

# Consultation on a refreshed Code of Practice for Statistics 2017

## About this consultation

Building on the recommendations for changes to the content and scope of the Code of Practice set out in the [Stocktake of the Code of Practice: Exposure Draft](#), this consultation seeks user's views on a refreshed Code of Practice for Statistics.

The consultation is available for completion through this Word version, or alternatively [online](#), with the questions structured around the following themes:

- A greater emphasis on *Trustworthiness, Quality and Value*
- Scope of the Code
- Detailed changes to the principles and practices
- Communication and audience

A full, draft version of the [revised Code](#) is provided for reference along with a summary [consultation document](#) that outlines the main proposed changes. The questions include ones about the detailed changes we propose to practices. To help with this, we have provided a [mapping tool](#) to show how we think Edition 2.0 of the Code differs from Edition 1.0.

The questions themselves should only take about 15–20 minutes to complete and we would really appreciate you taking the time to give your feedback. Responses should be submitted to the Authority by **5:00pm on 5 October 2017**.

Please email your completed response to [regulation@statistics.gov.uk](mailto:regulation@statistics.gov.uk), or alternatively by post to the following address, marked **Code 2.0 Consultation**:

Office for Statistics Regulation  
Government Buildings  
Cardiff Road  
Newport  
Gwent  
NP10 8XG

The Authority will publish all responses to the consultation on our website. This will include the name of your organisation, and with your permission, your name. Please indicate if you are content for your name to be published at the end of the consultation. We will not publish your contact details.

We will summarise the main findings in a report in the autumn of 2017, alongside plans for launching a refreshed Code. The Board of the Authority will consider that report and make any decisions on launching the refreshed Code towards the end of 2017.

If you have any queries concerning this consultation, please email [regulation@statistics.gov.uk](mailto:regulation@statistics.gov.uk)

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# Royal Statistical Society response

## Covering note

The Royal Statistical Society supports revision of the UK Statistics Authority's Code of Practice. The new Code will be of great importance to uphold public confidence in numerical information that is produced and released by official and government bodies. We had four general points on the draft.

1) The revised Code (henceforth V2) places great store on the three pillars of Trustworthiness (T), Quality (Q) and Value (V) as aspirations to ensure and improve public confidence in statistics. Whilst we would accept the three pillars as a useful way to categorise the underlying principles, we don't find the terms themselves to be particularly aspirational, nor that the narrative adequately explains how emphasis on these pillars would enhance user confidence over and above the principles themselves. Linked to this, and on a practical level, we believe there is too much duplication in V2. Part 1 does not, as stated, describe T, Q and V in more detail: it merely replicates the text shown in Part 2. As a result, V2 is an overly long document, which may be a barrier to users reading it. Essentially, it could be shortened to a brief narrative on T, Q and V and the checklist in Part 2.

2) Quite rightly, most of V2 focuses on what producers should do to ensure T, Q and V statistics, and users of statistics are described as the beneficiaries of the Code. However, there is a requirement for all users also to follow the principles of the Code – the reason for “the Gus O’Donnell guidance” at the time. These user responsibilities are not currently reflected in V2 other than the general statement at paragraph v of the Introduction.

3) A key feature of V2 is to drop the term ‘official’ from the title of the Code, on the grounds that OSR wish the Code to have wider applicability than just ‘official statistics’ (6<sup>th</sup> paragraph of the foreword). Thereafter, however, V2 is written entirely in terms of official statistics (the term features 26 times) and there is no explanation of how this wider applicability may operate. Wider applicability can arise in two quite different ways:

- the treatment of ‘other’ numerical information from within government, for example administrative data and management information;
- statistics produced by non-government bodies.

We would support non-government bodies adopting the code principles and have no difficulties with this definition of wider applicability. In the case of the former (the treatment of other numerical information from within government), however, we believe the approach should be for such information to conform with the principles of official statistics if they are to be published in support of government policy, and that there should be no distinction in treatment from official statistics. Given that the fundamental purpose of the Code is still to provide assurance on official statistics, we hold strongly to the view that it should remain a Code for Official Statistics.

4) We think that V2 should be a self-contained document, and that understanding of the Code should not be reliant on further guidance being issued.

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Our consultation response which follows puts forward some suggestions for clearer articulation of the principles and practices that should apply across organisations.

## A refreshed Code of Practice for Statistics

### Trustworthiness, Quality and Value (TQV)

1. Our draft refreshed Code is structured around what we have called three pillars of *Trustworthiness*, *Quality* and *Value*. Part 1 of the Code explains what *Trustworthiness*, *Quality* and *Value* mean and why they are important. To what extent do you think that *Trustworthiness*, *Quality* and *Value* capture what is needed to enhance public confidence in statistics? What else might be needed?

1.1. The three pillars do capture what is important; however, there are overlaps between each concept (for example, you cannot maintain trustworthiness in the absence of quality standards). The fact that T, Q and V are not mutually exclusive should be made clear.

1.2. We think that bullet-points and checklists should form the heart of the Code and much of the narrative on T, Q and V in Part 1 is duplicative and can be removed. This is to ensure that users of the Code turn directly to its principles and practices.

