



UK Statistics  
Authority

# Assessment of compliance with the Code of Practice for Official Statistics

## Short-Term Economic Output Indicators: Retail Sales

*(produced by the Office for National Statistics)*

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### **About the UK Statistics Authority**

The UK Statistics Authority is an independent body operating at arm's length from government as a non-ministerial department, directly accountable to Parliament. It was established on 1 April 2008 by the *Statistics and Registration Service Act 2007*.

The Authority's overall objective is to promote and safeguard the production and publication of official statistics that serve the public good. It is also required to promote and safeguard the quality and comprehensiveness of official statistics, and good practice in relation to official statistics.

The Statistics Authority has two main functions:

1. oversight of the Office for National Statistics (ONS) – the executive office of the Authority;
2. independent scrutiny (monitoring and assessment) of all official statistics produced in the UK.

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# **Assessment of compliance with the Code of Practice for Official Statistics**

## **Short-Term Economic Output Indicators: Retail Sales**

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## ASSESSMENT AND DESIGNATION

The *Statistics and Registration Service Act 2007* gives the UK Statistics Authority a statutory power to assess sets of statistics against the *Code of Practice for Official Statistics*. Assessment will determine whether it is appropriate for the statistics to be designated as National Statistics.

Designation as National Statistics means that the statistics comply with the *Code of Practice*. The *Code* is wide-ranging. Designation can be interpreted to mean that the statistics: meet identified user needs; are produced, managed and disseminated to high standards; and are explained well.

Designation as National Statistics should not be interpreted to mean that the statistics are always correct. For example, while the *Code* requires statistics to be produced to a level of accuracy that meets users' needs, it also recognises that errors can occur – in which case it requires them to be corrected and publicised.

Assessment reports will not normally comment further on a set of statistics, for example on their validity as social or economic measures. However, reports may point to such questions if the Authority believes that further research would be desirable.

Assessment reports typically provide an overview of any noteworthy features of the methods used to produce the statistics, and will highlight substantial concerns about quality. Assessment reports also describe aspects of the ways in which the producer addresses the 'sound methods and assured quality' principle of the *Code*, but do not themselves constitute a review of the methods used to produce the statistics. However the *Code* requires producers to "seek to achieve continuous improvement in statistical processes by, for example, undertaking regular reviews".

The Authority may grant designation on condition that the producer body takes steps, within a stated timeframe, to fully meet the *Code*'s requirements. This is to avoid public confusion and does not reduce the obligation to comply with the *Code*.

The Authority grants designation on the basis of three main sources of information:

- i. factual evidence and assurances by senior statisticians in the producer body;
- ii. the views of users who we contact, or who contact us, and;
- iii. our own review activity.

Should further information come to light subsequently which changes the Authority's analysis, it may withdraw the Assessment report and revise it as necessary.

It is a statutory requirement on the producer body to ensure that it continues to produce the set of statistics designated as National Statistics in compliance with the *Code of Practice*.

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## **Statement by the Head of Assessment on the Short-Term Economic Output Indicators Re-assessments**

The short-term economic output indicators are among the most important, high profile statistics produced by the Office for National Statistics (ONS), providing some of the earliest signals about the health and momentum of the UK economy, including consumer and business confidence. They inform decisions that affect the daily lives of everyone in the UK, such as interest rates. They are used by a wide range of organisations and people for making and monitoring economic policy, and for informing day-to-day and strategic decisions. This Assessment report is one of a suite of three reports covering five different, related indicators.

Overall, the report finds that ONS complies with much of the Code of Practice for Official Statistics. Users who engaged with the Assessment team as part of this assessment reported that the statistics largely meet their needs. ONS produces and publishes the statistics in a timely way, to a pre-announced timetable, and engages effectively with the key institutional users of the statistics. But it is wrong to focus just on these well-known institutions, like the Bank of England and the Office for Budget Responsibility. More than most sets of statistics, this package of outputs speaks to a very wide range of audiences for a wide range of uses, from guiding business decisions to acting as a general barometer of the economy.

In light of this enormous public significance, the range of Requirements included within this report reflects the fact that ONS is not doing all that it can to extract maximum value from the statistics. Many of the requirements relate to ONS communicating more effectively about some aspect of the statistics, or the processes involved in producing them. ONS does not consistently produce an adequate narrative to explain what the statistics mean, and could enhance their utility by giving more prominent reference to the material in the separate analytical documents that it produces, which draw together overall messages from a range of economic statistics (including those on the labour market). And while ONS has undertaken work to understand and measure the quality of the statistics, we agree with users that ONS needs to present information about uncertainty more clearly and more prominently.

Overall, these issues might reflect a situation within this pressurised area of ONS where the scope for highly skilled professional analysts to be able to stand back from the detail of the production process could be improved. Being able to step back would allow those experts to be able to undertake more activities that have potential to add significant public value to these statistics.

**Ed Humpherson**  
**Head of Assessment, UK Statistics Authority**

# **1 Summary of findings**

## **1.1 Introduction**

- 1.1.1 This is one of a series of reports<sup>1</sup> prepared under the provisions of the *Statistics and Registration Service Act 2007*<sup>2</sup>. The Act gives the Statistics Authority power to re-assess whether the *Code of Practice for Official Statistics*<sup>3</sup> continues to be complied with in relation to official statistics already designated as National Statistics. The report covers the sets of statistics reported in *Retail Sales*<sup>4</sup>, produced by the Office for National Statistics (ONS).
- 1.1.2 The previous assessment of these sets of statistics was reported in Assessment report 80<sup>5</sup>. They have been re-assessed as part of the Statistics Authority's ongoing programme of re-assessment.
- 1.1.3 This report forms part of a broader assessment of short-term economic output indicators produced by ONS. Assessment reports 278 and 280 examine GDP: Preliminary Estimate and Indices of Production and Services; and Construction Output and New Orders statistics.
- 1.1.4 This report was prepared by the Authority's Assessment team, and approved by the Assessment Committee on behalf of the Board of the Statistics Authority, based on the advice of the Head of Assessment.

## **1.2 Decision concerning designation as National Statistics**

- 1.2.1 The Statistics Authority judges that the statistics covered by this report are readily accessible, produced according to sound methods and managed impartially and objectively in the public interest, subject to any points for action in this report. The Statistics Authority confirms that the statistics listed in paragraph 1.1.1 are designated as National Statistics, subject to ONS implementing the Requirements listed in section 1.5 and reporting them to the Authority by June 2014.
- 1.2.2 ONS has informed the Assessment team that it has started to implement the Requirements listed in section 1.5. The Statistics Authority welcomes this.

## **1.3 Summary of strengths and weaknesses**

- 1.3.1 ONS engages well with a small core set of users of the retail sales statistics, and is starting to lay the foundations for stronger engagement with users outside this group. We particularly welcome the event held in March 2014 to discuss user needs and plans for future development. Users told us that they were generally satisfied with the quality of the statistics and the decisions made by ONS on the trade-off between accuracy and timeliness.

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<sup>1</sup> <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/index.html>

<sup>2</sup> [http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga\\_20070018\\_en.pdf](http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf)

<sup>3</sup> <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/index.html>

<sup>4</sup> <http://www.ons.gov.uk/ons/rel/rsi/retail-sales/index.html>

<sup>5</sup> <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/index.html>

- 1.3.2 ONS has continued to develop these statistics, in particular, the estimates of internet sales, which we know users are particularly interested in. However, information about the strengths and limitations of the statistics has not always kept pace with development.
- 1.3.3 Some common themes have emerged from assessing all of the short-term economic output indicators at the same time. These include the need to communicate better the uncertainty associated with early estimates to avoid inadvertent misuse of the statistics; the need to present the short-term economic output indicators more coherently on ONS's website to aid interpretation; and the need to improve the way that data are made available to better support analysis and re-use. At the same time, it is clear that ONS is making continuing efforts to engage more effectively with users and to provide a better narrative around the statistics.

#### **1.4 Detailed recommendations**

- 1.4.1 The Assessment team identified some areas where it felt that ONS could improve the production and presentation of statistics on retail sales. Those which are essential for ONS to address in order to strengthen its compliance with the *Code* and to enable designation as National Statistics are listed – as Requirements – in section 1.5, alongside a short summary of the key findings that led to each Requirement being made. Other recommended changes, which the Assessment team considers would improve the statistics and the service provided to users but which are not formally required for their designation as National Statistics, are listed – as Suggestions – in section 1.6.

#### **1.5 Requirements for designation as National Statistics**

- 1.5.1 This section includes those improvements that ONS is required to make in respect of its statistics on construction output and new orders in order to fully comply with the *Code of Practice for Official Statistics*, and to enable designation as National Statistics.

