

Respondent advocacy at Statistics New Zealand

Paul Brown^{1, 2}
Statistics New Zealand,
Statistics House, The Boulevard, Harbour Quays, Wellington 6140
New Zealand

Abstract

A Respondent Advocate role was established in Statistics New Zealand in 2008 to ensure more effective representation of the interests of survey respondents. The role reports directly to the Government Statistician and the holder acts independently, having no line management responsibilities that entail either survey management or statistical production.

Respondent advocacy sits within a broader operational strategy and programme of respondent management that seeks to ensure an ongoing and efficient supply of fit-for-purpose data, whilst maintaining the social licence needed to ensure the sustainability of both the collection and use of data.

The collection of data by Statistics New Zealand operates within a compliance model. Citizens and businesses are required by law to furnish data. As Statistics New Zealand transitions to a more pervasive electronic data collection environment, and as it negotiates its place in a larger and more open data ecosystem, new opportunities and challenges arise. A critical element of this will be data supply management that is much more cognisant of and responsive to the needs and expectations of the suppliers and of the social licence that underpins our endeavours.

Key Words: advocate, ombudsman, survey burden, social licence, data ecosystem, Statistics New Zealand

¹ Principal Statistician and Respondent Advocate.

² The views expressed in this paper are those of the author. No responsibility for them should be attributed to Statistics New Zealand.

1. Why have an advocate?

In this paper I will present some personal views of my role as the Statistics New Zealand Respondent Advocate. I aim to provide you some insights into how such a role can contribute to the central objective of a national statistics office in producing statistics that meet the test of public trust and confidence. Also, to raise some points that may provoke more discussion. To do this, I will refer to some examples of where I have sought to exercise some influence on behalf of the businesses and people that we depend on to provide the data we need to produce useful official statistics, and I will refer to some issues that excite and motivate me as Respondent Advocate.

In common with other national statistical offices, Statistics New Zealand operates a comprehensive program to ensure effective management of respondents. The program is located primarily within the Collection Operations group, which is responsible for the collection of survey data from businesses and households. The five yearly Census of Population and Dwellings is managed as a standalone survey program, providing its own respondent management.

Operational data collection tends to be driven by the business imperatives of acquiring the requisite survey datasets, meeting both delivery date and sample recruitment targets. Respondent management, in this context, is a means to an end and is frequently viewed in terms of its relationship to those immediate business objectives.

The sustainable supply of fit-for-use data poses a more challenging objective for the organisation as a whole. Underpinning this objective is the social licence extended by survey respondents, which reflects not only their views and experiences about providing data, but also their views about the end use and benefits of official statistics and by extension, their views about trust in government.

Survey owners within the organisation, those who use the data to produce and publish the statistics and provide access to the data for subsequent use, have a keener sense of the sustainable and fit-for-use supply imperative. But they also are driven by immediate business operational objectives and, in an increasingly customer-oriented world, are more sympathetic to the demands of users than the needs of data suppliers.

A respondent advocate role was established in Statistics New Zealand in recognition of the need to provide data suppliers with an adequate voice.

2. The New Zealand context

New Zealand has a relatively small population and economy, with some 4.6 million residents and just over 500,000 businesses. Coupled with a fairly comprehensive programme of official population, social, economic and environmental statistics, respondent burden has been relatively high. Around 12,000 businesses are surveyed each year, with sampling fractions directly related to their economic significance.

2.1 Business survey load

While the business survey burden has been relatively high it has, however, declined significantly over the past eight years as the survey programme has been progressively rationalised and more use made of administrative data, substituting for survey data. The administrative data ‘dividend’ is now expected to level out as most of the easy gains have been made.

