



MRS and MRS Census and GeoDems Response:

The Public Administration and Constitutional Affairs Committee (PACAC) consultation on the performance of the UK Statistics Authority (UKSA), and its two executive offices, the Office for National Statistics (ONS) and the Office for Statistics Regulation (OSR).

About the Market Research Society

1. [The Market Research Society \(MRS\)](https://www.mrs.org.uk/) is the UK professional body for market, opinion and social research, insight and analytics. MRS is the world's largest and oldest market, opinion and social research association, representing over 4,000 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. MRS has launched the Campaign for Better Data, providing guidance and training to help the sector strengthen and evolve the quality of the evidence it produces and reinforce public trust in research. Misinformation poses a growing risk which AI has the potential to exacerbate. Against this backdrop, MRS is providing new resources to help those in research to create even better data. It is calling on the research sector to continue to be vigilant and hone its skills to further fortify data accuracy and quality, ensuring the research sector is future-proofed².
4. More information about MRS can be found on the MRS website: <https://www.mrs.org.uk/>

About the MRS Census and GeoDems Group

5. 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.
6. 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.

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

² MRS Campaign for Better Data: <https://www.mrs.org.uk/topic/campaign-for-better-data>

About the UK Market and Social Research Sector

7. 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.
8. The UK research³, 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 US⁴.
9. 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 performance of the UK Statistics Authority and its executive offices, the Office for National Statistics (ONS) and the Office for Statistics Regulation (OSR).

10. MRS and MRS CGG welcome the opportunity to contribute to the Public Administration and Constitutional Affairs Committee (PACAC) consultation on the performance of the UK Statistics Authority (UKSA), and its two executive offices, the Office for National Statistics (ONS) and the Office for Statistics Regulation (OSR).
11. Within this response we will address each of the questions in turn.

How well served are policy-makers, researchers, businesses and citizens, by the data that ONS produces and the services it provides?

The Census: an example of how researchers are served by ONS.

12. To answer this question, we would like to reflect upon MRS and MRS CGG's experience with the decision about whether a census will be undertaken in 2031 in England and Wales, as this exemplifies the challenges within UKSA and ONS (less so OSR).
13. The census is a very valuable resource for the market, social and opinion research sector, and indeed across all sectors, due to its scope and coverage (geographical and population), and its longitudinal nature. For example, the determination of representative research samples requires the data from the census. 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 both a gold standard and 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.
14. Whilst ONS and UKSA recognise the importance of population statistics, a decision about the future of the census has still yet to be made. The uncertainty over the

³ Excludes academic research unless this is undertaken jointly with commercial research such as ESRC funded projects.

⁴ See Industry size and growth rates: <https://www.mrs.org.uk/resources/industry-size>

future of the 2031 censuses has not served UKSA or ONS well as it has highlighted the weaknesses in decision-making powers within the institutions.

15. It has also highlighted failings within UKSA and ONS between strategic ambition and delivery exposing needless risks to future population statistics. One proposal being considered is changing from a questionnaire census to a fully administrative process in one step. This 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 UKSA and ONS 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 needs to be made as a matter of urgency and 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.
16. 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. 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.
17. 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 and the quality of the administrative data is often poor with inadequate data cleaning and data control measures in place.
18. There does not currently seem to be a system or plan in place to address these weaknesses with administrative data. For example, 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. 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.
19. 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.
20. 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, not less important, with respect to ensuring that population statistics are accurate, reliable and robust for informed decision-making.

