

From: [REDACTED]@hotmail.co.uk>
Sent: 19 January 2022 10:40
To: regulation@statistics.gov.uk
Subject: Scottish Independence Poster Claim

You don't often get email from [REDACTED]@hotmail.co.uk. [Learn why this is important](#)

I saw this poster in the shop window of a Scottish Independence shop in Scotland. I went in to ask to see the figures/ calculations behind the claim and was told it was an aspiration. Can political pressure groups / parties do this ?

Anyway I have attached a photo of the said poster . I would appreciate it if you could give me your advice re if it is legal to make this claim.

Yours Sincerely

[REDACTED]



Sent from my Galaxy

From: regulation@statistics.gov.uk <regulation@Statistics.gov.uk>
Sent: 19 January 2022 11:21
To: DG Regulation <DG.Regulation@Statistics.gov.uk>
Cc: [REDACTED]@Statistics.gov.uk>; Gregory, Mary
[REDACTED]@Statistics.gov.uk>
Subject: FW: Scottish Independence Poster Claim

Hi!

From the regulation mailbox, no holding reply sent yet. Appreciate a second view as to whether we should take it on or not. Same claim as in photo is online:
<https://www.believeinscotland.org/pensions/> In 2018, it was only worth 28.4% of average income at retirement (based on the net replacement rate).

The link from there takes you to: <https://data.oecd.org/pension/net-pension-replacement-rates.htm#indicator-chart>

2020 seems to be the most recent, and it's now 58%.

So not probably within our remit but maybe an example of using 'not most recent' data that we seem to be seeing a lot of! Let me know how you think we should approach.

██████████

From: ██████████@Statistics.gov.uk
Sent: 19 January 2022 12:03
To: regulation@statistics.gov.uk; DG Regulation <DG.Regulation@Statistics.gov.uk>
Cc: Gregory, Mary <██████████@Statistics.gov.uk>
Subject: RE: Scottish Independence Poster Claim

Hi,

I agree that I don't think this comes under our remit; they aren't official statistics (as far as I was aware) but yes you're right that it's a use of out of date statistics. However, it's hard to tell when the webpage was published so there is a chance when it was published it was still in date (and who knows when the person put up the photo in the shop window). I don't think we should class it as casework personally, any thoughts Mary?

Thanks,

██████████

From: Gregory, Mary <██████████@Statistics.gov.uk>
Sent: 19 January 2022 12:10
To: ██████████@Statistics.gov.uk; regulation@statistics.gov.uk; DG Regulation <DG.Regulation@Statistics.gov.uk>
Subject: RE: Scottish Independence Poster Claim

Hi,

I can see a strong case for saying it's outside our remit, but my reservation is that if this were one of the major parties saying it in parliament I think we would see it for us, so I think it might be worth asking the LM&W domain to take a quick look and see if they have a view.

Like you say, it may just be out of date, but they can hopefully just take 15-20 mins to check it out and then we can decide how bad it seems?

Thanks!

██████████

From: regulation@statistics.gov.uk <regulation@Statistics.gov.uk>
Sent: 19 January 2022 16:24
To: [REDACTED] Statistics.gov.uk>; [REDACTED] <[\[REDACTED\]@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>; [REDACTED] [\[REDACTED\]@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>
Subject: FW: Scottish Independence Poster Claim

Hi there!

Some other correspondence we'd appreciate a look at, possibly not in our remit, but would appreciate you giving it a quick shake.

Thanks

[REDACTED]

From: [REDACTED] Statistics.gov.uk>
Sent: 20 January 2022 14:49
To: regulation@statistics.gov.uk; [REDACTED] Statistics.gov.uk>; [REDACTED] Statistics.gov.uk>
Subject: RE: Scottish Independence Poster Claim

Hello,

Sorry I've been slow to reply. I think it probably merits a proper look into as from a quick glance of published info, it looks a little complicated. I should have time on Monday to look into it, if it isn't urgent?

In short, I agree with Mary that had any major political party said this, we would intervene, so I think it may be worth us dropping an email to the organisation if we do have concerns.

A couple of things I've found from a quick scan:

- The latest data were only published last month (Dec 21) so it could be that the advertising material is outdated. Still strange though that they would use data from 2018 when data for 2019 are available, although the 2019 figure was similar to 2018.
- The situation in the UK does appear to have improved in the latest data but given this reflects the period during the pandemic, it may be skewed by the increase we've seen in average earnings in the UK (which represent those on low wages leaving the labour market as opposed to people actually seeing increases in their pay)
- The House of Commons Library have a [good explainer](#) on how to make appropriate comparisons of pension schemes between countries, which suggests the measure chosen by Believe in Scotland is the right one to be using ordinarily.

That's my starter for 10 – let me know what you think.

Thanks,

[REDACTED]

[REDACTED] | [Office for Statistics Regulation | UK Statistics Authority](#)
[statistics.gov.uk](#)
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

From: regulation@statistics.gov.uk <regulation@Statistics.gov.uk>

Sent: 20 January 2022 15:59

To: [REDACTED]@Statistics.gov.uk; regulation@statistics.gov.uk; [REDACTED],
[REDACTED]@Statistics.gov.uk; [REDACTED]@Statistics.gov.uk; Gregory, Mary [REDACTED]@Statistics.gov.uk>

Subject: RE: Scottish Independence Poster Claim

Thanks [REDACTED]

I'll send a holding reply for now and next week would be great. I'll log it as CW and we can discuss how to classify the closing of it when we cross that bridge!

Mary does that all sound alright for you?

[REDACTED]

From: Gregory, Mary [REDACTED]@Statistics.gov.uk>

Sent: 20 January 2022 20:27

To: regulation@statistics.gov.uk; [REDACTED]@Statistics.gov.uk; [REDACTED]
[REDACTED]@Statistics.gov.uk; [REDACTED]@Statistics.gov.uk>

Subject: RE: Scottish Independence Poster Claim

Thanks everyone.

Sounds good to me, much appreciated!

Mary

From: "regulation@statistics.gov.uk" <regulation@Statistics.gov.uk>

Date: 21/01/2022 08:38 (GMT+00:00)

To: [REDACTED]@hotmail.co.uk>

Subject: RE: Scottish Independence Poster Claim

Dear [REDACTED]

Thanks for getting in touch with the Office for Statistics Regulation. I've passed your concerns on to our team regarding the use of the figures behind the claim, and although it may fall outwith our remit, we're happy to look into this and get back to you.