<b>Finding</b>	<b>Requirement</b>
ONS is making real progress in user engagement, but a review of users' needs, and of their experiences of using the statistics, would be timely. ONS should:	<b>1</b> Document more fully the different uses made of these statistics and update the published information about users' experiences of the statistics, including how those experiences will inform the development of <i>Retail Sales</i> (para 3.3); and
ONS has communicated a series of development plans to users but has not	<b>2</b> (a) Make it clearer to users when changes to methods will have only a minimal impact on the statistics; and (b) keep all users informed of the outcomes of all development work carried out in response to published action plans, even

<p>kept them informed of the outcomes of these plans in any systematic way, for example, its work to try and develop retail deflators. ONS should:</p>		<p>where this does not lead to any change (para 3.7).</p>
<p>Revisions are of crucial interest to users. ONS does not clearly explain why <i>Retail Sales</i> has a different revisions policy to other statistics that feed into the National Accounts, and the nature of the revisions is not always well communicated. ONS should:</p>	3	<p>(a) Publish an updated revisions policy for <i>Retail Sales</i> and explain more clearly to users the rationale for differences between this policy and that for the National Accounts; (b) explain the nature of revisions resulting from methods changes; and (c) improve the metadata and signposting for the revisions analysis (para 3.10).</p>
<p>It is essential that users are confident that these statistics are produced with integrity. The purpose and content of ONS's regular meetings with HMT, the Bank of England, OBR and BIS is unclear. ONS should:</p>	4	<p>(a) Publish terms of reference for the short-term economic output indicators and quarterly National Accounts review meetings; (b) make the date of publication of any minutes transparent; and (c) document how those who produce the statistics are protected from any political pressures that might influence the production or presentation of the statistics (para 3.12).</p>
<p>ONS has a good understanding of the limitations of the methods it uses and has provided some good material in the public domain. However, it has not drawn this material on limitations together in a coherent and</p>	5	<p>Update the published methods and quality information to reflect the latest developments in the retail sales statistics, and provide better information about the strengths and limitations of the statistics (para 3.14).</p>

accessible way, and some aspects are out of date. ONS should:		
The retail sales statistics attract attention, and sometimes criticism, around the volatility of the month-on-month estimates, and their relationship to other statistics. ONS should:	6	Anticipate where estimates of retail sales might attract user attention, and enhance the information it presents for users about its sense-checking on those areas. This would include examining the statistics in the context of publications from other organisations. In addition, ONS should communicate the range of uncertainty attached to the statistics more generally (para 3.18).
Retail sales statistics are produced to internationally comparable standards, and are required by the European Union. ONS could set more of an international context for users. ONS should:	7	(a) Provide users with links to equivalent retail sales statistics for other countries; and (b) publish information about how <i>Retail Sales</i> meets international standards (para 3.20).
Every third month, the ONS includes additional employment questions in its survey, and this reduces response rates marginally (around 2 per cent). ONS should:	8	Investigate the impact of lower response rates on the short-term economic output indicators and if significant, establish whether there are any improvements that ONS might introduce to improve the response rates in those months when employment questions are asked and publish its plans (para 3.24).
These are among the most important statistics that ONS produces. But there is a risk that staff turnover affects ONS's ability to produce high quality outputs. ONS	9	Present evidence that ONS's recruitment and retention arrangements ensure that appropriately skilled people are employed and retained in the production of the short-term economic output indicators, and are based on an appropriate competence framework (para 3.26).

should:		
ONS employs a number of avenues to help users interpret the retail sales statistics but the narrative does not consistently translate through to the statistical report. ONS should:	10	Continue to improve the presentation across the statistical reports so that it aids user interpretation of the statistics, including drawing key additional analyses into the main reports. As part of meeting this Requirement ONS should consider the points detailed in annex 1 and annex 2 (para 3.29).
ONS has long recognised the need to improve its website. In the particular context of the retail sales statistics, ONS should:	11	Improve the accessibility of <i>Retail Sales</i> through ONS's website, making it clear to users how the statistical report relates to the other short-term economic output indicators (para 3.31).
For many users, ready access to data is an essential part of their use of the statistics. Users have told us that they find the retail sales data difficult to navigate. ONS should:	12	Consult users and publish plans to present the Excel data tables for <i>Retail Sales</i> in forms that enable and encourage analysis and re-use (para 3.32).

## 1.6 Suggestions for extracting maximum value from the statistics

- 1.6.1 This section includes some suggestions for improvement to ONS's statistics on retail sales, in the interest of the public good. These are not formally required for designation, but the Assessment team considers that their implementation will improve public confidence in the production, management and dissemination of official statistics.

1	ONS should continue to build on the good foundations for user dialogue that it has put in place and consider a range of means of identifying and engaging users, drawing on examples of good practice from within ONS and the wider Government Statistical Service (para 3.3).
2	ONS could help users of <i>Retail Sales</i> by making the <i>National Accounts Five-Year Plan</i> , and any updates on progress against that plan that impact their use of the statistics, more easily accessible

	(para 3.4).
<b>3</b>	ONS might aid users' interpretation of the retail sales statistics by publishing information about the comparability of these statistics with those produced by other countries noting that any analysis might need to be presented with a time lag. (para 3.20).
<b>4</b>	ONS could aid users' understanding of any limitations on the utility of the statistics by publishing clear links in <i>Retail Sales</i> to its disclosure control policy and clarifying which data are potentially most affected by the need to protect confidentiality (para 3.21).
<b>5</b>	ONS might consider where some flexibility might helpfully be introduced to ONS's corporate publishing policy and procedures to help its statisticians better serve user's needs (para 3.30).
<b>6</b>	ONS could usefully consider, in consultation with users, whether publishing <i>Retail Sales</i> slightly later each month would better serve the public good (para 3.33).

## 2 Subject of the assessment

2.1 The UK Annual and Quarterly National Accounts (National Accounts) are produced using an accounting framework that provides a systematic and detailed statistical description of the UK economy. The Accounts contain the elements required to compile aggregate measures, such as gross domestic product (GDP). ONS's short-term economic output indicators are a suite of statistics published in five statistical reports as indicators of short-term changes in economic activity:

- *Gross Domestic Product: Preliminary Estimate (GDP)*
- *Index of Production (IoP)*
- *Index of Services (IoS)*
- *Retail Sales*
- *Construction Output and New Orders (Construction)*

The subject of this report is *Retail Sales*. Assessment reports 278 and 280 review *GDP*, *IoP* and *IoS*; and *Construction* respectively. The National Accounts<sup>6</sup> are currently being re-assessed separately.

2.2 *Retail Sales* presents headline measures and indices of the quantity bought (volume) and amounts spent (value) in the retail industry in Great Britain, on a seasonally adjusted and non-seasonally adjusted basis. In addition to presenting sales for the four sub-sectors of the retail industry – food stores; non-food stores; non-store retailing (such as mail order and market stalls); and stores selling automotive fuel (petrol stations), *Retail Sales* also includes estimates of internet sales.

2.3 Retail sales statistics have been collected since the 1930s. Until March 2011<sup>7</sup>, ONS published a separate Business Monitor SDM28 (Business Monitor) alongside the main Retail Sales statistical report, presenting the more detailed analysis by size of business and commodity. Following engagement with users<sup>8</sup>, ONS discontinued the Monitor and began presenting the data tables as part of *Retail Sales*.

2.4 Statistics on retail sales are produced from data from the Monthly Business Survey (Retail Sales Index)<sup>9</sup> (MBS-RSI). The RSI is a statutory sample survey of approximately 5,000 retailers each month that collects information about retail turnover. The sample includes all large retailers and a representative panel of smaller retailers. The largest businesses are continuously sampled. ONS estimates that the sample represents 2.5 per cent of the retail industry in terms of number of businesses and approximately 93 per cent in terms of industry turnover. ONS collects further information about the commodities sold by around 33 of the largest retailers through the Monthly Commodity Survey

<sup>6</sup> The first assessment of the UK Annual and Quarterly National Accounts was published in Assessment report100: <http://www.statisticsauthority.gov.uk/assessment/assessment/assessment-reports/index.html>

<sup>7</sup> <http://www.ons.gov.uk/ons/rel/rsi/retail-sales/march-2011/index.html>

<sup>8</sup> <http://www.ons.gov.uk/ons/about-ons/get-involved/consultations/user-surveys/conclusions-from-the-retail-sales-index-user-engagement-day-1-march-2011-and-user-engagement-surveys.doc>

<sup>9</sup> <http://www.ons.gov.uk/ons/about-ons/get-involved/taking-part-in-a-survey/information-for-businesses/a-to-z-of-business-surveys/monthly-business-survey--retail-sales-index/index.html>

(MCS). Retailers included in this survey are asked to provide the same information as for MBS-RSI plus the turnover generated for: food; alcohol, tobacco and confectionery; clothing and footwear; household goods; automotive fuel; and other commodities. The data on internet sales were originally collected only for the businesses covered by the MCS and were published as experimental statistics. In March 2009, a question on internet sales was added to the MBS-RSI questionnaire.

- 2.5 Retail Sales statistics are released every month, just over two weeks after the reference period, making them one of the earliest and important indicators of short-term momentum in the economy. Retail sales data are used to estimate consumer spending on retail goods and the output of the retail industry, both of which are used in the compilation of the National Accounts. ONS uses retail sales data to compile the retail component of the IoS, through which it contributes to the output measure of GDP. As an important source for calculating ONS's estimates of Household Final Consumption Expenditure<sup>10</sup> (HHFCE), retail sales data also inform the expenditure measure of GDP.
- 2.6 Other important users of the statistics include:
- The Bank of England – Officials use the statistics to inform the advice that they give to various policy committees, most notably their Monetary Policy and Financial Policy Committees<sup>11</sup>.
  - The Office for Budget Responsibility (OBR) produces a five-year economic forecast twice yearly in its *Economic and fiscal outlook*<sup>12</sup>. As part of this, OBR forecasts GDP and takes on the latest available estimates at that time<sup>13</sup>.
  - Government departments (particularly HM Treasury), OBR, macro-economists and financial consultants, employer organisations and the industry itself use the statistics to provide an evidence base for future policy development and to monitor the impact of policy and progress towards government targets.
  - Macro-economists in the private sector have similar interests in monitoring the health of the economy, interpreting the main signals in the statistics and offering advice to their clients or colleagues – for example, commenting on the likelihood of amendments to interest rates or decisions to slow down or speed up quantitative easing. The private sector uses the statistics to develop its own forecasts of consumer spending and seek to identify early any stresses on, or structural shifts in, the economy, such as the recent growth in the proportion of online retail sales compared with traditional retail methods.
  - Other examples of the use of these statistics include: UK Cards Association's monthly Credit Expenditure Statistics<sup>14</sup> that present plastic card spending as a proportion of total retail sales using ONS's Retail Sales figures as the denominator; and the monthly House of Commons

<sup>10</sup> <http://www.ons.gov.uk/ons/rel/consumer-trends/consumer-trends/index.html>

<sup>11</sup> <http://www.bankofengland.co.uk/Pages/home.aspx>

<sup>12</sup> <http://budgetresponsibility.org.uk/economic-fiscal-outlook-december-2013/>

<sup>13</sup> <http://budgetresponsibility.org.uk/pubs/Forecasting-the-economy.pdf>

<sup>14</sup> <http://www.theukcardsassociation.org.uk/2013-facts-figures/index.asp>

Library research paper Economic Indicators<sup>15</sup> which sets the latest UK indicators in the context of statistics for other OECD countries. In addition, there is significant wider public interest in retail sales statistics, which generate substantial media attention when they are published.