Response Rates

21. Whilst the MRS and MRS CGG's experience with the census exemplifies the fundamental issues within UKSA and ONS it is not the only area of concern. ONS's declining response rates are having a detrimental effect on the whole research sector. The widespread media coverage of difficulties with ONS outputs, and UKSA's and ONS's poor responses to these issues, has had a cascade effect on the research sector due to the assumption that the ONS experience typifies the whole of the research sector, which it does not.
22. Whilst the research sector has found response rates more challenging during and following Covid-19, the commercial sector has had considerably more success in response rate recovery than ONS. For example, whilst the Labour Force Survey (LFS) has reported response rates of 17%, commercial research organisations are achieving rates between 45-50%⁵. This is consistent across the research sector, which indicates that whilst response rates are indeed lower than before Covid, ONS has not recovered at the same pace as the rest of the research sector.
23. Fundamentally the commercial research organisations and ONS are completing the same activities when it comes to data collection – so why is there such a significant difference in outcomes? One theory is that the employment contracts for ONS interviewers significantly disincentivise interviewers to achieve response rates. The interviewers are on civil service contracts. In the commercial sector flexible worker contracts are used which give interviewers control over the work they complete. Interviewers in the commercial sector:
 - Choose when to work
 - Choose which projects they accept and those they decline
 - Do not have to commit to fixed or regular hours which may be incompatible with other commitments such as child rearing, care giving, second jobs, etc.
 - Work for multiple research companies at the same time
 - Leverage benefits of worker status e.g., paid holiday, SMP, SSP, etc.
 - Receive bonuses for higher response rates
24. With the flexible-worker contracts, interviewers in the commercial sector are incentivised to achieve response rates, earning more in the process. As ONS interviewers are paid irrespective of the outcome of their activities, there is no incentive to drive response rates. [It should be noted, that the Employment Rights Bill, and the proposal to offer guaranteed hours, threatens these successful flexible-worker contracts, and so the fear of the research sector is that through proposed Government employment legislation response rates in the commercial sector will mirror those of ONS due to the introduction of unwanted, unneeded and inappropriate employment contracts.]
25. ONS's response to the response rate challenges with studies such as the LFS has been to increase incentives and to recruit more interviewers. Whilst this may improve response rates to a small degree it will not solve the systemic problems with the delivery of these surveys.
26. ONS needs to be focused on its core activities – the production of official statistics that are cross-cutting across departments (e.g., health, economics, population statistics). Other statistics should be outsourced to the commercial sector which has a successful track record delivering higher response rates, innovative data

⁵ UKSA submission to the Treasury Committee on Labour Market Statistics
<https://uksa.statisticsauthority.gov.uk/submission/office-for-national-statistics-correspondence-to-the-treasury-committee-on-labour-market-statistics/#:~:text=At%20its%20lowest%20point%20in,market%20data%20in%20October%202023.>

collection options and flexibility. This approach would enable ONS to focus on its core strengths (such as the census) and remove the distraction of surveys which ONS is not resourced, structured or funded to deliver.

Reliable Data

27. Beyond the census, the commercial research sector also relies on ONS surveys and statistics for commercial projects undertaken. The decreasing trust in the reliability of these statistics including the frequent revisions to estimates has a knock-on effect for commercial studies which rely upon ONS data for activities such as sample selection. When samples are found to be incorrect, due to revisions of ONS data, there is a cost to research businesses and their clients as they have to invest further to adjust for any errors made.
28. Similarly administrative data sources, which are so often cited as being the better alternative to survey data, are wholly inadequate for many commercial research purposes. For example, administrative health data is riddled with duplicates, meaningless codes, multiple addresses, deceased people seemingly still alive, etc.

Conflicting Priorities and Strategic Delivery

29. When assessing the effectiveness of UKSA, ONS and OSR it is important to recognise that some stakeholders are served better than others. Policy makers are significantly better served than other stakeholders such as researchers. Whilst the commercial research sector is keen to innovate and to evolve modes and methodologies, too often ONS makes decisions to maintain the status quo, protecting the structural delivery e.g., a statistics time series, rather than the information needs. The notable exception being for the census where risky and incomplete solutions (i.e., the move to an administrative-sources approach) has been prioritised over the existing successful survey-based approach. Changes do need to be made, but these should be in a measured and evidence-based way.
30. ONS has ambitious strategies in place without the infrastructure necessary to enable delivery, resulting in unrealistic plans without clear end goals creating huge pressure for those working within ONS. An example of this is real-time population estimates – what is the purpose of delivering this? Who is actually using this data?
31. ONS has a track record in delivering successful censuses. ONS does not have a track record in delivering other big statistics projects, and this includes transformation projects linked to the census. Half of the budget for the 2021 Census was meant to transform the digital approach to the census including the investment in the administrative data sources. If this had been successful, the situation with the census in 2031 would be less fraught, as it is the data sources transformation project has not delivered. ONS created a large data infrastructure which is not being used by Government departments. Instead, departments are working together to deliver their data needs without the ONS infrastructure e.g., DWP and HMRC working together to deliver benefits and employment data without using the ONS infrastructure. With the advent of AI, ONS's data infrastructure is likely to become increasingly redundant.
32. Similarly, although ONS's contribution to the discontinued Administrative Data Research Network is difficult to assess, the perceived view is that the partnership did not generally seem to yield the hoped-for outcomes. This is another example of the gap between ambition and poor delivery.

33. UKSA should be anchoring ONS when it drifts too far from achievable deliveries. However, UKSA tends to focus on the completion of specific activities rather than the delivery of successful outcomes.

The Staff

34. What ONS does is the primary concern, not the people who do the work that ONS undertakes. At the staff relationship level MRS welcomes and appreciates the openness and helpfulness of the ONS staff and their knowledge, skills and expertise. Similarly, many MRS members work successfully alongside ONS staff on partnership projects. Many ONS staff are both skilled and dedicated and have much to be proud of.
35. The staff within ONS are not driving the current difficulties, rather it is the environment and structure in which they work – the insufficient funds, the conflicting priorities, the unrealistic strategic plans – which is causing many of the problems currently being experienced.

