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Chair of the UK Statistics Authority, Sir Andrew Dilnot CBE

Bernard Jenkin MP Chair, Public Administration Select Committee House of Commons LONDON SW1A 0AA

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Dear Bernard

UK STATISTICS AUTHORITY RESPONSE TO MIGRATION STATISTICS

I am writing to respond formally on behalf of the UK Statistics Authority to the Committee's Seventh Report of Session 2013/14, *Migration Statistics* (HC 523), published on 28 July 2013. The Statistics Authority welcomes the Committee's report. The Authority's response to each of the Committee's recommendations and conclusions is set out in the attached Annex.

The Statistics Authority recognises that the current policy needs for measuring and monitoring UK inward and outward international migration are changing. Reliable and accurate national and local-area migration estimates are needed to measure population change and to produce annual population estimates. They are also used in resource allocation and the planning of service delivery, and for monitoring progress towards achieving the various targets that the Government has set itself, among other very important user requirements.

It is the Statistics Authority's view that the statistical sources that are being used to estimate international migration were *not* designed specifically for the purposes to which they are currently being put, and the Authority understands that these statistical sources are currently not fully meeting all the different needs of the users of these statistics. The limitations of the International Passenger Survey (IPS) in particular and UK international migration statistics in general, especially for local areas, have long been known and debated. The Statistics Authority believes that action must now be taken to address this.

Parliament, Government, and policy-makers more generally should, as a matter of urgency, consider – in consultation with other users – the policy purposes for which migration statistics are collected, the scope and levels of accuracy that are required in order to meet current and future policy needs, and the levels of public expenditure that are required to deliver the migration statistics that the UK needs. The UK Statistics Authority and the Office for National Statistics stand ready actively to support these deliberations, particularly in developing and costing alternative statistical solutions once the policy requirements have been fully identified and agreed.

At the present time, however, the Authority regards the broad statistical options ahead to be quite clear. They are between:

- Government funding for further work, including the development of new or additional statistical sources; or,
- Accepting the status quo and hence the limitations of the current migration statistics infrastructure. This would mean a consequent acceptance that the UK might not be able adequately to produce the migration statistics that the Government and other users might reasonably want.

There are a number of other general conclusions that we would make, before turning to each of the Committee's conclusions and recommendations in turn:

- The IPS is a sample survey undertaken at UK ports of entry. It was originally
 designed as a survey of respondents' international business and leisure travel
 patterns, not as the primary statistical source for definitive estimates of UK
 international migration;
- As the Committee acknowledges, ONS has made considerable progress in improving the quality and reliability of UK migration estimates derived from the IPS given the current survey design and levels of funding. Further improvements to the IPS (including significantly increasing the IPS sample size to produce more robust estimates with lower levels of statistical uncertainty) can only be delivered if sufficient financial resources are made available by government to ONS to bring this about;
- Currently, only data from the decennial census can provide statistical information about migrants at local and small area levels;
- New or additional sources of statistical information about UK international migration might provide better statistical answers to current policy questions. These include the development of a dedicated social survey of migrants, more effective realisation within government of the statistical benefits of the e-Borders programme, and greater use of existing administrative sources of data. These options will require additional resources and feasibility work. While previous evaluation work has been undertaken, implementation by government was not taken forward, largely on cost grounds and the absence of a suitable sampling frame;
- The e-Borders programme had the potential to provide significant statistical improvements in estimating UK international migration. But decisions made by government in recent years have meant that many of the hoped-for statistical improvements are unlikely to be delivered based on the current plans for the programme. As currently established, the e-Borders programme is incapable of providing direct statistical measurement of migration flows; and,
- The measurement and communication of statistical uncertainty is vitally important in the publication of statistical estimates of any kind, including in the area of UK migration statistics. Decisions on policy targets such as the setting of a 'net migration target' are for the Government to determine. The Authority expects, however, that levels of uncertainty calculated by professional statisticians should be properly taken into account in the formulation of such targets and in the communication of Government and agencies' performance.

The UK Statistics Authority and ONS stand ready to engage in the wider deliberations across government and beyond that are needed to identify and cost the necessary statistical solutions.

