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?

   These values will help instill more confidence in the production and publication of statistics/ numerical information. That said, statistics also need to be relevant in the modern world, support government and wider policy making, and increase public understanding on a broad range of issues. There is a sense that these pillars set out what users and the general public believe/ expect ONS should be doing regardless of the existence of the code. Maintaining/ protecting confidentiality will be critical in instilling public confidence in statistics.

   It may be helpful to set out more explicitly how compliance with the code will be assured, how often audits against it will be carried out, and how instances of non-compliance will be independently arbitrated and upheld in the public interest.

   The European Directive 2015 on Re-Use of Public Sector Information offers a number of channels for dispute resolution administered by the Office for Public Sector Information (OPSI). This offers a transparent and open framework for handling policy challenges, mediation, complaints and investigations. It would be good to see a similar framework incorporated within the governance principles (T2) and as an explicit element underpinning the Code of Practice implementation.

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

   Yes. However, a worked example would illustrate how the pillars will be implemented in practice.

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?

   In principle this meets your intention. That said the ultimate test will be the extent to which others, such as private sector organisations, adopt the code for the numerical information they produce.

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?

In principle, these pillars are transferable to organisations outside the official statistics system. Uptake may be prevented by existing approaches in said organisations and the extent to which the two approaches align. The intended purpose of the numerical information being produced may also have a bearing on whether this approach is used, e.g. whether the information has a wider utility or value, and the perceived robustness and quality assurance of the data. Cost, particularly for the voluntary sector, may represent a barrier to uptake. We agree that the pillars should be seen as a guide and not as a prescription to organisations outside the official statistics system. In this regard, the pillars provide a helpful framework for statistics production.

Private sector and other non-governmental / unofficial organisations outside the official statistics system might find the principle of integrity (T1) where their behaviours and actions are demonstrably in the public interest difficult to prove and uphold in the face of challenge.

There may be times when the use of recognised standards does not apply/ would not be relevant, for example, for a new and more innovative data set that needed a more flexible approach to demonstrate its value. In such cases, it may not be possible or difficult to validate through comparison with other relevant data sources and statistics as required under Principles Q1: suitable data and Q4: coherence).

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?

The code is silent on how ONS will engage with users/ beneficiaries in the course of its work and how wider stakeholder expertise will be harnessed by ONS in developing its work programme. Greater input from a wider audience on what information is valuable and relevant in a changing world would support ONS in the successful implementation and delivery of the code.

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?

We do not support the proposed new text in paragraph P4.6 of the revised code, which seeks to remove the specific reference to geographic referencing and coding in the original text. The updated wording reads, 'statistics should be consistent over time and between geographical areas while remaining relevant to society. Users should be provided with reasons for any deviation from accepted good practice and explanations of any implications for the use of the statistics'.

We firmly believe that the specific reference to geographic referencing and coding in the code should not be removed, as is being proposed above.

We therefore recommend the retention of the existing paragraph P4.6 of the current code (Version 1.0), which reads 'promote comparability within the UK and internationally by, for example, adopting common standards, concepts, sampling frames, questions, definitions, statistical units and classifications (including common geographic referencing and coding standards). Make the reasons for any deviations from standard models publicly available'. In our view, the original wording is more likely to result in better quality and more coherent statistics.

There would also be value in reviewing the geographic scale at which relevant datasets/ statistics are provided; small scale data and geographies can derive insight, as well as the more traditional larger data geographies used by the ONS. This approach would add value to users of ONS statistics, would ensure their relevance in a local context and would support local/ place-based policy making, which is the direction of travel for government policy.

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?

These appear to be fit for purpose.

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 roles and responsibilities of the Chief Statistician/ Head of Profession as set out appear to cover the necessary ground within the context of the official statistics system. The scope of the roles could be enhanced by inclusion of a responsibility to develop members of the Statistics profession and to advocate more widely around the benefits and value of statistics in policy making, in tune with the three pillars of the code.

The code could be more explicit and detailed about the roles and responsibilities of the Chief Statistician/ Head of Profession and Director General for Regulation for overseeing and managing the production of statistics outside the official statistics system. See earlier feedback (under section 1) about the need for a transparent and open framework for handling policy challenges, mediation, complaints and investigations around production of statistics. For example, where there is a complaint that a private sector body claiming to produce an official statistical release is not acting in accordance with the code.

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?