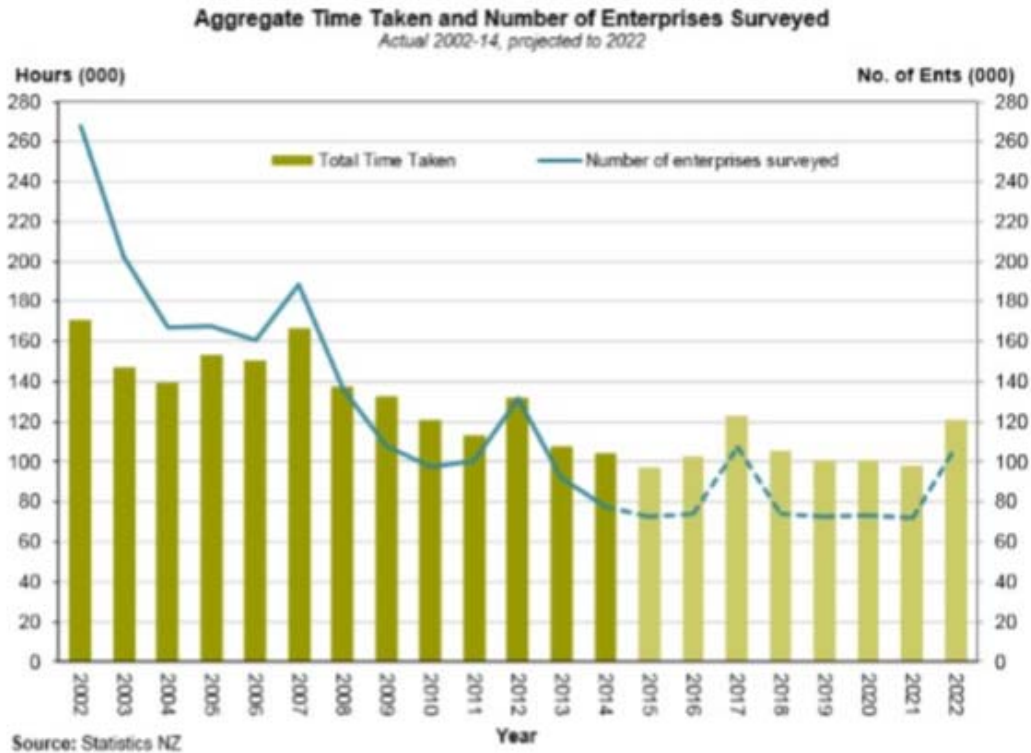


Figure 1: Business survey load: aggregate

These improvements are also reflected in the load on participating businesses. Average loads (time taken to furnish the data) have declined since 2009 and the average number of surveys they are in, since 2011.

Amelioration of business survey load is provided through a ‘hotspot’ review that identifies businesses whose total survey load exceeds specified thresholds. Survey relief is granted to those businesses, conditional on the impact of their absence on the statistical output being manageable. This may mean that the impact on the reliability of the statistical outputs is acceptable, or imputation provides a suitable alternative.

