. Whether or not the data will be made available on either a regular or recurring basis, or there is an intention or strong probability for that to be the case. When information is published for the first time, this may not be initially known, but there may still be value in considering the release as official statistics.

Methodology. Whether or not the data is collected and the results are compiled using widely accepted statistical methods.

Coverage. Whether or not the information is complete in the sense that it is broadly representative of the total population of entities that it embraces. National representation is typical, though official statistics can also focus on particular regions, e.g. cities.

Publication. Whether or not the information is put in the public domain. This may be done as a statistical release, or as part of an answer to a Parliamentary Question, Freedom of Information request, or as evidence to a Select Committee or as part of a Ministerial speech. If it is not going to be published, it is unlikely to be considered to be official statistics; however the principles of open data apply.

10. ONS confirmed with OSR that it considered the GSS guidance in considering its decision and that the ONS Head of Profession for Statistics made the final judgement on the designation. ONS has informed OSR that it had concerns over use of the estimates by quarter and how the data might be misinterpreted. These include:
 - Seasonal nature of the data/peaks in migration: ONS were concerned about the new data leading to misleading comparisons between quarters. Seasonal patterns of student inflow in the third quarter and outflow in second quarter (Q2_ (Q3) were a key concern in this area.
 - Differences between estimates by quarter and rolling year. There was some concern about potential misunderstanding as the quarterly data does not sum to the rolling year figure.
 - Confidence intervals: large CIs in the quarterly migration data are greater than those for the annual net migration estimates.
11. Though caveats were released with the quarterly data, ONS did not explain why the estimates are not official statistics. Explaining what led them to make this judgement, with reference to the National Statisticians guidance, would have provided clarity to users about the factors that were considered. ONS have now updated the [FAQs](#) associated with the MSQR publication to reflect this information. It would also have been helpful for ONS to outline the ways in which the statistics were produced in line with the Code of Practice for Statistics, possibly through a statement of voluntary compliance.

12. OSR has separately considered the available evidence against the considerations within the National Statistician’s guidance criteria. We consider that quarterly estimates meet most of the criteria, with the exception of Methodology and Coverage.

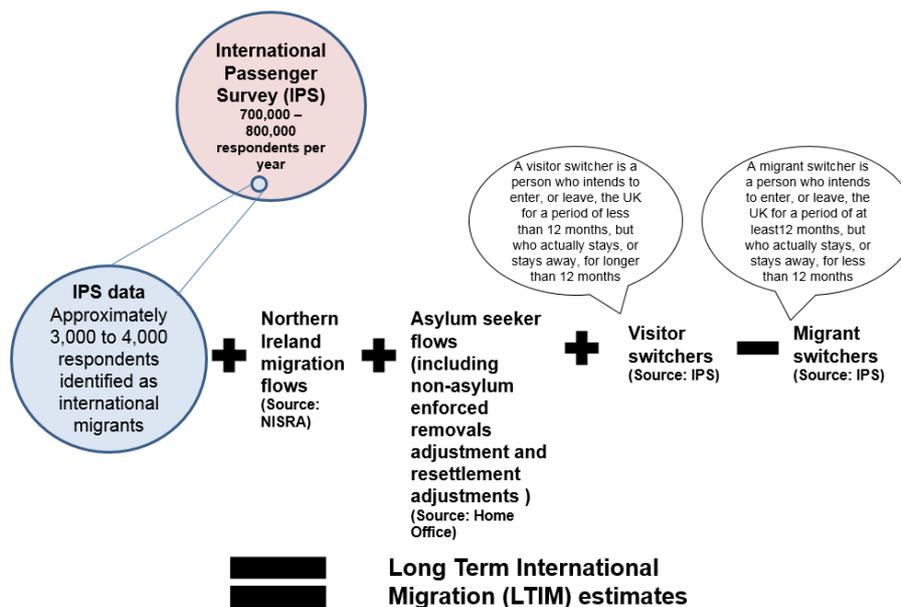
Methodology

13. When considering data collection and compilation of results, we have focused on how migration estimates are produced, rather than the data collection approach for the IPS alone. By ‘widely accepted statistical methods’ we mean:

- i) standard approach to processing of data and production of statistics in line with recognised or international standards;
- ii) standard approaches to understanding uncertainty e.g. considering sampling variability and non-sampling variability;
- iii) application of validation, calibration, adjustment, quality assurance and review methods that lead to the best estimate of the phenomenon being measured.