While the code is seeking to ensure statistics are produced through the use of quality data, the missing piece of the jigsaw appears to be that quality, or at least the perception of quality, lies in the interpretation of the data and the insights it reveals. The metric for best professional judgement appears under the trustworthy pillar; but this does not speak to the quality of interpretation. Perhaps it is the interpretation of the data that needs to be assured through the quality pillar, which would in turn instill confidence.

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?

It covers the above reasonably well. However, new or changing geographies can occur with changes in government policy, such as with the creation of Local Enterprise Partnerships (LEPs) and their impact on economic geography. The UK's exit from the European Union may also have an influence on geographical areas, as the UK may no longer need to work with the Nomenclature of Territorial Units for Statistics (NUTS) classification.

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?

New entities have been created by government in recent years, such as Local Enterprise Partnerships, which changed the economic development landscape. Statistics at the level of these geographies would support and enhance local policy making and help deliver local economic growth. The element that brings most datasets/ statistics to life is location/ geography, as this provides the context for the information. It is the linking of location to other disparate and multiple datasets that drives the insight to strategy and policy development and service delivery in both the public and private sectors. Producing statistics at the most appropriate geographic scale will be increasingly important once the UK exits the European Union.

The principle of continuing to evolve to remain relevant in a changing world is fundamental to the value of the information. However, encouraging innovation in data sources and analysis methods will often challenge the Code Practice principles of Integrity (T1), Confidentiality (T4), and all Quality principles (Q1-Q4). While there is implicit recognition of this within the code, and how it might be governed and managed within the official statistics system, the code could go further in promoting innovation by commenting on how synergies between innovations inside and outside the official statistics system might be enabled e.g. by promoting collaborations across public, private and academic sectors in the production and publication of experimental statistics.

Innovation in recent years has been driven by linked data and the semantic web, big data analytics and visualisation. Big data describes the collection of complex and large data sets, such that it is difficult to capture, process, store, search and analyse using conventional database systems. Its uses are shaping the world around us, offering more qualitative insights into our everyday lives. Big data visualisation enables more rapid identification of patterns and trends. Reports generated from big data visualisation tools make it possible to encapsulate complex information on operational, geographic and market conditions in a brief series or even single graphic. This means the information is more vibrant and memorable for users and decision makers.

Adopting this approach would meet the value V4 of the code, which calls for continuous improvements to be made to the presentation and dissemination of statistics, and for new and innovative ways to engage users to be exploited.

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?

The flexibility to produce and publish experimental statistics is a positive step and should help to encourage development of new datasets and new users of statistics. ONS should be mindful that production of experimental statistics may not meet the proposed test of quality that statistics be consistent over time and comparable, which at the outset they may not be by definition. However, this can be overcome provided the statistics and numerical information represent the best available estimate of what they aim to measure at a particular point in time, and are not materially misleading.

It would be helpful if ONS or the code provided an illustrative example of what constitutes experimental statistics. Whatever datasets are produced, these need to meet the needs of users and deliver added value over and above information that has already been produced and/ or published. New/ experimental statistics, as with existing datasets, need to be able to pass the 'So what?' test.

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 draft refreshed code is clear on this point and the proposed practices appear to be fit for purpose.

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**	☐ **Quality**	☐ **Value**
☐ Integrity	☐ Suitable data sources	☐ Accessible
☐ Good governance	☐ Sound methods	☑ Insightful
☐ Statistical capability	☐ Assured data quality	☐ Reflect the range of users and uses
☐ Protected confdentiality	☐ Coherence	☑ Innovative
		☐ Efficient data collection and use

It is not always clear what the words insightful and innovative mean in an objective context. It would therefore be helpful to users and others to have a clear and shared understanding of these terms. The guidance could helpfully provide examples of what does and does not constitute insightful and innovative.

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?

All codes of practice have a certain shelf-life; to remain a living and vibrant document, the code would need to be reviewed, and where necessary, updated on a regular/ periodic basis. Best practice would suggest refreshing the code every three years as a minimum, with a wholesale review every five years.

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

- ○ Highy satisfied
- ◉ Satisfied
- ○ Neither satisfied, nor unsatisfied
- ○ Unsatisfied
- ○ Highly unsatisfied

Click here to explain the reasons for your answer to this question

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

Damian Testa

Organisation

Royal Geographical Society with the Institute of British Geographers and the Association for Geographic Information

Position

Senior Public Affairs Manager

21. What type of organisation do you work in?

- ○ Academia / research
- ○ Voluntary
- ○ Business
- ○ Journalists / media

- ○ Local government
- ◉ Central or Devolved Government
- ○ Other (please specify)

Professional body, learned society, charity and a representative body for the UK geospatial industry

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

director@rgs.org

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

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