



Director General for the Office for Statistics Regulation

Simon Hoare MP
Chair, Public Administration and Constitutional Affairs Committee
House of Commons
London
SW1A 0AA

26 August 2025

Dear Mr Hoare,

As Director General of Regulation at the Office for Statistics Regulation (OSR), I am writing to submit evidence as part of the current inquiry into *Propriety, ethics and the wider standards landscape in the UK*.

We welcome the work of the Committee in exploring how the current, and future, system of ethical standards can best support trust in government. We would like to bring to the attention of the Committee how our work, experiences and ambitions play an important role in helping to secure public trust.

OSR's role in the wider standards landscape

As you are aware, OSR is the regulatory arm of the UK Statistics Authority (the Authority). The Authority was established under the Statistics and Registration Service Act 2007 ('the Act'). The Act gave the Authority the statutory objective of '*promoting and safeguarding the production and publication of official statistics that serve the public good*'; with OSR playing the central role in protecting public confidence in statistics produced and used by government.

OSR considers statistics to be the lifeblood of democratic debate and that the misuse of statistics results in an erosion of trust in government. We are an independent statutory body separate from producers of statistics; a position which allows us to undertake our responsibilities in upholding the public value of statistics with impartiality and with the requisite credibility and rigour.

We are responsible for setting the standards that official statistics must meet in the Code of Practice for Statistics (the Code)¹. The Code is based on the core principles of Trustworthiness, Quality and Value. Taken together, these principles provide an ethical framework that can support the publication of all statistics, analysis and evidence.

The Code aligns with the Civil Service² and Northern Ireland Civil Service³ core values of integrity, honesty, objectivity and impartiality. It is consistent with the Nolan principles⁴, the Ministerial Code⁵, and the Northern Ireland Guidance for Ministers⁶, as well as the UN Fundamental Principles of Official Statistics⁷.

We use our voice to stand up for statistics and represent the interests of the public by investigating concerns raised with us about the dissemination of statistics and their onward use. Often, this will include the use of data, statistics, and wider analysis by Ministers, Members of Parliament, and government officials.

OSR's influence and impact on public levels of trust in government in the UK

OSR's aim is to enhance public confidence in the trustworthiness, quality and value of statistics produced by government. We primarily do this through our core regulatory reviews on individual sets of statistics and broader systemic work programmes⁸. When it comes to our impacts on levels of trust in government however there are two main considerations that I wish to bring to your attention.

The Code of Practice for Statistics

Following an extensive public consultation, we are refreshing the Code. One core aspect of the refresh, based on strong support from our stakeholders, is incorporating the principles of intelligent transparency⁹ within the Code. These principles set out our expectations for the transparent and clear communication of statistics and form the basis for our regulatory judgements on such matters.

We are therefore adding a new set of standards to the Code – The Standards for the Public Use of Statistics, Data and Wider Analysis. These new standards reflect our current business practices and regulatory activity, and we consider incorporating them into the

¹ <https://code.statisticsauthority.gov.uk/>

² <https://www.gov.uk/government/publications/civil-service-code/the-civil-service-code>

³ <https://www.northernireland.gov.uk/publications/nics-code-ethics>

⁴ <https://www.gov.uk/government/publications/the-7-principles-of-public-life>

⁵ <https://www.gov.uk/government/publications/ministerial-code>

⁶ <https://www.finance-ni.gov.uk/publications/ministerial-code>

⁷ <https://unstats.un.org/unsd/dnss/gp/fundprinciples.aspx>

⁸ <https://osr.statisticsauthority.gov.uk/our-regulatory-work/>

⁹ <https://osr.statisticsauthority.gov.uk/transparency/>

Code will bring greater awareness and ultimately adherence to our expectations when using and communicating statistics in the public domain.

The Standards for the Public Use of Statistics, Data and Wider Analysis support the goal that statistics and data are used in a way that serves the public good. They apply to the public use of analysis beyond the publication of official statistics including, for example, in press releases, blogs, social media posts, policy documents, speeches and interviews. These standards are relevant to a wide range of professions and roles across public bodies including communication professionals, policy professionals, analysts, Senior Civil Servants, Ministers and Special Advisors.

The Standards for the Public Use of Statistics, Data and Wider Analysis are as follows:

- Equality of access: Public bodies should make statistics, data and wider analysis used in the public domain available to everyone in a timely way, so that the public can easily access, scrutinise and verify claims and decisions made based on them.
- Supporting understanding: Public bodies should use statistics, data and wider analysis with integrity and communicate them with clarity and accuracy, so that the public can easily understand the basis for claims and decisions made.
- Decision making and leadership: Public bodies should seek and use impartial, expert advice when using statistics, data and wider analysis in the public domain, so that the public can have confidence that they have been used appropriately.