Is the UK's data environment evolving, and what challenges and opportunities does this present official statisticians and analysts? What does the development of a National Data Library mean for the ONS?

36. The data environment is evolving – but this is a global rather than national trend. Disinformation, AI, and the speed of spread of information are critical challenges – the first to make a statement seizes the narrative and there is a sense of it being easier to apologize later than to first verify facts. Where facts are subsequently corrected, it is rarely headline news. Any steps that can be taken to improve this situation are to be welcomed.
37. The development of a National Data Library (NDL) seems to be complementary to ONS's products and services, although presumably NOMIS and other census data access channels may be replaced by the new initiative? Indeed, it seems likely that the impact would be most significant for the UK Data Archive/Service, but this is also ESRC-funded, so perhaps it is planned that they are involved in the initiative?
38. Overall MRS welcomes the NDL initiative. It is vital, however, that ownership for NDL is determined with a clear and deliverable plan in place to ensure that the initiative meets its objectives. This includes ensuring that there are data quality control measures in place for all data sources, including those managed by ONS. Furthermore, accessibility to the data by researchers is also key e.g., self-serve for approved researchers which includes practitioners who are adhering to ethical Codes of Conduct such as the MRS Code of Conduct.
39. There is a clear crossover between the NDL and the ONS's integrated data platform. What needs to be avoided is the problems ONS has had with its platform, particularly departments' unwillingness to share their data and/or supplying data which has been anonymized to such a degree that it is rendered relatively worthless. Furthermore, the ability to link data is where the real value add will be found more so than individual data sources. The legislative clarity being introduced by the Data Use & Access Bill will only deliver benefits to initiatives such as the NDL if the individual government department's attitudes and culture towards data sharing evolves.
40. Overall, for the NDL to be successful requires learning from mistakes from the past, such as the Administrative Data Research Network, and to focus more on the delivery of successful data outcomes rather than specific data locations or delivery platforms.

How successful has the OSR been in identifying issues with official data, and making the case for improvements?

41. Overall, the OSR is pro-active and effective, this was particularly noticeable during the Covid period.
42. The OSR Code and the 'Trustworthiness, Quality and Value' approach has been a clear framework for making the case for improvements.
43. OSR is a visible regulator that is open to challenge and is open to working with others on strengthening regulatory understanding and adherence. For example, MRS and OSR worked together creating a bridging document between the OSR Code of Practice for Statistics and the MRS Code of Conduct to assist practitioners working with both Codes to understand their regulatory responsibilities.
44. The fundamental challenge for the OSR is that it has insufficient independence from UKSA and ONS. To be a more effective regulator, OSR requires the freedom to make the necessary regulatory decisions.

How does the UKSA Board carry out its statutory functions, and how involved is it in the decisions taken by senior leaders at ONS and OSR?

45. The UKSA operates as a civil service body with limited decision-making authority, primarily responding to the priorities of the Government of the day. It is headed by the National Statistician, who serves as the principal advisor to the Government on statistical matters.
46. Given this structure, neither the ONS nor the OSR can be considered fully independent. This limitation affects both their perceived and actual effectiveness, as well as the extent to which their priorities may align with prevailing Government policies. There is a general lack of public understanding regarding these institutional arrangements and their implications. As a result, ONS is frequently subject to criticism for decisions that fall beyond its control. By contrast, OSR has been relatively more successful in maintaining the appearance of independence, though its structural constraints remain similar.
47. The effectiveness of the UKSA Board is difficult to assess from an external standpoint – even though MRS and the MRS CGG have strong engagement with OSR and ONS.
48. The UKSA Board seems to be active in their delivery of assessments and their periodic/ongoing reviews of e.g., the Code of Practice. There is perhaps a perception that the National Statistician is the UKSA, and that the ONS and OSR may advise but are not necessarily decision-makers. This lack of clarity is indicative of a need for greater accountability, responsibility and transparency within the various statistical institutions and their underpinning governance.
49. With regard to the cost of the census, despite the expense, the census for England and Wales has consistently delivered reliable and valuable data, and it is widely regarded as a vital information resource for public policy, planning, and research.
50. Current discussions surrounding the future of the census in 2031 do not adequately reflect the operational realities of the UK statistical system. In the absence of realistic or viable alternatives for 2031, the debate should shift from whether the census should proceed to how best to enhance it in synch with technological advancements and proliferation. There is a clear opportunity to harness new

technologies to improve data collection, accelerate analysis, and reduce costs—particularly given the successful move to an online-first approach in 2021. However, continued delays in decision-making regarding the census in 2031 are creating widescale mistrust and uncertainty. Many organisations perceive the continuation of the census as a logical and necessary step, yet in the absence of a formal decision, they are compelled to consider alternative methodologies – despite a longstanding reliance on census data.

