
Ed Humpherson, Director General for Regulation

Sean Whellams
Head of Profession for Statistics
HM Revenue and Customs
(by email)

15 July 2020

Dear Sean

Coronavirus Job Retention Scheme (CJRS) and Self-Employment Income Support Scheme (SEISS) statistics

I am writing to endorse the approach you have taken to produce statistics about the [Coronavirus Job Retention Scheme](#) (CJRS) and the [Self-Employment Income Support Scheme \(SEISS\)](#). These statistics estimate the number and value of claims made to the CJRS and to the SEISS administered by HM Revenue and Customs (HMRC). I would like to congratulate everyone involved for their work to produce these important statistics.

My team has conducted a [rapid regulatory review](#) of the published information. We have reviewed the extent to which they have been produced in accordance with the [Code of Practice's](#) Trustworthiness, Quality and Value pillars, while taking account of the pressures you and your teams have faced to deliver timely statistics about an important topic. A summary of our findings is set out below and we have already provided more detailed feedback to you.

Value

- These statistics and data help us understand the scale to which employers, employees and the self-employed have relied upon these schemes. There has been considerable press interest in the UK and in the devolved countries in the estimates particularly highlighting the take-up and value of the schemes at UK, regional and local authority levels
- The releases include information such as glossaries, background information about the schemes, the strengths and limitations of the statistics and links to other related statistics which help users to use and interpret the statistics. There are good breakdowns for each set of statistics which draw from the datasets available. The presentation of charts engages readers' interests and where data are ranked it's easy to see where or what is highest and lowest
- Your approach to engaging with devolved countries' statisticians about improvements that they would like to see in the statistics is praiseworthy. You have set out in the CJRS bulletin that there's scope to include additional analysis in further releases. For example, you have mentioned including breakdowns of the CJRS claims by age and sex of employees. This engagement helps the statistics meet users' needs as well as they can, and provide a strong foundation for future developments
- These statistics have been developed from management information that HMRC was [tweeting](#) on a daily basis following the launch of the CJRS on 20 April. Releasing the management information so promptly about the CJRS including numbers of unique applicants, the number of furloughed jobs and the value of claims was a good example of transparency. It is particularly good that your team went on from releasing the management information to match data from its Real Time Information (RTI) system with Coronavirus Job Retention Scheme data to produce breakdowns of claims providing even more insight in the official statistics now being produced

- The estimates of take-up of the SEISS relative to the estimated number of people eligible is helpful in making comparisons, we encourage you to do something similar for the CJRS, using a suitable denominator to enable easier geographic comparisons of the impact of furlough
- Your decision to publish sub-regional statistics will helpfully provide further insights from the wealth of data in tables accompanying the main statistics. We suspect that as part of managing the recovery from the pandemic at a local level, users would benefit from further sub-UK insights. For example, in relation to SEISS there might be benefit to users in providing some background on the plausible reasons for significantly lower take-up rates of SEISS in some of the London local authorities and significantly higher than average take-up in some south Wales local authorities

Quality

- The rationale for the assumptions made are well explained and reasonable. For example, that PAYE schemes provide a reasonable proxy for employers for the purposes of the release
- To allocate scheme applicants into regions and countries you have used the best available address data, for example in CJRS statistics, people's residential addresses. There are many reasons why someone's residential location would be in a different region or country to where their job is. CJRS bulletin already provides an explanation about the use of residential addresses in section 4 of the CJRS bulletin but it may be worth repeating the explanation in section 5 for people who go directly to that section. Similarly, in the SEISS statistics the claimant's self-assessment address is used which may be different to their residential address, for example the self-assessment address could be the claimant's accountant's or solicitor's address. Using a self-assessment address might result in some distortions in the figures. You might urge greater caution on placing too much weight on statistics on eligibility and take-up of SEISS at Local Authority and Parliamentary Constituency levels due to factors such as this
- There is interest in the numbers of people eligible for SEISS, for example the [House of Commons Treasury Select Committee](#) and the [Institute for Fiscal Studies](#). IFS for example suggested that the numbers of people eligible for SEISS are around 3.12m whereas the estimated numbers in SEISS are given as 3.4m. We consider that acknowledging and explaining differences, where possible, would offer further reassurance to your users about the quality of the HMRC estimates of totals numbers eligible for SEISS support

Trustworthiness

- You have pre-announced through the HMRC forward release calendar the release date for these statistics and has given a specific release date for the next release at least four weeks in advance

We look forward to seeing these statistics develop as circumstances change. As set out in our guidance on changes to statistical outputs you can include a statement to accompany information about these statistics such as "These statistics have been produced quickly in response to developing world events. The Office for Statistics Regulation, on behalf of the UK Statistics Authority, has reviewed them against several key aspects of the Code of Practice for Statistics and regards them as consistent with the Code's pillars of Trustworthiness, Quality and Value."

I am copying this letter to Jane Whittaker, Director of HMRC's Knowledge, Analysis and Intelligence directorate.

Yours sincerely



Ed Humpherson
Director General for Regulation