

8 February 2016

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Office for National Statistics
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Dear Sirs,

CONSULTATION ON CHANGES TO ONS PRODUCTS 2015

The Pensions and Lifetime Savings Association (the Association) has a strong interest in access to and the collection of data from households, employers and pension schemes on both pension savings and other forms of savings and investment. In our response below we have focused on those aspects of the consultation of greatest relevance to us and our members.

This year we reach the culmination of a decade of reform to build a pension system fit for the twenty-first century, developed from the recommendations of the Pensions Commission. One of the key findings of the Commission was that the UK lacked a sound evidence base on which to formulate pension policy. Since then, the evidence base has gradually improved through the collection of individual and household data on wealth and assets. With more change expected in both policy, employer provision of pensions and individual behaviour, in particular in response to automatic enrolment and the new pension freedoms, it is critical that quality data are maintained and analysed to identify the impact of change on retirement outcomes.

The Association recognises that the Office for National Statistics (the ONS), like other Government services, is seeking to deliver operational efficiencies in the face of budget cuts, and in order to make full use of the digital data revolution. However, we are opposed to changes that reduce the availability, or stop, the publication of key datasets used extensively by the pensions industry, or that affect the granularity of analysis that be conducted on pensions data by extensively reducing sample sizes.

There are a number of proposals that cause fundamental concern within the pensions industry:

▶ **The proposals to reduce the sample size, or stop producing the Wealth and Assets Survey (WAS).**

WAS is a critical survey as it is the only survey that collects complete data on individual and household wealth, including pensions. The datasets presented in Chapter 6 “*Private*

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Pension Wealth” are essential to much research undertaken in the pensions industry, and we would oppose stopping the data collection and publication of this non-statutory product.

Additionally whilst the overall sample size (20,000) is large by international standards we have significant concerns about the impact of reducing the sample size without assessing the potential impact on the granularity of analysis that could be undertaken, especially around the segmentation of private pensions data. We would have fewer concerns about the removal of the current £5 incentive for new recruits, and would only have concerns if this made recruitment more challenging. We would encourage the ONS to enable better access to raw data from WAS, perhaps releasing reduced variable data sets with a more limited explanatory document to help make the datasets more navigable and easier to analyse by external organisations. This could include a limited number of key variables from the survey (for example for pensions key pension statistics, alongside key respondent demographic).

▶ **The proposal to stop the Occupational Pension Schemes Survey (OPSS)**

We have some significant concerns about this proposal. While the Annual Survey of Household Earnings (ASHE) provides some insight into pensions around contribution rates, it does not provide the pensions scheme specific focus of OPSS nor is the data collected at pension scheme level which provides more robust estimates on both pensions membership and contribution rates. From 2015 OPSS has been collecting data on group personal pensions (GPPs) – making it the only data sources collecting scheme level data for all types of work place pensions.

- ▶ Although The Pensions Regulator (TPR) collects a wealth of statutory data on pension schemes, they do not currently publish their underlying data. Unless TPR commit to publishing anonymised data from their scheme return (something that has not been forthcoming historically) this approach this would result in the loss of some key data on workplace pension schemes. However, this would not address the collection and dissemination on GPPs over which TPR has limited oversight. **Proposals to stop publishing certain non-statutory data**

We would oppose stopping the publication of a number non statutory statistics that focus on wealth and longevity which the Association and the pensions industry more broadly find incredibly useful. In particular 4.2 ([Wealth in Great Britain](#)), 5.1 ([Ageing in the UK](#)), 5.9 ([Decennial Life Tables](#)), 5.12 ([Life Expectancy at Birth and at Age 65 by Local Areas in England and Wales](#)) and 5.18 ([Period and Cohort Life Expectancy Tables](#)).

There are also proposals to reduce the sample size of ASHE (and use HMRC data on pay instead), the Annual Survey of Insurance Companies and Annual Survey of Pension Funds. We are broadly comfortable with these proposed changes as long as they do not affect the robustness of the sample.

PENSIONS AND LIFETIME SAVINGS ASSOCIATION

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The Association welcomes any approach that the ONS will take to improve data quality – in particular the timeliness of statistical and data releases. Single source statistical bulletins do provide non-researchers with a level of insight that may not be accessible through access to only data and metadata; however we would be comfortable if longer statistical bulletins were summarised, or replaced with infographics so that the analysis remains accessible to non-technicians.

There are also general proposals to consider datasets that could be produced less frequently. We would argue that we would rather have smaller, though still robust, samples more frequently to maximise the availability of up-to-date statistics. The Association hopes that by investing in new technologies ONS will enable better access to data and metadata on its website

Yours faithfully

Elizabeth Spratt
Senior Researcher

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We are the Pensions and Lifetime Savings Association; the national association with a ninety year history of helping pension professionals run better pension schemes. With the support of over 1,300 pension schemes and over 400 supporting businesses, we are the voice for pensions and lifetime savings in Westminster, Whitehall and Brussels.

Our purpose is simple: to help everyone to achieve a better income in retirement. We work to get more money into retirement savings, to get more value out of those savings and to build the confidence and understanding of savers.



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