51. Repeated consultations on the future of the census, without a clear outcome, have reflected poorly on the ONS. This perception is unfair, given that final decisions rest elsewhere within the governance structure. Clarifying responsibilities and providing timely decisions would enhance trust and support effective planning across sectors that depend on census data.
52. The ambitions set by the Government often face significant challenges in execution, resulting in a poor delivery record. While the aims of the ONS are established by the Government, with public consultations undertaken; this has failed to shape final decisions in a meaningful way. These issues raise concerns that the existing governance framework is in effect fundamentally flawed and destined to fail. The ONS should be granted the autonomy to concentrate on its core functions—particularly those that no other entity can effectively deliver, such as the census. To ensure excellence, its scope should remain focused and streamlined, limiting any expansion and diversification of its deliverables. A refined approach of doing fewer things with greater precision would enhance efficiency.
53. The ONS faces both a real and perceived disconnect from other Government departments. The ONS struggles to exert influence over other departments and is not widely regarded as a department in its own right. Conversely, the OSR appears to navigate these challenges more effectively.
54. Furthermore, the ONS should operate with a clear, transparent, and well-defined mandate, rather than being compelled to respond reactively to Government policy or ministerial directives. A notable decline in the number of subject-matter experts has further exacerbated delivery challenges, both for existing surveys and new statistical products. More broadly, the overall comprehension of the statistical ecosystem appears to be weakening, raising concerns about its long-term sustainability and effectiveness.

Recommendations

- 1. Maintaining the Census:** The census should be maintained at least until 2031 as the foundation for representative samples, and administrative data sources should be used to complement, rather than replace, the census until such time as the resulting data is as robust and comprehensive (in terms of data collected and resulting outputs) as the current census.
- 2. Improving Transparency:** ONS should be more transparent about the steps being taken to improve data quality and response rates and provide a clear timeline for when these improvements will be implemented. UKSA should be more accountable for the decisions made, including ensuring that any strategic plans are being fulfilled as expected.
- 3. Improving Accountability:** A governance review to improve accountability is needed. Options include the UKSA becoming independent and given a clear-cut and finite remit and/or the UKSA could be disbanded and the ONS and OSR become two separate independent organizations, each with its own remit and powers. They

would need clear accountability but should be able to influence data decisions made by other departments to preserve the integrity of national and official statistics. Irrespective of any other changes, the OSR needs more independence from UKSA and the National Statistician to enable robust regulation and oversight.

- 4. Realistic Strategic Planning:** UKSA needs to revise its strategy based upon the Government's needs and data landscape, creating a realistic roadmap to deliver against these needs. This plan should reflect all the stakeholders in the data landscape, including commercial research practitioners, ensuring that appropriate partners are retained to deliver the requirements rather than assuming that ONS can deliver all the necessary requirements.
- 5. Streamlining ONS:** ONS needs to be focused on official statistics that are cross-cutting across departments (e.g., health, economics, population statistics). Other statistics should be outsourced to the commercial sector which has a successful track record delivering higher response rates, innovative data collection options and flexibility. This approach has already been successfully demonstrated with several surveys e.g., the Crime Survey for England and Wales. This approach would allow ONS to focus on its core strengths (such as the census) and remove the distraction of surveys which ONS are not resourced, structured or funded to deliver.
- 6. Investing in Resources:** There is a need for increased investment in both financial and human resources to support ONS's field force, response rates and improve data collection methods.
- 7. Enhancing Data Quality Control:** The ONS should have enhanced data quality control measures in place to ensure the reliability of ONS data being used by researchers, policy makers, etc.
- 8. Active AI Implementation:** The safe and ethical adoption of AI in business operations and statistical production must be a priority for ONS, in order for it to be relevant and effective. Future AI plans should be supported by a comprehensive and realistic plan that includes clear oversight, realistic timeframes and achievable and demonstrable quality assurance measures.

Next Steps

MRS appreciates the opportunity to contribute to this consultation and looks forward to working with the Public Administration and Constitutional Affairs Committee, UK Statistics Authority, OSR and ONS and other stakeholders to improve the quality and reliability of statistical data in the UK.

We would welcome discussing further the MRS and MRS CGG submission in response to the PACAC consultation.

- Debrah Harding, Managing Director, MRS: debrah.harding@mrs.org.uk
- Dr Emma White, Chair, MRS CGG: ewhite@advantagegroup.com