Kind regards,

[REDACTED]

Regulation@statistics.gov.uk

Office for Statistics Regulation | UK Statistics Authority

[@StatsRegulation](#) | osr.statisticsauthority.gov.uk

From: [REDACTED]@hotmail.co.uk>
Sent: 21 January 2022 08:46
To: regulation@statistics.gov.uk
Subject: RE: Scottish Independence Poster Claim


You don't often get email from [REDACTED]@hotmail.co.uk. [Learn why this is important](#)

Hi [REDACTED]
Many thanks.
Regards
[REDACTED]

Sent from my Galaxy

From: [REDACTED]@Statistics.gov.uk>
Sent: 04 February 2022 11:50
To: Gregory, Mary [REDACTED]@Statistics.gov.uk>
Cc: DG Regulation <DG.Regulation@Statistics.gov.uk>
Subject: RE: Scottish Independence Poster Claim

Hello,

Sorry for the incredibly slow turnaround on this one – here is the  [briefing](#) on the pensions claim from Believe in Scotland. Let me know if you have any questions.

Thanks,
[REDACTED]

[REDACTED] | [Office for Statistics Regulation | UK Statistics Authority](#)
[statistics.gov.uk](#)
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

From: DG Regulation <DG.Regulation@Statistics.gov.uk>
Sent: 04 February 2022 11:58
To: [REDACTED]@Statistics.gov.uk>; Gregory, Mary <[REDACTED]@Statistics.gov.uk>
Cc: DG Regulation <DG.Regulation@Statistics.gov.uk>
Subject: RE: Scottish Independence Poster Claim

Super briefing, thanks [REDACTED]. Your recommendation and draft response look sensible to me – the only thing I wondered was whether it would be helpful to note in the response that ASA have previously investigated the advertising campaign? But if we did we'd probably want to link to a source which isn't the Believe in Scotland website! I don't know if ASA would have something on their website about it.

[REDACTED]

From: Gregory, Mary <[REDACTED]@Statistics.gov.uk>
Sent: 06 February 2022 23:38
To: DG Regulation <DG.Regulation@Statistics.gov.uk>; [REDACTED]

[REDACTED]@Statistics.gov.uk>

Subject: RE: Scottish Independence Poster Claim

Thanks from me too!

I just had a couple of questions. Do we know the status of Believe in Scotland? I wondered if we should be considering getting in touch informally with them? I also wasn't sure how wide spread the campaign is (and it sounds like we don't know).

Thanks,
Mary

From: [REDACTED] Statistics.gov.uk>

Sent: 07 February 2022 11:15

To: Gregory, Mary [REDACTED] Statistics.gov.uk>; DG Regulation
<DG.Regulation@Statistics.gov.uk>

Subject: RE: Scottish Independence Poster Claim

I can't quite work it out. It looks like they're a campaign/lobby group promoting Scottish independence but not affiliated with a particular party – it says "BelieveinScotland.org is managed by the team at BusinessforScotland.com, one of Scotland's leading business networks and largest private sector economics and policy think tanks."

I did also wonder about reaching out to them to say someone had raised concerns with us and to ask them to use the latest data but I wasn't sure if they would just turn around and tell us the poster is old. Happy to draft something if helpful.

On ASA, I've really struggled to find anything formal on their website about this case. I had originally included a reference to it in the response but I was nervous about putting too much weight on ASA's verdict when I have only seen Believe in Scotland's summary of it. This [tweet](#) I found also implies that BIS may also have slightly misrepresented why ASA didn't act on the concerns.

Thanks,

[REDACTED]

[REDACTED] | [Office for Statistics Regulation | UK Statistics Authority](#)
[statistics.gov.uk](#)
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

From: Gregory, Mary <[REDACTED]@Statistics.gov.uk>

Sent: 07 February 2022 11:25

To: [REDACTED] Statistics.gov.uk>; DG Regulation
<DG.Regulation@Statistics.gov.uk>


Subject: RE: Scottish Independence Poster Claim

I think let's just send an informal email to them, we can then say in the response we've highlighted the info is out of date. I can't remember now what you said about the info on the website, but is that also out of date? In which case that might be the

thing to focus on? (if it's not out of date then i think less value in getting in touch – either way good the source was there and you were able to find it)

Mary

From: [REDACTED] Statistics.gov.uk>
Sent: 10 February 2022 09:54
To: Gregory, Mary [REDACTED]@Statistics.gov.uk>; DG Regulation <DG.Regulation@Statistics.gov.uk>
Subject: RE: Scottish Independence Poster Claim

So helpfully for us, they put out an article last week where the Daily Mail had criticised the use of the poster (which suggests its still in active use) where they've stuck to the line that the UK pension is one of the worst in the world. This means we have something tangible to message them about. I've updated  [the briefing](#) to include this article and the draft response to Believe in Scotland.

Thanks,

[REDACTED]

[REDACTED] | [Office for Statistics Regulation | UK Statistics Authority](#)
[statistics.gov.uk](#)
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

From: DG Regulation <DG.Regulation@Statistics.gov.uk>
Sent: 10 February 2022 10:01
To: [REDACTED] [Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>; Gregory, Mary <[\[REDACTED\]@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>
Subject: RE: Scottish Independence Poster Claim

Thanks [REDACTED] Just two minor suggestions from me on the email to Believe in Scotland – might be helpful to include a link to our website at the start, and wonder if the very last phrase is needed (from 'rather than...')? Maybe just feels a bit inflammatory (though of course is correct!)

[REDACTED]

From: [REDACTED] Statistics.gov.uk>
Sent: 10 February 2022 12:07
To: DG Regulation <DG.Regulation@Statistics.gov.uk>; Gregory, Mary <[\[REDACTED\]@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>
Subject: RE: Scottish Independence Poster Claim

Thanks [REDACTED] – both good suggestions which I've added in 😊

[REDACTED]

[REDACTED] | [Office for Statistics Regulation | UK Statistics Authority](#)
[statistics.gov.uk](#)
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

From: Gregory, Mary <[REDACTED]@Statistics.gov.uk>
Sent: 11 February 2022 09:09
To: [REDACTED]@Statistics.gov.uk>; DG Regulation <DG.Regulation@Statistics.gov.uk>
Subject: RE: Scottish Independence Poster Claim

Thanks [REDACTED]. I think this looks good.

I've made a few minor suggestions/comments, then do you want to get it to Ed for sign off.

I also wondered if you had a contact address for Believe in Scotland? And should we let [REDACTED] know that we're doing it (perhaps just copy in when it goes to Ed) given it's an organisation with a political affiliation – they may even want to get in touch themselves.

