

# THE CASE FOR COMMUNICATION BETWEEN NATIONAL STATISTICAL COUNCILS

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## *Abstract*

*The number, variety and importance of statistical council bodies have continued to grow over the ten years since this trend was recognised in the UN Handbook of Statistical Organization in 2003. Whilst their precise role and status will necessarily vary depending on the national context, we can ask if there is some essential core, some set of fundamental characteristics, that a national statistical council needs to have in order to be credible and relevant internationally.*

*This paper offers some tentative suggestions about those core characteristics. But more than that, it invites debate in the international statistical community, including among all those groups and organisations that have an interest in maintaining the highest standards of statistical practice. And within that framework, it proposes that statistical council bodies should exchange information about their roles and practices - to inform and stimulate this discussion and ultimately to help support and guide the work of such bodies. With these considerations in mind, the paper asks whether the United Nations or another international body might take on the challenge of stimulating and facilitating the exchange of information between national statistical councils.*

The 2003 United Nations Handbook of Statistical Organization made a number of observations about the evolving role and importance of national statistical councils. It noted that since the previous edition of the handbook in 1980, “the importance of such bodies has grown, and their introduction in areas where they did not already exist has become a visible trend.” That trend seems to have continued since 2003 and many countries now have a body with at least some of the characteristics commonly associated with a ‘statistical council’.

The Handbook says of such bodies:

“Their roles vary, but it is possible to state the following, taking into consideration their formal mission and the responsibilities they have assumed as their relationship with the statistical agency and its senior officers has flourished:

- A national statistical council can be used for the defence of the statistical agency.
- It exists to protect the statistical agency from attacks to which it cannot properly reply owing to restraints on public servants;
- The council can assume the role of guardian of fundamental values such as the protection of privacy;
- The council is the ultimate guarantor that, within existing resources, the statistical programme as defined by the chief statistician and instituted by his/her agency preserves the best possible balance among contending claimants for statistical attention, including economic, environmental and social statistics; national and regional details; and reliability and timeliness;
- The council is the interlocutor a minister might choose if he/she wishes to have the professional opinion of the chief statistician validated by a group of impartial experts;
- The council is the body a minister could turn to for advice and succession management in the case of a disagreement with the chief statistician;

- The council’s proceedings would constitute a venue for registering opinions about the output of the statistical agency.”

It adds that the various roles above imply different relationships - to the chief statistician, to the minister and to the public.

It is open to question whether this description of the roles of national statistical councils is, or ever was, a satisfactory one. The first bullet point talks about the council being ‘used for the defence of the statistical agency’. That comment perhaps reflects an underlying assumption that the Chief Statistician of a country should be seen as the pre-eminent authority in any national statistical system and that any statistical council should simply provide support, such as acting in defence of the Chief Statistician or the agency in the event of political or public criticism. The obvious weakness in this model is the possibility that the criticism of the statistical agency, or its chief, may sometimes be valid.

Ideally, a national statistical council should be able to defend the agency where appropriate but also to lead the public challenge where the agency fails to achieve the expected standards of good practice. However, these two requirements do not always sit easily together. A statistical council that is publicly authoritative and credible when it defends the national statistical agency may not then wish to criticise it on another matter in case it is seen to be inconsistent, or to be undermining the support it has given previously. It requires confidence in both its own judgement and in its public credibility for a statistical council to fulfil these two roles equally at the same time. Some councils are likely to find it more realistic to speak publicly either for the statistical agency or for the external community, but not both. Some may find it better not to speak publicly much at all, but that approach lessens the relevance and importance of the council.

An up-to-date and balanced description of the roles of existing national statistical councils might need to be broader than suggested in the 2003 UN Handbook. Unfortunately there is currently no reliable source from which to derive such a balanced description but there is some anecdotal evidence that statistical councils now take many different forms.

Some are chaired, or otherwise work at the direction of, the Chief Statistician as implied in the UN Handbook; some have a statutory basis that gives them authority over the Chief Statistician. Some work at the direction of a government minister or officials appointed by a minister; others are composed of independent public appointees accountable to the national parliament. Some have a basis in legislation that defines their roles clearly and gives them specific powers; others are appointed at the discretion of a government minister or the Chief Statistician and their role can be changed at any time. Some are seen as an integral part of the same government body that contains the national statistical agency; others have an existence quite distinct from the NSI and from other bodies that produce official statistics.

There are probably at least as many models of statistical council as there are models of public administration and it may be wisest just to accept that as inevitable rather than to suggest that there should be a ‘core’ or universal model.

