

Stocktake of the Code of Practice for Official Statistics

Exposure draft: December 2016

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Summary and Recommendations

The nature of the Stocktake

- 1.1 The Code of Practice for Official Statistics¹ was published in January 2009, following a public consultation in the preceding autumn. Since then it has been the basis of government statisticians' professional standards and the bedrock for the UK Statistics Authority's regulatory judgments – most notably the Authority's statutory Assessment function carried out by the Office for Statistics Regulation², and its public statements on the use of statistics in the public domain ("casework"). It has proved sufficiently flexible to allow the Authority and statistical producers to apply it in a wide range of statistical contexts. The Code emphasises in particular the importance of user engagement and of clear explanation of the messages contained in sets of statistics: there has been clear evidence of improvement in these areas.
- 1.2 The Code is consistent with the United Nations Fundamental Principles of Official Statistics³ and, in turn, with the European Statistics Code of Practice⁴.
- 1.3 The Stocktake of the Code of Practice was launched in late 2015 - building on prior work to develop standards and guidance in new areas such as 'Open Data', and following widespread discussion at the Authority's Regulation Committee and within the Authority's Office for Statistics Regulation - with the aim of raising the profile and enhancing the value of the Code. The Stocktake was carried out by the Office for Statistics Regulation on behalf of the Authority.
- 1.4 The Stocktake, overseen by a Steering Group (see Annex B) chaired by Dr Levy, a non-executive director of the Authority, comprised three distinct stages:

¹ <https://www.statisticsauthority.gov.uk/monitoring-and-assessment/code-of-practice>

² The Office for Statistics Regulation is the regulatory arm of the UK Statistics Authority (taking over the role of the Monitoring and Assessment team).

<https://www.statistics.gov.uk/monitoring-and-assessment/>

³ https://www.statisticsauthority.gov.uk/wp-content/uploads/2015/12/images-unfundamentalprinciples_tcm97-18281.pdf

⁴ <https://www.statisticsauthority.gov.uk/monitoring-and-assessment/code-of-practice>

- Consultation – via an online survey which elicited over 600 responses – supplemented by widespread engagement with producers, users, and other stakeholders
 - Analysis of the survey results, workshop discussions, and detailed desk-research
 - Development and reporting of Recommendations.
- 1.5 The Stocktake was conducted with an emphasis on engagement. This has itself contributed to raising the profile of the Code and has kept the statistical and user communities engaged in (and contributing to) our thinking about how we propose to increase the value of the Code in future. During the Code Stocktake, substantial effort was devoted to communication – including hosting over 30 workshops or presentations across the UK and over 35 bilateral meetings (see Annex C). The Authority’s website was regularly updated with developments from the Stocktake⁵, which were cross-posted on other sites to increase awareness and which encouraged further bilateral discussion with users.
- 1.6 The Stocktake activity was strategic in nature, and this report reflects the particular focus on establishing a long-term vision for the development of the Code of Practice. While the Stocktake began as a free-standing exercise, from May 2016 it was taken forwards in the wider context of the development of proposals stimulated by Recommendation 24 of the Bean Review⁶.
- 1.7 As the Office for Statistics Regulation, with responsibility for setting the standards official statistics must meet, we will be responsible for the implementation of the recommendations in this report.

Emerging themes, and Recommendations

- 1.8 The precursor to these recommendations was a set of Emerging Themes. These were outlined through the analysis of our engagement activity and shaped by an internal team workshop which discussed the results of a suite of analytical work packages (see Annex D) to define the rationale, assess the evidence and develop next steps – all targeted at the strategic goal of increasing the public value of official statistics (OS).

⁵ For example <https://www.statisticsauthority.gov.uk/monitoring-and-assessment/code-of-practice/code-of-practice-stock-take-latest-news>

⁶ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/507081/2904_936_Bean_Review_Web_Accessible.pdf. Recommendation 24: The UKSA regulatory function should be subsumed within a new Independent Regulation and Evaluation Office (IREO) charged with assessing the trustworthiness and quality of official statistics as well as ONS’s effectiveness...