- 2.7 The official statistics published by ONS are not the only regular estimates of retail sales. The British Retail Consortium (BRC) produces the BRC-KPMG UK Retail Sales Monitor<sup>16</sup> and the Confederation of British Industry (CBI) carries out a Distributive Trades Survey<sup>17</sup>.
- 2.8 European Regulation (EC) 1165/98 and subsequent amendments<sup>18</sup> require the collection of short-term statistics (STS) by EU Member States. ONS told us that it complies fully with this STS regulation in respect of Retail Sales statistics. The UK national accounting framework currently adopts the concepts and definitions in the *European system of national and regional accounts 1995*<sup>19</sup> (ESA95), which is the European Union equivalent of the United Nations' *System of National Accounts 1993*<sup>20</sup> (1993 SNA). From September 2014, the UK has to produce its National Accounts according to the concepts and definitions of the *European System of Accounts 2010*<sup>21</sup> (ESA 2010). ESA 2010 is equivalent to the *System of National Accounts 2008*<sup>22</sup> (2008 SNA). Eurostat is also leading on implementing the *Framework Regulation Integrating Business Statistics*<sup>23</sup> that aims to streamline and rationalise the reference framework for European business statistics and reduce unnecessary statistical burden on respondents. The resulting changes to regulations will impact on the short-term economic output indicators no earlier than 2016.
- 2.9 ONS consulted<sup>24</sup> on its *National Accounts and Related Statistics Work Plan for 2013/14 to 2017/18*<sup>25</sup> (*National Accounts Five-Year Plan*) from 31 May to 31 July 2013. The *National Accounts Five-Year Plan* includes in its scope all of the short-term economic output indicators and outlines the work programme to be able to deliver on related European Regulations, including providing details of derogations<sup>26</sup> that it has sought from Eurostat. ONS also began a National Statistics Quality Review<sup>27</sup> of the National Accounts and related products in September 2013. The review is due to report in Spring 2014. ONS advised us that the short-term economic output indicators are not the central focus of this review, and so we have not delayed this Assessment to consider its outcomes.

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<sup>15</sup> <http://www.parliament.uk/briefing-papers/RP14-2/economic-indicators-january-2014>

<sup>16</sup> [http://www.brc.org.uk/brc\\_data.asp?kCat=53&sCat=THE+BRC+KPMG+RETAIL+SALES+MONITOR](http://www.brc.org.uk/brc_data.asp?kCat=53&sCat=THE+BRC+KPMG+RETAIL+SALES+MONITOR)

<sup>17</sup> <http://www.cbi.org.uk/business-issues/economy/business-surveys/distributive-trades-survey/>

<sup>18</sup> [http://epp.eurostat.ec.europa.eu/portal/page/portal/short\\_term\\_business\\_statistics/legislation](http://epp.eurostat.ec.europa.eu/portal/page/portal/short_term_business_statistics/legislation)

<sup>19</sup> [http://epp.eurostat.ec.europa.eu/statistics\\_explained/index.php/Glossary:ESA95](http://epp.eurostat.ec.europa.eu/statistics_explained/index.php/Glossary:ESA95)

<sup>20</sup> <http://unstats.un.org/unsd/nationalaccount/sna1993.asp>

<sup>21</sup> [http://epp.eurostat.ec.europa.eu/portal/page/portal/esa\\_2010/introduction](http://epp.eurostat.ec.europa.eu/portal/page/portal/esa_2010/introduction)

<sup>22</sup> <http://unstats.un.org/unsd/nationalaccount/sna2008.asp>

<sup>23</sup> [http://ec.europa.eu/governance/impact/planned\\_ia/docs/2012\\_estat\\_011\\_business\\_statistics\\_en.pdf](http://ec.europa.eu/governance/impact/planned_ia/docs/2012_estat_011_business_statistics_en.pdf)

<sup>24</sup> <http://www.ons.gov.uk/ons/about-ons/get-involved/consultations/consultations/national-accounts-and-related-statistics-work-plan/index.html>

<sup>25</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/economy/national-accounts/articles/2011-present/national-accounts-and-related-outputs-work-plan-2013-14---2017-18/index.html>

<sup>26</sup> Derogations are formal permissions to delay producing some of the detail required by ESA 2010 regulation

<sup>27</sup> <http://www.ons.gov.uk/ons/media-centre/statements/announcement-of-the-nsqr-on-the-national-accounts/index.html>

However, the assessment of the National Accounts will consider the outcomes of the review and this may lead to requirements that impact upon the short-term economic output indicators, either directly or indirectly.

- 2.10 ONS publishes *Retail Sales* in HTML and PDF with supplementary tables and charts in Excel and CSV formats. This equates to a level of three stars under the Five Star Scheme that forms part of the Open Standards Principles proposed in the Open Data White Paper: Unleashing the Potential<sup>28</sup> and adopted as government policy in November 2012<sup>29</sup>. Five stars represents the highest star rating within the Scheme.
- 2.11 ONS told us that the annual cost of producing *Retail Sales* is £531,000.

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<sup>28</sup> [http://data.gov.uk/sites/default/files/Open\\_data\\_White\\_Paper.pdf](http://data.gov.uk/sites/default/files/Open_data_White_Paper.pdf)

<sup>29</sup> <https://www.gov.uk/government/publications/open-standards-principles/open-standards-principles>

### 3 Assessment findings

#### Principle 1: Meeting user needs

The production, management and dissemination of official statistics should meet the requirements of informed decision-making by government, public services, business, researchers and the public.

Requirements from previous Assessment report 80 (January 2011):

- Take steps to develop a greater understanding of the use made of retail sales statistics; publish the relevant information and assumptions and use them to better support the use of the statistics.

- 3.1 ONS has identified a core set of users that it works with to understand their needs. ONS engages regularly with the Bank of England, Department for Business, Innovation and Skills (BIS), HM Treasury, and OBR about their use of Retail Sales statistics – for example, through meetings of the Short-term Output Indicators Stakeholder Group<sup>30</sup> and regular Reviews of Quarterly National Accounts<sup>31</sup>. As part of its key accounts strategy, ONS also invites these users (and other government departments) to comment on its performance at the end of each year. As part of this Assessment, users who are members of these different groups told us that they welcome these opportunities for a regular dialogue with ONS.

Retail Sales Q&A #askONS

How is the Retail Sales Index compiled and why do the figures sometimes appear to contradict other surveys? Join us here 11am-12pm on 21 February for a Twitter Q&A with Kate Davies, Head of Retail Sales at ONS, on the latest figures. Tweet questions using #askONS and follow the story here.

Live Twitter Q&A (11am-12pm)

Richard Perks (@RichardP\_Mintel)  
I'm a fan of the ONS data on the whole, but the monthly headline only serves to devalue it #askONS  
(11:36 AM · 21 Feb 2014)

Kate Davies (@StatisticKate)  
@RichardP\_Mintel thanks for being a fan. Month-on-month should not be used in isolation, needs to be discussed with other growth rates  
(12:01 PM · 21 Feb 2014)

Source: <http://storify.com/ONS/retail-sales-q-and-a-askons>

- 3.2 ONS makes further attempts to consult users more widely, for example, holding two question and answer sessions about *Retail Sales* on Twitter (illustrated above), but does so less systematically, relying mainly on notices published to its website or included in the notes to the statistical reports. ONS acknowledges that, as a result, it has generally experienced a limited response from users. ONS publishes some brief information in the statistical reports and associated

<sup>30</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/economy/national-accounts/presentations-and-meeting-papers/short-term-output-indicators-stakeholder-group/index.html>

<sup>31</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/economy/national-accounts/presentations-and-meeting-papers/meeting-papers/index.html>

quality reports about the users and uses of *Retail Sales*, informed by the outcomes of user events and surveys carried out during 2011 to capture users' experiences of the statistics<sup>32</sup>.

- 3.3 During the course of this assessment, ONS held a user seminar to discuss the methods used to produce retail sales statistics, together with the latest published estimates. ONS has announced this event in the statistical report and on StatsUserNet<sup>33</sup> and told us that it issued direct invitations to a wide range of potential users of the statistics. ONS told us that it hoped that while this event is labelled as a seminar, it would facilitate a good dialogue with users. Also, the *National Accounts Five-Year Plan* states that by 2014, ONS will support a user forum for the short-term economic output indicators that promotes discussions with non-government users. ONS also told us that a new ONS Economic Forum will meet for the first time in April 2014. We welcome these developments and hope that they will lay the foundations for ongoing engagement. As part of the designation as National Statistics, ONS should document more fully the different uses of these statistics and update the published information about users' experiences of the statistics, including how those experiences will inform the development of *Retail Sales*<sup>34</sup> (Requirement 1). We suggest that ONS should continue to build on the good foundations for user dialogue that it has put in place and consider a range of means of identifying and engaging users, drawing on examples of good practice from within ONS and the wider Government Statistical Service.
- 3.4 The *National Accounts Five-Year Plan* encompasses a wide range of statistical outputs, including the short-term economic output indicators, and sets out the priorities for delivering and developing these statistics. ONS has published the plan on its website and has committed to preparing six-monthly progress reports and consulting users on annual updates to priorities. However, this plan is not readily accessible to users of *Retail Sales* and these statistics are only directly mentioned once. We could not find evidence of any systematic dialogue with users about plans for developing ONS's retail sales statistics since 2011. During the course of this Assessment, on 19 March 2014, ONS published a *Retail Sales* work plan<sup>35</sup>. ONS told us that it used the seminar on 5 March to gather feedback from users about the plan, which it said should be viewed as a dynamic document that will be maintained in light of emerging priorities and continuing engagement. We suggest that ONS could help users of *Retail Sales* by making the *National Accounts Five-Year Plan*, and any updates on progress against that plan that impact their use of the statistics, more easily accessible.