But this diversity in the models and roles does raise a question about whether there is, nonetheless, some fundamental common ground amongst national statistical councils that might be seen as essential. Are there in fact some characteristics of good statistical councils that are so fundamental that a body should not be recognised internationally as *being* a national statistical council unless it can demonstrate those characteristics?

This is a question of real importance to the future governance of official statistics world-wide and it deserves to be fully debated within the international statistical community – not just by national statistical agencies but by all organisations and groups with an interest in statistical

good practice. With that in mind, here are some very tentative suggestions for characteristics that a robust national statistical council should exhibit:

- i. A statutory, or formal, basis that establishes its objectives, membership, responsibilities and accountability, and from which it draws its authority. Without such a formal basis, the continued existence of the council, and its role, are too easily open to pressure and change.
- ii. An identity distinct from the national statistical agency and distinct from any other government Minister, department or agency. We might look for tests such as whether it is possible to contact the national statistical council directly; and whether its 'voice' is distinct from that of the Chief Statistician and from the Minister responsible for statistics.
- iii. An open and transparent style of working. Is it clear how it sets its priorities, and what its forward work programme covers? Does it publish reports and statements in its own name – and is all of its work publicly reported? Are details of its committees – terms of reference and membership, and reports of their meetings – published?
- iv. Members who represent, or reflect the interests of, a broad range of users of official statistics, including those outside government; and who have been appointed by fair means on the basis of their relevant knowledge.
- v. A clear commitment to uphold good statistical practice in relation to the national statistical system. This might include responsibility for ensuring compliance with a Code of Practice (such as the UN Fundamental Principles or European Statistics Code of Practice) or it might simply involve a role in deciding whether good practice has been followed in certain cases brought to its attention.
- vi. A clear commitment to support and encourage the use of official statistics wherever there is 'public utility' in that use (in government, in society and internationally) – that means wherever the use of statistics can be seen to do good. This may include some responsibility for reviewing the statistical programme and commenting on it.

### **The UK Statistics Authority model**

It seems unlikely that every national statistical council in existence today would find these six tests easy to pass. To take one example, the UK Statistics Authority has a clear statutory role and responsibility for ensuring good practice and reporting publicly to Parliament. Its members are mostly appointed from outside government following a largely independent and transparent public appointment process. It works to support the beneficial use of UK official statistics, to challenge mis-use and to ensure good practice. But it still faces some challenges in being seen to meet these six criteria. One is that it has a complex structure that includes a role in the management of the Office for National Statistics (more details are given in the annex) which creates a potential tension in terms of maintaining a distinct identity. Another is that the UK Statistics Authority is prevented by legislation from taking responsibility for one area of good practice – access to official statistics before they are published. That role is reserved for government ministers in the UK.

However, where the UK Statistics Authority clearly does meet the expectations of a national statistical council is in its published reports and statements. Here its distinctive voice comes through; sometimes openly challenging the UK statistical service to improve its work but also actively supporting the UK National Statistician on matters of good practice on many occasions. It has produced reports challenging the Government to improve the rules on access to official statistics prior to publication and has also, at one time or another,

challenged the use or interpretation of official statistics by each Prime Minister in the UK since the Authority was created (as well as criticising the use of official statistics by a number of other Ministers and other prominent individuals and organisations).

Ultimately, there is no single international authority that can endorse a body as meeting shared expectations of a national statistical council. However, there are several international bodies, including the UN Statistical Commission, that could challenge existing national statistical councils to meet whatever might be agreed as a set of criteria of good practice.

As already noted, national statistical councils vary greatly. Some may not want to be part of an international dialogue about the expectations on such bodies. Some may not be allowed by their national governments to involve themselves in international discussions or to disclose information openly about what they do and how they do it. But for the rest, those that see their role within the national statistical system as a matter of real importance and a matter of pride to those involved, they should want to share information with other national statistical councils around the world. They might aim simply to validate their own roles within an international community of statistical councils, or they might aim to learn from the experience and practices of others. The author of this paper can only speak for one national statistical council – the UK Statistics Authority – but it would be pleased to share detailed information about its work with any other statistical council.

These considerations raise another question. Should either the UN or another international body take on the challenge of stimulating and facilitating the exchange of information by national statistical councils, and keep a central record of up to date information that anyone with an interest can study. There have been tentative moves in this direction in the past but currently the subject seems to lie dormant. Perhaps national governments or Chief Statisticians would sometimes prefer not to expose the national statistical council arrangements to international scrutiny, and that might be the reason that little progress seems to be made. Or perhaps it is more that there is simply no forum to which this discussion naturally falls. What we can be sure about is that sooner or later, whether it is 2013 or 2023, an active dialogue between bodies that regard themselves as being national statistical councils will emerge and that once it is established, it will be of great relevance to the development of those and similar bodies in the future.

