
Ed Humpherson, Director General for Regulation

Tony Dent
Director
Better Statistics CIC
(by email)

28 April 2022

Dear Mr Dent,

Thank you for your letter. You raise important points, both about the ONS Covid Infection Survey and the Code of Practice for Statistics. I have addressed these in turn below.

ONS Covid Infection Survey

My team is planning a review of the Covid Infection Survey in light of the plans to scale the survey back. This review will be a follow-up to our [previous review](#), published in March 2021. It will look at whether, and to what extent, the statistics continue to serve the public good and meet the standards of the Code of Practice – including the representativeness of the survey. We will also consider previous recommendations we have made regarding the survey and whether these have been addressed.

Code of Practice for Statistics

We agree with you that value for money is an important aspect of statistics. We do not consider, however, that it is necessary for [the Code](#) to include a specific reference to it. This is because, enshrined in the principles of the Code, are the principles of value for money (which consist of judgements as to whether an activity, policy or programme is the optimal use of resources to achieve the intended outcome, taking into consideration inputs, outputs and outcomes). Indeed, the Code embeds a focus on inputs (in terms of both resources and data collected); outputs (in terms of the way statistical results are compiled and presented); and outcomes (in terms of the way statistics meet user needs). Our focus is on these principles being used to ensure that statistics serve the public good. We would expect that any significant value for money issues would be picked up through regulatory reviews as they would be counter to the principles of the Code.

Therefore, our view is that the Code allows for consideration of value for money issues – specifically under T4.4: *Good business practices should be maintained in the use of resources*; V1.6: *Periodically review whether to continue, discontinue or adapt the statistics*; and V5: *Efficiency and proportionality*, in relation to reducing burden and the burden imposed by collection. While we would not make a judgment on value for money ourselves, we would be looking for evidence that producers have assessed value for money under both the Trustworthiness and Value pillars, decided on rationale for spending, and been transparent about these decisions.

You are also concerned that the Code does not provide guidance on good practice for survey methods. The National Statistician, along with the Government Statistical Service (GSS), is responsible for guiding statistics producers on how to produce statistics. The GSS provides [guidance](#) on methodology, including [survey design](#), through the [Analysis Function Support](#). This includes the Methodology Advice Service which is available to statistics producers. Our expectation is that producers follow national good practice and that statistics are based on appropriate methods. However, your point is a good one and we will raise it with the GSS quality team.

We are planning to start our review of the Covid Infection Survey in June 2022, with the intention of reporting in late summer. My team would be very happy to speak to you as part of this review and I would be keen to join that meeting – it would be good to discuss both the Infection Survey and the broader focus of the Better Statistics CIC. Please let me know if this is something you are interested in doing.

Yours sincerely

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

Ed Humpherson
Director General for Regulation