The refreshed Code, which will be launched in November this year, includes the Standards for the Public Use of Statistics, Data and Wider Analysis. We will share this with the Committee when published.

Intelligent transparency in practice

Intelligent transparency - which forms the basis of our new Code standards - and use of data and statistics in government should go hand in hand. Intelligent transparency is an OSR campaign, that emerged during the time of the pandemic, aiming to bring greater transparency, clarity and ultimately public confidence to the communication of data and statistics.

When we publish blogs or articles on government use of analysis to support claims or for policy evaluation, these are grounded in intelligent transparency principles. For example, our recent blog on the Governments' Plan for Change missions¹⁰, highlighting the importance that such commitments are underpinned by reliable and accessible data, and

¹⁰ <https://osr.statisticsauthority.gov.uk/blog/mission-possible-statistics-and-data-in-the-uk-governments-mission-led-approach-to-government/>

our blog on embedding intelligent transparency¹¹, which reflected on conference speeches and a claim made by the Prime Minister at the Labour Party Conference based on unpublished data.

Often, OSR is able to secure impact and improvements in the communication of statistics by working with government departments to offer advice and support. We have also written publicly on several cases relating to intelligent transparency in order to increase awareness and push for change. Key examples include:

- During the lead up to the 2024 General Election, we published a statement¹² on claims made by the then Government about the UK's plan to *"increase defence spending to 2.5% of GDP by 2030 – an increase of £75 billion"*. We determined that the figure of £75 billion did not provide a clear picture to the public as it assumed that annual spending on defence would remain flat in cash terms. If the calculation assumed that defence spending was held at the share of GDP originally planned for 2024-25 then the proposed cash 'increase' would drop from £75 billion to £25 billion. Our statement notes: *"Cumulating spending increases (or cuts) over several years to derive a large cash figure for presentational purposes does not in general facilitate public understanding of the data in question – the longer the period you choose, the bigger the number you get."*
- In October 2024, we were made aware of an unsupported statement made by the Prime Minister, Sir Keir Starmer MP at the Labour Party Conference regarding immigration returns. At the time, the Prime Minister made the claim there was no Home Office data or statistics available in the public domain for the relevant time period to support this statement. We worked with the Home Office and this led to the publication of an ad-hoc statistical release¹³, which provided the underlying data that related to the statement.

The Ministerial Code

The current version of the Ministerial Code states that *'Ministers need to be mindful of the UK Statistics Authority's Code of Practice which defines good practice in relation to official statistics, observance of which is a statutory requirement on all organisations that produce National Statistics in accordance with the provisions of the Statistics and Registration Service Act 2007'*.

¹¹ <https://osr.statisticsauthority.gov.uk/blog/embedding-the-habit-of-intelligent-transparency/>

¹² <https://osr.statisticsauthority.gov.uk/election-2024/recent-statements-on-defence-spending/>

¹³ <https://www.gov.uk/government/publications/returns-from-the-uk-between-july-and-august-2024/returns-from-the-uk-between-july-and-august-2024>

In October 2024, Sir Robert Chote, Chair of the Authority, wrote privately to Secretaries of State, asking that *[Secretaries of State] consider going beyond the letter of the Ministerial Code, from merely being mindful to complying with the Code of Practice for Statistics*.

Over the past few years, there have been several calls in favour of strengthening the Ministerial Code including:

- The independent review of the Authority by Professor Denise Lievesley CBE in March 2024 stated that: *'As the current and former Chairs of the UKSA and PACAC have noted, there is scope to strengthen the Ministerial Code to mandate adherence to the UKSA Code of Practice for Statistics. This Review concurs'*¹⁴. The review goes on to say: *'bolstering the Code in this way will send a clear signal to the country that Ministers are holding themselves to the highest account.'*
- A letter from the Royal Statistical Society to Secretaries of State (July 2024) which calls for Secretaries of State to *'pledge to abide by the Code of Practice of Statistics – rather than merely being mindful of it as the current Ministerial Code requires'*¹⁵.
- A PACAC report from March 2020 on 'Government transparency and accountability during Covid 19: The data underpinning decisions' which stated that: *'The Ministerial Code needs to be strengthened so it is clear that Ministers are required to abide by the UKSA Code of Practice in their presentation of data. The UKSA Code includes the principle of trustworthiness that builds 'confidence in the people and organisations that produce statistics and data'. Abiding by the UKSA Code of Practice is a statutory requirement for Government Departments. It is simply not enough to ask Ministers to be "mindful" of the UKSA code.'*¹⁶

We consider the Ministerial Code is a fundamental route to help underpin the ethical use of statistics however, as currently set out, it could go further to realise that outcome.

