

Assessing and Assuring the Integrity of Official Statistics in the UK

57th Session of the International Statistical Institute, Durban, 16-22 August 2009

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Abstract

Official statistics in the UK are produced by over 100 organisations. Whilst these organisations are required to observe a tough new Code of Practice for Official Statistics, the practical implications of doing so and being seen to do so in such a decentralised system are considerable. The paper considers one element of the maintenance and demonstration of standards, relating to integrity, and suggests how integrity, and the perception of integrity, might be strengthened.

1. The UK's decentralised statistical system

The substantially, and increasingly decentralised nature of UK official statistics is well-documented¹. The main strength stems from the closeness of statisticians to policy makers and, hence, the policy relevance of their advice – supporting evidence informed policy making, with statisticians having a foothold in every part of government, there to challenge and to provoke debate. In many cases statisticians have an input to the setting of performance indicators, and the development of targets and monitoring regimes.

The main limitations of this decentralised approach relate to planning, and standards. *Planning*, at the level of the statistical system, is very complicated – individual departments have budgets and make plans against these. This increases the risks that resources can become imbalanced against overarching statistical needs, that statistical activities are duplicated, that some cross-cutting statistical needs are not identified and met because they don't match departmental boundaries sufficiently well; and that the needs of non-government users are not identified or prioritised. And it is inherently more difficult to agree and maintain *standards* across a large number of diverse organisations than in a single statistical institute - a problem often exacerbated in the UK by the relatively junior position of statisticians within their Departments' hierarchies.

This paper considers one element of the maintenance and demonstration of standards, relating to integrity, in the UK's decentralised statistical system.

2. Assessment against the Code of Practice

The development and promulgation of standards has been a focus of the work of the head of the Government Statistical Service (GSS) and statistical Heads of Profession² within departments for a number of years. But the establishment in April 2008 of the UK Statistics Authority³ - with a remit to safeguard the production and publication of official statistics – has provided a statutory basis to support the establishment of common standards across the GSS. The Authority's Code of Practice for Official Statistics⁴, published in January 2009, sets out a series of principles and associated practices.

¹ See, for example, http://www.statscom.org.uk/C_1198.aspx, and <http://www.statisticsauthority.gov.uk/uk-statisticalsystem/organisations/index.html>

² 2 Heads of Profession are the senior statistical advisers in government departments. They are professionally accountable to the National Statistician, under informal (non-statutory) arrangements.

³ <http://www.statisticsauthority.gov.uk/about-the-authority/index.html>

⁴ <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/index.html>

Compliance with these is a requirement for designation as National Statistics and is advisory for other, non-National (official) statistics, National Statistics being a subset of official statistics. The extent of compliance with the Code is determined by means of a formal process of Assessment⁵, conducted by the Authority's Monitoring and Assessment (M&A) Team.

The process of Assessment is evidence-based. In practice this means that we will collect information from the producers of a set of statistics about the extent to which they consider that they meet the 74 practices set out in the Code; we will collect information from users, and from the providers of raw information (such as the owners of administrative databases, or representatives of survey respondents); and we will analyse this information whilst reaching our own views about, for example, the accessibility of statistical reports, or the effectiveness of confidentiality protection.

3. Assessment of practices relating to integrity

However, there are a few important practices in the Code about which we think will be hard to gather evidence of compliance, and hence where our views will necessarily be less evidence-based. These relate to integrity – see Box 1.

Box 1: “Integrity” principle from the Code of Practice for Official Statistics

Principle 3: Integrity

At all stages in the production, management and dissemination of official statistics, the public interest should prevail over organisational, political or personal interests.

Practices

1. Issue statistical reports separately from any other statement or comment about the figures and ensure that no statement or comment – based on prior knowledge - is issued to the press or published ahead of the publication of the statistics.
2. Ensure that those producing statistical reports are protected from any political pressures that might influence the production or presentation of the statistics.
3. Ensure that the relevant statistical Head of Profession has the sole responsibility for deciding on statistical methods, standards and procedures, and on the content and timing of statistical releases.
4. Follow all statutory obligations and internationally endorsed guidelines governing the collection of data, confidentiality, and release.
5. Inform the National Statistician about complaints that relate to professional integrity, quality or standards, whether or not they can be resolved directly.
6. Implement controls to ensure that individuals do not abuse the trust placed in them for personal gain.
7. Promote a culture within which statistical experts in government can comment publicly on statistical issues, including the misuse of official statistics.

