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**Director General for Regulation**

John Pullinger CB  
National Statistician  
By email

23 March 2016

Dear John,

**DIFFERENCES BETWEEN DWP STATISTICS ON NATIONAL INSURANCE NUMBERS ALLOCATED TO ADULT OVERSEAS NATIONALS AND ONS MIGRATION FIGURES**

I am writing about the differences between the National Insurance Numbers Allocated to Adult Overseas Nationals (NINO) statistics and Office for National Statistics's (ONS) International Migration estimates. By way of context, the Authority is currently assessing the Department for Work and Pensions's (DWP) NINO statistics for compliance against the *Code of Practice for Official Statistics*.

I welcome the recent summary<sup>1</sup> published by ONS of the main differences in approach between the ONS's headline long-term migration figures and DWP's NINO statistics. This summary incorporated input from DWP and Her Majesty's Revenue and Customs (HMRC). We welcome this cross-departmental working, and also the commitment in the note to on-going reconciliation work between the different sources of migration data. ONS is planning to provide an update on this work as part of its Migration Statistics Quarterly Report (MSQR) publication in May. Given the current high level of public interest in migration, it is particularly important that the different sets of data are brought together in a coherent way, fully quality assured and published in an orderly manner, to paint as full a picture as possible of the patterns of migration. It is also important that the strengths and limitations of all the data sources are well explained.

The lack of a clear understanding and explanation of the differences between the DWP and ONS figures has led to speculation about the quality of these National Statistics. There is a significant risk that a lack of progress in reconciling and explaining the differences over the coming weeks could undermine public confidence in official migration estimates. To properly inform public debate and serve the public interest, it is important that colleagues at ONS, DWP, HMRC and Home Office continue to work collaboratively to ensure that progress is made to address this issue in such a way as to avoid piecemeal data emerging at different times and on different bases. The contextualisation of the data will therefore be an essential part of any work on this issue.

The ONS's May publication will form part of the statistical evidence informing public debate on immigration levels ahead of the EU referendum on 23 June. Should it become apparent that this publication will fall short of meeting any expectations that it will provide a full picture of the differences between migration sources (due to the relevant data from HMRC and DWP not being available for example) I would expect ONS to make this known publicly as soon as possible. I would welcome your prompt reassurance on these matters.

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<sup>1</sup><http://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/methodologies/differencesbetweeninternationalpassengersurveyandnationalinsurancenumberstatisticsasshowninthemigrationstatisticsquarterlyreport>

As noted above, we are currently assessing the DWP NINO statistics, and will publish our conclusions later this year. It seems clear to me that the issues we have identified to date, including those of coherence with other sources noted in this letter, are relevant factors in considering whether the NINO statistics meet the highest standards of trustworthiness, quality and value, and hence their National Statistics status. Although we are not currently assessing the ONS migration statistics, I would encourage you to consider these issues of comprehensiveness and reconciliation for these too.

I am copying this letter to Glen Watson at ONS, David Frazer and Neil McIvor at DWP, Sean Whellams at HMRC and David Blunt at the Home Office.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ed Humpherson', written in a cursive style.

Ed Humpherson