## **ANNEX: SOME CHARACTERISTICS OF THE UK STATISTICS AUTHORITY**

In July 2012, the UK Statistics Authority published a summary report on the 240 formal assessments it had undertaken between 2009 and 2012 covering every existing set of UK National Statistics – that is, all the main official statistics produced by some 40 different bodies in the four distinct political administrations that make up the United Kingdom. It was, we believe, the most comprehensive audit of official statistics ever undertaken in the UK; and quite possibly in any country. The summary report was intended partly as a formal record of what was done and partly a contribution to international discussion about statistical codes and their enforcement.

The decision that all National Statistics would be subject to formal assessment against a revised Code of Practice was not taken by the Statistics Authority itself or by the Office for National Statistics (the UK's main statistics office). It was taken by the UK Parliament and written in to the 2007 legislation that created the Statistics Authority. This was a very firm signal that official statistics were not just to be prepared to high standards, they must be seen to respect those standards with full documentation. Whilst we have now reviewed every set of National Statistics, the job is not finished. The legislation requires the process to continue indefinitely and as of early 2013 we are starting a programme of work to re-assess all the more important set of statistics. We also follow up and report on the implementation of all past recommendations. So it will go on; continuous pressure to fully meet all the requirements of the Code of Practice and to demonstrate that this is the case.

The Code that we introduced in January 2009 contains some 74 specific requirements. It is challenging: designed to prompt improvement rather than simply accept the generally good standards already being achieved when it was introduced. It is a measure of that challenge that the assessment process has so far generated well over one thousand recommendations.

The portfolio of 240 detailed reports, all available online, and each typically covering several sets of official statistics, are individually short and straightforward but they build together into a rich and detailed review. This work has set the statistical service in the UK on a more focused path of improvement and development, with particular attention paid to helping the user of statistics to find, understand and get the most out of the great wealth of information that is official statistics.

However, formal assessment is not the only thing that the Statistics Authority does and to understand some of its other roles it is necessary to provide some context. The *Statistics and Registration Service Act 2007*, under which the Statistics Authority was established, was the first comprehensive statistical legislation in the United Kingdom. Whilst many countries around the world had introduced legislation governing the production of official statistics in the first part of the 20<sup>th</sup> Century or earlier, the UK did not follow their example. Part of the reason for this was that the UK system of official statistics had developed from its earliest days as a decentralised system, with responsibility for the production of official statistics spread widely across government departments and agencies.

After much debate, the final form of the legislation brought together in a new organisation, responsibility for monitoring and reporting to all four UK parliaments on the work of all parts of the statistical system (including formal assessments), along with responsibility for replacing government ministers as the top stratum of accountability to Parliament for the work of the Office for National Statistics. Some estimates put ONS as being only about a fifth of whole statistical system but it does have responsibility for many of the most sensitive and important statistics. To make this complex model viable in legal terms, it was necessary to treat all the parts – the Authority itself, the staff responsible for monitoring and reporting on official statistics, and the 3,500 staff of ONS – as being within a single statutory body, a ‘non-ministerial department’, which would also be called the Statistics Authority.

It would be fair to say that this elaborate structure can be confusing to external observers. The words ‘Statistics Authority’ should sometimes be understood as referring to the top Board of eight external appointees and three executives; sometimes to the Board plus the 30 staff responsible for monitoring the statistical system and supporting the top Board; and sometimes to the 3,500 staff of the entire legal structure including all of the Office for National Statistics. The key principle that enables this to work is that when it comes to monitoring and reporting on the work of ONS itself, this is done in exactly the same way as for any other part of the statistical system. So where necessary, the Authority will publish reports critical of the work of ONS despite the fact that it is, itself, responsible for oversight of the work of ONS. Indeed, this responsibility lies at the heart of a current project within ONS, on behalf of the Authority, to improve the presentation of statistics in published reports and bulletins.

To make this work there needs to be formal separation between different functions of the Authority. The legislation made provision for that and established three formal individual roles. The first is the Chair of the Statistics Authority who has overall responsibility. The second is the National Statistician who is a top level official within the UK Civil Service and has responsibilities for both ONS and for professional advice on all statistical work in government. And the third is the Head of Assessment who is appointed by the non-executive members of the Board and advises the Board independently on compliance with the Code of Practice and related matters.

It is perhaps unlikely that any other country would adopt a statutory structure quite like the UK one. It was created to operate within an already complex landscape of public administration involving both central and devolved administrations and many different producers of official statistics. It is to the credit of those who wrote the legislation, itself rather complicated, that the structure does seem mostly to work quite well whilst still being confusing to everyone, including the staff of the Authority at times.