Thank you !

Mary

From: [REDACTED]@Statistics.gov.uk>
Sent: 11 February 2022 10:32
To: Gregory, Mary [REDACTED]@Statistics.gov.uk>; DG Regulation <DG.Regulation@Statistics.gov.uk>
Subject: RE: Scottish Independence Poster Claim

Thanks Mary – I've made the changes and I'll send it on to Ed now with Ross copied in.

I've struggled to find a named contact but they do have a general enquiries inbox info@BelieveinScotland.org . Do we think that's ok to address it to?


Thanks,

[REDACTED]

[REDACTED] | [Office for Statistics Regulation | UK Statistics Authority](#)
[REDACTED]@statistics.gov.uk
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

From: [REDACTED]@Statistics.gov.uk>
Sent: 11 February 2022 10:36
To: Humpherson, Edward [REDACTED]@statistics.gov.uk>; Tivey, Ross [REDACTED]@Statistics.gov.uk>
Cc: Gregory, Mary [REDACTED]@Statistics.gov.uk>; DG Regulation <DG.Regulation@Statistics.gov.uk>
Subject: Casework - Believe in Scotland pensions claim

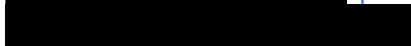
Morning both,

We've had some casework in about an advertising campaign run by an organisation called Believe in Scotland – briefing attached and  [saved here](#). We haven't been able to find the ASA's findings on this case so have tried not to place too much weight on the fact they didn't intervene, particularly given this [twitter thread](#).

Let me know what you think.


Thanks,




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Briefing – Pensions claim by the Believe In Scotland independence party

Issue

1. On 19 January 2022,  emailed OSR to question a claim made in a poster by an organisation called Believe in Scotland – a Scottish independence organisation. The poster claimed that “The UK has the worst state pension in the developed world.”
2. When the complainant queried what figures underpinned the claim, they were told by shop staff that the claim was an aspiration. The complainant has therefore asked OSR whether it is legal for politically affiliated organisations to use data in this way.

Recommendation

3. We recommend that we:
 - i. Respond privately to  with our findings.
 - ii. Contact Believe in Scotland to make them aware that the latest data do not support the argument. Draft responses are provided at the end of this briefing.

Conclusion

4. The advertising campaign run by Believe in Scotland took place across 2020 and 2021, at which point the data they were using was the most up to date data available for comparing pensions across countries.
5. The campaign was subject to a [review](#) by the Advertising Standards Agency (ASA) following multiple complaints about the claims being made on the billboards. Believe in Scotland state that ASA did not rule to remove the advertising campaign as the organisation was able to provide data to support the argument.
6. The latest OECD publication on '[Pensions at a Glance 2021](#)' was published on 8 December 2021. The latest data show a marked improvement for the UK, which while it is still below the OECD and EU averages, is no longer towards the bottom end of the distribution.
7. Believe in Scotland appear to have updated this marketing material at some point to say that the UK has the worst basic state pension in the developed world. This is still incorrect when looking at the latest data. It published [an article](#) on 3 February 2022, defending the use of these statistics.

Background

8. The task of comparing pension provision in the UK with that of other countries is complicated by substantial differences in the structure of pension systems across the world. Income from occupational and personal pensions is a relatively important source of pensioner income in the UK, in contrast to many other countries where state provision is dominant.
9. An alternative basis for comparison is pension replacement rates which illustrate the effectiveness of each country's pension system at sustaining workers' living standards as they enter retirement. The net replacement rate is defined as the individual net pension entitlement divided by net pre-retirement earnings, taking account of personal income taxes and social security contributions paid by workers and pensioners.
10. The OECD publishes a biennial report called 'Pensions at a Glance' which covers pension systems across OECD and G20 countries. The report presents modelled net replacement rates for each member country, based on what a typical pensioner would receive after earning a given percentage of average earnings over their working lifetimes. The figures show the hypothetical level of pension which people would receive if they work for a full career and if today's pension rules remain unchanged. They provide a comparison of the projected long-term outcomes of today's pension policies, which is not necessarily the same as the pensions received by today's pensioners. Consistent economic assumptions are used for all countries to focus the comparison on systemic factors.
11. In 2018, the analysis showed that the UK had a net replacement rate of 28.4% from mandatory pensions, which was one of the lowest across the countries included in the report. It was also well below the OECD average of 58.6% and the EU average of 63.5%.
12. When voluntary provision was included in the calculation, the UK's net replacement rate was 61.0%, which was still below the OECD and EU averages.
13. In 2021, the UK had a net replacement rate of 58.1% from mandatory pensions. While this remained lower than the OECD and EU averages at 62.4% and 66.7% respectively, it was no longer towards the lowest end of the distribution.
14. The OECD analysis did not contain a voluntary provision calculation for the UK in 2021 as it now classes the UK's pension provision system as 'quasi-mandatory' due to the increased coverage of pension provision that has occurred from auto-enrolment.

Draft response to complainant

Dear [REDACTED]

Thank you for your email of 19 January 2022 concerning a poster by the organisation Believe in Scotland.

We are aware that the poster is part of a wider advertising campaign run by Believe in Scotland during 2020 and 2021. On its website, the organisation provides a source to the underlying data which are from a report on '[Pensions at a Glance 2019](#)' by the Organisation for Economic Co-operation and Development (OECD). The report contains modelled analysis for each member country, based on what a typical pensioner would receive after earning a given percentage of average earnings over their working lifetimes. The figures show the hypothetical level of pension which people would receive if they work for a full career and if today's pension rules remain unchanged.

At the time of the campaign being launched, the figure used in the poster was correct and the most up to date data available for comparing pensions across countries.

The latest OECD report on '[Pensions at a Glance 2021](#)' was published on 8 December 2021. The latest data show a marked improvement for the UK, which while it is still below the OECD and EU averages, is no longer towards the bottom end of the distribution of pension provision in the OECD membership.

At the time of your query, we did not know if Believe in Scotland were actively continuing to use this advertising material or if the store was displaying an old poster. However, we have since seen [the article](#) published by Believe in Scotland which continues to use these out-of-date figures. We have therefore written to the organisation to make them aware that the latest data don't support its argument.

Our remit concerns official statistics and therefore we cannot comment on the legality of the use of these data in advertising. We'd recommend you contact the [Advertising Standards Agency](#) should you wish to raise a complaint.

