



MRS and MRS Census and GeoDems Response: ONS consultation on the future of population and migration statistics

About the Market Research Society

1. [The Market Research Society \(MRS\)](#) is the UK professional body for market, opinion and social research, insight and analytics. MRS is the world's largest and oldest research association, representing 5,000 individual members and over 600 accredited Company Partners in over 50 countries. It has a diverse membership of individual researchers within agencies, independent consultancies, client-side organisations, the public sector and the academic community.
2. MRS's expertise as the lead authority on market, opinion and social research is recognised around the globe. MRS promotes, develops, supports and regulates standards and innovation across market, opinion and social research and data analytics. MRS regulates research ethics and standards via its Code of Conduct¹. All individual MRS members and Company Partners agree to regulatory compliance of all their professional activities via the MRS Code of Conduct and its associated disciplinary and complaint mechanisms.
3. More information about MRS can be found on the MRS website: <https://www.mrs.org.uk/>

About the MRS Census and GeoDems Group

4. The MRS Census and GeoDems Group (CGG), is an advisory board to MRS, and was established in 1989 with a mission to promote the full and effective use of large datasets such as the national census and other open data for use as geodemographic information in analysis.
5. MRS CGG works with ONS and other bodies to represent and make a case for the statistical needs of the market research and geodemographics user communities.

About the UK Market and Social Research Sector

6. There are circa 3,100 active registered businesses in the UK listing market research and opinion polling as their primary activity, and a further 1,700 listing market research and opinion polling as a subsidiary activity. It is estimated that the sector employs at least 70,000 workers.
7. The UK research², insight and analytics sector is a great UK success story. The UK is an £9bn market for research and is the second largest research market in the world, second only to the US³.

¹ See: <https://www.mrs.org.uk/pdf/MRS-code-of-conduct-2023.pdf>

² Excludes academic research unless this is undertaken jointly with commercial research such as ESRC funded projects.

³ See Industry size and growth rates: <https://www.mrs.org.uk/resources/industry-size>

8. Research, insight and analytics stand at the heart of all well-informed commercial, social and political decisions. Insight into what makes a product, business initiative or government policy work is often the hidden – yet defining – factor between success and failure. It is our sector that provides the deeper intelligence needed for our world today.

The view of MRS and MRS CGG on the future of the census

9. MRS and MRS CGG are grateful for the opportunity to contribute to the ONS consultation on the future of the population and migration statistics.
10. MRS and MRS CGG acknowledge the progress made in developing alternatives to the census, particularly with respect to population estimates, but note that there are variables and geographies for which alternatives to the census have not yet been identified.
11. MRS and MRS CGG believe that the continuation of the census approach is essential for ensuring that the UK continues to have robust, reliable and comparable population statistics. The census is a core source of population data for research practitioners and businesses within the UK. The census is used daily by many practitioners across the UK for research purposes to enable service provision, policy development and business planning.
12. MRS CGG undertook research with MRS Company Partners in late 2023 to explore attitudes to the census, in anticipation of the 2024 decision with respect to the future of the census in the UK. This research generated detailed responses from over 80 businesses representing some of the world’s largest research suppliers, plus specialist businesses and a wide range of SMEs. More than 85 per cent of participants reported that the UK census is important to their organisation, with 74 per cent of participants stating they were users of census data from all parts of the UK. See Figure 1 and Figure 2 for verbatim quotes from two MRS Company Partners who participated in the MRS research, explaining how the census is used and the value of census data.

Figure 1: A verbatim quote from an MRS Company Partner about the importance of the census for research businesses

The ONS population data - population size & breakdown, by main demographics...is used widely used by us, most typically to provide the contextual structure and basis for defining the size of markets. It is the best and most reliable data for understanding the true size and profile of consumer (and sometimes business or workforce) markets and is invaluable to the robust findings we can provide for our clients...if this data were not as readily available it would be detrimental to our business...