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<sup>32</sup> <http://www.ons.gov.uk/ons/about-ons/get-involved/consultations/user-surveys/index.html>

<sup>33</sup> <http://www.statsusernet.org.uk/communities/viewdiscussions/viewthread/?GroupId=175&MessageKey=67d8ff0f-df90-49dc-9bc3-0dc2e043aa1d>

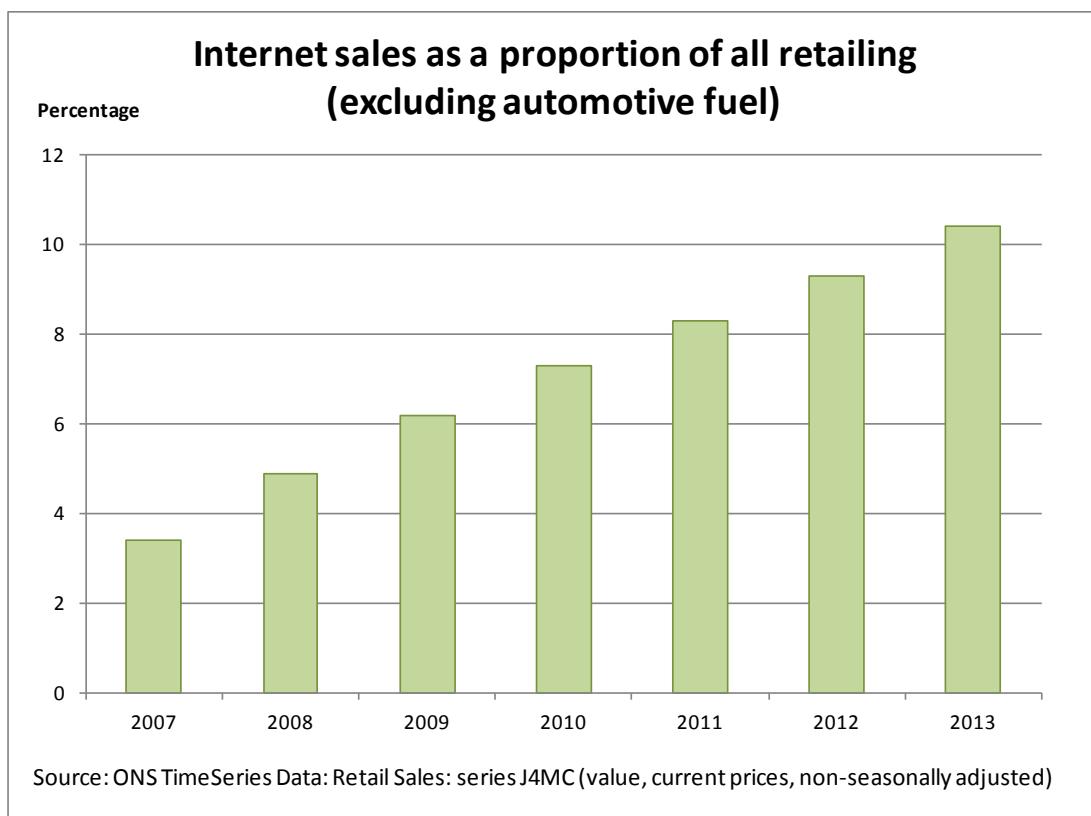
<sup>34</sup> In relation to Principle 1, Practices 1, 2 and 5 of the *Code of Practice*

<sup>35</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/economy/retail-sales/rsi-work-plan-2014.pdf>

## Principle 2: Impartiality and objectivity

**Official statistics, and information about statistical processes, should be managed impartially and objectively.**

- 3.5 ONS publishes these statistics in an orderly and timely manner on its website, free of charge to users. The statistics are presented impartially and objectively.
- 3.6 ONS generally alerts users to any planned changes to methods or classifications in the background notes to its statistical reports, usually one period in advance of publishing the changed statistics – for example, ONS pre-announced in December 2013<sup>36</sup> that it would be publishing seasonally adjusted estimates of the value of internet sales as part of the following month's *Retail Sales*, and has subsequently announced plans to seasonally adjust the proportion of all retail sales made through the internet<sup>37</sup>. The Authority welcomes this development: the user response to this Assessment indicates that the internet sales statistics are becoming increasingly important and that there is keen interest in having seasonally adjusted series.



- 3.7 Where the impact on the statistics of any changes to methods is potentially significant ONS publishes detailed articles or reports – for example, an article in 2013 about updates to the standard errors presented in *Retail Sales*<sup>38</sup>. ONS told us that where the impact of the change is likely to be minimal, for example,

<sup>36</sup> <http://www.ons.gov.uk/ons/rel/rsi/retail-sales/november-2013/stb-rsi-november-2013.html#tab-background-notes>

<sup>37</sup> <http://www.ons.gov.uk/ons/rel/rsi/retail-sales/january-2014/stb-rsi-january-2014.html#tab-background-notes>

<sup>38</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/economy/retail-sales/updated-accuracy-measures-for-the-retail-sales-index.pdf>

as the result of a regular annual seasonal adjustment review, it would not generally publish any additional information. However, it is not always made clear to users that there has been little or no impact as a result of the change. We also found that while ONS is generally good at informing users about changes to the statistics, it does not always keep users abreast of work carried out to deliver on published action plans where the feasibility study has concluded that no improvement can be made – for example, recent work to try to develop deflators for internet sales. ONS told us that while it does communicate its findings directly to the user(s) that raised the issue, it does not tend to report on the outcomes more widely. As part of the designation as National Statistics, ONS should (a) make it clearer to users when changes to methods will have only a minimal impact on the statistics; and (b) keep all users informed of the outcomes of all development work carried out in response to published action plans, even where this does not lead to any change<sup>39</sup> (Requirement 2).

- 3.8 While users responding to this Assessment voiced some frustration with the number of revisions to published statistics and some wanted more information about the nature of the revisions, the overall view was that ONS strikes an appropriate balance between timeliness and accuracy. This reflects what ONS told us was their experience. ONS told us that it had asked users whether they would prefer the release of the statistics one month later in order to improve the response rate and hence reduce the scale of any revisions – by publishing 18 days after the month's end, the MBS-RSI typically has a 64 per cent response rate (90 per cent of sampled turnover) and one month later this will have risen to approximately 75 per cent (98 per cent of turnover)<sup>40</sup>. ONS told us that users were prepared to accept the revisions in order to have more timely statistics.
- 3.9 *GDP, IoP, IoS and Construction* all manage revisions to the statistics in line with the National Accounts revisions policy<sup>41</sup>. *Construction* aligned with the National Accounts policy from September 2013, reflecting ONS's view that 'as a key component of the production approach to measuring GDP it should be subject to the same data policies that govern the accounts'<sup>42</sup>. Retail sales statistics are also used in the estimation of GDP and the National Accounts but while the National Accounts policy says that these statistics follow the National Accounts monthly rules, *Retail Sales* has a separate policy<sup>43</sup> with different rules about how often, and for what length of time series, revisions can be made. *IoS* notes that statistics it presents about the retail sector are broadly comparable with *Retail Sales* but that with the two series operating under different revisions policies there can be timing differences. ONS explains the rationale for the different approach in *A Quick Guide to the Retail Sales Index*<sup>44</sup>, saying that 'This approach ensures that the RSI uses all available information and provides

<sup>39</sup> In relation to Principle 2, Practices 3 and 4 of the *Code of Practice*

<sup>40</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/quality-information/economy/quality-and-methodology-information-for-retail-sales-index.pdf>

<sup>41</sup> <http://www.ons.gov.uk/ons/guide-method/revisions/revisions-policies-by-theme/economy/national-accounts-revisions-policy.pdf>

<sup>42</sup> <http://www.ons.gov.uk/ons/rel/construction/output-in-the-construction-industry/september-and-q3-2013/stb-construction-sept-2013.html#tab-background-notes>

<sup>43</sup> <http://www.ons.gov.uk/ons/guide-method/revisions/revisions-policies-by-theme/economy/retail-sales-index-revisions-policy.pdf>

<sup>44</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/economy/retail-sales/a-quick-guide-to-the-retail-sales-index.pdf>

the most up-to-date estimates for recent periods'. We consider it would be helpful to users if ONS explained more clearly why this statement applies to the retail sales statistics but not to the other short-term economic output indicators. Also, the revisions policy requires some updating.

- 3.10 ONS publishes information about the extent of any revisions to the seasonally adjusted volume measure of retail sales in revisions triangles<sup>45</sup>, with a summary in the statistical report supported by more detailed analyses in Excel tables, including tests for the statistical significance of the average revisions. The Excel charts comparing initial estimates with those published twelve months later are particularly helpful. However, there is no prominent information about the size of revisions users might typically expect, as is presented for other short-term economic output indicators, and there is no easily accessible guidance about how to interpret the different analyses presented. ONS does not routinely provide information about the nature of any revisions resulting from methods changes and the signposting of information about revisions from the statistical reports also needs to clearer. ONS told us that it plans to publish an updated revisions policy and some additional revisions analyses. As part of the designation as National Statistics, ONS should (a) publish an updated revisions policy for *Retail Sales* and explain more clearly to users the rationale for differences between this policy and that for the National Accounts; (b) explain the nature of revisions resulting from methods changes; and (c) improve the metadata and signposting for the revisions analysis<sup>46</sup> (Requirement 3).