- 1.9 Based on the work of the Code Stocktake to date, the Office for Statistics Regulation concludes that the high level principles of the Code are robust: they, and the majority of the detailed practices in the Code, have stood the test of time well. However, the Code needs to be updated to reflect the changing channels for the distribution of statistics, the increasing sophistication of users, and the capabilities presented by new technology. We also propose changes to the ways that we apply the Code to enhance the public value of statistics. This is an optimum time to develop and launch a refreshed Code, with an engaged community and alongside our recent launch as the Office for Statistics Regulation.
- 1.10 During the Stocktake different stakeholders' experiences of the Code were explored. Some commented on aspects of the Code itself – that is, the content of the Code; others, perhaps reflecting our focus on the 'lived experience' of the Code, raised different aspects of the way in which we have used the Code in making our regulatory judgments – that is, the application of the Code.
- 1.11 Structuring the report in terms of content/application was considered, but it was felt to be limiting for the main body of the report. However the findings and recommendations have been separated into those which relate to content (including supporting material) and those which relate to application.
- 1.12 The thirteen recommendations of the Code Stocktake are set out below.

The content and scope (C) of the Code

Finding 1: National Statistics status is conferred on those statistics which meet the highest standards of Trustworthiness, Quality and Public Value. Those we spoke to as part of the Stocktake were supportive of the philosophy of Trustworthiness, Quality and Public Value, and felt that a clear and consistent articulation of these attributes through the Code would help to enhance the Code.

Recommendation C1:

- a) The elements of the National Statistics brand - Trustworthiness, Quality and Public Value (TQV) - should be explained and emphasised more distinctly in the Code (paragraphs 3.3-3.5).
- b) The Code should be restructured so that it is clear that compliance with the Code supports statistics that achieve the outcomes of trustworthiness, quality and public value (paragraphs 3.3-3.5).
- c) The Code should provide more explicit support for Heads of Profession in Departments in raising any concerns they have relating to the trustworthiness, quality and public value of their statistics (paragraph 3.4 & 3.11)

Finding 2: There was widespread support for our proposal that the presentation of the Code should be more transformational, and have even less of a sense of providing a checklist for producer and regulator to follow.

Recommendation C2:

- a) The Code should be more overtly outcome- and principle-based (and less practice/rule-based).
- b) The Code should give greater prominence to an articulation of Trustworthiness, Quality and Public Value, and proportionately less prominence to (for example, by annexing/linking) the detailed practices (paragraphs 3.6-3.8).

Finding 3: The Code currently encourages producers to consider statistical series in isolation from related statistics that describe similar or complementary phenomena. This tendency can appear to give insufficient weight to the coherence of statistics at a broader, more systemic level.

Recommendation C3: The Code should include practices that explicitly support the concept of public value, particularly the importance of ensuring coherence within 'families' of statistics and across statistical domains (paragraph 3.74).

Finding 4: Heads of Profession within Departments play a crucial role in supporting the publication of statistics of high public value, making final decisions on the content of statistical releases. However, Departments publish a wide range of other types of information, including management information and research, and in some cases the public value of this information might be enhanced if it complied more fully with the Code. Working with their Department's policy and analysis function, Heads of Profession can help ensure that this wider body of information is released in a transparent and trustworthy manner.

Recommendation C4: The Code currently expects Heads of Profession to play a key role in deciding how statistics are published by their Departments. The Code should also emphasise a clearer responsibility for advising about what new statistics should be published. The Code should also recognise the important role played by Heads of Profession in advising about how Departments might publish a wider range of numerical outputs (paragraph 3.11).