Yours sincerely

Sir Andrew Dilnot CBE

ANNEX

A. Quality of international migration estimates

1. We welcome work the ONS has done to improve the quality of migration statistics. The ONS has done its best to produce informative migration statistics using the International Passenger Survey. However, the International Passenger Survey is inadequate for measuring, managing and understanding the levels of migration that are now typical in the UK. The Government must plan to end reliance on the International Passenger Survey as the primary method of estimating migration: it is not fit for the purposes to which it is put. (Paragraph 23)

The International Passenger Survey (IPS) was designed as a social survey to measure patterns of respondents' international business and leisure travel, *not* as the primary statistical source for definitive estimates of inward and outward international migration. The limitations of the International Passenger Survey have long been known and debated, and the Statistics Authority has, on several occasions, also set out its views in this area.¹

The Authority appreciates the Committee's welcome for the improvements that ONS has made to the quality of migration estimates derived from the IPS. In recent years, the IPS sample size has been increased alongside provision for increased survey coverage at regional airports, leading to improved national estimates of international migration. ONS now also publishes confidence intervals for its IPS migration estimates so that users are aware of their quality and their limitations.

The Authority is aware that the IPS still cannot deliver all the statistical outputs that some users of migration statistics currently expect. ONS is confident that the IPS estimates at a national level are as reliable and accurate as is possible to achieve under the current survey design and levels of funding.

The Authority understands that the Government currently uses IPS-based estimates for monitoring progress against its own target for 'net migration'. It is our view that the central statistical estimate of the 'balance' between inward and outward migration derived from the IPS is currently the best available measure of 'net migration' given the existing statistical sources. While it would be possible to increase the sample size of the IPS still further, so as to reduce the level of uncertainty in the IPS estimates, this would require significant additional funding from government – for example, in the region of approximately £15 million per annum so as to reduce the current level of statistical uncertainty in the current IPS estimates by 50 per cent.

Given ongoing budgetary restrictions, ONS is not in a position to fund such work from within its own resources. If the IPS continues to be used for the purposes of measuring international migration, and further statistical improvements to the IPS are required, the Statistics Authority will require the necessary additional resources to do so.

New or additional sources of statistical information about UK international migration might provide better statistical answers to current policy questions, and ONS is ready to participate actively in renewed cross-departmental feasibility work to evaluate and cost what might be possible. A large-scale face-to-face survey of migrants in the UK has previously been

¹ http://www.statisticsauthority.gov.uk/assessment/monitoring/monitoring-reviews/monitoring-review-4-2013---the-robustness-of-the-international-passenger-survey.pdf;

http://www.statisticsauthority.gov.uk/reports---correspondence/correspondence/letter-from-sir-michael-scholar-to-rt-hon-keith-vaz-mp-11072011.pdf; and

http://www.statisticsauthority.gov.uk/reports---correspondence/reports/authority-report-4--migration-statistics-the-way-ahead.pdf

considered and a feasibility report was published by the Home Office in January 2011, but the Government subsequently concluded against funding this.² It was estimated then that such a migrant survey could cost at least £2 million per year based on the survey design envisaged. Depending on the policy and statistical requirements of a future survey of migrants, it is possible that the set-up and operational costs of a migrant survey may be somewhat higher in future. Establishing a migrant survey, of course, is not without its challenges, but a migrant survey could provide valuable information on the characteristics and distribution of migrants. However, the sample size would determine the extent to which it would be possible to produce statistical information on very small populations and, as a sample survey, there would continue to be a level of associated uncertainty around the estimates which would need to be considered. The funding of evaluation work by government would be important to consider these matters further.

2. e-Borders data has the potential to provide better headline estimates of immigration, emigration and net migration from 2018. The ONS and Home Office should move as quickly as possible to measuring immigration, emigration and net migration using e-Borders data. (Paragraph 24)

The Statistics Authority recognises the potential benefits of using e-Borders data as part of the statistical estimation of UK international migration. It was initially envisaged that the e-Borders programme had the potential to provide significant statistical improvements in estimating international migration, but decisions in recent years have meant that many of the hoped for statistical improvements seem unlikely to be delivered. The Statistics Authority is disappointed that there remains some considerable uncertainty about when the statistical benefits of e-Borders will be fully realised.

ONS is continuing to work with the Home Office to identify what statistical benefits e-Borders can provide, building on an initial assessment published in March 2012.³ For example, some e-Borders data based on Civil Aviation Authority information is used to identify the main flows of migrants into and out of the UK which can, in turn, help to maintain IPS sampling frames and sampling efficiency in the meantime.