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<sup>45</sup> Revisions triangles track revisions over time

<sup>46</sup> In relation to Principle 2, Practice 6 of the *Code of Practice*

### **Principle 3: Integrity**

**At all stages in the production, management and dissemination of official statistics, the public interest should prevail over organisational, political or personal interests.**

- 3.11 No incidents of political pressures or abuses of trust were reported to or identified by the Assessment team. ONS statisticians are involved in press briefings at the time of statistical releases. This ensures that statistical experts can comment publicly on statistical issues, and minimises the risk of misinterpretation of the statistics.
- 3.12 As noted in paragraph 3.1, ONS holds two quarterly meetings with HM Treasury, Bank of England, OBR and BIS – one about the short-term economic output indicators and one to review the quarterly National Accounts. ONS has published the minutes<sup>47</sup> for the meetings held in 2013 on its website. However, ONS does not publish any terms of reference for the groups and as the minutes are not dated, it is difficult to establish how quickly they are made available. Also, while the quarterly National Accounts review meetings are always held after the release of those statistics, there are no such restrictions on the timing of the short-term economic output indicators meetings. For example, the group met on 4 June to discuss Q1 2013, after the release of the second estimate of GDP on 23 May 2013 but before the quarterly National Accounts on 27 June 2013. The minutes of the short-term economic output indicators meetings illustrate that discussions do sometimes extend to the National Accounts. ONS assured us that there has never been political interference during those meetings. However, given the potential risk of the appearance of inappropriate influence by the key stakeholders on the estimates, ONS could do more to increase the transparency of the discussions and protect the independence of the statistics. As part of the designation as National Statistics, ONS should (a) publish terms of reference for the short-term economic output indicators and quarterly National Accounts review meetings; (b) make the date of publication of any minutes transparent; and (c) document how those who produce the statistics are protected from any political pressures that might influence the production or presentation of the statistics<sup>48</sup> (Requirement 4).

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<sup>47</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/economy/national-accounts/presentations-and-meeting-papers/index.html>

<sup>48</sup> In relation to Principle 3, Practice 2 of the *Code of Practice*

## Principle 4: Sound methods and assured quality

**Statistical methods should be consistent with scientific principles and internationally recognised best practices, and be fully documented. Quality should be monitored and assured taking account of internationally agreed practices.**

Requirements from previous Assessment report 80 (January 2011):

- Improve the documentation on methods, to make it more coherent and include explanations of why particular choices were made.
- Improve information about the quality of the statistics, including estimates of the main sources of bias and estimates of sampling error.
- Publish a plan to review the data sources and methods used to produce the experimental statistics, to ensure that they are produced to a level of quality that meets users' needs.

- 3.13 ONS has improved the documentation of the methods used to produce the retail sales statistics – *Retail Sales* presents some summary information about the methods used to produce the statistics and more detail is published in a quality report<sup>49</sup> and two user guides: *A Quick Guide to the Retail Sales Index*<sup>50</sup> and *A Quick Guide to Internet Sales*<sup>51</sup>. ONS also publishes a series of articles, reports and conference papers<sup>52</sup> that it signposts clearly in *Retail Sales*. However the documentation does not always keep pace with developments to the statistics and ONS could do more to present the strengths and limitations of the statistics in relation to their potential uses.
- 3.14 The user guides were updated in early 2014 to include more comprehensive information for users about the internet sales statistics. ONS first released internet sales as 'experimental' statistics and in 2011, it published an internet sales strategy<sup>53</sup> with short, medium and long term priorities. ONS told us that it has since delivered the short and medium term priorities and has removed the experimental label from these statistics. In addition to describing the methods used, the user guides helpfully highlight a number of areas where these relatively new statistics would benefit from improvement, for example, the development of volume estimates and the calculation of standard errors. In most cases, ONS told us that reviews are underway. We would expect to see these reviews reflected in the prioritised work plan discussed in paragraph 3.4. The quality report was last updated in October 2012 and does not represent the latest developments to the retail sales statistics, and in particular, internet sales. ONS could also helpfully provide more information about the strengths

<sup>49</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/quality/quality-information/economy/quality-and-methodology-information-for-retail-sales-index.pdf>

<sup>50</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/economy/retail-sales/quick-guide-to-the-retail-sales-index.pdf>

<sup>51</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/economy/retail-sales/a-quick-guide-to-internet-sales.pdf>

<sup>52</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/economy/retail-sales/index.html>

<sup>53</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/economy/retail-sales/internet-sales-strategy-in-the-retail-sales-inquiry-following-the-uk-statistics-authority-assessment-2011.html>

and limitations of the methods employed – for example, for seasonal adjustment and deflation. Some of the richest information is reported in the outcomes of the 2010 Triennial Review of the RSI<sup>54</sup> – for example, about the relevance of the statistics for users and international comparability. These reviews provide a helpful snapshot every three years but the information is not updated in between reviews and it is not specifically written for users. Key information from the reviews could be helpfully drawn out in the quality report. ONS told us that it will update the quality report. As part of the designation as National Statistics, ONS should update the published methods and quality information to reflect the latest developments in the retail sales statistics, and provide better information about the strengths and limitations of the statistics<sup>55</sup> (Requirement 5).

- 3.15 ONS publishes some helpful information in *Retail Sales* about the quality of the statistics, including survey response rates and standard errors for the month-on-month and year-on-year growth in all retail sales (non-seasonally adjusted) volumes. ONS provides a brief explanation in the statistical report to help users interpret the standard errors and has also published two articles about how the measures are calculated, in 2011<sup>56</sup> and 2013<sup>57</sup>. ONS told us that no National Statistics Institutes have successfully developed standard errors for seasonally adjusted estimates as the methodology would be very complex and is beyond the current level of technical development. However, it advises that the year-on-year movement should not be subject to seasonality.
- 3.16 The media and City and industry commentators regularly reflect on the volatility of the month-on-month retail sales estimates. *Retail Sales* is particularly vulnerable to criticism when it includes estimates of monthly change that are out of step with the expectations of commentators, or that are not consistent with results from other early indicators of retail and consumer activity. In 2008, continued discussion in the media led to the publication of a UK Statistics Authority Monitoring and Assessment Note<sup>58</sup> which supported ONS's conclusion that the estimates of retail sales in May that year, and the subsequent decrease in June, reflected the actual changes in the turnover reported by businesses. However, the Authority made three important points:
- It noted that ONS had published detailed comparisons of *Retail Sales* with the British Retail Consortium's Retail Sales Monitor, and confirmed that the Authority regarded this as good practice;
  - It considered that even an informal indication of reliability, in numerical terms, would minimise misinterpretations; and
  - It considered that the presentation of the various estimates of change in retail sales could be improved to make their usability and interpretation clearer to users, believing that some users place too much reliance on

<sup>54</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/quality/reviews/retail-sales-index-2010-triennial-review.pdf>

<sup>55</sup> In relation to Principle 4, Practices 1 and 2 of the *Code of Practice*

<sup>56</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/economy/retail-sales/measuring-the-accuracy-of-the-retail-sales-index.pdf>

<sup>57</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/economy/retail-sales/updated-accuracy-measures-for-the-retail-sales-index.pdf>

<sup>58</sup> <http://www.statisticsauthority.gov.uk/assessment/monitoring/monitoring-reviews/volatility-of-the-retail-sales-index.pdf>

month to month changes and that in a highly volatile situation such monthly estimates are not good guides to longer term trends.

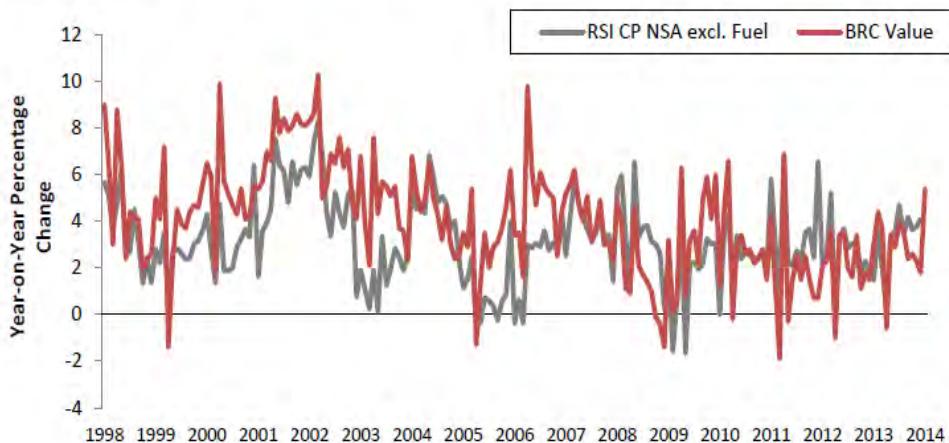
- 3.17 ONS has undertaken a range of work to address these points, with the publication of standard errors discussed in paragraph 3.15 being one important development. ONS also told us that for *Construction* and *Retail Sales* it has recently started to place more emphasis in its statistical reports on the underlying trends rather than month-on-month fluctuations, and that when it has done this, it has received positive feedback from media. We found examples of this when ONS published December *Retail Sales* on 17 January 2014 – the BBC reported ‘On the face of it, a bumper Christmas with retail sales steaming ahead in December. And yet...Once you look beyond the volatility of a single month's figures, the underlying trend looks more subdued’<sup>59</sup>. However, in the same month we saw similar criticisms from the media and commentators to those described in paragraph 3.16<sup>60</sup>. We consider that ONS could address this in two ways:
- the statistics team told us that it anticipates occasions where the estimates might draw attention and that it carries out a lot of quality assurance and ‘sense checks’ on the data. This will include examining the statistics in the context of other published intelligence, reviewing anecdotal evidence and stepping systematically back through the production process – for example, asking ONS methodologists to review the seasonal adjustment for particular series. These investigations ensure that ONS has confidence in the published estimates but it does not convey the key conclusions of its investigations to users to provide them with similar assurances.
  - where ONS has published helpful information for users, it has not done so consistently or sufficiently prominently. To avoid misuse of the statistics, a number of users told us that they felt ONS could do more to measure and emphasise more prominently the degree of uncertainty surrounding these estimates. Similar concerns have been raised in relation to the other short-term economic output indicators. With respect to consistency, a good example is the detailed comparison of *Retail Sales* with the British Retail Consortium’s Retail Sales Monitor. After publishing this analysis in 2008, over time ONS has referenced it in the quality report but has not consistently discussed comparability with other published indicators in the statistical report. Following the recent criticism, ONS has revisited this earlier work and published a note about comparisons with the BRC-KPMG United Kingdom Retail Sales Monitor and the CBI Distributive Trades Survey<sup>61</sup>. ONS concludes that ‘despite the differences in coverage, external retailing surveys generally correlate reasonably well with ONS official data’. ONS illustrates this (in part) with its chart below, comparing the year-on-year percentage change in ONS’s retail sales current prices series (excluding fuel) and BRC’s total sales growth series. We consider that such information should be consistently available from the statistical reports every month.

