



27 June 2022

SCOTLAND'S CENSUS 2022: SCOTTISH GOVERNMENT RESPONSE TO RETURN RATE

We wanted to put on the record our concerns about the defensive lines and activity by both the Cabinet Secretary for the Constitution, External Affairs and Culture Angus Robertson and Registrar General Paul Lowe in relation to the low response rate in Scotland's census. Based on public-facing communications, we are not confident that the Scottish Government fully appreciates the gravity of the shortfall in responses, and more specifically the implications for addressing inequality.

The Ministerial statement by Mr Robertson on 9 June 2022 stated that 28 local authorities had 'exceeded the 85% mark'. Mr Robertson did not specify which four areas had not done so, nor were they noted on the Scottish Government [press release](#). The areas are Glasgow City, West Dunbartonshire, and Dundee City, which based on the Scottish Index of Multiple Deprivation ([SIMD](#)) account for 36.42% of the "20% most deprived" data zones in Scotland. The local authority with the largest share of those (Glasgow) had the lowest rate of census return. We are not aware of any public facing comments by the Scottish Government or NRS which recognise the significant of data loss in these areas.

Instead, we have seen a large amount of activity that appears to be aimed at minimising reputational damage. Most recently, Mr Robertson told the Scottish Parliament. "I am delighted that it has reached the return rate that it has, given the challenges that were faced through the census collection period" ([16 June 2022](#)).

On 7 June Mr Lowe told a Parliamentary Committee:

"We can produce a good-quality census outcome with the 87-plus per cent return rate that we have received now. I appreciate that this has been a source of speculation, so I commissioned an international panel of experts chaired by Professor James Brown from Sydney, who is a professor in official statistics, and including the UK national statistician, Sir Ian Diamond. Last week, they issued a statement saying that the census had achieved a solid foundation and that it was appropriate to move on to the next stages." ([Lowe, Scottish Parliament 7 June](#))

We understand that the group referenced by Mr Lowe was initially publicised in a [news item](#) of the Scottish census website (2 June). The item refers to an 'International Steering Group', described as 'a group of pre-eminent international authorities' although we note that only two of the seven members are not based in the UK. The group does not include anyone who

works with quantitative data in Scotland in an applied capacity and who will be familiar with the range of alternative administrative data sources available here, and their limitations.

Both the NRS and Scottish Government has used the Group to provide supportive media lines, notably the assertion by the Chair Professor Brown that Scotland's census has a 'solid foundation' on which to proceed.

"We have secured a good level of national census returns and coverage. I am pleased that the International Steering Group has acknowledged that we are in a strong position to move forward and I welcome the contributions they will make to steering our statistical and methodological work over the next few months. This will support us to deliver our census coverage survey, and our work to identify the appropriate administrative data which can support our quality assurance work. ([Paul Lowe, 2 June](#))

"An international steering group of global census experts has also been established by the registrar general to help to steer the work of NRS as we move forward from the collection element of the census. The steering group, which is chaired by Professor James Brown, has acknowledged that we are in a strong position from which to move forward. I welcome the contributions that that group will make to steering NRS's statistical and methodological work over the next few months"

"In terms of having confidence, if [MSP Sarah Boyak] is not prepared to listen to what the NRS has to say about things, I point her in the direction of the international steering group, which is made up of experts on the census. For those who are unaware of who is on the group, I can say that it is chaired by Professor James Brown, the Australian Bureau of Statistics professor of official statistics at the University of Technology Sydney. He is joined by Professor Sir Ian Diamond, the UK's national statistician, and Professor David Martin, professor of geography at the University of Southampton and deputy director of the UK Data Service. I could go on, because it includes other colleagues who are eminent in their field of conducting censuses."

"I appeal for Willie Rennie to wait for the international steering group to do its work and for parliamentary colleagues on the portfolio committee who will be looking at it to do theirs."

(Mr Robertson, [9 June](#))

The authoritative statement by Professor Brown feels premature at this stage, particularly given the very low response rate in deprived areas. It also appears inconsistent with comments made previously by one of the Group's members:

David Martin, a deputy director at the publicly funded UK Data Service, which collates economic, social and population figures, has predicted the target will be missed. "You're not going to close the gap to 95 per cent, that's just inconceivable," he said. "The ramifications are really pretty big if they can't rescue it." (Times, 24 May)

It is inconsistent also with comments by other independent academics and policy analysts, including Professor Lindsay Paterson ([Times, 3 June](#)),

On 30 May IPPR Scotland Director Philip Whyte stated:

“It’s hugely concerning that areas with some of the highest levels of deprivation in Scotland, like Glasgow and West Dunbartonshire, haven’t even seen an 80% census response rate yet...