ONS’s methods approach for both the annual and quarterly long-term estimates are set out below.

14. **ONS’s rolling annual Year End LTIM (National Statistics)** estimates are published quarterly and give an annual estimate based on data from the [International Passenger Survey \(IPS\)](#), a sample survey, with [adjustments made for asylum seekers, resettlement schemes, switchers and flows](#) to and from Northern Ireland. The rolling year LTIM estimates are about 90% based on IPS data. The year-end LTIM methods can be summarised as follows:



Source: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/methodologies/longterminternationalmigrationestimatesmethodology>

15. Adjustments applied to rolling LTIM year-end estimates shown above (NI, Asylum seekers, Switchers), are re-run every quarter through the year. The breakdowns for the preceding three provisional quarters can change until finalised at year end. These adjustments are not applied to the individual quarter data.

16. As well as the adjustments outlined, the rolling year LTIM estimates are [calibrated](#) based on the Labour Force Survey (LFS) geographical distribution of migrants, this is to reflect the difference between migrants stated destination within the UK and where they settle in reality. LFS migrant distributions are therefore used to adjust the IPS distributions and may have small impacts on in inflow and balance estimates for the annual UK data. This calibration can not be applied to the quarterly data as the LFS sample size is not sufficient.

17. The rolling LTIM year-end data undergoes a final calibration to take account of annual Civil Aviation Authority, Department for Transport, Eurostar and Eurotunnel known totals of passenger flows. This only results in a small change to the provisional totals, but can only be done at year end once the annual flows data is received, and therefore cannot be applied for the individual quarter data.
18. ONS publish [data](#) which shows the components and adjustments used to estimate year-end LTIM. It details what proportion of the LTIM estimate is based solely on the IPS and how much this changes as a result of adjustments. Tables 1 and 2 show the scale of each of the adjustments applied to annual LTIM estimates for net migration.

Table 1: Adjustments 2012 - 2017 (migrants annually, thousands, balance)

	Total	IPS	NI	Asylum Seekers	Resettled Persons Adjustment	Visitor Switchers	Migrant Switchers
2012	+ 176.8	+ 154.5	- 2.0	+ 17.2	z	+ 9.7	- 2.6
2013	+ 209.1	+ 177.6	+ 1.6	+ 17.3	z	+ 15.9	- 3.2
2014	+ 312.9	+ 273.5	+ 2.7	+ 21.0	z	+ 20.2	- 4.5
2015	+ 332.3	+ 280.3	+ 1.5	+ 30.1	+ 1.3	+ 24.1	- 5.0
2016	+ 248.6	+ 205.4	+ 1.7	+ 30.9	+ 4.8	+ 9.9	- 4.2
2017	+ 284.5	+ 266.5	+ 1.1	+ 25.6	+ 5.6	- 8.3	- 6.0