⁵ [http://www.statisticsauthority.gov.uk/assessment/principles ---procedures/index.html](http://www.statisticsauthority.gov.uk/assessment/principles---procedures/index.html)

It is relatively straightforward to establish whether, for example, practice 1 (“issue statistical reports separately ...”) is followed. Users who regularly follow the publication of a particular set of statistics will be aware of any political commentary associated with the statistics and, furthermore, the M&A Team can readily check to ensure that political statements do not appear in statistical reports and do not precede the publication of the statistics.

However, practices 2, 3 and 5 are less straightforward. The M&A Team needs to be able to judge whether these practices are followed. How can we do so? How can we be certain that, for example, “those producing statistical reports are protected from any political pressures that might influence the production or presentation of the statistics”? If a Government Minister exerted pressure on a statistical Head of Profession, how would we know?

In such a situation the Head of Profession might, conceivably, bow to the pressure – in which case they would be unlikely to tell us, and we would probably not be able to identify the problem ourselves.

Or they might resist the pressure successfully – as we believe would tend to be the case given Ministers’ concerns about being accused of political interference, and the fundamental honesty we ascribe to Civil Service statisticians – but again, how would we know? It must be unlikely that a Head of Profession would tell us that a Minister had tried to compromise their professional independence, because by doing so they would place their Minister’s career in jeopardy, and would make their own position within their organisation very uncomfortable.

Of course the concept of “political pressures that might influence the production ... of statistics” is itself quite subtle. Where is the distinction between appropriate influence and inappropriate pressure? Drawing such distinctions requires judgement by statisticians but this judgement, when it takes place behind closed doors, will inevitably be viewed sceptically. The planning of statistical activity in the UK’s decentralised system is not transparent (outside the civil service machine) – neither the Statistics Authority nor the public knows what advice is provided to Ministers about statistical plans. Such an environment can all-too-easily foster a climate in which integrity can be doubted.

4. The six pillars of integrity

In such circumstances, how might the ‘six pillars of integrity’⁶ – legality; equity; social legitimacy; justification; confidentiality; and sincerity – inform our thinking?

Ensuring that statisticians “are protected from any political pressures that might influence the production or presentation of ... statistics” requires ministers not to seek to exert political pressure, and it requires the administrative heads of government departments to defend their statisticians’ professional independence. In other words it requires behaviours that are *sincere* – leading by doing what is genuinely right, and avoiding hypocrisy.

In the UK, trust in politicians is not strong. It seems unlikely that the public or Parliament would take seriously an assessment that was based, in part, on an assumption of ministerial sincerity.

The related concepts of *equity* – justice, or fairness, formalised in an agreement between two parties which may be both explicit and implicit – and of *social legitimacy* – an entitlement which is recognised by others as justifiable and correct – provide more fertile ground. In practical terms these concepts could be operationalised in the form of guidance issued centrally to Ministers – perhaps supported by

⁶ Taken from literature on business ethics.

a public statement by the Prime Minister. This might be effective because it increases the degree of risk to a Minister tempted to transgress the Code, from the risk of embarrassment to the risk of being forced to resign.

But we are still left with the paradox that for such sanctions to apply, the offending behaviour would need to have been identified or be otherwise visible. And the greater the sanction, the more likely it is that political interference would be kept quiet. It would seem, therefore, that under the current decentralised arrangements for UK official statistics, that the Authority can never be absolutely certain that statistics are produced with the degree of integrity required by the Code, where the producer body is headed by a Minister.

5. Organisational/legal arrangements to support integrity

However, some important producers of official statistics in the UK *are* independent of ministers. The Office for National Statistics (ONS), for example, is overseen by the Statistics Authority itself, and this provides its reporting line and accountability to Parliament. And the Information Centre for Health and Social Care is an 'arms length body', accountable to its Board and to Parliament. So these organisations are relatively easily able to resist any attempts at political interference, and indeed would have no reason to hesitate in blowing the whistle if such attempts were made.

Perhaps this is the future for the governance of official statistics in the UK. If more Heads of Profession were accountable to strong, independent boards, and hence had no reason to fear inappropriate pressure from ministers, then their integrity might be presumed; they would face fewer obstacles in being transparent in describing their planning processes, their efforts to improve the quality of their statistical services and products, and so on. At the same time, statisticians could continue to maintain their close links with policy makers, with all the public good advantages described earlier. And the process of assessment would still serve as a backstop, in terms of political influence, as it would look for delayed releases, non-neutral commentary, and unexpected changes in the information shown in statistical releases. This would seem to be a win-win situation.

Statistical organisations across the world, especially those which are nationally decentralised, may wish to consider whether organisational/ legal arrangements are a necessary pre-condition to being able to demonstrate the integrity of their statistical systems.