

The Market Research Society (MRS) Submission

HM Treasury Consultation document: Independence for statistics

Preamble

With members in more than 70 countries, The Market Research Society (MRS) is the world's largest association representing providers and users of market, social, and opinion research, and business intelligence. All individual MRS members and MRS Company Partners agree to self-regulatory compliance with the MRS Code of Conduct. Full details regarding MRS and its activities are provided in appendix A.

Introduction

MRS welcomes the possibility offered by HM Treasury to respond to the consultation on the independence for statistics.

This response has been gathered in direct consultation with MRS' Census and Geodemographics Group (CGG). The CGG is an advisory committee of MRS containing around twenty individual members with experience in the creation and use of population statistics (in their widest sense), census data and geographic information. The Group was formed in 1989 and since then the CGG has worked with the UK Census Offices, via the Office for National Statistics (ONS), representing the needs of the research industry in consultations on the 1991, 2001 and 2011 censuses.

CGG is also part of the Statistics Users Forum.

MRS confirms that no parts of this paper should be treated as confidential or un-attributable.

Overview

MRS generally supports the submission made by the Statistics Users Forum. The following highlights the issues that are of specific to MRS members, market research and the geodemographic communities.

MRS welcomes the general proposals to make official statistics more independent of Government and to allocate oversight of the statistics system to Parliament.

However, there are a number of areas which require further consideration:

- A clear definition of “national statistics” needs to be introduced which encompasses all official statistics to ensure consistency in the collection and use of statistics across the UK.
- Statistics which are not produced by the ONS require more structure to reduce the likelihood of increased fragmentation.
- Greater emphasis and consideration must be given to users of statistics.
- Steps must be taken to ensure that cross-UK statistics are comparable.
- The funding for other statistics, particularly the census, must not be affected by the proposals.
- All official statistics should be produced in adherence with the statistics code of practice.
- Administrative data should be shared with researchers particularly as researchers and statisticians are already familiar with data protection and privacy issues due to the existing ethical codes such as the MRS Code of Conduct and MRS data protection guidelines.

The following section provides the detailed background to the above points.

Detailed Response

1. Definition of ‘national statistics’

The concept of “national statistics” is not clear within the document. If this concept is to be used as the basis for the proposal there needs to be greater clarity in terms of the agreed definition of “national statistics”. Any definition needs to have meaning outside government where the distinction between data gathered by the Government Statistics Service and that generated by Government Social Research is not well understood.

The agreed definition of national statistics must be consistently and appropriately applied by government, the ONS, and the research and statistics community as a whole. Fundamentally the distinction must incorporate all official statistics including crucial policy areas such as health, education and crime which are currently produced outside of the ONS. Similarly it must apply to all statistics collected irrespective of frequency. An example of the current confusion: quarterly NHS waiting lists are ‘national statistics’, monthly figures are not. Any changes must remove such irregularities.

2. Fragmentation

Statistics produced by the UK system are fragmented in nature, (due to constitutional arrangements, the decentralised tradition of statistics collection and practical arrangements), and as such a central body is required to hold the system together and to present statistics to users in a consistent and coherent format. Such a body should provide greater co-ordination across the UK to ensure that statistics are consistent across the UK.

The proposal to make ONS independent presents an opportunity for better and more consistent connections between all statistical activities. MRS strongly recommends that future proposals include appropriate arrangements to remove the risk of greater fragmentation.

3. Users and user access

MRS members are significant users of statistics. The current proposals largely focus on the needs of government. Whilst this is an important aspect, in order for national statistics to fill the role as defined in the consultation, "encouraging and informing debate...key resource for business, academia and the wider community" greater consideration of the users is required.

Users must be recognised as customers and appropriate structure and funding put in place to ensure that proper consideration is given to this important group.

A crucial part of the user relationship, relates to access to statistical data. In order for the changes to meet the Government's stated objective "... to build a strong economy and a fair society with opportunity for all..." MRS is of the view that any proposals developed must contain a firm commitment that all users – whether public or commercial - will have equal terms for access, use and dissemination of all statistics.

Moreover, the system is not easy for users and obvious information portals, such as the ONS website, are inadequate for the task. With the problems of fragmentation (detailed above) it is vital that the statistical data is readily available with well-planned easy access.

4. Cross-UK statistics

Linked to the above issue is the difficulty in collating coherent statistics for the whole of the UK. Statistics for the different countries within the UK are collated on different bases thus making comparison and aggregation impossible. Aside from the additional costs which are incurred in attempting to overcome the inconsistencies in UK statistics and the poorer

rate of return that investment in output which is not cross-UK provides, statistics users are also at a significant disadvantage in not being able to obtain suitable cross-UK information.

MRS believes that greater consideration must be given to enabling consistency in cross-UK statistics particularly between the devolved administrations.

5. Funding

MRS seeks clarification from HM Treasury that the funding arrangements for the census will not be affected in any way by the proposed developments.

MRS acknowledges the need for Government to set funding priorities, particularly as information gathering exercises become more costly and activities such as giving access to administrative data would create new demands for funds. However, all users of statistics (via bodies such as MRS) must be able to contribute to this decision making process to ensure that appropriate priorities are set to ensure that the information based economy is least harmed and at its most cost effective.

6. Consistent standards

All statistics collected should be of a consistent standard and in line with the statistics code of practice. This code should apply to any official statistics including that produced outside government departments.

7. Administrative data

The consultation indicates that there are privacy concerns regarding the sharing of administrative data due to privacy concerns.

MRS is the UK Code-holding body for market, social and opinion research. The fundamental principles within the MRS Code of Conduct are that research is conducted honestly, objectively and without unwelcome intrusion or harm to respondents. Moreover, MRS has developed specific data protection advice, in liaison with the Information Commissioner's Office, to explain to researchers what the Data Protection Act 1998 means in relation to the collection of research and statistics. As such, MRS would contest that researchers are already very familiar with the need to safeguard privacy rights and have developed systems in order to ensure this and as such there is no need for enhanced data protection provisions.

8. Future consultation

Although MRS has contact and participation in the Statistics Users Forum, via the MRS CGG, this should not be the sole point of contact for any future discussions.

MRS would wish to be consulted on any future developments in this area as the changes have a direct impact on the activities of a significant proportion of the MRS membership.

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The Market Research Society (MRS)

With members in more than 70 countries, MRS is the world's largest association representing providers and users of market, social, and opinion research, and business intelligence.

MRS serves both individuals and organisations who identify with its core values of professionalism, excellence, and effectiveness.

It has a diverse membership of individual researchers within agencies, independent consultancies, client-side organisations, the public sector and the academic community – at all levels of seniority and in all job functions.

MRS Company Partners include agencies, suppliers, and buyers of all types and sizes who are committed throughout their organisations to supporting the core MRS values.

All individual members and Company Partners agree to self-regulatory compliance with the MRS Code of Conduct. Extensive advice to support this commitment is provided by MRS through its Codeline service and by publication of a wide range of specialist guidelines on best practice.

MRS offers various qualifications and membership grades, as well as training and professional development resources to support them. It is the official awarding body in the UK for professional qualifications in market research.

MRS is a major supplier of publications and information services, conferences and seminars, and many other meeting and networking opportunities for researchers.

MRS is “the voice of the profession” in its media relations and public affairs activities on behalf of professional research practitioners, and aims to achieve the most favourable climate of opinion and legislative environment for research.

More information regarding MRS and its activities, including the activities of the MRS Census and Geodemographics Group, can be found via www.mrs.org.uk