Z = not applicable

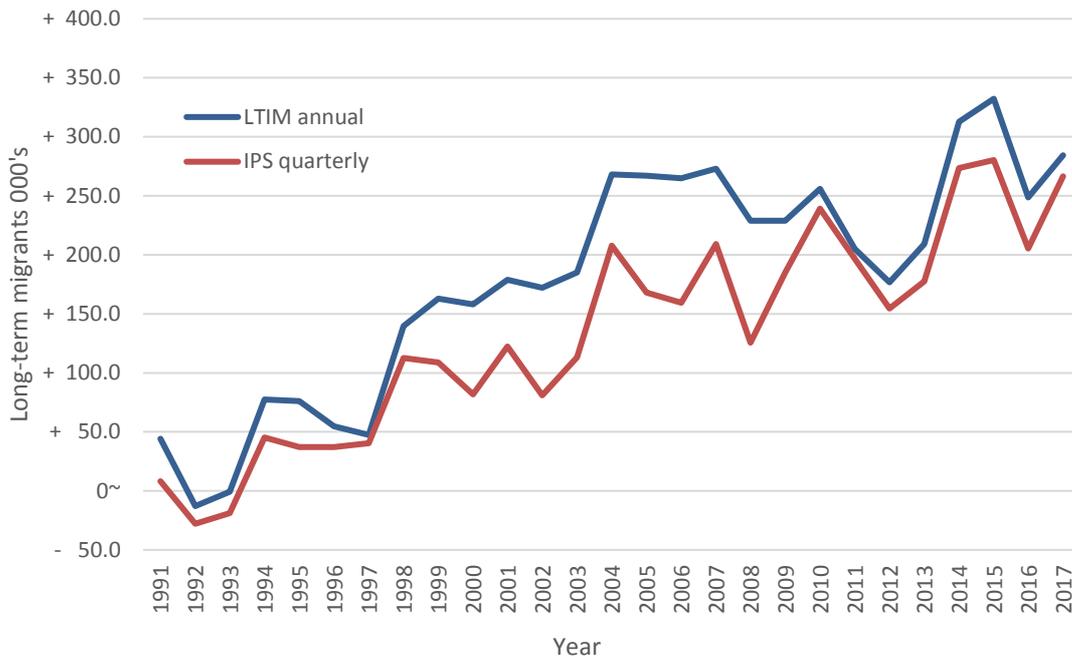
Table 2: Adjustments as percentage of total annual migration (balance) estimate

	Total	IPS	NI	Asylum Seekers	Resettled Persons Adjustment	Visitor Switchers	Migrant Switchers
2012	100%	87%	-1%	10%		5%	-1%
2013	100%	85%	1%	8%		8%	-2%
2014	100%	87%	1%	7%		6%	-1%
2015	100%	84%	0%	9%	0%	7%	-2%
2016	100%	83%	1%	12%	2%	4%	-2%
2017	100%	94%	0%	9%	2%	-3%	-2%

Source: ONS rolling year LTIM estimates

19. Chart 1 below shows a comparison between the combined LTIM estimates by quarter (not official statistics) and the rolling year LTIM estimates published as National Statistics.

Chart 1: IPS estimates by summed individual quarters and rolling Year End LTIM estimates



Source: [OSR analysis of summed IPS estimates by individual quarter, ONS rolling year LTIM estimates](#)

20. In summary, ONS does not apply the same validation, calibration, QA and review methods to the quarterly migration data as it does to its annual estimate, and its annual estimate is not possible without the addition of supplementary sources. It is therefore our view that the quarterly IPS data are not “compiled results” in the sense intended by the National Statistician’s guidance.
21. Given the nature of the quarterly estimates it is important that comprehensive guidance is provided to ensure their appropriate use.

Coverage

22. Coverage applies not just to the completeness in geographical terms, but also in terms of the extent to which the information is a reasonable representation of what it seeks to measure. Significant variability or uncertainty in the data may undermine confidence in the representativeness of the estimate. The IPS migrant data alone are reasonably complete in geographical terms in that they cover the whole UK and represent 90% of the whole migration picture. However, the addition of estimates for asylum seekers, NI border moves, switching evidence and known passenger flows calibration produces a more complete picture of migration for the annual LTIM estimates.
23. Table 3 shows, quarter by quarter, the proportion of passengers, subject to sampling by route. Just under a fifth of overall passenger flows are by sea and the Channel Tunnel (less than 18%). Air traffic represents the majority of passengers and has the least good coverage. This primarily relates to the fact that there is no interviewing between 10pm and 6am, and small airports and ports with no coverage. The quarterly variation reflects seasonal changes in flight times and routes throughout the year.

