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**Director General for Regulation**

Bernard Jenkin MP  
Chair  
Public Administration and Constitutional Affairs Committee  
House of Commons  
London  
SW1 OAA

19 April 2016

Dear Bernard

I am replying to your recent letter to John Pullinger, National Statistician, to update you from the regulatory perspective. The Authority's regulatory function which I lead has been keeping a watch on both the use of administrative data, and the production of migration statistics, over a number of years.

As regulator, the Authority has written two important letters on this topic over recent weeks, each of which we have published on the Authority website.

The first of these was the letter to Will Moy at Full Fact that you referenced in your letter. In this letter, Sir Andrew Dilnot was pleased to note that on 4 February some data on active National Insurance Numbers (NINos) allocated to EU citizens was provided by the Department for Work and Pensions in response to a Freedom of Information Request. The letter also said that it was disappointing that the data was provided two months after the release of a related ad-hoc statistical release by the Department, and that such a delay was not in keeping with the spirit of equality of access which the Code of Practice promotes.

The second was a letter that I wrote to the National Statistician, John Pullinger on 23 March. This letter set out the importance of painting a full picture of patterns of migration ahead of the EU referendum, and of ensuring that any issues with the promised reconciliation work are communicated promptly.

For your convenience I have attached copies of each of these letters as the annexes to this letter.

We would be very happy to keep you and your Committee informed of any further activity on these issues.

Yours sincerely,



Ed Humpherson

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**Chair of the UK Statistics Authority, Sir Andrew Dilnot CBE**

Will Moy  
Full Fact  
9 Warwick Court  
London  
WC1R 5DJ

8 February 2016

Dear Will,

**NATIONAL INSURANCE NUMBERS ISSUED TO RECENT MIGRANTS**

Thank you for your letter of 23 December regarding a Freedom of Information (FOI) request from the National Institute of Economic and Social Research on the numbers of National Insurance Numbers (NINOs) issued to recent migrants who were 'active', which was initially turned down by HM Revenue and Customs (HMRC).

It is not the role of the UK Statistics Authority to comment on whether the Freedom of Information Act has been complied with, but we have examined this issue with regard to the Code of Practice for Official Statistics. There is nothing in the Code that would be an obstacle to releasing data which addressed these questions. In addition, releasing such information would support the principle of equality of access to statistics.

We have been in contact with HMRC and the Department for Work and Pensions (DWP) to discuss data on active National Insurance Numbers (NINOs) allocated to EU citizens. We were informed that such data were not straightforward to assemble. To do so requires linking data between two large databases (one held by DWP and the other held by HMRC). While I am pleased to note that on 4 February<sup>1</sup> part of the information<sup>2</sup> requested by Mr Portes was provided, it is disappointing that this was two months after the release of the ad hoc release referred to in Mr Portes' FOI request<sup>3</sup>. Such a delay is not in keeping with the spirit of equality of access which the Code of Practice promotes.

I understand that work is underway to provide information on the receipt of benefits and tax paid associated with NINOs held by people whose country of origin is outside the UK. The planned release of these data was also confirmed in a response to a written parliamentary

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<sup>1</sup><https://www.gov.uk/government/publications/migrants-and-tax-credits>

<sup>2</sup> The numbers of recent migrants from EEA member states (other than the UK) claiming tax credits.

<sup>3</sup><https://www.gov.uk/government/statistics/uk-benefit-and-tax-credit-claims-by-recently-arrived-eea-migrants>

question, in which the Financial Secretary to the Treasury stated that HMRC plans to publish further information on this subject 'early in 2016 once it has been properly collated'<sup>4</sup>.

The Office for National Statistics is preparing a report to be published in the first half of 2016 which will include a discussion of the differences between the data sources on migration for work, including the International Passenger Survey (that collects data on EU nationals who immigrate to work in the UK) and NINo data. When available, the linked DWP and HMRC data will be incorporated into this work to provide additional evidence for how the different data sources compare.

Yours sincerely,

A handwritten signature in black ink that reads "Andrew Dilnot". The signature is written in a cursive style with a large initial 'A' and 'D'.

**Sir Andrew Dilnot CBE**

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<sup>4</sup><http://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2015-12-17/20697/>

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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