Figure 2: A verbatim quote from an MRS Company Partner about the value of census data

It will be a great shame if the gold standard census is replaced with survey data. A rich, valuable data set should not be replaced by a less robust methodology. Yes, things change faster than every ten years, but nevertheless, the confidence that an all-household read provides should not be underestimated. I think it would be a poor trade off to get weaker data more frequently.

13. Whilst in principle we are supportive of the plans outlined by the ONS to create a sustainable system for producing essential, up-to-date statistics about the population, which primarily uses administrative data, complemented by survey data and a wider range of data sources, we are not convinced that the alternative arrangements are as yet sufficiently developed to produce estimates that are as accurate, equivalent in scope and detail and of sufficient quality as the current census. Moreover, we do not believe that the alternatives will produce the quality, variety and detail of data that is necessary to meet the needs of the research sector.
14. Changing from a questionnaire census to a fully administrative process in one step is a risky endeavour, particularly where there is no population register (or equivalent) in place. Countries which have successfully migrated from a census to an administrative-based solution had population registers, or similar, as the foundation to their transitions. The UK does not have this, and as such comparing the UK process to other countries which have population registers and an identity card system in place is potentially misleading and highly risky. The decision regarding the future of the census should be undertaken whilst realistically assessing what would be best for the UK based upon the current UK population sources and administrative arrangements, not on approaches that have worked in countries with dissimilar arrangements to the UK.
15. Using administrative data sources as the primary source of population and migration statistics will require robust access to and control over administrative data from government. However, ONS's current access to administrative data appears to be fragile and under-resourced. There does not currently seem to be a system or plan in place to address these weaknesses.
16. Administrative data sources are at the mercy of operational changes, as departmental needs and budgets change, leading to non-comparability over time. There is no evidence of any back-up arrangements should an administrative data source become unavailable, have a change in frequency or become less robust. The only reference in the consultation document to these types of challenges is a statement that "The ONS is maintaining an ongoing dialogue with data providers to understand their operational changes and would continue to work in partnership with them to ensure the data gathered is as relevant and reliable a source for statistics as possible" (p.34). We take the view that greater engagement is needed around this risk, as there is plenty of historic evidence of these kinds of challenges. For example, the use of the benefit claimant count as a measure of unemployment was repeatedly affected by rule changes during the 1980s.
17. It is not clear how, under the provisions of the current legislation, ONS would ensure that the necessary data continues to be available and what steps would be taken if core administrative data sources were to become unavailable or unusable for the purposes of producing population and migration statistics.
18. Looking to the future and the potential for administrative data to be influenced by machine-learning and artificial intelligence tools and methodologies, the independence of the census data (or at least the understanding built up over many decades of the biases that may exist in census data), may well become even more important with respect to ensuring that population statistics are accurate, reliable and robust for informed decision-making.
19. It is also not clear that any alternatives to the census would be any more cost effective. [According to the Office for National Statistics \(ONS\), the estimated cost of Census 2021 was £906 million over 10 years³](#). This is equivalent to about £15 per person in England and Wales, or £1.50 per year. [The ONS also estimated that the benefits of Census 2021 would be at least £4.5 billion over 10 years³](#). This is

equivalent to about £75 per person in England and Wales, or £7.50 per year. Therefore, based on this calculation, the value of the UK census is about five times its cost. It is not clear what the cost of the alternative arrangements will be, particularly as much of the costs will be spread between ONS and other government departments. We have seen no evidence that the alternative arrangements will deliver the equivalent or more value to the UK economy. Moreover, as online participation and automation continue to be implemented, the overall costs of undertaking the census should decrease, whilst the benefits continue to grow.