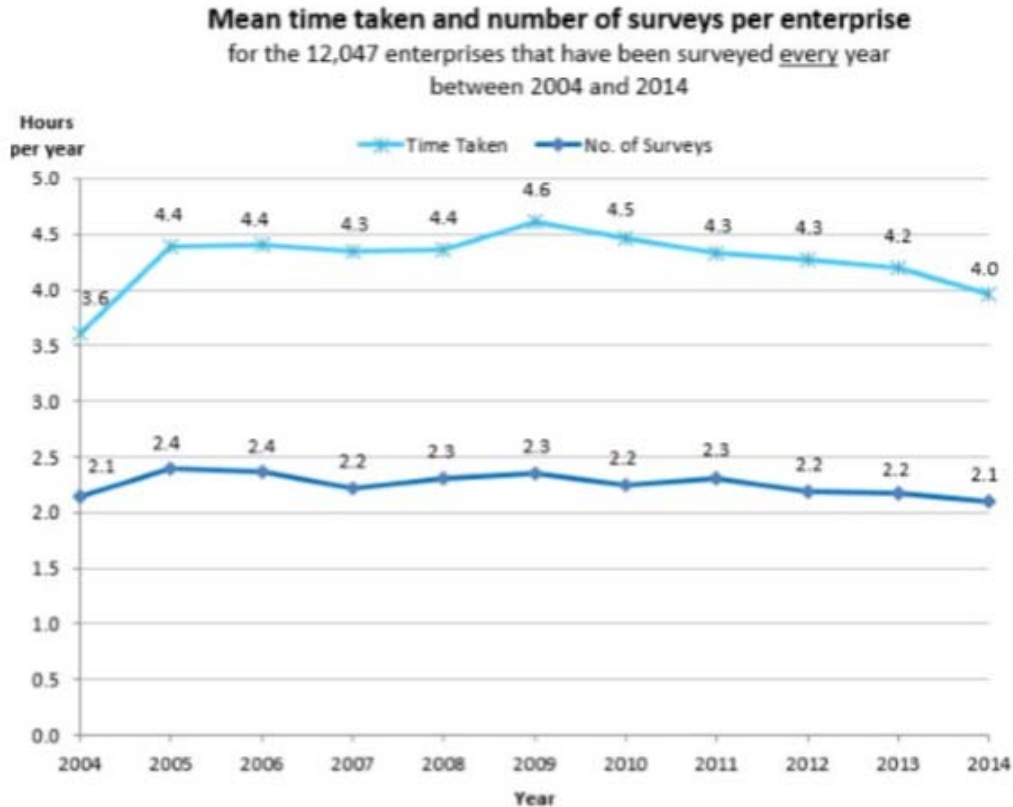


Figure 2: Business survey load: average

2.2 Response rates and complaints

Response rates provide some indication of respondent resistance. In New Zealand, respondents are compelled by law to furnish data requested in surveys undertaken by Statistics New Zealand. The overwhelming majority comply. However, like most countries, we observe gradually declining response rates over time, more acutely in household compared to business surveys. Business surveys display response rates in the range 95-75%, compared to 85-60% for household surveys (the Population Census not included).

Over time, the proportion of respondents who are prepared to comply has not changed much. However, those who resist are pushing back harder. We receive around 500 respondent complaints annually, which are investigated and monitored. This is generally managed within the Collections Operations group and two designated full-time roles undertake the bulk of the investigations and much of the relationship management follow-up. In my role as Respondent Advocate (which comprises 20% of my Principal Statistician role), I investigate the more difficult and complex cases, particularly those that have not been remedied through the Collection Operations processes. These typically require a

degree of tailored relationship management, beyond that provided through the standard relationship management services.

In dealing with complaints from individual respondents, the Respondent Advocate is able to provide gravitas to a response that might otherwise be considered ‘stock and trade’, to offer specific remedy tailored to the circumstances of the respondent, and to recommend improvements to the standard processes and procedures where investigation of the compliant has pointed to shortcomings.

The Respondent Advocate is also in a position to connect more directly the supply of data to the purpose and benefits of the resultant statistical products. My experience is that this is a frequently a critical factor in persuading respondents who are very reluctant or who have initially refused to comply.

Analysis of complaint types indicates that over three quarters of them relate to the conditions under which we conduct the surveys. These are issues which are, to some extent, remedial.

