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THE ROYAL STATISTICAL SOCIETY

Sir Michael Scholar
Chair, UK Statistics Authority
Statistics House
Tredegar Park
Newport
South Wales
NP10 8XG

12 Errol Street
London EC1Y 8LX
DDI: +44 (0)20 7638 8998
Fax: +44 (0)20 7614 3905
E-mail: suf@rss.org.uk
Internet: <http://www.rss.org.uk>

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Dear Sir Michael

I am writing on behalf of the Statistics User Forum to express the concern of many of our members about the way in which a number of departments are conducting consultations on their forward plans for statistical activity. In particular members are concerned about the very short time frame being allowed for some consultations. Although, in our view, consultations should ideally form only a small part of the user engagement process, in many areas they are currently the main vehicle for such engagement. Since user engagement is one of the areas most frequently identified by the assessment process as needing development, we feel it is very important for the UK Statistics Authority to ensure that consultations are being conducted in a way that maximises fruitful engagement.

The government's Code of Practice on Consultation recommends that a minimum of 12 weeks should be allowed for public consultations. However, on a number of occasions a considerably shorter timescale has been adopted, on the basis that consultations on statistical work programmes can be regarded as technical and thus addressed to a mainly specialist, and easily targeted, audience. The most recent example of which we are aware is the consultation being conducted by DCLG on its Statistics Plan, which was to be open for just four weeks, with difficulties for users exacerbated by it including four bank holidays and the academic Easter break. We are pleased that DCLG have recognised this difficulty by extending the deadline, though this still falls far short of the 12 weeks recommended.

Such an approach ignores the fact that users of official statistics cover a very wide range of individuals, groups and institutions, not just a tight group of specialists. It also means that the only practical means of communication is by e-mail, and so other, complementary, consultation methods cannot be used. For example, user engagement events where producers meet and discuss issues face to face with users, such as the interactive user workshop facilitated by the Health Statistics User Group last November which was designed to provide an input to identifying strategic priorities for health and social care statistics.

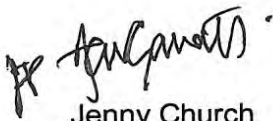
The benefits of consultation are well set out in the secretary of state's foreword to the Code of Practice: "Effective consultation brings to light valuable information which the Government can use to design effective solutions. Put simply, effective consultation allows the Government to make informed decisions on matters of policy, to improve the delivery of public services, and to improve the accountability of public bodies."

The approach of short deadlines undermines the opportunity to secure these benefits. There is a risk that policies will be under-informed, with the potential consequence of being less effective with insufficient accountability.

We would urge the UK Statistics Authority to bring pressure to bear on departments to adhere to the Code of Practice guideline of allowing at least 12 weeks for consultations on priorities and work programmes for statistical activities.

In the longer term, we are drawing up best practice guidelines for user engagement which we hope will be adopted by all the parties involved. These have already been discussed with the National Statistician and her Heads of Profession Strategy Group at a recent StatSUG meeting, and we discussed them further with the Theme Group Leaders on 17 May. The guidelines underline the importance of user engagement being seen as an ongoing process rather than a series of one-off, quick fire, consultations. We hope that the development by the RSS of StatsUserNet as an online user engagement tool using social networking software will assist in this by providing users with a one stop shop for advice, discussion and information, and allowing producers direct access to a large user community.

Yours sincerely,



Jenny Church
Honorary Officer for the RSS Statistics User Community Theme