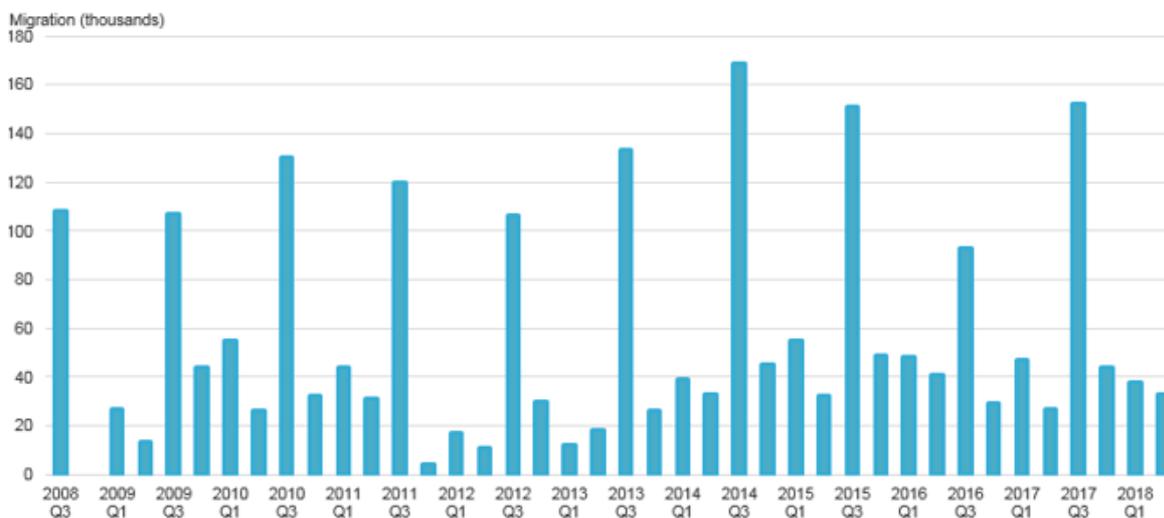
Table 3: Proportions of passengers who were subject to sampling by the International Passenger Survey 2016, by route and quarter

Route	Quarter 1 (Jan to Mar)	Quarter 2 (Apr to June)	Quarter 3 (July to Sept)	Quarter 4 (Oct to Dec)	Total
Air	92.20%	87.10%	86.50%	90.40%	88.60%
Sea	97.70%	96.30%	95.20%	95.70%	96.00%
Tunnel	100.00%	97.90%	98.00%	97.80%	98.40%
Total	93.30%	88.80%	88.10%	91.40%	90.00%

Source: Civil Aviation Authority, Department for Transport, Eurostar and Eurotunnel.

24. In addition, there is also significant variability in seasonal flows that lead to a marked fluctuation from quarter to quarter. The estimates by quarter show peaks in migration, see Chart 2 below.

Chart 2: IPS estimates of LTIM by individual quarter (balance)

