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**Director General for Regulation**

Olivia Christopherson  
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DCMS  
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London,  
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Dear Olivia,

As you know, we recently started to assess statistics and data from the Community Life Survey (CLS) against the Code of Practice for Statistics. During the assessment, we spent time considering the innovative push-to-web methods used in the survey.

We think that more work is needed to develop the push-to-web method and there are opportunities to increase the value of the statistics and data further. Rather than setting a detailed set of requirements that we anticipate will take considerably longer than six months to complete, we propose to defer the assessment at this stage. We will return to it when you are satisfied the methods are sufficiently developed and are confident in the quality of the resulting statistics and data.

The use of the push-to-web method is new to government and DCMS is leading the way by adopting this approach for the CLS. The published details of the survey's development contribute to the debate about best practice. Deferring the assessment will allow time for DCMS and the wider Government Statistical Service (GSS) to develop their expertise in these methods, and you are planning to take this work forward with others in the GSS.

You are also exploring how to increase your dialogue with different types of users and considering how to address the strong unmet demand for locally disaggregated data. You have also started to look at the coherence of different data sources that measure aspects of community participation and engagement, which are potentially confusing for people who want to use the statistics. There is the potential for this work on coherence to go further. We recognise that improving coherence and addressing the local data issue will require innovation and creative thinking in the light of your limited resources.

The annex to this letter sets out in more detail our thinking on the trustworthiness, quality and value of the CLS statistics and data, based on our work to date.

Thank you for your openness as we gathered and considered our evidence. We look forward to hearing about your continuing progress to improve the statistics and data from the CLS.

I am copying this letter to Maria Willoughby, Head of Surveys in DCMS and Julie Stanborough, Deputy Director, Best Practice and Impact in ONS, who leads the teams supporting the GSS.

Yours sincerely

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

Ed Humpherson  
Director General for Regulation

## Annex: Review of statistics from the Community Life Survey (CLS)

<p><b>Quality:</b> Q3 Sound Methods – producers of statistics and data should use the best available methods and recognised standards and be open about their decisions</p>	
<p><b>Actions taken by the statistics teams at Cabinet Office (previously responsible for CLS) and at DCMS</b></p> <ul style="list-style-type: none"> <li>• Published <a href="#">information</a>: <ul style="list-style-type: none"> <li>○ about how those contracted to run the survey developed the method</li> <li>○ examining the differences in results between the previous and new methods to consider the extent of bias in the survey</li> </ul> </li> <li>• Published a <a href="#">technical note</a> looking at the changes to the methods and the implications for the 2016/17 statistics</li> </ul>	<p><b>Office for Statistics Regulation’s evaluation of evidence</b></p> <p>We had concerns about the soundness of the CLS methods considering:</p> <ul style="list-style-type: none"> <li>• The continuing debate around some of the detailed methods including methods used to select respondents and to improve response rates</li> <li>• The low response rate for the survey, which was 21% in 2016, compared with around 60% previously with face-to-face interviewing</li> <li>• Some results – such as for charitable giving and civic participation – are not as expected, which might indicate material differences in the sample to the general population</li> <li>• The lack of robust alternative sources that can be used to verify the results</li> </ul>
<p><b>Other evidence and context</b></p> <ul style="list-style-type: none"> <li>• Few government social surveys across the world use this method; statistics from CLS are the first official statistics in the UK to draw on a data source that uses this method</li> <li>• Literature (for example articles in <a href="#">Statistics Canada Survey Methodology Journal</a>; <a href="#">Social Research Association Research Matters – pg. 7</a>), public forums and one-to-one discussions with independent experts and experts from government survey suppliers. These demonstrated: <ul style="list-style-type: none"> <li>○ Broad acceptance that use of push-to-web methods will grow in government social surveys</li> <li>○ Less consensus about the detail of how to implement the method</li> <li>○ Concern about the response rate and whether the sample materially misrepresents the population</li> </ul> </li> <li>• Current practice is context specific which means that the statistics team at DCMS cannot rely on established good practice to form their own judgements about how sound the methods are.</li> </ul>	<p>Positive factors we saw include:</p> <ul style="list-style-type: none"> <li>• The innovation demonstrated by the statistics teams in introducing the method</li> <li>• The parallel runs of the new self-completion methods with face-to-face interviewing that allowed comparison of results arising from the two methods</li> <li>• The thoroughness with which the methods were developed and tested</li> <li>• The transparency of the development process that is helping to inform the ongoing debate about push-to-web methods and the openness of the CLS survey contractors to participate in that debate</li> <li>• DCMS’s commitment to developing a cross-Government view of push-to-web methods for government surveys</li> </ul> <p><u>Looking to the future</u></p> <p>The DCMS statistics team should continue to work with others across Government to jointly develop their independent judgements about push-to-web methods and the quality of the resulting data and statistics.</p>