<sup>59</sup> <http://www.bbc.co.uk/news/business-25774455>

<sup>60</sup> <http://www.thetimes.co.uk/tto/business/economics/article3978126.ece>

<sup>61</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/economy/retail-sales/comparability-of-rsi-sales-and-external-indicators-2012-13.pdf>

Figure 1: Monthly retail sales growth for all retailers, compared with the BRC-KPMG RSM survey growth



Source: Office for National Statistics: Retail Sales Index (RSI) and external surveys

- 3.18 As part of the designation as National Statistics, ONS should anticipate where estimates of retail sales might attract user attention, and enhance the information it presents for users about its sense-checking on those areas. This would include examining the statistics in the context of publications from other organisations. In addition, ONS should communicate the range of uncertainty attached to the statistics more generally<sup>62</sup> (Requirement 6).
- 3.19 ONS told us that it applies standard quality assurance procedures each time the statistics are produced and that *Retail Sales* is part of a pilot project to strengthen quality assurance procedures. These procedures are signed off annually by the head of the division responsible for the statistics following a 'walk-through' of the production process. ONS also completes an annual quality review for each output using a Quality, Methods and Harmonisation Tool<sup>63</sup> (QMHT) in order to provide additional assurance about the quality and methodology of these outputs. Based on the recommendations that the Assessment team saw, the QMHT supports the principles of the *Code*. However, the statistics team told us that it considers that the QMHT is yet not producing sufficiently 'intelligent' output to justify the resources required to input the necessary information and is not helping to inform its continuous improvement programme. ONS's Quality Centre manage the deployment of QMHT and told us that it would be conducting a user engagement exercise with the statistics teams in early 2014 to gauge fitness for purpose and inform improvements.
- 3.20 The *National Accounts Five-Year Plan* outlines how ONS complies with current European Regulation and how it will implement new regulatory requirements driven by international standards, most notably the introduction of the concepts and definitions in ESA10. *Retail Sales* and supporting methods and quality information do not provide any information about the international standards for the short-term economic output indicators and do not discuss the comparability of the Retail Sales statistics with those from other countries, except in the

<sup>62</sup> In relation to Principle 4, Practice 2 of the *Code of Practice*

<sup>63</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/quality/harmonisation/index.html>

triennial review reports. *Retail Sales* is produced for Great Britain and ONS told us that there are no equivalent statistics for Northern Ireland. The European Regulation requires ONS to deliver sales data for the UK and so ONS uses data from the Annual Business Survey to generate UK data. ONS told us that it has considered whether it might be helpful to publish some UK estimates based on this methodology, but there has been no user demand for this and so it has not been prioritised over other developments. As part of the designation as National Statistics, ONS should (a) provide users with links to equivalent retail sales statistics for other countries; and (b) publish information about how *Retail Sales* meets international standards<sup>64</sup> (Requirement 7). We suggest that ONS might aid users' interpretation of the retail sales statistics by publishing information about the comparability of these statistics with those produced by other countries, noting that any analysis might need to be presented with a time lag.

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<sup>64</sup> In relation to Principle 4, Practice 6 of the *Code of Practice*

## **Principle 5: Confidentiality**

**Private information about individual persons (including bodies corporate) compiled in the production of official statistics is confidential, and should be used for statistical purposes only.**

- 3.21 ONS has assured us that it takes all necessary steps to protect the confidentiality of the data that it collects. ONS provides some information in the quality reports about how it protects confidentiality but it does not provide links to its disclosure control policy<sup>65</sup>. We consider that it would be particularly helpful to users of *Retail Sales* to understand more about how ONS balances confidentiality protection with optimising the utility of the statistics, and which statistics are potentially most affected. We suggest that ONS could aid users' understanding of any limitations on the utility of the statistics by publishing clear links in *Retail Sales* to its disclosure control policy and clarifying which data are potentially most affected by the need to protect confidentiality.
- 3.22 ONS exchanges confidential statistical records for statistical purposes with a small number of government departments, devolved administrations and Eurostat. Arrangements with Eurostat are governed by European regulation. ONS told us that the arrangements with the other bodies is the same for all the short-term economic output indicators – individual service level agreements are signed and reviewed annually and ONS uses secure electronic transfer methods to send the data.

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<sup>65</sup> <http://www.ons.gov.uk/ons/guide-method/best-practice/disclosure-control-policy-for-tables/index.html?format=contrast>

## **Principle 6: Proportionate burden**

**The cost burden on data suppliers should not be excessive and should be assessed relative to the benefits arising from the use of the statistics.**

- 3.23 ONS reports the cost to businesses of responding to statistical surveys in its annual compliance plans<sup>66</sup>; the cost of compliance in 2011/12 was estimated at £230,000 for the MBS-RSI and MCS.
- 3.24 Once a quarter, additional employment questions are asked as part of the Monthly Business Survey. The statistics team told us that this impacts upon response rates to the survey every third month – the team estimates the impact on the number of responses received for the retail sales is a fall of approximately two per cent.. As part of the designation as National Statistics, ONS should investigate the impact of lower response rates on the short-term economic output indicators and if significant, establish whether there are any improvements that ONS might introduce to improve the response rates in those months when employment questions are asked, and publish its plans<sup>67</sup> (Requirement 8).

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<sup>66</sup> <http://www.ons.gov.uk/ons/about-ons/get-involved/taking-part-in-a-survey/information-for-businesses/compliance-and-simplification-plans/index.html?format=contrast>

<sup>67</sup> In relation to Principle 6, Practice 1 of the *Code of Practice*

## Principle 7: Resources

**The resources made available for statistical activities should be sufficient to meet the requirements of this Code and should be used efficiently and effectively.**

Requirements from previous Assessment report 80 (January 2011):

- Demonstrate effective stewardship of resources allocated to retail sales statistics, including how expenditure is monitored against its work programmes.

- 3.25 The short-term economic output indicators are produced by a number of small teams under the common leadership of a senior statistician, with *Construction* and *Retail Sales* produced by a team of ten. The statistics team told us that ONS generally experiences a high risk of staff turnover across the teams producing the short-term economic output indicators, making it difficult to maintain a corporate memory, and that it struggles to recruit people with the specialised skills needed. Our research indicated that there are a number of interacting factors at play:
- the transfer of National Accounts operations from London to Newport over a concentrated period of time means that a lot of people joined at the same time and so will potentially move on at the same time;
  - high vacancy rates across National Accounts means that jobs are often offered on promotion, with those with the greatest experience naturally having the greatest chance of success and so moving between teams; and
  - ONS recruiting based on general statistical competences drawn from the general Civil Service Competency framework, rather than giving greater weight to testing the competences needed to acquire key skills used by a 'national accountant' such as seasonal adjustment; deflation; interpreting and assuring economic time series; and contextualising the statistics for users.
- 3.26 The first two factors might be considered a natural and unavoidable part of bedding in operations and should resolve themselves over time with sound management – ONS told us that it has put some policies in place including investing more resources in economic statistics and prioritising recruitment and limiting lateral moves away from identified priority teams. However, we are concerned that 'national accountant' is not seen as a sufficiently specialist role within ONS and that recruitment does not focus more on the specialist skills set required. Also, whilst the statistics team told us that it has access to advice from economists in preparing commentary and briefing, and that these economists prove a good 'sounding board' for the statisticians, we consider that the statistics would benefit from having the economists more embedded in the quality assurance process. While the Assessment team understands the challenges that ONS faces, these are some of the most important official statistics that ONS produces and as such we consider that it is of the highest priority that they should be sufficiently resourced by people with the appropriate skills. As part of designation as National Statistics, ONS should present

evidence that its recruitment and retention arrangements ensure that appropriately skilled people are employed and retained in the production of the short-term economic output indicators, and are based on an appropriate competence framework<sup>68</sup> (Requirement 9).

- 3.27 ONS told us that the division that produces the short-term economic output indicators prepares an annual business plan, and that the statistics team must report progress against the plan each year as part of ONS's stewardship reporting process.