“Scotland has some very welcome ambitions to secure a more inclusive economy but poor-quality data will make that task harder. Policymakers must ensure public services in areas with high levels of deprivation do not see any negative impacts as a result of potentially skewed census results.”
([Guardian, 30 May](#))

Dr Mark Roodhouse (University of York) has also stated that a lower response rate risked missing small social groups such as some migrants, localised pockets of poverty and the very elderly ([Sunday Post, 22 May 2022](#)).

We think the OSR may wish to seek reassurances about how the establishment of the advisory group relates to the Scottish Government’s adherence to the Code of Practice on Statistics. Specifically, the OSR may wish to satisfy itself that this group has not been established with the intention of providing an alternative authority to any more critical assessment of the adequacy of the data which may be made by sources independent of government, not least the OSR.

Mr Robertson has put forward several possible reasons for Scotland’s low response rate, none of which stand up to serious scrutiny, particularly given the high response rate secured by ONS. These include references to people being concerned about events in Ukraine and the cost of living, generating sceptical responses in the media.

The Ministerial statement on 9 June 2022 referred to “changes in society’s attitudes to the census and completing it”. Mr Robertson has also invoked ideas about individual responsibility and personal blame.

“I will begin by saying—because it is important to state it on the record—that it is not the Government that completes individual census returns: doing that is a matter of personal responsibility. I find it passing strange that the party that believes in personal responsibility has drawn absolutely no attention to the fact that it was the decision of people, for a variety of different reasons, not to return their census responses.” ([9 June 2022](#))

This line does not suggest an analysis of causes driven by concern about the higher non-response rate in local authorities with a higher proportion of deprived areas, including Glasgow City. More importantly, it appears to reject organisational accountability. The Scottish Government lines are not being taken seriously by the media, with the risk of further undermining public trust in the census:

[Nicola Sturgeon's minister ridiculed for blaming £31M census botch-up on Ukraine crisis](#)
(29 April 2022)

[Ukraine invasion partly to blame for Scots census fiasco, says Nicola Sturgeon's minister: Angus Robertson ridiculed for claiming that public anxiety caused by 'recent world events' led to low survey turnout](#) (Telegraph, 28 April 2022)

[Scots 'too busy' to complete 2022 census despite millions spent on promoting it](#)
(Daily Record, 9 June 2022)

There are evidently serious questions about the handling of Scotland's census. We note that in concluding the Ministerial statement on 9 June Mr Robertson stated that administrative data would be used in conjunction with census data, to shore up census outputs:

In conclusion, through a combination of census returns, individual administrative data, the census coverage survey and adjustments using aggregate administrative data, NRS will be able to proceed effectively with the next phase of the census, which is to produce the high-quality outputs that are required by data users.

A lack of available administrative data was however one of the key reasons cited by NRS in choosing to delay the census to 2022, as reported by Audit Scotland.

[ONS] has access to administrative data from other public bodies which it can use to supplement any gaps in census data caused by a reduced response rate. The ONS was therefore confident that it could manage the risks involved in delivering the census in 2021. NRS's director of statistical services and the Scottish Government chief statistician confirmed to the Census Programme Board that the data required to deliver a similar solution was not available for Scotland, so NRS could not be assured that the risks could be managed in the same way in Scotland.

More recently the Times ([14 June](#)) reported that a decision was taken by NRS in 2020 not to develop this type of data.

Other potential contributory factors are now [emerging](#) in the press, including the reduced number of field staff, and we anticipate that more factors will come to light via whistleblowing. ONS and NRS also [approached paper questionnaires differently](#), which may help explain some of the shortfall. ONS used a paper first approach in some targeted areas (11% of households) and in some reminder communications. NRS stated in 2021 that it was 'considering' this approach, but only appeared to do so during the later extension period, as noted by Mr Robertson in his statement on 9 May.

These reports suggest a considerable number of issues to consider in understanding the reasons for the lower response rate than planned for, which fall within the immediate responsibility of government.

We hope that OSR can investigate the above issues as part of its ongoing assessment of Scotland's census. Our most immediate request is that the OSR take an interest in the Scottish Government's level of concern at what appears to be a disproportionate loss of data from more disadvantaged households, and satisfy itself that all possible action is being taken now to limit the impact of this, so that any risk of that not happening due to complacency is minimised.

Yours sincerely,

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