1.3. Some adjustment is needed in the principles under Trustworthiness, and perhaps under Value, to ensure support for effective communication about government statistics and numerical information, as explained below:

In the current draft, principles for Trustworthiness and Value do not refer to any roles outside of statistical production. Some of the more detailed practices in Part 2 of the Code have clear relevance to communication and leadership roles. For example:

- T1 3) vii) 'Ensure that government statements released alongside or following the release of official statistics, which present numerical information and statistics, meet basic professional standards, and that any such statements are clearly labelled as policy or ministerial statements'
- T2 2) i) 'As the principal advisor and accountable officer within the organisation on statistical matters, the views of the Chief Statistician/Head of Profession for statistics should be considered in matters relating to numerical information, including advising on the release of new statistics.'

Developing greater clarity, wherever possible, at all levels of the Code about its applicability to other roles (beyond statistical production) would be beneficial. This would help to inform a wide range of roles across government departments that they can (for example) access advice from the statistical profession regarding the release of numerical information, and that the views of the Chief Statistician or Head of Profession should be taken into account.

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2. Have we explained *Trustworthiness*, *Quality* and *Value* clearly in the draft refreshed Code? If not, what is unclear?
  - 2.1. The term *Trustworthiness* is cumbersome, not in common usage and may not be immediately understood. 'Trustworthy' is an adjective rather than a noun but we suggest this is a better term to use because it would be more immediately recognised and understood.
  - 2.2. Under *Trustworthiness* in particular, we feel that communication across the organisation should be referred to, as discussed above. (It could potentially also be referred to in other areas such as *Value*.)
  - 2.3. We are pleased to see some strengthening of the principles under *Quality*, in particular Q2.3. However, many of the de-designations of National Statistic (NS) status occurred after a successful OSR assessment. There was discussion during the Code of Practice stocktake of OSR mandating deep-dive reviews on key statistics to avoid such incidents again. It might be difficult to formulate but Q2.3 should perhaps mandate periodic *Quality Reviews* with external experts for key statistics (the model under the 2000 NS proposals). Also, Q3 should be more specific about quality assurance procedures, for example adherence to the *Quality Assurance Framework* of the European Statistical System.
  - 2.4. Under *Value*, and under *Quality*, we feel that the contents of Principle V3 and Practice Q2.4 are potentially weaker than the current requirement to consult or discuss with users in the case of substantial changes, and that the Code will be stronger if it retains a formal requirement for this.

## Scope of the Code

3. The draft refreshed Code contains a description of the pillars and how they fit together in Part 1. Our intention is that this will encourage those producing a wider range of numerical information to think about what the Code aims to achieve in principle. How well does this meet our intention? What else could we do?

Please see covering note.

4. To what extent do you think that organisations outside the official statistics system would be able to apply the three pillars of *Trustworthiness*, *Quality* and *Value* voluntarily? What do you think might prevent this?

We support emulation of the Code by non-government bodies where it is appropriate. On other government information, we think it is important to preserve the status of official statistics and not create a multiplicity of different forms of government information that conform with some elements of the Code but not others. We should not confuse or compromise the Code's primary purpose which is to provide a certain standard of official statistics.

5. Part 2 of the draft refreshed Code gives the detail of what we mean by *Trustworthiness*, *Quality* and *Value*. How well do you think the principles and practices in Part 2 reflect *Trustworthiness*, *Quality* and *Value*? What additional practices might reflect these three pillars?

Please see answer to question 1 and question 2.

Principles and practices are pitched / aimed at producers even though there are points that are also relevant to other roles. Other roles ought ideally to look through the Code and find certain points relevant to them – particularly for those areas where producers cannot act alone. For example, under T1.1, it would be better to say where responsibility lies for protecting producers from undue pressure.

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## Changes to the principles and practices

6. We have updated the practices of the refreshed draft Code to reflect how statistics and data are changing, while allowing for further developments. Do you have any comments on the detailed content of the practices of the refreshed Code? Are there any other practices we might cover? Is there anything you think we might change?

Please see answer to questions 1, 2, and 5.

7. The draft refreshed Code includes practices that set out the responsibilities of each person in the organisation: T1.3iv in relation to pre-release access and T2.1 in ensuring the appropriate handling and use of statistics. How well do these practices cover what you think are the responsibilities of the people in producer organisations involved in the use and handling of statistics? What is unclear?

Please see covering note and responses to questions 1, 2, and 5. Practices should give an indication of how the wider applicability of the Code across organisations may operate. E.g. Principle T1 'integrity' refers only to producers even though there is some guidance on pre-release access and communication here which requires wider compliance.

8. The draft refreshed Code includes more specific practices in relation to the roles and responsibilities of the Head of Profession for statistics. Are the practices relating to Heads of Profession (under *Principle T2: Good governance*) sufficient to support them in undertaking their role overseeing and advising on the production of statistics and wider numerical information? Are there other aspects of their roles and responsibilities that the Code might include?

We support the specification of practices in relation to the roles and responsibilities of the Head of Profession for Statistics.