Draft response to Believe in Scotland

Dear Believe in Scotland,

As the UK Statistics Authority's regulatory arm, the [Office for Statistics Regulation](#) is responsible for managing its casework function, undertaking monitoring to identify issues and investigating issues raised with the Authority. We use our voice to stand up for statistics and to represent the public, reporting publicly where we have concerns and highlighting good practice.

We received concerns regarding a poster by Believe in Scotland which claims that "The UK pays the worst state pension in the developed world". It is good that when you first launched this marketing campaign, you provided a source to the underlying data on your website, which was the '[Pensions at a Glance 2019](#)' by the Organisation for Economic Co-operation and Development (OECD). At the time of the campaign being launched, and until recently, the figure used in the poster was correct and the most up to date data available for comparing pensions across countries.

However, the latest OECD report on '[Pensions at a Glance 2021](#)' was published on 8 December 2021. The latest data show a marked improvement for the UK, with a net replacement rate of 58.1% from mandatory pensions. While this remained lower than the OECD and EU averages at 62.4% and 66.7% respectively, it was no longer towards the lowest end of the distribution.

The OECD analysis did not contain a voluntary provision calculation for the UK in 2021 as it now classes the UK's pension provision system as 'quasi-mandatory' due to the increased coverage of pension provision that has occurred from auto-enrolment.

This therefore no longer supports the claim made in your marketing material. We would suggest you update this claim to refer to valid comparisons with the OECD and EU.

From: Humpherson, Edward [REDACTED]@statistics.gov.uk>

Sent: 11 February 2022 10:44

To: [REDACTED]@Statistics.gov.uk>; Tivey, Ross [REDACTED]@Statistics.gov.uk>

Cc: Gregory, Mary [REDACTED]@Statistics.gov.uk>; DG Regulation <DG.Regulation@Statistics.gov.uk>

Subject: RE: Casework - Believe in Scotland pensions claim

[REDACTED]

I have some questions about this – the scope of our work, the OECD analysis, and the ASA role. Could we have a quick meeting to discuss?

[REDACTED]

From: [REDACTED]@Statistics.gov.uk>
Sent: 14 February 2022 09:02
To: Tivey, Ross [REDACTED]@Statistics.gov.uk>; DG Regulation <DG.Regulation@Statistics.gov.uk>
Subject: RE: Casework - Believe in Scotland pensions claim

Hi Ross,

Hope you had a nice weekend! I just wanted to follow up on the call last week about whether you had a working level contact for ASA I should message about the pensions casework?

DG Reg – Ed also suggested I should copy in [REDACTED] Could you share their email address with me please?

Thanks,

[REDACTED]

[REDACTED] | [Office for Statistics Regulation | UK Statistics Authority](#)
[REDACTED]@statistics.gov.uk
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

From: DG Regulation <DG.Regulation@Statistics.gov.uk>
Sent: 14 February 2022 09:31
To: [REDACTED]@statistics.gov.uk>
Subject: FW: Casework - Believe in Scotland pensions claim

Hi [REDACTED]

Do you have [REDACTED] email address you could share with [REDACTED] please?

Apologies I don't know who he is or if we're able to share his contact details?

Thanks,

[REDACTED]

From: [REDACTED]@statistics.gov.uk>
Sent: 14 February 2022 10:31
To: [REDACTED]@Statistics.gov.uk>
Cc: DG Regulation <DG.Regulation@Statistics.gov.uk>; Tivey, Ross [REDACTED]@Statistics.gov.uk>
Subject: RE: Casework - Believe in Scotland pensions claim

Thanks [REDACTED]

Hi [REDACTED],

Please see enclosed contact details for [REDACTED] as requested.

[REDACTED]@asa.org.uk

Please shout if you need anything else.

BW,

From: [REDACTED]@Statistics.gov.uk
Sent: 14 February 2022 10:40
To: [REDACTED]@statistics.gov.uk
Cc: DG Regulation <DG.Regulation@Statistics.gov.uk>
Subject: RE: Casework - Believe in Scotland pensions claim

Thank you! 😊

[REDACTED] | [Office for Statistics Regulation | UK Statistics Authority](#)
[statistics.gov.uk](#)
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

From: Tivey, Ross <[REDACTED]@Statistics.gov.uk>
Sent: 15 February 2022 08:56
To: [REDACTED]@ASA.Org.UK>
Cc: [REDACTED]@Statistics.gov.uk>
Subject: [External] Believe in Scotland

Hi [REDACTED]

Thanks for the call just now. Here's the link as discussed: [ASA rejects Unionist complaints over independence campaign's pensions billboards](#). Interested to know what you found and whether this is still a live case for you – feel free to give me a call later if easier.

Thank you
Ross

Ross Tivey | Private Secretary to the Chair, Sir David Norgrove
[UK Statistics Authority](#) | 1 Drummond Gate, London SW1V 2QQ
[REDACTED]@statistics.gov.uk

For information on the work of the UK Statistics Authority, visit:
<http://www.statisticsauthority.gov.uk>

From: [REDACTED]@ASA.Org.UK>
Sent: 15 February 2022 09:52
To: Tivey, Ross [REDACTED]@Statistics.gov.uk>
Cc: [REDACTED]@Statistics.gov.uk>
Subject: RE: Believe in Scotland

You don't often get email from [REDACTED]@asa.org.uk. [Learn why this is important](#)

Hi Ross

Good to chat to you earlier and thanks for your follow-up email.

I've looked into this and I can confirm that we received 127 complaints about the Business for Scotland (Believe in Scotland) ad campaign (they came in this time last year). We assessed the complaints and the ad campaign to establish whether there were grounds for any action, e.g. launching an investigation. We considered the material fell outside our remit because it was political advertising (for the purposes of our Code) and therefore closed the case.

Political advertising falls outside the UK Advertising Code: Rule 7.1 states "Claims in marketing communications, whenever published or distributed, whose principal function is to influence voters in a local, regional, national or international election or referendum are exempt from the Code"

Having read the Business for Scotland blog piece I think they've perhaps embellished things slightly. We were not 'moved' to take action, not because we didn't think complainants may have raised a legitimate concern but because it fell outside our remit. The complainants' concerns were not for us to comment on either way, in any form of assessment.

In responding to complainants to explain our decision we stated:

The principal function of the ad is to influence people, including potential voters, in a referendum on Scottish Independence. Although no referendum has been called, clearly there could be one in the future. The ASA Council has always interpreted the "whenever published or distributed" wording in the rule to mean that an ad/advertising claim can be political – and therefore fall outside the Code – even if no election or referendum has been called. We have therefore concluded that the ad is exempt from the Code. For that reason, we will not be taking your complaint further. You may find our guidance on [political advertising](#) of interest.

