

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, 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

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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?

We suggest adding a reference to the principle of ‘Honesty’, which seems to us a key principle in the production of statistics and worth highlighting. We suggest amending the first principle related to the trustworthiness pillar in the draft along the following lines: ‘Confidence in statistics is dependent on the integrity and honesty of those producing statistics....’. ‘Honesty’ is not mentioned at all other than in the introduction, referencing the Nolan Principles, and we think it would add value and help inspire public confidence in the statistics produced if the principle of ‘honesty’ were explicitly referenced.

2. Have we explained *Trustworthiness*, *Quality* and *Value* clearly in the draft refreshed Code? If not, what is unclear?

The three pillars are explained clearly and concisely, and their relationship to the Code’s principles and practices is delineated rigorously.

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?

Part 1 explains well the principles behind the Code. We believe the principles are not merely consistent with the Nolan Principles (i.e. do not contradict them), but also apply them: the Code outlines the sort of practices that the Nolan Principles demand of public office holders when they produce numerical information.

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 believe that the Code, and in particular the pillars of Trustworthiness and Quality, should be seen as the practical way in which the Nolan Principles of honesty, objectivity and integrity apply to public office holders when they produce numerical information. The Nolan Principles apply to all public office holders, and those providing public services, not just those within the official statistics system.

We propose that the Nolan Principles are referenced more explicitly within the

Code, in particular how the Code can be seen as a practical application of the Nolan Principles. This would demonstrate how and why the three pillars apply (in a proportionate way) to all public office holders who produce or publish numerical information.

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?

We believe that practices relating to the declaration and management of conflicts of interest are needed to reflect the pillar of trustworthiness (see Q6).

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?

Whilst T1 includes provision for protection against undue pressure (T1.1), there is no mention or requirement of the need to declare and manage conflicts of interest that potentially arise in the production of statistics.

Our view is that the concept of ‘undue pressure’ is not broad enough to encompass the risks posed by unmanaged conflicts of interest. Unmanaged conflicts of interest may exist even where undue pressure does not, and both need to be guarded against in order to uphold the principle of integrity.

We strongly recommend that a provision requiring those involved in the production of statistics to declare relevant conflicts of interest, and requiring organisations to have processes in place to record and manage such conflicts of interest, should be included under the principle of integrity.

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?

It could be made explicit in T1.3iv that the ‘essential recipients’ are the same as those in T1.3iii, i.e. essential in relation only to the production and publication of statistics.

The refreshed practices relating to pre-release access are welcome and important, and the provisions in T1.3iii and T1.3v are clear and robust.

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?

The Code may include responsibility for oversight of the recording and management of conflicts of interest (see Q6).

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?

[Click here to enter your response](#)

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?

[Click here to enter your response](#)

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?

[Click here to enter your response](#)

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?

[Click here to enter your response](#)

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?

[Click here to enter your response](#)

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.

- | <input type="checkbox"/> Trustworthiness | <input type="checkbox"/> Quality | <input type="checkbox"/> Value |
|--|--|--|
| <input type="checkbox"/> Integrity | <input type="checkbox"/> Suitable data sources | <input type="checkbox"/> Accessible |
| <input type="checkbox"/> Good governance | <input type="checkbox"/> Sound methods | <input type="checkbox"/> Insightful |
| <input type="checkbox"/> Statistical capability | <input type="checkbox"/> Assured data quality | <input type="checkbox"/> Reflect the range of users and uses |
| <input type="checkbox"/> Protected confidentiality | <input type="checkbox"/> Coherence | <input type="checkbox"/> Innovative |
| | | <input type="checkbox"/> Efficient data collection and use |

[Click here to specify your reasons for the additional guidance options selected](#)

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

[Click here to enter your response](#)

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?

[Click here to enter your 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?

We believe that the Code is written in a clear and accessible way.

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

Satisfied

The refreshed Code is clear, concise, and robust. It addresses, in our view, the main relevant ethical issues relating to the production of numerical information. We believe it not only fits with the Nolan Principles, but helpfully applies these principles to public office holders and those delivering public services, when they produce numerical information. However, we strongly believe that the Code would be strengthened by the inclusion of a requirement to declare and manage conflicts of interests that arise in the production of statistics, and with an explicit reference to the principle of honesty.

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

[Click here to enter your response](#)

A bit about you

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

Name

Lord Bew

Organisation

Committee on Standards in Public Life

Position

Chair

21. What type of organisation do you work in?

Central or Devolved Government

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

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

Email address

public@public-standards.gov.uk

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

- Yes

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

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

[Click here to enter any further comments](#)

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