9. The draft refreshed Code has an expanded range of principles and practices related to *Quality*, based on the Authority's *Quality Assurance of Administrative Data*. To what extent does the refreshed Code cover aspects of *Quality: robust data, methods and statistics*? What other aspects of *Quality* might they include?

Please see answer to question 2 (point 2 and 3) – we feel that *Quality* could be strengthened, mainly by making the wording of principles more direct, and by including a requirement for user consultation in the practices.

10. The draft refreshed Code includes a specific principle on coherence (Q4), that '*Statistics should be consistent and comparable, while remaining relevant to society*'. It also has a practice (Q3.3) about the use of similar data sources for quality assurance, and drawing insight from related statistical outputs (V2.4). To what extent do you think that the refreshed Code sufficiently covers the statistical practices related to coherence? Are there other aspects of coherence we might include?

No response.

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11. We have added a new principle: ‘*Statistics need to continue to evolve to remain relevant in a changing world*’ (V4: *Innovative*), emphasising innovation. To what extent does this new principle have the right focus to encourage and stimulate creativity and continuous improvement across all aspects of statistics production? What do you think we should add or change?

We support the addition of this principle.

12. The detailed practice relating to experimental statistics sits within *Principle V4: Innovative* in the draft refreshed Code. To what extent do you think the practice on experimental statistics (V4.5) is sufficiently clear to encourage the open and transparent development of new statistics that involves users?

We think it is sufficient.

13. The draft refreshed Code includes a principle that ‘*Statistics should help answer society’s important questions*’ (V2: *Insightful*). The principle focuses on ensuring the public value of statistics through clear presentation, demonstrating relevance and supporting use, as well as through working collaboratively. How well do the practices under *V2: Insightful* set out what is expected of producers?

The principle is not the most clear, but the practices do set out more clearly what is required and meant by it.

## Communication and audience

14. In previous discussions in the Code Stocktake and subsequent focus groups we found strong interest in the idea of additional guidance to help understand how to apply the Code, with examples of best practice. Which, if any, of the three pillars of *Trustworthiness*, *Quality* and *Value* or their related principles do you think need additional guidance and why? Select all that apply.

**Trustworthiness**

Integrity

Good governance

Statistical capability

Protected confidentiality

**Quality**

Suitable data sources

Sound methods

Assured data quality

Coherence

**Value**

Accessible

Insightful

Reflect the range of users and uses

Innovative

Efficient data collection and use

We think the Code should be a self-contained document, and that understanding of the Code should not be reliant on further guidance being issued (although more user-friendly presentation online could be considered).

15. To what extent should the guidance be tailored for different audiences? What groups of people in particular might require guidance?

We would like to see adjustment at all levels of the Code to signpost more of a range of roles to the principles that are appropriate.

16. Annex A of the consultation document includes a data diagnostic tool that is intended for people who want to use statistics, to consider whether to use particular data sources. To what extent will the data diagnostic tool aid users in assessing the suitability of data for their uses? What more might they need?

No response.

17. How clear and understandable is the language used in the Code? How could it be made clearer? Are there any areas of the draft refreshed Code you believe are at risk of becoming out-dated?

Please see covering note which indicates we find V2 an overly long document, which may be a barrier to users reading it, and suggests that much of the narrative on T, Q and V in Part 1 is duplicative and can be removed.

18. Overall, how satisfied are you that the draft refreshed Code meets your needs? Please explain your reasons in the comment box below.

We are satisfied with the overall framework; however, we think there should be clearer articulation of the principles and of some of the practices – particularly with regard to more of a range of roles. Rather than adding narrative and guidance, these principles and practices should be the heart of the document.

19. Do you have any further comments on the draft refreshed Code of Practice for Statistics?

No further comments.

## A bit about you

20. Please provide details about your name, organisation and position

Name

[Click here to enter your name](#)

Organisation

[The Royal Statistical Society](#)

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Position

[Click here to enter your position](#)

21. What type of organisation do you work in?

- Academia / research
- Voluntary
- Business
- Journalists / media
- Local government
- Central or Devolved Government
- Other (please specify)

[Click here to specify your sector](#)

22. Are you responding to this consultation officially, on the behalf of your named organisation or as a private individual?

- Officially on behalf of named organisation
- As a private individual

## Your response

23. May we contact you to discuss your response to this consultation? This may be to follow up any specific points that we need to clarify. We will not publish your contact details.

- Yes
- No

Email address

policy@rss.org.uk

24. Are you happy for us to contact you about future consultations?

- Yes
-

No

25. To support transparency in our decision making, responses to this consultation will be made public. This will include the name of your organisation where you are responding on their behalf, and with your permission, also your name. Please indicate if you are content for your name to be published. We will not publish contact details. Any information provided in response to this consultation could be made publicly available if required under a Freedom of Information request.

Yes, I consent to my name being published with my response

No, please remove my name before publishing my response

26. Please tell us if you have any specific suggestions for how we might improve this consultation, or any other comments about the consultation process

No response.

Thank you for taking the time to consider and complete this consultation  
on a refreshed Code of Practice for Statistics

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