20. Furthermore, delivering the full range of statistics currently provided by the census will require an ongoing role for social surveys, but this role has not been specified or determined. At this stage the quality of the survey outputs cannot be predicted, and users cannot assess whether the proposed outputs could meet business and society's needs. It is important that any decisions regarding the use of social surveys are completed and reviewed with users before a final decision on the future of the census is made. This will also clearly have an impact on the costs of any alternative. The consultation document estimates that "the proposed transformation would cost less than half the cost of a 2031 census over a ten-year period" (p.40). It is unclear how this estimate has been calculated, given that the number of social surveys required (and the effort required to engage people to become participants to complete them in sufficient numbers) remains unknown.
21. ONS's own research on the alternative arrangements to the census is partial and incomplete with many questions outstanding about coverage, geographical depth and quality (see Missing Essential Population Data Requirements section). Until these gaps are addressed it is crucial that the census is maintained. This is why we believe moving from the traditional census approach would be a risky jump in the dark, which could have grave consequences for every person in England and Wales, and potentially the UK, should a similar approach be adopted in Scotland and Northern Ireland.
22. It is our view that the proposed new arrangements will not produce the comprehensive data that the research sector needs to provide the insights, data and evidence which help businesses, public bodies and other constituents to better understand consumers, customers and citizens in developing goods, services and public policy essential for economic efficiency, innovation and progress.
23. It is on this basis that we recommend the continuation of a traditional census for at least one more time, to enable the alternative arrangements to be developed fully and the numerous data gaps filled in order to deliver the quality of data that is essential for the continued growth and prosperity of the UK.

Missing Essential Population Data Requirements

24. There are a number of reasons why we have concerns regarding the current ONS proposals, particularly the loss of some variables and types of population data which are essential to the research sector:

Approximated Social Grade

25. Mapping Social Grade onto the census – Approximated Social Grade (ASG) – has been an advanced analytics success in the last three censuses. However, the ONS proposal puts ASG at a high risk of becoming unavailable in the future. The ASG model is based upon a set of common questions that were included in both the census and the market research source; the current model variables are: Standard Occupational Code 2020, Employment Status, Qualification, Tenure, Working Status, Ethnicity, Car Ownership, Household Size, and Sex. The majority of these

variables are at an exploratory or partial development stage in the ONS view of the future, according to the consultation document. And the main driver of Social Grade, Occupation, is at an exploratory stage with limited coverage.

26. There is a strong business case for retaining ASG in the census. The need for ASG applies across multiple sectors and it is a critical tool for market, social and opinion research. In research, ASG enables surveys to be geographically targeted and controlled by Social Grade. In marketing and advertising, Social Grade helps to define the target market (very few products are purchased by all grades); ASG can be used to predict the market size in each territory and to target campaigns in the 'best' areas. Similarly, retailers can use ASG to predict store performance and help in the site location process, for example, to search for sites with a certain level of 'AB' households in their catchment areas. Local authorities can use ASG to understand the Social Grade profiles of their areas in order, say, to 'market' their areas for business investment. In opinion polling, practitioners use ASG for predicting poll results down to small areas such as electoral wards. Users of these predictions include political parties, charities and campaign groups. All would be negatively impacted by the loss of small-area census data for ASG (and other relevant topics).

Loss of small-area data

27. Small-area data are used by a large number of users for a variety of purposes. The Company Partner survey (see paragraph 12 above) found that 60 per cent of participants use census data at small-area levels. This includes local authorities (see Figure 3 for an example of a verbatim quote from an MRS Company Partner who participated in the MRS research), for whom local data are vital for area planning, working with communities and funding bids. Small-area data are also used for market research in representative surveys at sub-national and local levels.

Figure 3: A verbatim quote from an MRS Company Partner about the value of Census data to local authorities

The Census is a critical tool for our local authority for area planning, working with our communities and funding bids. Local level data is vital for us.

28. It is essential to have robust data about small geographical areas to identify concentrations of vulnerability. This information helps government and public sector organisations to respond proactively, both strategically and operationally, and was fundamental in supporting, for example, the UK Government's response to the COVID pandemic. Without such granular data, a larger proportion of scarce resources would have been mistargeted and it is likely that many more individuals would have been adversely impacted. The UK's successful response to similar situations in the future could depend on having access to granular baseline data for planning purposes.
29. Additionally, many opinion research and polling businesses use small-area census data for multi-level regression and post-stratification (MRP) analysis. This is a modern statistical technique which produces more accurate polling results, and also allows poll results to be inferred at low-level geographies, such as electoral ward or postal sector. The ONS proposal does not include proposals for Social Grade, Religion, or (Welsh) Language at any geographic level; and does not have definite small-area proposals for Occupation Status, Housing Tenure, Marital Status, or Vehicle Ownership. These are important variables for MRP in general (Social Grade, Religion, Marital Status and Housing Tenure) and also for specific surveys on, for example, transport or property issues. Of these, Social Grade, Occupation Status and Housing Tenure are the most important.