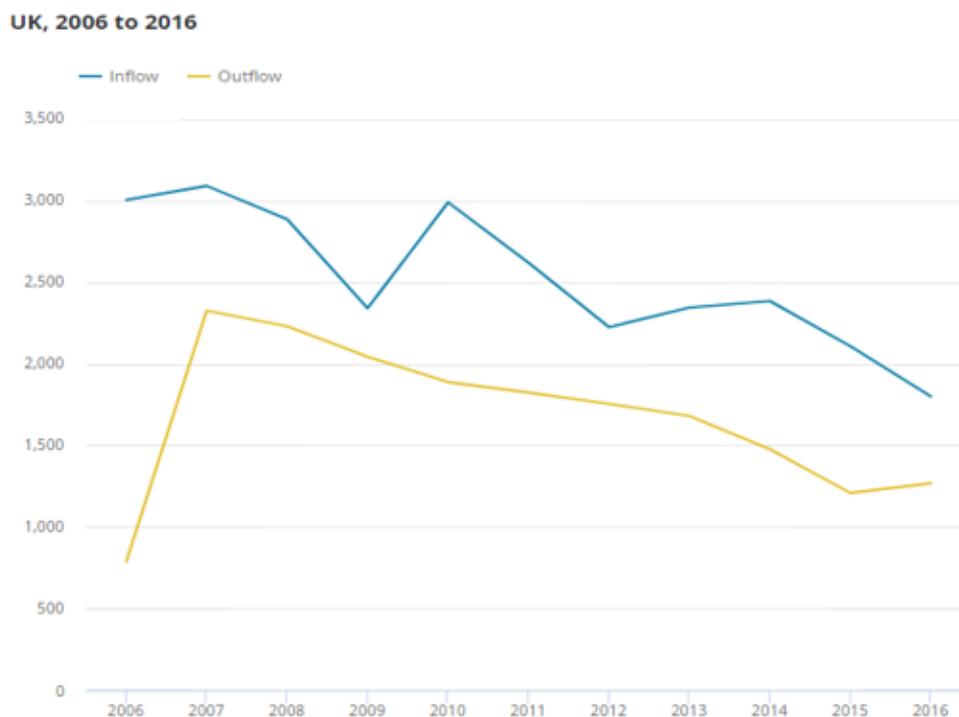


Source: ONS, LTIM by individual quarter

25. The quarterly seasonal peaks are effectively smoothed out in rolling year LTIM estimates. ONS included warnings for users about the seasonal nature of the quarterly migration data. The risk of inappropriate interpretation is less likely to impact experienced or expert users of statistics. ONS consider that seasonality in the migration patterns for different citizenship groups (British, EU, Non-EU) may be more pronounced at the quarterly level and the number of migrants observed within certain citizenship groups can be very low in particular quarters.
26. ONS also believes the IPS methods did not capture student immigration sufficiently well following the EU referendum due to inadequate interviewer shifts during Q3 2016 (shown in Chart 2). ONS is currently considering whether to formalise a permanent adjustment into the historical LTIM series (for non-EU students only) drawing on the Home Office data. Further consideration of alternative administrative sources as part of the ONS migration transformation programme may uncover further quality concerns/potential improvements for the historical annual IPS series. This issue has a more pronounced effect on the quarterly estimates than the rolling year estimate.
27. ONS's [quality information in relation to migration flows](#) provides information on IPS sampling and highlights some relevant issues relating to coverage of the overall IPS migration figures. Currently only a small number of long-term migrants are interviewed by the IPS each year (between 3,000 and 4,000 long-term migrants from interviews with approximately 800,000 passengers). The numbers in the achieved IPS sample have been reducing over time and this is likely to have caused increased sampling error and more volatile estimates. Decreases are

thought by ONS to be due to overall increase in passenger numbers over time (driven by tourism) and therefore migrants making up a smaller proportion of all passengers, leading to fewer migrants being captured by the current IPS methodology. While contact rates for individual quarters are not available, this issue is more severe at the quarterly level when the full methodology is not applied and given that they are based on a fraction of the annual sample.

Chart 3: Number of Long-Term Migrant contacts, IPS, inflows and outflows



Source: ONS, Table 1.02, Long-Term International Migration 1 Series

28. Table 4 below shows the confidence intervals for both the rolling annual and LTIM estimates by quarter. Issues with sample size is a known limitation with the rolling year LTIM estimates leading to sizable confidence intervals around the headline annual estimate.

Table 4: Confidence intervals for migration quarterly and annual estimates

	Net quarterly estimate 000's	CI +/- 000's	CI % of total estimate +/-
2017 Quarter 3	+ 152	32	21
2017 Quarter 4	+ 44	22	50
2018 Quarter 1 ^P	+ 38	18	47
2018 Quarter 2 ^P	+ 33	22	67
	Net rolling annual estimate 000's	CI +/- 000's	CI % of total estimate +/-
YE Dec 17	+ 285	48	17
YE Mar 18 ^P	+ 266	48	18
YE Jun 18 ^P	+ 273	49	18

Source: ONS LTIM estimates by individual quarter dataset, ONS rolling year LTIM estimates

29. The sample size issue is exaggerated when considering IPS data at a quarterly level and as such the confidence intervals calculated for the quarterly LTIM estimates are wider than they are for the rolling annual estimates. The confidence intervals in the quarterly data are even wider when broken down by the three citizenship groups: British, EU, and Non-EU.
30. ONS is currently carrying out a transformation of its migration statistics. As part of this ONS is considering how it can best meet user needs in relation to migration estimates, and in OSR's view this should include consideration of how to provide timely estimates of migration. The work to date has identified a continued role for the IPS, given that it is more timely than administrative sources. ONS should consider options for developing quarterly estimates of migration that are more consistent with the annual LTIM approach and more robust than the

current quarterly estimates. However, these estimates would still be likely to have considerable margins of error associated with them unless there were substantial increases to the migrant sample.