OSR's relationship with the new Ethics and Integrity Commission

OSR's primary role and remit relates to official statistics and their production – that is, statistics produced by the Authority, government departments, the devolved administrations and organisations listed within an Official Statistics Order, as defined within section 6 of the Act.

¹⁴ <https://www.gov.uk/government/publications/independent-review-of-the-uk-statistics-authority-uksa-2023/independent-review-of-the-uk-statistics-authority-by-professor-denise-lievesley-cbe-html>

¹⁵ <https://rss.org.uk/RSS/media/File-library/Policy/2024/RSS-to-new-ministers-110724.pdf>

¹⁶ <https://committees.parliament.uk/publications/5076/documents/50285/default/>

OSR is part of the Authority and our influence on the statistical and analytical landscape is heavily determined by our central positioning within the statistical system and strong partnerships with professional bodies such as the Government Statistical Service.

The Authority, and therefore OSR, is currently represented in meetings of the chairs of independent standards offices held by the Committee on Standards in Public Life. As we seek to strengthen our voice and seek improvements in how data and statistics are communicated and used, we see the benefits of maintaining this relationship and working with the new Commission where we have common goals.

Considerations for the Inquiry/new Ethics and Integrity Commission

Through our work, we consider that effective monitoring of the appropriate use and communication of data and statistics can improve trust in government and support the integrity of evidence in public debate.

We propose this could be strengthened in future by the following measures.

Endorsement and support of the Standards for the Public Use of Statistics, Data and Wider Analysis by the new Ethics and Integrity Commission

Over recent years, we have worked closely with the Heads of Profession for Statistics network across government departments to deliver training and raise awareness of the principles of intelligent transparency. We have had considerable success engaging with civil servants including statisticians, analysts, communication professions, policy teams and Permanent Secretaries. However, to date, we have had limited direct contact with MPs and Ministers.

As these principles will now be embedded within the Code and are relevant to all across government and parliament, we would encourage parliamentary committees and individual MPs to be aware of these standards in their work.

The Ethics and Integrity Commission could play a key role in ensuring that the standards are fully embraced and embedded across Government as the default approach for communicating statistics.

Strengthening the Ministerial Code

If the opportunity arose through any future revision of the Ministerial Code, we would strongly recommend that additional weight be given to Minister's responsibilities with regard to the Code. We would like to see Sir Robert Chote's ask of Secretaries of State to be formalised and that the Ministerial Code requires Ministers to comply with, not just be mindful of, the Code and in particular, the Standards of Public Use of Statistics, Data and Wider Analysis.

Greater partnership between OSR and the new Ethics and Integrity Commission

Standards and ethics governing Ministerial conduct and practices are varied and wide ranging with different propriety and ethic bodies in play. Recognising the alignment of interests, we are in regular contact with the Committee on Standards in Public Life, focussed on strengthening and aligning the Code and the Nolan Principles.

We strongly believe in the importance of our voice in relation to the use of statistics, as well as the place transparent, clear and accurate communication of statistics hold in helping to improve trust in government. Indeed, this was recognised in a PACAC report from May 2024 on 'Transforming the UK's Evidence Base' which stated that: *'Too frequently, Government communications exhibit a disregard for evidence. This is helpful neither to the Government, in building trust in our democracy and support for policies of the day, nor to citizens who rightly expect to be able to scrutinise the work of Ministers and officials. Since its launch in 2022, the Office for Statistics Regulation's Intelligent Transparency guidance has helped to unlock important evidence for Parliament, business, researchers and citizens, but there remains more to do.'*¹⁷

The Ethics and Integrity Commission will have responsibility for convening ethics bodies. We envisage our relationship with the Commission to be the same as is currently the case with the Committee on Standards in Public Life: managed by the Authority, with engagement from OSR. Once the Commission is established, we are open to exploring other opportunities for engagement.

I hope this evidence is useful to the Committee's inquiry. I would welcome the opportunity to further discuss and explore any of the points I have raised.

I am copying this letter to Doug Chalmers CB DSO OBE, Chair of the Committee on Standards in Public Life.

Yours sincerely,



Ed Humpherson
Director General for OSR

¹⁷ <https://committees.parliament.uk/publications/44964/documents/223187/default/>