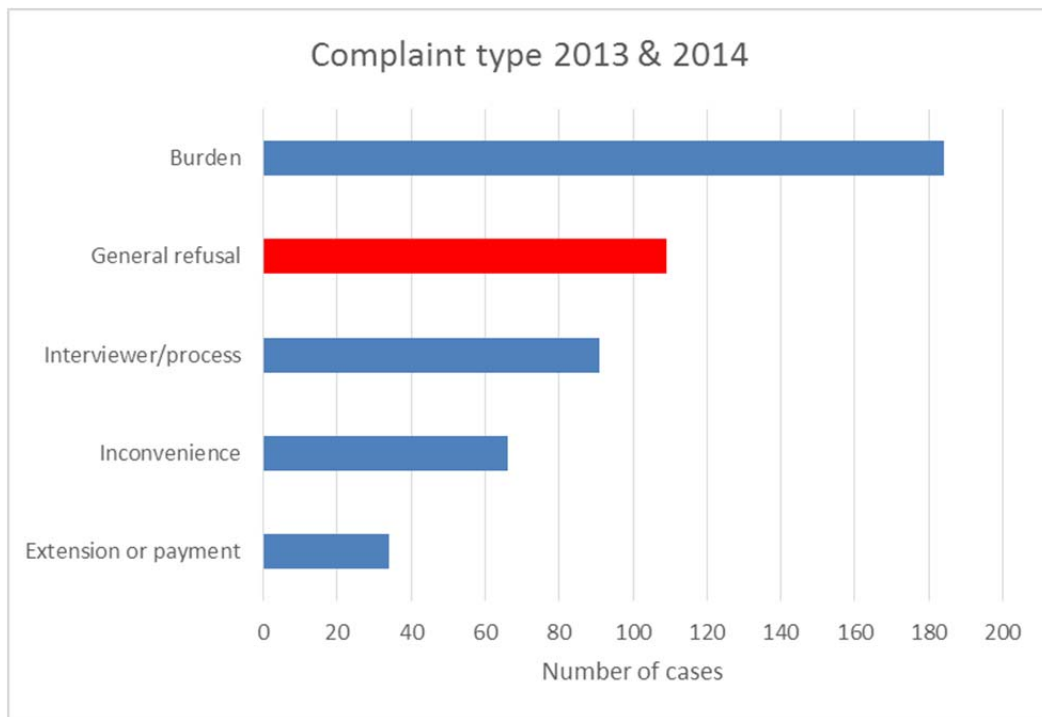


Figure 3: Complaint type

A social licence typology illustrates a possible distribution of respondent motivations. Complaints come mainly from those around and below the legitimacy boundary. However, we should also mind the ‘reluctant accepters’, who may drift into the red over time.

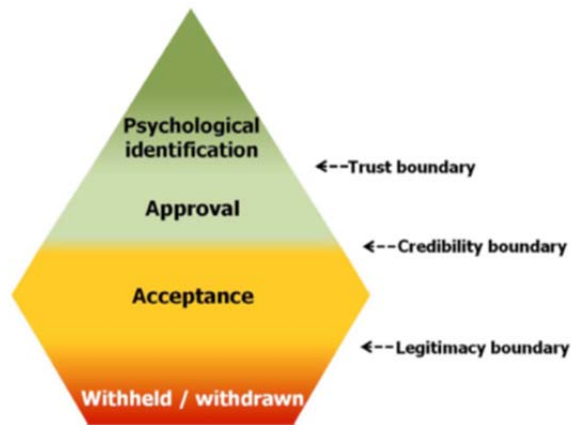


Figure 4: Social Licence typology (Boutiller & Thompson)

3. A Respondent Advocate Perspective

When the Respondent Advocate position was established some eight years ago it was primarily envisaged as a reactive role, providing a ready response to address respondent-related issues, particularly complaints that could not or had not been managed effectively within the Collection Operations systems and processes.

However, it also had an active element promoting (particularly to data suppliers) the purpose and benefits of official statistics, recognising that the social licence that supports the supply of data is rooted in both perception and knowledge of its uses and benefits. My predecessor and I have both sought to make the role more active, by reviewing business strategies and initiatives that impact on respondents, championing policies and programmes that impact on respondents and mentoring staff involved in managing respondent issues.

I will outline a few of the more useful contributions that I think that I and my predecessor have led.

3.1 Business survey respondent load policy

My predecessor, Mike Moore, played a major role in championing and stewarding our thinking and system development around managing respondent load. Central to this was the notion of establishing a respondent perspective in a business that

was built around the conduct of distinct surveys. The resultant policy provided for regular review of the total survey load for each business survey respondent (i.e. number of surveys and average time required to furnish the data). Those business whose load exceeded pre-determined thresholds for a business of their size were eligible for relief. Around two thirds of the eligible businesses are granted sufficient relief to bring them within the load thresholds. The majority of those not granted relief are systemic cases, where the load results from their inclusion in a single survey. There are three such surveys, relating to international investment and local government activity, where the data required are also required for statutory reporting purposes.

3.2 Improvement by design: Using a statutory tool

Our legislation requires us to seek approval of the Minister of Statistics if we intend to make substantive changes to an existing survey or start a new one. The purpose is to provide assurance that the compliance burden imposed by the survey is reasonable and justified by the value of the information generated.

I have used this statutory requirement to institute an efficient standard work process that factors survey respondent interests into the early stages of the (re)design process. In my role as Respondent Advocate, I provide advice to the Government Statistician on the prospective trade-off between the information value and compliance burden of any proposal.