We recommended that they raised their concerns with their MP/MSP.

I hope that all makes sense and clarifies things.

Do let me know if you have any further questions.

Best wishes







Read our [2020 Annual Report](#)

Legal, decent, honest and truthful

From: Tivey, Ross [redacted]@Statistics.gov.uk>
Sent: 15 February 2022 10:14
To: [redacted]@ASA.Org.UK>
Cc: [redacted]@Statistics.gov.uk>
Subject: RE: [External] Believe in Scotland

Hi [redacted]

Thanks for the quick reply, that's really helpful to know. We'll let you know what we decide to do with it, just for your info. For what it's worth I think our initial view was that the claim was essentially correct when published, but has now fallen a little behind the published research on which it depends.

[redacted]

Many thanks
Ross

From: [redacted]@ASA.Org.UK>
Sent: 15 February 2022 12:10
To: Tivey, Ross [redacted]@Statistics.gov.uk>
Cc: [redacted]@Statistics.gov.uk>
Subject: RE: [External] Believe in Scotland

You don't often get email from [redacted]@asa.org.uk. [Learn why this is important](#)

Hi Ross

I appreciate you keeping us posted on where you end up on this.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Best wishes

[REDACTED]

[REDACTED]

[REDACTED]

Read our [2020 Annual Report](#)

Legal, decent, honest and truthful

From: [REDACTED]@Statistics.gov.uk>
Sent: 15 February 2022 14:18
To: [REDACTED]@asa.org.uk
Cc: DG Regulation <DG.Regulation@Statistics.gov.uk>
Subject: OSR casework on Believe in Scotland billboard campaign

Hi [REDACTED],

I hope you're well.

I just wanted to flag to you on Ed Humpherson's behalf that we've received some casework concerning a figure used in a billboard campaign run by the organisation Believe in Scotland. In investigating the complaint, we uncovered that ASA has previously looked at this campaign so your colleague [REDACTED] has been a huge help in bringing us up to speed on that case.

We can let you know what we end up doing in response to the complaint but at this stage, we envisage the response being private and informal. Do let me know if you have any questions about the case.

Thanks,

[REDACTED]

[REDACTED] [Office for Statistics Regulation | UK Statistics Authority](#)
[@statistics.gov.uk](#)
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

From: [REDACTED]@ASA.Org.UK>
Sent: 15 February 2022 14:43
To: [REDACTED]@Statistics.gov.uk>
Cc: DG Regulation <DG.Regulation@Statistics.gov.uk>; [REDACTED]@ASA.Org.UK>
Subject: RE: OSR casework on Believe in Scotland billboard campaign

Many thanks for letting me know [REDACTED] and I'm delighted [REDACTED] has been able to help. Best,

[REDACTED]
Chief Executive
[REDACTED]

[REDACTED]

Read our [2020 Annual Report](#)

Legal, decent, honest and truthful

From: DG Regulation <DG.Regulation@Statistics.gov.uk>

Sent: 21 February 2022 10:25

To: [REDACTED]@Statistics.gov.uk>

Cc: DG Regulation <DG.Regulation@Statistics.gov.uk>

Subject: Casework Updates: 2021/192: Pensions in [REDACTED]

Importance: High

Hi [REDACTED]

I'm covering for PO this week and need to update the casework agenda. Got two welcome your help with:

Pensions In Scotland: Latest I have on this one was the correspondence with ASA thanking for their help. In the email it said you will be responding privately and informally. Do you have an update on current position and estimated timeline for closing?

[REDACTED]

Thanks ever so much

Donna

Donna Livesey | Head of Regulation Support

[Office for Statistics Regulation](#) | [@StatsRegulation](#) | [OSR LinkedIn](#)

[REDACTED] [@statistics.gov.uk](#)
[REDACTED]

From: [REDACTED]@Statistics.gov.uk>
Sent: 21 February 2022 10:38
To: DG Regulation <DG.Regulation@Statistics.gov.uk>
Subject: RE: Casework Updates: 2021/192: Pensions in [REDACTED]

Hi Donna,

On the pensions casework, I need to make a couple of tweaks to the draft response in light of a conversation with Ross and then I will run it past Mary again when she's back in and hopefully we can get that one sent and closed this week.

[REDACTED]

Thanks,

[REDACTED]

[REDACTED] [Office for Statistics Regulation | UK Statistics Authority](#)
[statistics.gov.uk](#)
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

From: [REDACTED]@Statistics.gov.uk>
Sent: 22 February 2022 08:31
To: Humpherson, Edward [REDACTED]@statistics.gov.uk>; Gregory, Mary [REDACTED]@Statistics.gov.uk>; Tivey, Ross [REDACTED]@Statistics.gov.uk>
Cc: DG Regulation <DG.Regulation@Statistics.gov.uk>
Subject: RE: Casework - Believe in Scotland pensions claim

Morning All,

I have updated the [briefing](#) following the call the other week and the information provided by the ASA. Hopefully we can send these out this week and close the case, but let me know what you think.

Thanks,

[REDACTED]

[REDACTED] | [Office for Statistics Regulation | UK Statistics Authority](#)
[@statistics.gov.uk](#)
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

Briefing – Pensions claim by the Believe In Scotland independence party

Issue

15. On 19 January 2022, [REDACTED] emailed OSR to question a claim made in a poster by an organisation called Believe in Scotland – a Scottish independence organisation. The poster claimed that “The UK has the worst state pension in the developed world.”
16. When the complainant queried what figures underpinned the claim, they were told by shop staff that the claim was an aspiration. The complainant has therefore asked OSR whether it is legal for politically affiliated organisations to use data in this way.

Recommendation

17. We recommend that we:

- i. Respond privately to [REDACTED] with our findings.
- ii. Contact Believe in Scotland to make them aware that the latest data do not support the argument. Draft responses are provided at the end of this briefing.

Conclusion

18. The advertising campaign run by Believe in Scotland took place across 2020 and 2021, at which point the data they were using was the most up to date data available for comparing pensions across countries.
19. The campaign was subject to a [review](#) by the Advertising Standards Agency (ASA) following multiple complaints about the claims being made on the billboards. ASA considered that the material fell outside of its remit as it was political advertising.
20. The latest OECD publication on '[Pensions at a Glance 2021](#)' was published on 8 December 2021. The latest data show a marked improvement for the UK, which while it is still below the OECD and EU averages, is no longer towards the bottom end of the distribution.
21. Believe in Scotland appear to have updated this marketing material at some point to say that the UK has the worst basic state pension in the developed world. This is still incorrect when looking at the latest data. It published [an article](#) on 3 February 2022, defending the use of these statistics.