Differences in coverage or methodology between ONS's Long-Term International Migration statistics by individual quarter and ONS official statistics monthly Labour Force Survey (LFS) and the Retail Sales Indices (RSI)

31. The correspondent mentioned two ONS official statistics – Labour Force Survey (LFS) and Retail Sales Index (RSI) – for which ONS publishes an early estimate and where the complainant considers this shows there is little difference in approach with the LTIM estimates by quarter. While there may be other relevant examples to compare what is presented below focuses on these for the purposes of comparison.
32. [The monthly LFS estimates](#) are based on rolling three-month averages:
 - Though a quarterly survey, the design of the LFS and fieldwork procedures enable monthly estimates of levels, such as the number of people in employment, to be produced for rolling three-monthly periods. Such estimates are published in the monthly Labour Market Statistics bulletin and relate to the average of the latest 3-month period.
 - The monthly estimates have the full LFS weighting methodology applied. The estimates are produced from the LFS-defined annual population totals - the mid-year estimate/projection less the communal establishment population - by simple linear interpolation. At certain points in time, ONS releases revised population estimates. LFS conducts reweighting exercises and re-releases of data and labour market estimates.
33. For the RSI, [ONS publishes headline results](#) based on the latest quarter on quarter change, but also publishes the most recent month-on-month change. The monthly RSI data are based on the same methodology but with a smaller sample size.
34. While in all cases ONS publish sub-optimal components (based on small samples) for the three early cuts of these outputs (LTIM, LFS, RSI), the main difference for migration is the LTIM estimates by quarter have not yet been developed in a way that is coherent with the annual LTIM approach (i.e. so that a version of the full annual LTIM methodology can be applied quarterly). However, while the LFS and RSI examples highlight a common methods approach for their estimates produced for different intervals, it is likely other official statistics on a given topic exist that more clearly differ methodologically when produced for different intervals.
35. The correspondent highlighted the reluctance of ONS to release the LTIM estimates by quarter. ONS's concerns about the quality of existing quarterly estimates are justified, but it needs to be clearer about the limitations of the estimates, as well as set out what the current figures can be appropriately used for. ONS could have involved users in its decisions about quarterly estimates and acknowledged the value of robust quarterly estimates.

Designation as official statistics and impact on trust and serving the public good

36. The correspondent raises concerns about whether ONS's actions have affected public confidence in the migration statistics available for decision making. OSR expects producers of statistics to act with integrity and in a trustworthy manner, to make informed decisions and be transparent about those decisions.
37. The decision on whether a particular set of data should be treated as official statistics should be taken in consultation with the Head of Profession for Statistics in a producer body and should take into consideration the principles in the National Statisticians guidance. There may be some cases in which OSR's views do not align with the producers on the status of the data.

38. In this case, OSR's view is that ONS's reluctance to designate the statistics as official statistics was driven by a desire to ensure appropriate interpretation of high profile statistics in the context of known limitations with the IPS, exacerbated by lower levels of coverage and aggregation. This is further supported by the fact that ONS produced the statistics in line with the Code of Practice for Statistics in all aspects except methodology and coverage.
39. However, ONS should have been transparent about the decision-making processes surrounding the official statistics designation and about which aspects of production of the estimates had been in line with the Code of Practice for Statistics, ideally through a statement of voluntary compliance.
40. We would recommend ONS consider communication with users more fully, including in advance of publication, as this would have helped reinforce perceptions of it as trustworthy producer of statistics and data. This points to the need for ONS to review its communication and handling of its decision on the status of the LTIM estimates and the manner which it engaged with users about their requests for this information.

Dissemination of quarterly LTIM

41. ONS have committed to releasing LTIM estimates by quarter in each MSQR. This is in response to users' interest in having an early indicator of changing migration patterns, particularly following the EU referendum. We welcome the ONS efforts to meet user needs but would encourage it to consider more fully how the data can be disseminated in a way that best support its appropriate use.