30. Without these topics being available at small-area level (either OA or LSOA), it would not be possible to run good-quality regression polls in the UK. At least three significant groups of clients would be affected. Firstly, the major British political parties, who all use MRP polling for democratic campaigning in elections. Secondly, charities and campaign groups who use MRP polling to measure and publicise support for their causes. And, finally, businesses who use MRP polling for commercial reasons. All these groups would be negatively affected by the loss of small-area census data in the relevant topics.

Geographical granularity

31. The reduction in geographic granularity from OA to LSOA level for which administrative data estimates might be produced is of concern to the research sector, and we would welcome more detail and reassurance regarding the ONS proposals in this area.

Inclusive data

32. We have significant concerns about the ONS proposal for provision of estimates of some of the more sensitive census topics such as Ethnicity, Religion, Gender Identity, Sexual Orientation and Health, where existing administrative sources either do not cover these topics adequately, or where obtaining the administrative data sources to provide estimates on these topics might in itself be particularly sensitive, and therefore difficult to operationalise.
33. For the last five years MRS has been leading a campaign to improve inclusion and diversity within research. One of the key pillars of this work is to improve representation in research, particularly the use of more inclusive characteristics when selecting and gathering data from research participants beyond the traditional parameters of Age, Gender, Region and Social Class. MRS best practice recommends that sampling parameters are extended to include gender identity, sexual orientation, ethnicity and physical and/or mental Health conditions alongside the census-derived ASG variable. The MRS inclusion campaign's aims and objectives align with those of the UKSA Inclusive Data Taskforce, which was established to ensure "that everyone in society counts and is counted and no one is left behind".
34. Population statistics derived from the census are vital to the understanding of the UK population and data, and for the research sector census data is crucial to establish representative samples of the UK population. A recent online inclusion survey of MRS Company Partners provided clear evidence that census is used for guidance on accurate quotas/targets to set in order to ensure representation. Comments included "*...It has a huge impact on experiences - incredibly important to ensure these voices are heard...*" and "*...Because ethnicity is finally being recognised as a critical social dimension and yet we still have little understanding of how well it is represented in sample and so in research results...*"
35. The Census 2021 included additional questions which have enabled more inclusive data to be collected from the UK population including questions on gender identity and sexual orientation. This data is part of the essential toolkit for the entire UK research sector ensuring inclusive research samples and representation within research. Without the scale and depth of inclusive data provided by the census, further barriers to inclusion will be erected and MRS and MRS CGG fear that not everyone in society will be counted and in fact significant numbers of the UK population will be left behind. It is vital that robust inclusive data about the UK population, as provided by the current census, is available to ensure that everyone

has a voice and that we understand fully the differences across all communities within the UK population.

36. *Case Study example of inclusion:* Parkinson's UK are always working to increase the coverage of their support network for patients with the condition. Support networks have grown organically over many years, and periodically need refining to reflect changes to the UK population. Understanding where the gaps in the current support network are, with respect to where the patient population is, was addressed by combining the UK Census 2021 data with NHS Digital and Parkinson's UK datasets. As a result, in the first instance, above the line marketing communications can be better targeted, and potentially outreach keyworkers could be placed in areas where there are opportunities to support people at an earlier stage, particularly where ethnic and cultural norms tend towards care in the community/family rather than through health services. Earlier engagement with health services has the potential to slow the progression of the disease, improving individual quality of life and management of the health condition with a knock-on positive effect on their families and communities due to lower burden and cost savings (people with diagnoses stay in the working population and there is a reduction in burden on health and social care services) as a result of better health for longer.

Harmonised data

37. It is also essential that whatever approach is undertaken for the collection of population and migration statistics, it must be harmonised, with consistent data available across the UK as a whole. This enables ingestion and use of the data across England, Scotland, Wales and Northern Ireland to be easier, with associated significant benefits for the research sector and its clients.