Background

22. The task of comparing pension provision in the UK with that of other countries is complicated by substantial differences in the structure of pension systems across the world. Income from occupational and personal pensions is a relatively important source of pensioner income in the UK, in contrast to many other countries where state provision is dominant.
23. An alternative basis for comparison is pension replacement rates which illustrate the effectiveness of each country's pension system at sustaining workers' living standards as they enter retirement. The net replacement rate is defined as the individual net pension entitlement divided by net pre-retirement earnings, taking account of personal income taxes and social security contributions paid by workers and pensioners.
24. The OECD publishes a biennial report called 'Pensions at a Glance' which covers pension systems across OECD and G20 countries. The report presents modelled net replacement rates for each member country, based on what a typical pensioner would receive after earning a given percentage of average earnings over their working lifetimes. The figures show the hypothetical level of pension which people would receive if they work for a full career and if today's pension rules remain unchanged. They provide a comparison of the projected long-term outcomes of today's pension policies, which is not necessarily the same as the pensions received by today's pensioners. Consistent economic assumptions are used for all countries to focus the comparison on systemic factors.
25. In 2018, the analysis showed that the UK had a net replacement rate of 28.4% from mandatory pensions, which was one of the lowest across the countries included in the report. It was also well below the OECD average of 58.6% and the EU average of 63.5%.

26. When voluntary provision was included in the calculation, the UK's net replacement rate was 61.0%, which was still below the OECD and EU averages.
27. In 2021, the UK had a net replacement rate of 58.1% from mandatory pensions. While this remained lower than the OECD and EU averages at 62.4% and 66.7% respectively, it was no longer towards the lowest end of the distribution.
28. The OECD analysis did not contain a voluntary provision calculation for the UK in 2021 as it now classes the UK's pension provision system as 'quasi-mandatory' due to the increased coverage of pension provision that has occurred from auto-enrolment.
29. ASA received 127 complaints about the Believe in Scotland advertising campaign in early 2021. It assessed the complaints and the campaign to establish whether there were grounds for any action and considered that the material fell outside its remit because it was political advertising.

Draft response to complainant

Dear [REDACTED],

Thank you for your email of 19 January 2022 concerning a poster by the organisation Believe in Scotland.

We are aware that the poster is part of a wider advertising campaign run by Believe in Scotland since 2020. On its website, the organisation provides a source to the underlying data which are from a report on ['Pensions at a Glance 2019'](#) by the Organisation for Economic Co-operation and Development (OECD). The report contains modelled analysis for each member country, based on what a typical pensioner would receive after earning a given percentage of average earnings over their working lifetimes. The figures show the hypothetical level of pension which people would receive if they work for a full career and if today's pension rules remain unchanged.

At the time of the campaign being launched, the figure used in the poster was correct and the most up to date data available for comparing pensions across countries.

The latest OECD report on ['Pensions at a Glance 2021'](#) was published on 8 December 2021. The latest data show a marked improvement for the UK, which while it is still below the OECD and EU averages, is no longer towards the bottom end of the distribution of pension provision in the OECD membership.

At the time of your query, we did not know if Believe in Scotland were actively continuing to use this advertising material or if the store was displaying an old poster. However, we have since seen [the article](#) published by Believe in Scotland which continues to use these out-of-date figures. We have therefore written to the organisation to make them aware that the latest data don't support its argument.

Our remit concerns official statistics and therefore we cannot comment on the legality of the use of these data in advertising. Due to the political nature of the advertising, we are also aware that the Advertising Standards Agency is unable to investigate the campaign. We recommend that you raise your concerns with your MSP.

Draft response to Believe in Scotland

Dear Believe in Scotland,

The [Office for Statistics Regulation](#) provides independent regulation of official statistics produced in the UK. Our regulators are based in London, Edinburgh and Newport. We aim to enhance public confidence in the trustworthiness, quality and value of statistics produced by government. We are also responsible for managing the UK Statistics Authority's casework function, undertaking monitoring to identify issues and investigating issues raised with the Authority.

We recently received concerns regarding a poster associated with your organisation and thought it would be helpful to share our observations from looking into the complaint. The concerns relate to the claim that “The UK pays the worst state pension in the developed world”.

It is good that when you first launched this marketing campaign, you provided a source to the underlying data on your website, which was the [‘Pensions at a Glance 2019’](#) by the Organisation for Economic Co-operation and Development (OECD). At the time of the campaign being launched, and until recently, the figure used in the poster was correct and the most up to date data available for comparing pensions across countries.

As you may be aware, the latest OECD report on [‘Pensions at a Glance 2021’](#) was published on 8 December 2021. The latest data show a marked improvement for the UK, with a net replacement rate of 58.1% from mandatory pensions. While this remained lower than the OECD and EU averages at 62.4% and 66.7% respectively, it was no longer towards the lowest end of the distribution.

The OECD analysis did not contain a voluntary provision calculation for the UK in 2021 as it now classes the UK’s pension provision system as ‘quasi-mandatory’ due to the increased coverage of pension provision that has occurred from auto-enrolment.

The latest data therefore no longer support the claim made in your marketing material. We would suggest you update your material to refer to valid comparisons with the OECD and EU.

From: Gregory, Mary [REDACTED]@Statistics.gov.uk>

Sent: 22 February 2022 09:25

To: [REDACTED]@Statistics.gov.uk>; Humpherson, Edward [REDACTED]@statistics.gov.uk>; Tivey, Ross [REDACTED]@Statistics.gov.uk>

Cc: DG Regulation <DG.Regulation@Statistics.gov.uk>

Subject: RE: Casework - Believe in Scotland pensions claim

Hi [REDACTED]

Thanks very much for the updates and finding out more from ASA.

I’ve put a few really minor track changes in the letter. However, I did have one more fundamental question which I’d be interested in your view on. While I can see the source is now inconsistent with the claim, is it still the case that the UK has one of the worst state pensions, as presumably there is a difference between defining occupational and private pensions as mandatory/voluntary contributions and whether or not something is state pension. So might the statement still be true, but they would need a different source? Or is there no reasonable way of making that comparison?