Labelling

42. The data are currently released as an additional dataset as part of the MSQR with limited commentary or interpretation. The benefit of this approach is that users have access to all relevant data and analysis in one place. However, other approaches may have achieved a clearer distinction between the status of quarterly and rolling annual estimates in a way that provides context and supports its appropriate use, for example ONS considered publication through a research article. The labelling as LTIM may also be confusing given the full LTIM methodology cannot be applied.
43. It was unusual for ONS to use the term 'not official statistics' rather than naming the data to reflect its status such as management information, transparency data, research, experimental statistics etc. There was further confusion by the text in the quarterly data spreadsheet stating that: "*All estimates by quarter are labelled as experimental statistics*" (which has now been removed from the latest publication). It is also likely that the labelling of the data as "not official statistics" is only meaningful for knowledgeable users who are familiar with the National Statistics and official statistics designations. We would encourage ONS to review how the data is presented in future and welcome the changes that have been made to the February publication.
44. It is OSR's view that regardless of designation as official statistics, public debate would be best informed if ONS provide clear guidance on how its quarterly long-term migration statistics can be used appropriately. In many respects, this is true for the annual estimates as well which should be considered in terms of the added value and insight offered by the overall MSQR package; an essential consideration for their current National Statistics status.

Commentary and interpretation

45. The LTIM estimates by quarter included caveats and guidance to users, including a Notes page with the data tables which provides details of limitations of the data. The publication includes a strong steer for users not to use the quarterly data.
46. While the limitations are highlighted, there is limited support for appropriate use of the data. One feature which is helpful is a function in the spreadsheet to encourage users to compare

quarterly data with that of the same quarter in previous years, this should support users in avoiding misinterpretation of quarter on quarter changes due to seasonal fluctuations.

47. Given that users are able to obtain two separate long-term migration measures, either by summing the four individual quarterly estimates for a given year or using the annual LTIM estimate, ONS should consider how to provide further support to users and facilitate appropriate interpretation to ensure users draw on the most appropriate migration estimates for their needs.

Overall judgement on complaint

48. Taking all this together, our view is: using the 2016 GSS guidance, we conclude that ONS's decision not to label its LTIM estimates as official statistics is defensible because the methodology criterion is not met and we have concerns about the coverage criterion. The methodology criterion is not met because the full methodology to compile an estimate of migration is not implemented. The coverage criterion is questionable because of the seasonal variability, the wider CIs compared to annual rolling estimate, and the absence of some additional data sources representing around 10% of the final estimate. In our view, this data is more aligned to raw or not fully processed survey data, so ONS's decision not to label as official statistics is legitimate in the circumstances.
49. While the quarterly statistics have clear quality issues, we do not consider these issues so great as to lead ONS not to publish them. The estimates should, however, be clearly supported with fuller interpretation and guidance on how they can be appropriately used and the development of more robust estimates should be considered as part of ONS's transformation programme.
50. Beyond our judgement on the status of the LTIM estimates by quarter, there are a number of other key points:
 - i. ONS started to release this data in response to users' requests for more timely long-term migration estimates and have provided some guidance to users. We welcome efforts to release the data in an orderly manner.
 - ii. ONS should have considered the messaging and possible implications of using the label 'not official statistics'
 - iii. ONS should be clearer about its decision-making process and judgements on why the estimates were labelled as 'not official statistics'
 - iv. ONS should be clearer on the standards the estimates were produced to, including the principles of the Code of Practice for Statistics – to provide assurance to users, as the meaning of labelling 'not official statistics' is likely to be lost on many users.
 - v. ONS should provide fuller guidance on the appropriate use and interpretation of the quarterly estimates so that their value as a timely estimate can be used to inform decision making where appropriate
 - vi. ONS considered other dissemination options for these estimates e.g. research article or as experimental statistics but considered the advantages of keeping all the information together outweighed these alternatives
 - vii. ONS could have considered undertaking an open development project and involving users in development and publication of the estimates
 - viii. ONS should consider developing a more robust early measure of long-term international migration that is consistent with its headline annual migration estimates in the context of its migration transformation plans

- ix. Given its decision that the quarterly estimates are not official statistics, ONS should remove reference to experimental statistics in the guidance notes
- x. ONS followed proper protocol when undertaking its decision making – it considered the criteria for official statistics and escalated to the ONS Head of Profession who made the final decision