At the start of the development process Business managers must consult with me about the need to seek formal approval. If we deem that formal approval is warranted, the Manager submits a business case addressing the measures that are being taken in the design to minimise burden and enhance respondent experience, and providing assurance that the expected burden will be within reasonable bounds. This provides the basis for seeking an approval-in-principle decision from the Minister. It also provides an opportunity for the Manager to showcase their good work. For almost all initiatives this is sufficient. The Minister is not involved again unless the development process delivers unexpected results, such as an unexpected and unreasonable compliance burden.

3.3 Improving respondent support services

Efficient customer servicing in a business generally starts with allocating resource to customer segments in relation to their value to the business. Translating this into the context of survey respondent management, this means prioritising respondents in relation to their relative contribution to the statistical output. Consequently, we apply to business survey respondent servicing the segmentation that we use for the design of the survey samples (i.e. economic significance).

In our case, a Key Account unit provides individualised services to the top 100 business survey respondents. This helps to ensure a sustainable supply of quality data and has provided a basis to support valuable initiatives around respondent-centred data supply agreements, reducing compliance burden considerably.

While I wholeheartedly support such initiatives, I have a concern that the basis of the service is biased towards those who can deliver, and does not take enough account of respondent capability. My observations of dealing with and analysing business survey complaints over several years indicated to me an unrecognised segment that I characterise as ‘statistically important, but with low compliance capability’ Typically, these are medium to large businesses, employing significant staff and generating significant revenue. They tend to have minimal corporate resource, with the managing director typically doubling as the accounts clerk. Consequently, responding to government surveys is typically done by the managing director at home at night after dinner. I also noted that while there was not a large number, they tend to be serial complainants and therefore worthy of some investment.

I have been successful in persuading the Data Collections group to extend the scope of the Key Account Unit to accommodate this segment. This entails some one-on-one consultancy to identify options to manage the burden down. Examples of ameliorative measures include identifying more efficient means of furnishing the required data and providing an advance calendar of survey requests. This sounds simple, but the personal attention pays dividends and gives a strong signal to the respondent, and others they are connected with, that this government agency has a human face and listens to them.

4. Other Issues and Initiatives impacting of data supply and suppliers

In this section I will touch on some issues and initiatives relevant to data supply and suppliers, where I seek to promote a Respondent Advocate perspective.

4.1 Business survey re-engineering

In common with many other NSOs we are progressively re-engineering our business survey processes to make better use of our list frame and our capabilities to integrate data from different sources. An obvious innovation has been data re-use, obviating the need to collect some bespoke survey data.

Another is a re-imagining of the survey process, putting respondents at the centre rather than the survey topics. As a result we are in the process of consolidating a number of previously distinct surveys into a single survey containing multiple topics and directed to a range of industry segments. My view as Respondent Advocate is that this is a great innovation, so long as consolidation does not result

in unreasonable respondent burden. My experience of business survey respondents is that they appreciate having to do fewer surveys.

4.2 Social licence and data re-use

Data re-use is posing some very interesting opportunities and challenges for NSOs throughout the world. On the one hand we seek to make more and better use of existing data so that we can reduce survey compliance burden and reduce the costs of statistical production. On the other hand, customers are demanding more and better access to more granular data to satisfy their information needs beyond those served by the use of the headline indicators that we produce as part of our core business.

As we venture into the data ecosystem we need to understand better how we must engage and operate. As collectors of bespoke survey data we can focus primarily on our respondents and exercise a direct and immediate influence on what data is collected, how and the manner of its use. As data re-users we become part of a broader community of data users and the scope of our activity in regard to both bespoke and re-used data is likely to be influenced by the ways in which we use the data and other players in the community use it. This suggests a broader scope for the advocacy role on the one hand, and a more active engagement in negotiating the social licence that we and others need to ensure that our use does not undermine the ongoing supply of data.

Statistics New Zealand hosts the Secretariat to New Zealand's *Data Futures Partnership*, a cross sector group mandated by Government to engage with citizens, the private sector and non-government organisations to help drive change across New Zealand's data-use ecosystem. The Partnership aims to promote data-driven innovation in an ethical, inclusive and trusted way that will deliver benefits to all New Zealanders. An important element of the working group's remit will be to actively canvass social licence pertaining to re-use of data across a wide range of purposes, of which the production of official statistics is but one.