Mary

From: [REDACTED]@Statistics.gov.uk>

Sent: 22 February 2022 10:10

To: Gregory, Mary [REDACTED]@Statistics.gov.uk>; Humpherson, Edward [REDACTED]@statistics.gov.uk>; Tivey, Ross [REDACTED]@Statistics.gov.uk>

Cc: DG Regulation <DG.Regulation@Statistics.gov.uk>

Subject: RE: Casework - Believe in Scotland pensions claim

Thanks Mary.

That rephrasing works well for me – thanks Mary! 😊



████████████████████ | [Office for Statistics Regulation | UK Statistics Authority](#)
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<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

Briefing – Pensions claim by the Believe In Scotland independence party

Issue

1. On 19 January 2022, ██████████ emailed OSR to question a claim made in a poster by an organisation called Believe in Scotland – a Scottish independence organisation. The poster claimed that “The UK has the worst state pension in the developed world.”
2. When the complainant queried what figures underpinned the claim, they were told by shop staff that the claim was an aspiration. The complainant has therefore asked OSR whether it is legal for politically affiliated organisations to use data in this way.

Recommendation

3. We recommend that we:
 - i. Respond privately to ██████████ with our findings.
 - ii. Contact Believe in Scotland to make them aware that the latest data do not support the argument. Draft responses are provided at the end of this briefing.

Conclusion

4. The advertising campaign run by Believe in Scotland took place across 2020 and 2021, at which point the data they were using was the most up to date data available for comparing pensions across countries.
5. The campaign was subject to a [review](#) by the Advertising Standards Agency (ASA) following multiple complaints about the claims being made on the billboards. ASA considered that the material fell outside of its remit as it was political advertising.
6. The latest OECD publication on '[Pensions at a Glance 2021](#)' was published on 8 December 2021. The latest data show a marked improvement for the UK, which while it is still below the OECD and EU averages, is no longer towards the bottom end of the distribution.
7. Believe in Scotland appear to have updated this marketing material at some point to say that the UK has the worst basic state pension in the developed world. This is still incorrect when looking at the latest data. It published [an article](#) on 3 February 2022, defending the use of these statistics.

Background

8. The task of comparing pension provision in the UK with that of other countries is complicated by substantial differences in the structure of pension systems across the world. Income from occupational and personal pensions is a relatively important source of pensioner income in the UK, in contrast to many other countries where state provision is dominant.
9. An alternative basis for comparison is pension replacement rates which illustrate the effectiveness of each country's pension system at sustaining workers' living standards as they enter retirement. The net replacement rate is defined as the

individual net pension entitlement divided by net pre-retirement earnings, taking account of personal income taxes and social security contributions paid by workers and pensioners.

10. The OECD publishes a biennial report called 'Pensions at a Glance' which covers pension systems across OECD and G20 countries. The report presents modelled net replacement rates for each member country, based on what a typical pensioner would receive after earning a given percentage of average earnings over their working lifetimes. The figures show the hypothetical level of pension which people would receive if they work for a full career and if today's pension rules remain unchanged. They provide a comparison of the projected long-term outcomes of today's pension policies, which is not necessarily the same as the pensions received by today's pensioners. Consistent economic assumptions are used for all countries to focus the comparison on systemic factors.

11. In 2018, the analysis showed that the UK had a net replacement rate of 28.4% from mandatory pensions, which was one of the lowest across the countries included in the report. It was also well below the OECD average of 58.6% and the EU average of 63.5%.

12. When voluntary provision was included in the calculation, the UK's net replacement rate was 61.0%, which was still below the OECD and EU averages.

13. In 2021, the UK had a net replacement rate of 58.1% from mandatory pensions. While this remained lower than the OECD and EU averages at 62.4% and 66.7% respectively, it was no longer towards the lowest end of the distribution.

14. The OECD analysis did not contain a voluntary provision calculation for the UK in 2021 as it now classes the UK's pension provision system as 'quasi-mandatory' due to the increased coverage of pension provision that has occurred from auto-enrolment.

15. ASA received 127 complaints about the Believe in Scotland advertising campaign in early 2021. It assessed the complaints and the campaign to establish whether there were grounds for any action and considered that the material fell outside its remit because it was political advertising.

Draft response to complainant

Dear [REDACTED]

Thank you for your email of 19 January 2022 concerning a poster by the organisation Believe in Scotland.

We are aware that the poster is part of a wider advertising campaign run by Believe in Scotland since 2020. On its website, the organisation provides a source for the underlying data which are from a report on '[Pensions at a Glance 2019](#)' by the Organisation for Economic Co-operation and Development (OECD). The report contains modelled analysis for each member country, based on what a typical pensioner would receive after earning a given percentage of average earnings over their working lifetimes. The figures show the hypothetical level of pension which people would receive if they work for a full career and if today's pension rules remain unchanged.

At the time of the campaign being launched, the figure used in the poster was correct and was the most up to date data available for comparing pensions across countries.

The latest OECD report on '[Pensions at a Glance 2021](#)' was published on 8 December 2021. The latest data show a marked improvement for the UK, which while it is still below the OECD and EU averages, is no longer towards the bottom end of the distribution of pension provision in the OECD membership.

At the time of your query, we did not know if Believe in Scotland were actively continuing to use this advertising material or if the store was displaying an old poster. However, we have since seen [this article](#) published by Believe in Scotland which continues to use these out-of-date figures. We have therefore written to the organisation to make it aware that the latest data don't support its argument.

Our remit concerns official statistics and therefore we cannot comment on the legality of the use of these data in advertising. Due to the political nature of the advertising, we are also aware that the Advertising Standards Agency is unable to investigate the campaign. We recommend that you raise your concerns with your MSP.

Draft response to Believe in Scotland

Dear Believe in Scotland,

The [Office for Statistics Regulation](#) provides independent regulation of official statistics produced in the UK. Our regulators are based in London, Edinburgh and Newport. We aim to enhance public confidence in the trustworthiness, quality and value of statistics produced by government. We are also responsible for managing the UK Statistics Authority's casework function, undertaking monitoring to identify issues and investigating issues raised with the Authority.

We recently received concerns regarding a poster associated with your organisation and thought it would be helpful to share our observations from looking into the issue. The concerns relate to the claim that "The UK pays the worst state pension in the developed world".

It is good that when you first launched this marketing campaign, you provided a source to the underlying data on your website, which was the '[Pensions at a Glance 2019](#)' by the Organisation for Economic Co-operation and Development (OECD). At the time of the campaign being launched, and until recently, the figure used in the poster was correct and the most up to date data available for comparing pensions across countries.