Household data

38. The ONS's proposal for the alternative to the census is that data should be compiled based on address rather than household. Nationwide, the effect will not be large, as relatively few addresses are in multi-occupancy. However, it will make a substantial difference in a number of significant areas which will damage the quality of market research data.
39. Items from cars to groceries are generally purchased and consumed at a household level rather than at address level in multi-occupancy households. Television viewing too is affected, as members of the same household are likely to watch the same programmes. Without household data, media research and fast-moving consumer goods (FMCG) research will be severely affected, resulting in lower quality data which will have significant impacts on advertising revenues, consumer spending and ultimately UK GDP. FMCG and media research together account for over 36 per cent of the total annual research spend for 2022, representing c.£2.8bn of research spend⁴.

Loss of consistency of 12-month residency

40. Registers and other administrative data sources often - by necessity - adopt different concepts, reference points and definitions of population-related variables from those that are generally applied in traditional censuses and other field-based surveys and data collection operations. Most notable of these is the definition of the key population base used in population estimates - usual residents - that is currently based on a continuous 12-month residency criterion in accordance with

⁴ Based on figures collected from the MRS Annual Survey 2022.

international recommendations and practice. Any move away from the construct of such a key variable not only affects continuity with previous censuses and datasets but erodes comparisons with international data. Moreover, an important consequence of any such change of the definition is the inevitable effect on the identification of 'place of residence' and its impact on the distribution of sub-national population estimates and projections.

41. Users should be made aware that such a difference may exist before deciding whether or not any such difference is acceptable for their own business and/or research purposes. What, for one purpose (such as planning transportation infrastructure) may be considered an acceptable difference when assessing the balance between continuity and coherence of the resulting statistical data, may be considered unacceptable for other purposes (such as allocation of Central Government revenue support among local authorities).

Alternatives to the census

42. If ONS determines to proceed with its plan to abandon the traditional census approach and to opt for an alternative administrative data-based solution, it would be crucial that further investment is made in this solution to ensure that the resulting data provides population statistics which meet the business needs of the UK.
43. Whilst the proposed administrative data methodology holds a promise of enormously increasing the quality and accuracy of *intercensal* population and household statistics, it does not claim to improve upon the quality of and accuracy of population and household statistics collected using the census methodology.
44. We strongly recommend that the current census is retained. If ONS decides to change methodology to administrative data sources, contrary to our recommendation, the following would be imperative to enable the data to meet the needs of the research sector:
 - Produce harmonised UK estimates;
 - Maintain the depth and breadth of data available from the census including data to at least LSOA level;
 - Collect the information required to produce Approximated Social Grade, as described in paragraph 25;
 - Have robust data quality;
 - Produce reliable and robust inclusion data;
 - Continue to produce estimates for households based on the current concept;
 - Publish raw data rather than verified statistical counts at small-area levels;
 - Ensure that any surveys used to improve data are sufficiently robust (e.g., 750,000 households) to give the necessary granularity, and
 - Up-to-date data with the appropriate level of detail; recency is not a benefit in itself, only when it is combined with depth and quality of data does it have value.

45. Furthermore, if a decision is made to no longer support the census, we would recommend that a cost-effective shorter questionnaire of all households in 2031 must be undertaken to fill in any missing data from the administrative data sources.

MRS and MRS CGG Recommendation

46. In conclusion, it is our view that the proposed new arrangements will not produce the comprehensive data that the research sector needs to provide the insights, data and evidence which help businesses, public bodies and other constituents to better understand consumers, customers and citizens in developing goods, services and public policy essential for economic efficiency, innovation and progress.

47. We recommend the continuation of a traditional census for at least one more cycle, to enable the alternative arrangements to be developed fully and the numerous data gaps filled, in order to deliver the quality of data that is essential for the continued growth and prosperity of the UK.

Next steps

We would welcome discussing further the MRS and MRS CGG submission in response to the ONS consultation on the future of population and migration statistics:

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