As Statistics New Zealand ventures further into the data ecosystem it will need to exercise increasingly active advocacy around its use of the data and the protection and consideration that it affords to those who have furnished the data. There is a myriad of issues in this space, too numerous to address in this paper. However, I think that transparency of intent and practice, promoted through effective communication, will be crucial to navigating a successful way forward. This will require investment over and above that directed to the traditional production and dissemination functions of the NSO.

4.3 Legislation review

Statistics New Zealand is in the process of reviewing its enabling legislation, the Statistics Act 1975. Like most legislation of that era directed to the production of

official statistics, the Act empowers the NSO to collect data for the purposes of producing official statistics. While reuse of data is acknowledged, the Act is more concerned about the conditions under which survey data may be collected and used. The NSO is vested mandatory powers of collection, which are balanced by obligations to ensure statistical use only and to protect respondent confidentiality.

The legislation has served well over its 40 years of use, but changes in the technology of statistical production, the sources of data and the demand for extraction of more value from the data, now challenge its capabilities. One aspect, is the confidentiality provisions which place severe constraints on the value that can be extracted from the data. My view is that there needs to be more attention to harm management than sole reliance on technical methods to minimise disclosure risk. I believe that harm management, informed by active social licence, provides better opportunity to extract more value from data, while honouring the interests of those who supplied the data.

Another aspect is the acquisition of existing data for re-use. Re-use data is frequently held by third parties, so the link between the entities or persons who originally provided the data and the official statistician is tenuous. Our legislation enables us to obtain data from third parties, but the powers to compel supply are not as evident as they are when we obtain bespoke data via a survey.

Re-use of personal data in New Zealand is governed by the Privacy Act 1993, which while placing strong controls of the re-use of identifiable data, is much more permissive of de-identified data for statistical and research purposes. That said, neither the Statistics nor Privacy Acts provide clear guidance on how we might ensure a sustainable supply of these data of the quality we need.

Among the issues we will seek to address in our legislation review, are the conditions under which we can obtain and re-use data that has been collected for other purposes. Also, how we might exercise influence to assure the quality of the data. These are issues that have been and are being addressed by a number of other NSOs as they grapple with the same problems.

Review of our legislation is likely to invite questions about the need for compulsory powers to acquire data, be it bespoke survey data or existing data. As Respondent Advocate I admit to being conflicted on this point. My initial inclination is to argue that the NSO should not need compulsory powers to obtain data and should invest more in securing the requisite social licence by promoting the value of the data. Having said that, I am cognizant that, in New Zealand at least, the compulsory acquisition provisions do more to signal the value the data than effect universal compliance. This is reflected in the fact that we exercise considerable discretion in prosecuting our powers. And my experience in dealing with respondents is that mandatory compliance is frequently a 'satisficing' factor in decisions to comply, placing people and entities in the 'acceptance' zone of the social licence typology.

5. Conclusion

In this paper I have not attempted to provide a comprehensive and coherent review of the strategy and programmes of work that Statistics New Zealand undertakes to ensure effective management of survey respondents. Instead, I have sought to provide some insights into my role as Respondent Advocate and to touch on some of the emergent issues that excite and motivate me in this role.

As I have pointed out, the role demands some 20 percent of my time, the other 80 percent being devoted to my Principal Statistician duties. I believe that the role makes a useful contribution in representing the interests of respondents and I have sought to progressively embed an advocate perspective into the design and operational activities of the office that impact on respondent interests.

Acknowledgement

I would like to acknowledge the assistance of my colleague, Ron McKenzie, who reviewed this paper and provided valuable advice. I remain responsible for any views expressed.

References

Boutilier, R & Thomson , I (2011) [Modelling and Measuring the Social Licence to operate: Fruits of a dialogue between theory and practice.](#)

[New Zealand Data Futures Partnership](#)

[New Zealand Privacy Act 1993](#)

[New Zealand Statistics Act 1975](#)