As you may be aware, the latest OECD report on '[Pensions at a Glance 2021](#)' was published on 8 December 2021. The latest data show a marked improvement for the UK, with a net replacement rate of 58.1% from mandatory pensions. While this remained lower than the OECD and EU averages at 62.4% and 66.7% respectively, it was no longer towards the lowest end of the distribution.

The OECD analysis did not contain a voluntary provision calculation for the UK in 2021 as it now classes the UK's pension provision system as 'quasi-mandatory' due to the increased coverage of pension provision that has occurred from auto-enrolment.

The latest data therefore no longer support the claim made in your marketing material. We would suggest you update your material to refer to valid comparisons with the OECD and EU.

From: Humpherson, Edward [REDACTED]@statistics.gov.uk>

Sent: 22 February 2022 12:44

To: [REDACTED]@Statistics.gov.uk>; Gregory, Mary
<[REDACTED]@Statistics.gov.uk>

Cc: DG Regulation <DG.Regulation@Statistics.gov.uk>; Tivey, Ross <[REDACTED]@Statistics.gov.uk>

Subject: RE: Casework - Believe in Scotland pensions claim

Thanks all – I'm happy for this to go out

Ed


From: [REDACTED]@Statistics.gov.uk>

Sent: 22 February 2022 13:05

To: DG Regulation <DG.Regulation@Statistics.gov.uk>

Subject: RE: Casework - Believe in Scotland pensions claim

Hi Donna,

Are you ok to send out the replies (at the end of the  [briefing](#)) or would you like me to?

The original complaint email came into the regulation inbox on 19 January 2022 (email address relates to [REDACTED] but the email is written by a [REDACTED] and the email address we have for the second response to Believe in Scotland is info@believeinScotland.org

Thanks,

[REDACTED]

[REDACTED] | [Office for Statistics Regulation | UK Statistics Authority](#)
statistics.gov.uk
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

From: DG Regulation <DG.Regulation@Statistics.gov.uk>
Sent: 22 February 2022 13:19
To: [REDACTED] <[REDACTED]@Statistics.gov.uk>
Cc: DG Regulation <DG.Regulation@Statistics.gov.uk>
Subject: RE: Casework - Believe in Scotland pensions claim

Thanks [REDACTED] I'll send them out, no problem.

[REDACTED]

From: [REDACTED] <[REDACTED]@Statistics.gov.uk>
Sent: 22 February 2022 13:29
To: DG Regulation <DG.Regulation@Statistics.gov.uk>
Subject: RE: Casework - Believe in Scotland pensions claim

Thank you! 😊

[REDACTED] | [Office for Statistics Regulation | UK Statistics Authority](#)
statistics.gov.uk
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

From: regulation@statistics.gov.uk <regulation@Statistics.gov.uk>
Sent: 22 February 2022 13:38
To: [REDACTED] <[REDACTED]@hotmail.co.uk>
Subject: RE: Scottish Independence Poster Claim

Dear [REDACTED]

Thank you for your email of 19 January 2022 concerning a poster by the organisation Believe in Scotland.

We are aware that the poster is part of a wider advertising campaign run by Believe in Scotland since 2020. On its website, the organisation provides a source for the underlying data which are from a report on '[Pensions at a Glance 2019](#)' by the Organisation for Economic Co-operation and Development (OECD). The report contains modelled analysis for each member country, based on

what a typical pensioner would receive after earning a given percentage of average earnings over their working lifetimes. The figures show the hypothetical level of pension which people would receive if they work for a full career and if today's pension rules remain unchanged.

At the time of the campaign being launched, the figure used in the poster was correct and was the most up to date data available for comparing pensions across countries.

The latest OECD report on '[Pensions at a Glance 2021](#)' was published on 8 December 2021. The latest data show a marked improvement for the UK, which while it is still below the OECD and EU averages, is no longer towards the bottom end of the distribution of pension provision in the OECD membership.

At the time of your query, we did not know if Believe in Scotland were actively continuing to use this advertising material or if the store was displaying an old poster. However, we have since seen [this article](#) published by Believe in Scotland which continues to use these out-of-date figures. We have therefore written to the organisation to make it aware that the latest data don't support its argument.

Our remit concerns official statistics and therefore we cannot comment on the legality of the use of these data in advertising. Due to the political nature of the advertising, we are also aware that the Advertising Standards Agency is unable to investigate the campaign. We recommend that you raise your concerns with your MSP.

Kind regards



Regulation@statistics.gov.uk

Office for Statistics Regulation | UK Statistics Authority
[@StatsRegulation](https://www.stats.gov.uk) | osr.statisticsauthority.gov.uk

From: regulation@statistics.gov.uk <regulation@Statistics.gov.uk>

Sent: 22 February 2022 13:38

To: info@believeinScotland.org

Subject: Scottish Independence Poster Claim

Dear Believe in Scotland,

The [Office for Statistics Regulation](#) provides independent regulation of official statistics produced in the UK. Our regulators are based in London, Edinburgh and Newport. We aim to enhance public confidence in the trustworthiness, quality and value of statistics produced by government. We are also responsible for managing the UK Statistics Authority's casework function, undertaking monitoring to identify issues and investigating issues raised with the Authority.

We recently received concerns regarding a poster associated with your organisation and thought it would be helpful to share our observations from looking into the issue. The concerns relate to the claim that "The UK pays the worst state pension in the developed world". It is good that when you first launched this marketing campaign, you provided a source to the underlying data on your website, which was the '[Pensions at a Glance 2019](#)' by the Organisation for Economic Co-operation and Development (OECD). At the time of the campaign being launched, and until

recently, the figure used in the poster was correct and the most up to date data available for comparing pensions across countries.

As you may be aware, the latest OECD report on '[Pensions at a Glance 2021](#)' was published on 8 December 2021. The latest data show a marked improvement for the UK, with a net replacement rate of 58.1% from mandatory pensions. While this remained lower than the OECD and EU averages at 62.4% and 66.7% respectively, it was no longer towards the lowest end of the distribution.

The OECD analysis did not contain a voluntary provision calculation for the UK in 2021 as it now classes the UK's pension provision system as 'quasi-mandatory' due to the increased coverage of pension provision that has occurred from auto-enrolment.

The latest data therefore no longer support the claim made in your marketing material. We would suggest you update your material to refer to valid comparisons with the OECD and EU.

Kind regards

Sent on behalf of Ed Humpherson, Director General for Regulation



Office for Statistics Regulation | UK Statistics Authority
[@StatsRegulation](#) | osr.statisticsauthority.gov.uk