<b>Value:</b> V1 Relevance to users – users of statistics and data should be at the centre of statistical production; their needs should be understood, their views sought and acted on, and their use of statistics supported	
<b>Actions taken by the DCMS statistics team</b>	<b>Office for Statistics Regulation’s evaluation of evidence</b>
<ul style="list-style-type: none"> <li>After taking over DCMS responsibility for the survey, the statistics team held a large-scale event to develop their understanding of how the statistics and data are used and explore needs</li> </ul>	<p>We had some concerns about the value of the current statistics considering:</p> <ul style="list-style-type: none"> <li>The strong demand for disaggregated local data, given the subject matter, combined with the use made of the CLS national data</li> </ul>
<b>Other evidence and context</b>	Positive factors we saw included:
<ul style="list-style-type: none"> <li>Our discussions with people who have previously used, use currently, or have the potential to use statistics from the CLS which demonstrated: <ul style="list-style-type: none"> <li>Agreement that CLS provides useful measures</li> <li>Use is limited for some users because the sample size does not allow useful local breakdowns</li> </ul> </li> <li>The subject of the survey explores community participation and engagement, principally in the local area</li> </ul>	<ul style="list-style-type: none"> <li>Clear evidence of interest in the subject matter of the survey</li> <li>The ambition of the statistics team to improve the value of the statistics</li> </ul> <p><u>Looking to the future</u></p> <p>The team should continue to develop the dialogue with users and potential users of the statistics and to search for ways to meet demand for disaggregated local data. Considering the demand for local data at the same time as coherence and looking for opportunities to collaborate might suggest more innovative and cost-effective approaches such as combining samples or surveys.</p>
<b>Coherence and collaboration:</b> Share resources and collaborate to achieve common goals and produce coherent statistics (Trustworthiness T4.4); signpost to other related statistics and data sources and explain the extent of consistency and comparability (Value V3.3)	
<b>Evidence</b>	<b>Office for Statistics Regulation’s evaluation of evidence</b>
<ul style="list-style-type: none"> <li>The publications and supporting documentation about the survey and other similar data and statistics</li> <li>Our discussions with: <ul style="list-style-type: none"> <li>people who have previously or who currently use statistics from the CLS</li> <li>the team in ONS that are commissioned by the Prime Minister to develop the new measure of loneliness</li> <li>the statistics team in DCMS</li> </ul> </li> </ul> <p>These uncovered different ways of measuring similar topics such as volunteering and loneliness and demonstrated the potential for confusion among some people using the statistics</p>	<p>The DCMS team is considering rationalising questions across some of its surveys where topics overlap. This is welcome, but we think there is potential for a wider review of the statistics from the CLS and other related statistics – and their data sources – to improve overall coherence. This might involve, for example, considering efficiencies of data collection or changes to the way the statistics are presented.</p> <p>We are pleased that the statistical team in DCMS is working closely with ONS on a wider review of how loneliness is measured, reflecting current political interest in this topic.</p> <p><u>Looking to the future</u></p> <p>The statistics team should collaborate with other statistics producers and consider creative ways to produce coherent statistics on similar topics, to better explain those aspects of society.</p>