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**Director General for Regulation**

Ms Janet Downs  
By email

17 December 2015

Dear Ms Downs,

Thank you for your emails of 10 November and 1 December regarding speeches made by the Secretary of State for Education, the Rt. Hon. Nicky Morgan MP on 9 November 2015 and by the Schools Minister, Nick Gibb MP on 22 January 2015. Both of these speeches referenced Programme for International Student Assessment (PISA) data. I am sorry for the delay in responding, it was necessary for Statistics Authority officials to make enquiries with the Department for Education as part of reviewing the issues you raised.

In your emails you highlighted two primary concerns. The first, in light of Sir Andrew's 2012 intervention regarding the use of PISA data, was Ms Morgan's statement that the last Labour Government had "let down young people, as PISA showed us that between 2000 and 2009 the UK fell further and further behind the countries with the highest educational standards". Secondly that Mr Gibb used international test data in a misleading way.

Officials from the Department for Education (DfE) informed us that following our intervention in 2012, they had established quality assurance processes to ensure that all references were checked to ensure they were correct and accurate. Specifically, performance in the 2000 and 2003 PISA results should be treated with caution and only referred to if accompanied by an acknowledgment of the bias introduced by non-random school and pupil participation in the study. Further to this, DfE also acknowledged that appropriate caveats should accompany any mention of the PISA ranking. Unfortunately on this occasion DfE's quality assurance and fact checking process did not identify the misstatement about the PISA data.

We note that the text accompanying the published speech stated, on 11 November<sup>[1]</sup>, that the transcript of the speech was exactly as delivered. However, this was not the case as the transcript did not include the reference to PISA data. This commentary was subsequently amended to read "original script, may differ from delivered version". We would expect that when a transcript of a speech is published and differs from the speech given, a footnote to the text is provided detailing what the changes were. With this in mind, the Head of Profession for statistics for DfE may wish to consider adding such a footnote on the changes to the published speech.

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<sup>[1]</sup> Date first accessed by UK Statistics Authority officials

With regard to Mr Gibb's speech, we do not believe that the minister was misleading regarding the use of the 2000 PISA data. The [University of Southampton bias report](#) was carried out retrospectively for PISA 2000 and 2003 and the report notes that there was an "... under-representation of pupils with low achievement" (page iv executive summary). We have been told that Mr Gibb's reference to "a bombshell" was describing his shock at the 2006 PISA result; we note also that in discussing the UK's relative position in PISA 2009 Mr Gibb referred to that fact that it "*looked ... worse*". We do not consider this to be factually incorrect. Finally, we note your references to other sources of international test data: we will bring these to the attention of DfE's statistical Head of Profession.

I am copying this letter to Iain Bell, Head of Profession for statistics, Department for Education.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Ed Humpherson'.

Ed Humpherson