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<sup>68</sup> In relation to Principle 7, Practices 1 and 6 of the *Code of Practice*

## Principle 8: Frankness and accessibility

**Official statistics, accompanied by full and frank commentary, should be readily accessible to all users.**

Requirements from previous Assessment report 80 (January 2011):

- Improve the explanatory commentary and contextual information in the Retail Sales bulletin to aid user interpretation.
- Improve the commentary and contextual information in the Business Monitor, including links to supporting material on methods and quality.

- 3.28 ONS has made improvements to the commentary in *Retail Sales* in response to feedback received from a range of activities during 2012 and 2013 – for example, the Chair of the Authority, Sir Andrew Dilnot, led two workshops to review and improve ONS statistical reports including *GDP* and *Retail Sales*; ONS ran focus groups with a range of users and established a Statistical Products Working Group; and ONS engaged with the National Statistician's Good Practice Team to have *Retail Sales* reviewed by an expert user panel.
- 3.29 ONS has also started to publish regular additional pieces of narrative alongside the statistical reports to provide users with insights into specific aspects of the statistics, including special factors impacting trends. Examples include 'How have rising prices affected food and non-food retail sales in the UK?'<sup>69</sup> and 'How sensitive to the weather is the retail sector?'<sup>70</sup>. We know from our own engagement with users of official statistics that these are of great value. However, users would also welcome a better insight into the statistics within the statistical reports. *Retail Sales* offers this in some respects, for example, discussing trends in sales in the context of movements in consumer price inflation and household earnings, but could do more to contextualise the main messages of the report and offer more in the way of possible explanations around the changes presented. For example, in January *Retail Sales*<sup>71</sup> ONS presents store price inflation growth, as measured by its implied price deflator<sup>72</sup>, but does not discuss how this compares with headline inflation<sup>73</sup>. Often, in media briefings and the one-off pieces, ONS draws on deeper analysis of trends, special factors and anecdotal evidence to provide that insight but this does not always translate through to the reports. Aspects of this, including the importance of providing better and more prominent information about uncertainty around early estimates, are discussed in paragraphs 3.17 and 3.18. Also, ONS does not present any commentary about the commodity statistics, though ONS told us that it is currently reviewing the survey sample design to allow it to strengthen the connection between the commodities data

<sup>69</sup> <http://www.ons.gov.uk/ons/rel/rsi/retail-sales/september-2013/sty-retail-sales.html>

<sup>70</sup> <http://www.ons.gov.uk/ons/rel/rsi/retail-sales/november-2013/sty-how-sensitive-to-the-weather-is-the-retail-sector-.html>

<sup>71</sup> <http://www.ons.gov.uk/ons/rel/rsi/retail-sales/january-2014/index.html>

<sup>72</sup> The implied deflator is derived by dividing the non-seasonally adjusted value and volume data to leave a price relative

<sup>73</sup> As measured and presented in Consumer Price Inflation:

<http://www.ons.gov.uk/ons/rel/cpi/consumer-price-indices/january-2014/index.html>

and overall retail sales. This will facilitate better commentary. ONS acknowledges that enhancements can always be made to aid user interpretation and told us that it has established an editorial group to oversee the continuous improvement of the statistical reports for the short-term economic output indicators. As part of the designation as National Statistics, ONS should continue to improve the presentation across the statistical reports so that it aids user interpretation of the statistics, including drawing key additional analyses into the main reports<sup>74</sup> (Requirement 10). As part of meeting this Requirement ONS should consider the points detailed in annex 1 and annex 2.

- 3.30 During the course of this assessment, we established that ONS's corporate systems and procedures place some restrictions on the way the statistics teams are able to publish the statistics. For example, the statistics team is not able to feature a chart on the front page of the statistical report, limiting their scope for presenting underlying trends. Also, decisions by ONS's media team about the scheduling of additional pieces of analyses do not appear to be primarily driven by the needs of the users – 'How sensitive to the weather is the retail sector?' was published two days ahead of the statistical report in January but presented information about seasonal adjustment and the treatment of special events that would have made it a useful addition to the regular monthly release. We understand that as a large producer of official statistics, ONS must adopt some common practices. Nevertheless, we suggest that ONS might consider where some flexibility might helpfully be introduced to its corporate publishing policy and procedures to help its statisticians better serve users' needs.
- 3.31 The latest estimates for *Retail Sales* are reasonably straightforward to locate on ONS's website. However, ONS does not make optimum use of the release page to direct users to important information about the statistics that is held in separate areas of ONS's website – for example, statistical plans and web pages dedicated to presenting information about methods and quality<sup>75</sup>, which ONS told us it is reviewing. Users suggested that a model for this might be the Consumer Price Inflation statistics release page<sup>76</sup>. On a similar point, we think it would be helpful to users if ONS could improve the signposting between the short-term economic output indicators. The new Economy theme pages<sup>77</sup> that ONS has been developing on its website should help users in this respect but there is no clear link to this information from the release pages or the statistical reports. Ease of accessibility is dependent on the point of entry to the website. As part of the designation as National Statistics, ONS should improve the accessibility of *Retail Sales* through its website, making it clear to users how the statistical report relates to the other short-term economic output indicators<sup>78</sup> (Requirement 11).
- 3.32 As part of the user response to this Assessment, we received a range of feedback about the Excel data tables that ONS publishes alongside the statistical reports and more than one user said that they would welcome a

<sup>74</sup> In relation to Principle 1, Practice 5 and Principle 8, Practice 2 of the *Code of Practice*

<sup>75</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/index.html>

<sup>76</sup> <http://www.ons.gov.uk/ons/rel/cpi/consumer-price-indices/october-2013/index.html>

<sup>77</sup> <http://www.ons.gov.uk/ons/taxonomy/index.html?nscl=Economy>

<sup>78</sup> In relation to Principle 8, Practice 4 of the *Code of Practice*

review of the tables published for *Retail Sales*. The key themes were: the volume of data makes it difficult to locate the key series; the quality of presentation and labelling of the data tables is mixed and the numbering system is different to the tables in the statistical reports; there are no direct links to the data tables in the statistical report; and the file sizes are too large for older versions of Excel to cope with. ONS told us that it will present some proposed changes for user feedback. As part of the designation as National Statistics, ONS should consult users and publish plans to present the Excel data tables for *Retail Sales* in forms that enable and encourage analysis and re-use<sup>79</sup> (Requirement 12).

- 3.33 In making our assessment about the frankness and accessibility of these statistics, we recognise that the speed with which *Retail Sales* must be produced presents the statistics team with a unique challenge. As the team seeks to maximise survey response to ensure the optimum quality of the statistics, the time available to them to ‘step back’, understand the latest estimates and present them in a way that will aid user interpretation is limited. ONS typically has around five working days to produce the statistics, assure their quality and prepare for publication. Whilst we understand that users have indicated that they would not want a long delay to publication (see paragraph 3.8) we consider that users may be better served by ONS publishing these statistics two or three days later each month to allow more time for the statistics team to add value. We suggest that ONS could usefully consider, in consultation with users, whether publishing *Retail Sales* slightly later each month would better serve the public good.

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<sup>79</sup> In relation to Principle 8, Practice 6 of the *Code of Practice*

## **Protocol 1: User engagement**

**Effective user engagement is fundamental both to trust in statistics and securing maximum public value. This Protocol draws together the relevant practices set out elsewhere in the Code and expands on the requirements in relation to consultation.**

3.34 The requirements for this Protocol are covered elsewhere in this report.

## Protocol 2: Release practices

**Statistical reports should be released into the public domain in an orderly manner that promotes public confidence and gives equal access to all, subject to relevant legislation.**

Requirements from previous Assessment report 80 (January 2011):

- Ensure all releases are issued at 9.30am on the day of release.

- 3.35 *Retail Sales* is normally issued at 9.30am. The last breach<sup>80</sup> reported to the National Statistician was in December 2011. In a later breach report<sup>81</sup> covering other ONS outputs, ONS reports that timeliness of market sensitive publications has improved significantly but that there are several factors impacting upon timely release, including the size and volume of files to be uploaded to its website. ONS includes information in the breach reports about actions being taken to minimise this risk going forward.
- 3.36 Based on the list<sup>82</sup> published alongside *Retail Sales* in January 2014, 38 individuals have restricted access to these statistics 24 hours prior to publication. ONS told us that during 2013 it re-examined the lists of those people given restricted access prior to release as part of a wider review by the National Statistician of pre-release access to ONS statistics, but that this has resulted in only minor reductions to the pre-release access lists for the short-term economic output indicators, mainly to remove cases of duplication. Sir Andrew Dilnot, Chair of The Authority, recently wrote to Bernard Jenkin MP, Chair of the Public Administration Select Committee, to reiterate his concern that pre-release access arrangements for GDP are deeply unsatisfactory<sup>83</sup>. The Authority supports the National Statistician's drive to reduce the degree and incidence of pre-release access to the fullest extent possible under the law. The National Statistician will shortly be finalising the necessary arrangements to reduce further pre-release access to ONS statistics following the exercise to minimise the extent of such access<sup>84</sup>. Equality of access is a fundamental principle of statistical good practice, both in the UK and internationally. All the parties to public debate should, as far as possible, have the same information at the same time, and only the absolute minimum number of people should see official statistics in their final form before they are published.

<sup>80</sup> <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/breach-reports/collective-report-of-09-30-release-breaches.pdf>

<sup>81</sup> <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/breach-reports/breaches-of-the-code-of-practice-for-official-statistics--covering-the-period-1-april---30-june-2013.pdf>

<sup>82</sup> <http://www.ons.gov.uk/ons/rel/rsi/retail-sales/december-2013/prs---pre-release-access-list-december-2013.html>

<sup>83</sup> <http://www.statisticsauthority.gov.uk/reports---correspondence/correspondence/letter-from-sir-andrew-dilnot-to-bernard-jenkin-mp---10032014.pdf>

<sup>84</sup> <http://www.statisticsauthority.gov.uk/news/statistics-authority-statement-of-strategy.pdf>

### **Protocol 3: The use of administrative sources for statistical purposes**

**Administrative sources should be fully exploited for statistical purposes, subject to adherence to appropriate safeguards.**

- 3.37 The Retail Sales statistics produced from survey data and do not use administrative data sources. ONS told us that it has explored the use of administrative tax records from HM Revenue & Customs to produce *Retail Sales* but concluded that it is not available on a timely enough basis to serve as a suitable substitute for survey data.