However, as currently established, it is the Statistics Authority's general view that the e-Borders programme is insufficient to provide direct statistical measurement of migration flows. It is estimated that, of the total 200 million recorded passenger trips made through UK ports of entry per year, only approximately 800,000 (< 0.5 per cent) are for long-term migration purposes (either inward or outward international migration). E-Borders remains a system that is designed primarily to provide intelligence and to enhance border security. E-Borders data is based on travel documentation (especially passengers' passports), and e-Borders systems are currently unable to produce any statistical information on individual passenger intentions (including long-term migration intentions, intended length of stay, and final location of stay in the UK), on travel histories, dual nationality, or on detailed demographic characteristics of passengers beyond gender, age, citizenship, country of origin and country of destination.

3. Migration is an international phenomenon. Data held by other countries on migration to and from the UK could help improve the depth and quality of UK migration statistics. The ONS should co-operate further with foreign national and international statistics agencies to improve the quality of UK migration statistics. (Paragraph 25)

http://www.ons.gov.uk/ons/guide-method/method-quality/imps/latest-news/delivering-statistical-benefits-from-e-borders/index.html

² https://www.gov.uk/government/publications/a-feasibility-study-for-a-survey-of-migrants

The Statistics Authority agrees that further international collaboration would be useful in this area, to establish what further benefits and opportunities might be realised. Through a variety of different international fora, ONS continues to engage routinely with experts in other national statistical offices on a range of technical and methodological statistical issues, including the measurement of international migration. Following the 2001 Census, ONS analysis showed that, while there were some considerable potential benefits in further international collaboration to improve the quality of UK migration estimates, the quality of other countries' data varied quite markedly and the systems for data collection were also very different to our own.⁴

A recent study by the University of Southampton on behalf of *New Opportunities for Research Funding Agency Co-operation in Europe* (NORFACE) examined ways in which it might be possible to produce more accurate detailed statistical analysis of migrant flows through the use of data from other countries.^{5,6} ONS plans to build on this work, in collaboration with other national statistical offices, to investigate the extent to which data from other countries might be used to improve UK migration estimates. This work is planned to begin next year and further information will be published on the ONS website in due course. My office will keep the Committee clerk informed of progress in this area.

B. Measuring progress against the net migration target

4. In the longer term, migration estimates based on the International Passenger Survey are too uncertain for accurate measurement of progress against the Government's net migration target. We are struck by the advice of the Migration Advisory Committee to the Government that it should aim for net migration of only 50,000 as the only means of being certain that net migration is in fact below 100,000. The Government should not base its target level of net migration on such an uncertain statistic: doing so could lead to inappropriate immigration policy. (Paragraph 29)

The Statistics Authority recognises the importance of measuring and communicating statistical uncertainty in the publication of statistical estimates of any kind, as we set out in our written evidence to the Committee in January 2013. Decisions on policy targets such as a 'net migration target' are matters for the Government to determine, but the Authority would expect levels of statistical uncertainty calculated by professional statisticians to be properly considered in the formulation of such targets and to be taken account of in the communication of the Government's and agencies' performance achieved against such targets.

C. Understanding who is migrating to and from the UK

5. Migration estimates based on the International Passenger Survey do not provide sufficient detail on the characteristics of people migrating to and from the UK to judge properly the social and economic consequences of migration and the effects of immigration policy. These data are indispensible for anticipating demand for public services such as schools and the NHS. Migration statistics should provide detailed information on the characteristics of people migrating to and from the UK

⁴http://www.ons.gov.uk/ons/rel/population-trends-rd/population-trends/no--130--winter-2007/using-data-from-overseas-to-improve-estimates-of-emigration.pdf

⁵ Raymer, J., Wiśniowski, A., Forster, J.J, Smith, P.W.F, and Bijak, J., Integrated Modelling of European Migration, Journal of the American Statistical Association (forthcoming), available at http://www.tandfonline.com/doi/abs/10.1080/01621459.2013.789435

⁶ Wiśniowski, A., Bijak, J., Christiansen, S., Forster, J.J., Keilman, N., Raymer, J., and Smith, P.W.F., Utilising expert opinion to improve the measurement of international migration in Europe, Journal of Official Statistics (forthcoming)

within particular periods, including information that is relevant to evaluating the impact of immigration policy and necessary for planning services. The ONS should broaden the information it gathers on the characteristics of migrants to include level of educational qualification, labour market skills, ethnic group, and languages spoken. (Paragraph 34)

