Our response to the Independent Review of the UK Statistics Authority

Centre for Public Data, April 2024

Summary

1. We welcome the Review's findings, in particular the concerns it expresses about data gaps and unmet needs for statistics. Its recommendation for a Statistical Assembly that will set the statistical agenda by consulting with a wide range of users is a positive step towards solving these problems.

2. However, if the Assembly is to support a statistical agenda with more emphasis on user needs, UKSA's current engagement processes must change. If the Assembly takes the form of a reactive consultation, only well-resourced, highly motivated users are likely to engage. This is a risk for UKSA, given its duty to ensure that statistics serve the public good.

3. We therefore recommend that:

   a. UKSA must identify how it will gather user needs from outside its usual engagement base. This should include a realistic plan to identify needs from media and civil society organisations with limited spare capacity. Suitable methods might combine participatory techniques, proactive user research, and desk research to identify unmet need for statistics.

   b. UKSA and the Cabinet Office should ensure this plan is realistically resourced.

   c. UKSA should lay out and consult on its plans for gathering user needs, clarifying how it intends to identify data gaps.
The Review

4. We welcome the review led by Professor Lievesley, the concerns it expresses, particularly those about data gaps and unmet needs for statistics, and the solutions it proposes. It mirrors concerns we have expressed in e.g. our inputs to the Office for Statistics Regulation and in our Missing Numbers project. Groups including the Royal Statistical Society and the Public Administration and Constitutional Affairs Committee have also expressed similar concerns.

5. We agree with the Review that the governance of the statistical system can sometimes feel opaque: “Many users, both inside and outside of government, feel that there is too little transparency in the way the statistical agenda is set, and are unclear how they might get their needs to be recognised”.

6. We therefore welcome:

   a. The Review’s recommendation that a more active approach to identifying user needs is required, and agree that “the UKSA should take a more prominent role in identifying data needs”. (Our Missing Numbers work on rental statistics, for example, lays out how user needs are not currently feeding into the system.)

   b. The proposal for a Triennial Statistical Assembly to consult a broader range of users to understand the UK’s needs for statistics, and for UKSA to use the Assembly to inform “a proposal for statistical priorities for the next three years”.

   c. The recommendation that UKSA’s proposal should identify data gaps, and allow users to hold it to account on filling those.

   d. The range of users outside government that the Review recommends should be included in the Assembly, particularly the inclusion of media and civil society.

Risks and concerns

7. While we support the aims set out above, if the Assembly is to support a statistical agenda with a greater emphasis on user needs, UKSA must switch from using traditional, reactive consultation methods, to using more participatory, modern methods.

8. The precise form of the Assembly is not laid out in the Review. If it takes the form of a traditional consultation, or event, we fear it may worsen the existing problem, because:

   a. Many important groups will struggle to take part, especially media and civil society organisations (which are mentioned as users in the Review). These
groups generally have little spare capacity and diverse needs. Such groups are unlikely to identify as ‘statistics users’, and are unlikely to be tracking developments in statistical governance. Current consultation methods tend to leave these groups with numerous unmet needs for statistics, as our research has found.

b. In the same way, if users need to know that the Assembly is taking place and potentially attend an event, only groups with the capacity to do so will be able to make their voices heard. There is therefore a danger that the Assembly only benefits groups with the connections and capacity to engage.

9. These are risks for UKSA, given its duty to ensure that statistics serve the public good. There is another risk, as noted in the Cabinet Office response to the Review, which is that the process could be ‘captured’ by particular groups, rather than hearing from the full range of users.

10. UKSA's current approach has been ineffective, as the Review's concerns identify. In recent years ONS's user engagement strategy has focussed on low-cost, passive activities such as recruiting ‘champions’ and publishing case studies and guidance. While some of ONS's guidance does recommend active user research, the strategy does not require producers to do such research, or give them any extra resources to do so. Unsurprisingly, there is little evidence that much research has been done.

11. To inform UKSA's work, the Government should also clarify how it prioritises the needs of different users of statistics. The Government response said “external user engagement will always be balanced against the statistical needs of the Government - particularly economic - which take precedence”. We do not think this is in line with relevant legislation, and we share the concerns about this expressed in the Royal Statistical Society’s response to the Review.

Recommendations

12. We therefore recommend that UKSA sets out a transparent future approach for user engagement that does not place the burden of engagement on users themselves, as follows:

a. UKSA must set out clearly how the Assembly will work, which user groups it intends to include, and how it will make it easy for statistics users from all backgrounds, particularly the media and civil society organisations, to engage.

b. The Assembly must capture needs from all statistics users - including groups who do not identify as such. UKSA should consider using a range of modern user research techniques, such as:
participatory techniques, such as citizens’ advisory groups or expert panels;

- active user research recruitment, and interviews with user groups;

- desk research to identify expressions of unmet need for statistics, from media articles, academic research, Parliamentary debate, etc.

c. UKSA and the Cabinet Office should ensure these plans for user engagement are realistically and adequately resourced.

d. UKSA should lay out and consult on its plans for engagement.

About us

13. The Centre for Public Data is a non-partisan, non-profit research and advocacy organisation that works to improve the quality of UK public data. We have a particular interest in data gaps - areas where a lack of publicly available data or statistics means that questions of significant public interest cannot be answered. Relevant work includes Missing Numbers, a project investigating data gaps; research on unanswered Parliamentary Questions; and research to identify gaps in criminal justice and health statistics.