Finding 5: To meet the Authority's objective of safeguarding official statistics that serve the public good, the Authority and the Office for Statistics Regulation, as the Authority's regulatory arm, has increasingly commented on the public use of other numerical information from the perspective of the Code. It has done so because concerns about this sort of information can spill over to affect perceptions of official statistics and users cannot be expected to distinguish between official statistics, as defined by Departments, and other types of numerical information published by Government. For other types of numerical information such as management information and research, there are benefits in terms of public confidence in compliance with the core principles of the Code, particularly relating to transparent publication. The Bean Review⁷ recommended that "high-profile releases of management information by departments should be treated as official statistics and be compliant with the Code".

Recommendation C5:

- a) The formal scope of the Code should continue to be official statistics (as defined by the Statistics and Registration Service Act 2007). Formal regulation, of compliance with the new Code – through assessment – would continue to focus on official statistics produced by public bodies.
- b) The Code should recognise that Government publishes a wider range of outputs that might be commonly understood by the public as 'statistical information' – aggregated statistics and underlying data. The Code should advocate to Government departments the benefits of wider applicability of the core principles around transparency to other categories of numerical information (produced by official bodies) and also recognise the potential application of these principles to statistics and other numerical information produced by non-official bodies.
- c) To reflect this emphasis on wider applicability of core principles, the Code could be renamed as the "Code of Practice for Statistics", in line with the Statistics and Registration Act 2007.

⁷ See Recommendation 18 -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/507081/2904936_Bean_Review_Web_Accessible.pdf: "the government should delegate to UKSA the power to decide that a piece of data be classified as an official statistic; high-profile releases of management information by departments should be treated as official statistics and be compliant with the Code; UKSA should decide whether official statistics should be assessed against the Code for the purposes of National Statistic status"

- d) In some cases this flexible and voluntary approach should be supplemented by the Authority formally recognising specific Government information released as official statistics, in line with the Bean Review recommendation. The Code should explain the criteria the Authority will adopt to determine when and how it will recognise Government outputs as official statistics, in line with the Bean Review and building on the existing National Statistician's guidance (paragraph 3.53).

Finding 6: During the course of the Stocktake it became clear that some producers see the Code as a barrier to improving the ways in which they disseminate their statistics and statistical data. This is a perception that the Office for Statistics Regulation is keen to dispel by improving the content of the Code.

Recommendation C6:

- a) The Code should stimulate innovation and creativity in the exploitation of data and technology, and the development of statistical products and visualisations that users want (paragraphs 3.16-3.19).
- b) The Code should support experimentation in methods through a clearer articulation of the purpose and benefits of experimental statistics (paragraph 3.31).
- c) It should be accompanied by updateable standards and guidance for the compilation, use and release of data, and examples of best practice (paragraphs 3.20-3.21).

Finding 7: The Code emphasises the importance of using sound methods and explaining the quality of statistics. The Office for Statistics Regulation thinks that it should be enhanced - to emphasise the importance of embracing new and emerging methodologies, and to support deeper reviews of method. This enhancement will support producers in improving and explaining the quality of their statistics for the benefit of guiding users on how far they can rely on statistics. This is likely to require the addition of new practices in the Code, as well as the development of supporting material which might be readily updated over time.

Recommendation C7: The Code should be accompanied by updateable standards and guidance about aspects of methods and quality; these are likely to need to be rooted in new practices.

For methods this should include:

- the importance of using sound methods
- the importance of methodological review and innovation to ensure that methods keep pace with changes in society
- the merits of trialling new methodologies

- agreed standards for documenting methods and methodological choices accessibly
- the need to engage with users and other experts about methods used.

In relation to quality, the Code should:

- be more explicit about the need for effective and proportionate quality management and assurance arrangements
- be accompanied by standards for reporting the various aspects of the quality of statistics in ways that help users to understand the strengths and limitations of the statistics in the context of their potential use (paragraph 3.39).

The Code should make explicit the responsibility of statistical Heads of Profession to continuously improve the statistics produced by their organisations (paragraph 3.11).

Finding 8: The value and application of the Code is currently limited by the way it is presented as a stand-alone PDF. It could be enhanced by improving its presentation, while retaining the existing hard copy/pdf format which is valued particularly by producers.