- 6. e-Borders data could potentially provide detailed information on the characteristics of migrants subject to visa control. However, e-Borders data alone will not provide detailed information on the characteristics of those migrants not subject to visa control, or any information on the geographical origin and destination of migrants within the UK. If the International Passenger Survey is not an adequate source for this information, and no other sources are available, new sources of migration statistics are needed, even though they may come at some cost. (Paragraph 35)
- 7. The ONS should develop new sources of data that can provide accurate statistics on the numbers and characteristics of people migrating to and from the UK, and on their areas of residence within the UK. The ONS should link International Passenger Survey responses to e-Borders data as soon as possible. However, the need for further data may also require the creation of a new routine migrant survey covering the whole of the UK. (Paragraph 36)

As discussed at (1) above, the Statistics Authority recognises the limitations of the IPS as a statistical source which was not designed primarily to measure inward and outward international migration but is, nevertheless, currently being used to do so. The Authority also understands the need for much more fine-grained statistics on the characteristics of migrants, particularly at local and small area levels, and this might reasonably be considered in an evaluation of the need for new statistical source(s) to be established, for example a large-scale face-to-face survey of migrants and the consequent additional resources required to do so, and the further realisation of the statistical benefits of the e-Borders programme.

Also as discussed at (2) above, the Statistics Authority acknowledges the *potential* benefits of using e-Borders data as part of the statistical estimation of UK international migration. While it was first envisaged that the e-Borders programme had the potential to provide significant statistical improvements in estimating international migration, decisions made by government in recent years have meant that many of the hoped for statistical improvements are unlikely to be delivered. The Statistics Authority is disappointed that there remains some considerable uncertainty as to when the statistical benefits of e-Borders will be fully realised. As currently established, it is the Statistics Authority's general view that the e-Borders programme is insufficient to provide direct statistical measurement of migration flows into and out of the United Kingdom.

D. Local area migration statistics

8. The International Passenger Survey does not provide accurate estimates of international migration in local areas. The Census provides the most accurate data on the number and characteristics of migrants at the local level, but it is too infrequent to act as a routine source of data. The future of the Census is also uncertain. As the only reliable source of data on migrant populations in local areas, the potential loss of the Census is a concern. Accurate estimates of migration in local authorities must be available independent of the Census. The ONS should develop new sources of data on international migration that are robust enough to provide accurate estimates of annual migration flows to and from local authority areas, even if the Census continues.(Paragraph 45)

The Statistics Authority agrees that, at present, statistical information derived from the decennial census is a source of migrant estimates at local area geographies, and for detailed information relating to the country of birth, citizenship, educational attainment, employment, and other demographic attributes of migrants resident in the UK. ONS is currently consulting on approaches for the future of population statistics, including the census, in England and Wales. The consultation closes on 13 December.⁷

As discussed above, new sources of statistical information about international migration should be considered, alongside an evaluation of the benefits and financial costs involved. These include a new migrant survey, together with statistical information from e-Borders, as well as more efficient use of administrative data held within government which could be opened up through further data-sharing legislative gateways.

E. Home Office migration statistics

9. We welcome improvements in the breadth of migration data published by the Home Office since 2011. The Home Office and ONS should use e-Borders data to produce more accurate measures of immigration, emigration and net migration by age, sex and nationality at the national level as soon as possible. (Paragraph 61)

As discussed above, the Statistics Authority recognises the potential statistical benefits of using e-Borders data as part of the statistical estimation of UK international migration, although remains disappointed that these benefits are not currently being fully realised.

10. The Home Office should move as rapidly as possible towards integrating visa information with e-Borders data, with the aim of measuring immigration, emigration and net migration by people in different visa categories. This would also provide data on the number of people in different visa categories currently living in the UK, and would enable the Home Office to gather detailed information on the characteristics of migrants subject to migration control. The Government should formulate and publish a plan for integrating UKBA's IT, which sets out its objectives, how they will be achieved, and in what time. (Paragraph 62)

This recommendation is for the Government to respond to. The Statistics Authority agrees with the Committee's conclusion.

11. The Home Office's programme to modernise IT across the immigration system provides an opportunity to improve significantly official migration statistics. It is vital that ONS and other government statistical needs are fully understood and incorporated into new IT specifications. The Home Office and ONS should together develop a coherent strategy for better migration statistics. (Paragraph 63)

The Statistics Authority agrees with the Committee's conclusion. ONS stands ready to engage further with the Home Office on its strategy for modernising IT across the immigration system.