## **Annex 1: Compliance with Standards for Statistical Reports**

- A1.1 In November 2012, the Statistics Authority issued a statement on *Standards for Statistical Reports*<sup>85</sup>. While this is not part of the *Code of Practice for Official Statistics*, the Authority regards it as advice that will promote both understanding and compliance with the *Code*. In relation to the statistical reports associated with ONS's Retail Sales statistics, this annex comments on compliance with the statement on standards.
- A1.2 In implementing any Requirements of this report (at paragraph 1.5) which relate to the content of statistical reports, we encourage the producer body to apply the standards as fully as possible.

### **Include an impartial narrative in plain English that draws out the main messages from the statistics**

- A1.3 The main messages from the statistics are given at the start of the report. They are presented in a straightforward style, describing the latest changes and highlighting any notable contributions to those changes by the different sectors of the retail industry. In addition to presenting the latest short-term changes, ONS does discuss what is happening in terms of the underlying trends. However, this is somewhat restricted by not being able to present a chart alongside the main messages. The main messages offer some contextual information, for example, the heavy snow in January 2013 which it considers may have reduced sales in that month. However, we consider that the main messages in the statistical reports could offer greater insight for the user.
- A1.4 An introductory paragraph very briefly describes the volume and value measures presented in the report and the source of the statistics. However, it does not explain the structure and contents of the report and no information is provided about how to interpret the data. For example, ONS does not provide any prominent advice about the volatility of the month-on-month estimates.
- A1.5 The statistical report includes a helpful 'economic context' section which examines retail sales over a nine year period, in the context of the economic downturn and what has happened to consumer prices and household earnings during that period. ONS is also increasingly publishing additional one-off pieces of analysis alongside the main statistical reports and has recently started to cross-reference these in statistical reports. The statistical report for January 2014 published on 21 February 2014 provided a link to an article examining falling real wages<sup>86</sup>. This signposting is important to aid accessibility. In the course of its work, the Assessment team has seen much evidence that users very much appreciate this kind of additional narrative but often struggle to find it.

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<sup>85</sup> <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-reports.html>

<sup>86</sup> <http://www.ons.gov.uk/ons/rel/elmr/an-examination-of-falling-real-wages/2010-to-2013.html>

- A1.6 *Retail Sales* presents commentary about the contributions to growth by the different sectors of the retail industry and by different sized retailers. It also examines internet sales. The commodity statistics presented in the data tables are not discussed in the statistical report.
- A1.7 *Retail Sales* does not present any comparisons with other countries in the statistical reports and does not discuss the international comparability of the statistics. In February 2014, ONS published an article about how the official statistics compare with those published by the British Retail Consortium and the Confederation of British Industry.
- A1.8 All narrative is reported impartially with no statements of opinion and is demonstrably evidence based.

#### **Include information about the context and likely uses of the statistics**

- A1.9 *Retail Sales* briefly defines the headline measures at the beginning of the report. ONS also defines the sectors of the retail industry when they are first introduced, though we consider that *Retail Sales* might do more to make it clear that non-store retailing does not equate directly to internet sales. ONS also presents detailed information about definitions in the background notes but does not direct users to this.
- A1.10 *Retail Sales* presents some brief summary information about the users and uses of the statistics, explaining how retail sales data contribute to the output and expenditure measures of GDP, and explaining that whilst some users are interested in the latest monthly estimate, others are interested in the longer term trends. ONS does not take this opportunity to caution users about the volatility of the month-on-month estimates. Also, we consider it would be helpful if the report could signpost users to more detailed information that would better aid their understanding.

#### **Include information about the strengths and limitations of the statistics in relation to their potential use**

- A1.11 The text in the reports includes appropriate emphasis that the statistics are estimates. The main messages are used to advise users of any special or one-off factors they should consider when using the statistics. There is also a section in the background notes about statistical special events and *Retail Sales* presents standard errors for the month-on-month and year-on-year growth in all retail sales (non-seasonally adjusted). However, the reports would benefit from more prominent information about the uncertainty around the estimates.
- A1.12 ONS publishes a good range of information about the scale of revisions in the statistical reports and in Excel tables, presenting revisions triangles and tests for the significance of the average revisions. The metadata might be improved to help users interpret this information, and ONS presents very little information about the nature of any revisions due to changes in methods. Also, the Retail Sales Revisions Policy is out of date.

## **Be professionally sound**

A1.13 The descriptive statements are demonstrably consistent with the statistics. The descriptions of proportions, changes, trends and patterns are professionally sound and the charts are clearly presented.

## **Include, or link to, appropriate metadata**

A1.14 The title of the statistical report explains the coverage of the statistics and the period to which the latest statistics relate. The report does include a statement about the frequency with which the statistics are updated and the timing of the next release. The name of the producer body, and the name and contact details of the responsible statistician are all given in the report.

A1.15 The statistical report includes background notes with some summary information about methods and quality, including a 'What's new' section in which it announces changes to definitions and methods. ONS then provides further information in signposted user guides and quality reports. The quality report was last updated in 2012 and does not reflect the latest developments in the statistics. It also presents insufficient information about the strengths and limitations of the statistics in relation to use.

A1.16 The statistical report includes a large number of data tables. No information is provided about the content of these tables and the Assessment team found them difficult to navigate. The reports would also benefit from some information about which data tables might be appropriate for different uses. The statistical report and the release page for the retail sales statistics provide a link to the associated Excel data tables and time series data. There is some consistency of labelling between the tables in the report and those in Excel but they are not presented in the same order and the structure takes some time to understand. No metadata is presented to aid interpretation. The Excel tables do not contain the full historical time series and ONS does not provide any information about what other periodicities or length of time series are available from the time series datasets. Also, ONS does not make it clear in the Excel tables where users can find the data in csv format and the titles of the series are not always complete in time series datasets.

## **Annex 2: Summary of assessment process and users' views**

- A2.1 This assessment was conducted from August 2013 to March 2014.
- A2.2 The Assessment team – Penny Babb, Emma Bowditch and Donna Livesey – agreed the scope of and timetable for this assessment with representatives of ONS in August. The Written Evidence for Assessment was provided between 11 and 15 October. The Assessment team subsequently met ONS during November to review compliance with the *Code of Practice*, taking account of the written evidence provided and other relevant sources of evidence.

### **Summary of users contacted, and issues raised**

- A2.3 Part of the assessment process involves our consideration of the views of users. We approach some known and potential users of the set of statistics, and we invite comments via an open note on the Authority's website. This process is not a statistical survey, but it enables us to gain some insights about the extent to which the statistics meet users' needs and the extent to which users feel that the producers of those statistics engage with them. We are aware that responses from users may not be representative of wider views, and we take account of this in the way that we prepare Assessment reports.
- A2.4 The Assessment team received 10 responses from the consultation of users. The respondents were grouped as follows:

Employers' organisations, trade associations and professional bodies	2
Commercial	3
Central government , Bank of England and regulators	4
Individuals	1

- A2.5 The overall impression from the feedback is that users find ONS staff to be helpful and prompt in answering any questions about the statistics, though two users raised concerns about the depth of knowledge among the teams. Those users who engaged in regular stakeholder meetings with ONS reported strong working relationships and one user indicated that they would like something similar.
- A2.6 Users were broadly content with the quality of the statistics but highlighted the increasing relevance of the internet sales statistics, and the importance of having a seasonally adjusted monthly time series. Users told us that they understood that the early release of short-term economic output indicators would inevitably result in later revisions. The information about revisions published alongside the statistics was broadly welcomed, though some users identified areas for improvement – clearer revisions information in the data downloads; more detailed revisions analysis and better information about the nature of the revisions resulting from changes in methods. Users also conveyed the importance of having better and more prominent indications of any uncertainty around the estimates in order to allow them to advise clients appropriately and to avoid misuse of the statistics.
- A2.7 Some users told us that they do not use the commentary presented around the statistics and go straight to the data tables. Others told us that they value the commentary and were broadly positive about recent improvements in explaining the strengths and limitations of the statistics. Users said that they do

not really use the general economic commentary but that they particularly welcome additional analysis about one-off factors, assumptions underpinning the estimates and the impact of changes to methods. Some users are only interested in the very short term and focus on the latest estimate. Others want to examine the latest estimates in the context of longer term trends and a number of users said that they would like to see explanations for any exceptions from the trend, including any anecdotal evidence that ONS has. One user said they would like to see 'contributions to recent movements' similar to that presented for the Consumer Price Inflation statistics and another user said they would like to see users views about the commentary better reflected.

- A2.8 A number of users highlighted problems with the data tables in the statistical reports and made available in Excel: data files that are too large; poor labelling and metadata; inconsistent numbering of tables; and tables difficult to locate. Some users suggested a fundamental review of the content, presentation and accessibility of the data tables for *Retail Sales*. Users acknowledged recent improvements to ONS's website but told us that poor signposting remains a barrier to using these statistics on three levels – linking the data, metadata and statistical reports for each individual output; presenting the short-term economic output indicators as a coherent group; and placing these estimates in the context of the other measures of GDP and the National Accounts. Users suggested that a more common presentation and language across the outputs and a glossary of terms would be helpful.

### **Key documents/links provided**

Written Evidence for Assessment document