Recommendation C8:

- a) The Office for Statistics Regulation should support producers and users by releasing an interactive Code that:
 - explains the rationale for each specific practice
 - provides examples of ways in which different organisations have complied with the principles and practices of the Code
 - links to standards and guidance
 - links to a catalogue of case studies that illustrate (for example) the proportional application of the Code (see Recommendation A3); and
 - supports the proposed approach to voluntary compliance (see Recommendation A4).
- b) This should be supplemented by alternative presentations of the Code that make it more accessible to stakeholders beyond the statistical production team (paragraph 3.45).

The regulatory application (A) of the Code

Finding 9: It is hard to argue that each of the current 800 sets of National Statistics are all of equally high public value – many have important but ‘niche’ uses. And there is considerable support for the proposition that the Office for Statistics Regulation should apply the Code more systemically than previously and move away from any sense that Assessment is a checklist exercise, in favour of a demonstrable focus on public value.

Recommendation A1: The Office for Statistics Regulation should work collaboratively with producers of official statistics to explore opportunities for clarifying the use of the National Statistics designation within their overall portfolio of statistics. This exploration could focus on the most valuable statistics, perhaps by reviewing the uses made of them and interactions between ‘families’ of statistics - that is, groups of statistics that address the same policy or societal questions (paragraph 3.73).

Finding 10: Many sets of statistics have been designated as NS for several years, and are unlikely to be re-assessed. Those we spoke to as part of the Stocktake encouraged exploration of the idea that designation – the immediate outcome of the application of the Code through assessment – should be time-limited, though it was recognised that we would need to be mindful of the Office’s future resource position.

Recommendation A2: The Office for Statistics Regulation should explore the feasibility of a defined shelf-life for the National Statistics designation – which could be different for different sets of statistics (paragraph 3.77).

Finding 11: The Office for Statistics Regulation recognises that different elements of the Code are relevant to different types of numerical information, and in particular that higher standards apply to official statistics than, for example, to management information. Producers of official statistics should comply with the Code; those responsible for other numerical information would be encouraged to explain how they comply. However the Office for Statistics Regulation has not published its position on which elements of the Code ought to apply to different types of information and therefore how compliance should be explained by those publishing the information. By doing so we will help producers of numerical information to understand the situations in which the Office for Statistics Regulation might intervene.

Recommendation A3: The Office for Statistics Regulation should clarify its expectations around proportionality – to help organisations decide how they should comply with the Code in relation to different types of numerical information being published for different purposes. While this guidance should be rooted in the enhancement of the public value of numerical information, it should not be unduly prescriptive. We regard two aspects of trustworthiness - equality of access, and the protection of confidentiality – as fundamental (paragraph 3.55).

Finding 12: Organisations outside government produce information which is used in the compilation of official statistics, or otherwise has the potential to enhance debate – and a number are keen to comply with the Code. We consider that such an ambition has the potential to raise standards and to enhance the profile of the Code.

Recommendation A4: The Office for Statistics Regulation should formalise and implement a proposition for voluntary compliance with the Code to support the extension of the reach of the Code. Organisations which produce, for example, data sources underpinning the Sustainable Development Indicators or other numerical information would be able to commit to compliance with the Code and to publish information about the extent to which they (voluntarily) comply with the Code (paragraphs 3.57-3.60).

Finding 13: Recommendations C1- C8 above describe ways in which the content of the Code should be revised. Furthermore, we are aware that there are many other aspects of the Code (including release times, media engagement as well as other points of detail (Annex A)) that merit serious consideration by a wide range of stakeholders.

Recommendation A5: The Board of the UK Statistics Authority should commission the Director General for Regulation to consult widely on a new Code of Practice for Statistics, including supporting standards and guidance, and to develop an ongoing communications role that would raise and maintain its profile. Proposals for a new Code and supporting standards and guidance should not be unduly prescriptive, reflecting the importance of flexibility in the application of the Code (paragraph 4.4).

- 1.13 The rationale for these recommendations is set out in the key findings section of the report.