F. Communicating migration statistics

12. The net migration target can disguise the nature of actual population change in the terms which concern many members of the public. Members of the public do not always understand the distinction between immigration and net migration, and many are more concerned by some types of immigration than others. The

⁷http://www.ons.gov.uk/ons/about-ons/get-involved/consultations/consultations/beyond-2011-consultation/index.html

Government should do more to enable better public understanding of migration, in order for the net migration target to be meaningful to and understood by the public. (Paragraph 68)

13. Public understanding of migration statistics is poor. This is partly because migration is a complex phenomenon, but also because official migration statistics do not present a full and accurate picture of migration to and from the UK. As a consequence, the public debate about migration has too often focussed on the headline measure of net migration, without considering the size and composition of its component flows, the range of behaviour it summarises, and the different types of people it covers. (Paragraph 73)

The Statistics Authority agrees with the Committee's conclusions. In March 2012, ONS published a conceptual framework for population and migration statistics as part of the Migration Statistics Improvement Programme⁸. This was a first step to improve understanding of the underlying concepts of migration, the nature of the data available, and the methods used to derive statistical estimates of UK international migration. ONS has made other significant improvements to the reporting of migration estimates, including the publication of a new quarterly migration statistics report to improve the clarity and coherence of the published migration statistics. ONS will also continue to publish relevant analytical articles on migration through the ONS's analytical work programme.

14. We welcome improvements in the reporting of migration statistics by the Home Office. The Home Office has substantially increased the range of data it publishes on immigration control. The Home Office Immigration Statistics User Guide is an effective summary and explanation of the available statistics. We also welcome the new Home Office website at Gov.uk, which addresses some of the criticisms of the Home Office website made in evidence to this inquiry. (Paragraph 74)

This conclusion is for the Government to respond to.

15. We welcome improvements in the reporting of migration statistics by the ONS, including the Migration Statistics Quarterly Report, which summarises the most recent migration statistics, and the new topic page for migration on the ONS website. However, the clarity and accessibility of the information that the ONS provides on migration statistics could still be improved. The ONS has improved the presentation of the material it publishes on migration statistics but it should also consider the content of this material, and the way it is explained and presented. The aim should be that a non-expert user should be able to develop an understanding of migration statistics with no prior knowledge or experience. Migration statistics should be presented alongside related guidance on their sources, methodology, use and interpretation. (Paragraph 75)

The Statistics Authority appreciates the Committee's support for the improvements that have been made by ONS, including the development of the new *Migration Statistics Quarterly Report*, enhancements made to the ONS website, and the publication of additional migration statistics analysis. The Authority agrees that ONS routinely should keep under review the ways in which ONS presents data and related analysis of migration statistics so that both expert and non-expert users alike find them useful and engaging. The Code of Practice for Official Statistics – especially principles 4 and 8 – already requires that official statistics should be produced alongside information about sources, methodology, uses and interpretation. The Statistics Authority will continue to monitor the extent to which producers

⁸ http://www.ons.gov.uk/ons/guide-method/method-quality/imps/latest-news/conceptual-framework/a-conceptual-framework-for-population-and-migration-statistics---download-file.pdf

of migration statistics comply with the Code of Practice in these areas, including through the Authority's statutory Assessment programme.

16. The ONS should produce a user guide to ONS migration statistics similar to the Home Office's Immigration Statistics User Guide. This should explain what migration statistics measure, how they are produced, and what data are available—including table by table guidance. It should be honest and open about the weaknesses of the data. (Paragraph 76)

The Statistics Authority agrees with the Committee's recommendation and has asked ONS to discuss with the Home Office the feasibility of developing the Home Office user guide to become a guide to all official statistics in the area of migration. The quarterly migration statistics report produced by ONS also contains guidance and background information about the statistical concepts, sources and methods used in compiling UK international migration statistics. ONS also published a migration statistics 'first-time users' guide in October 2013 which is designed to introduce non-expert users to the sources of migration statistics, how the statistics are compiled and where they can be found, the definitions used, and other advice to aid interpretation and use of the statistics, including measurement of uncertainty and confidence intervals.

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http://www.ons.gov.uk/ons/guide-method/method-quality/specific/population-and-migration/international-migration-methodology/background-notes-and-guidelines-for-long-term-international-migration-estimates.pdf
 http://www.ons.gov.uk/ons/rel/migration1/migration-statistics-quarterly-report/august-2013/user-information.pdf

¹¹ http://www.ons.gov.uk/ons/external-links/other/international-migration-stats-first-time-user-guide.html