

Code of Practice for Official Statistics

Report on the Consultation and the Principles and Procedures for Assessment

January 2009



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the Principles and Procedures
for Assessment

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About the UK Statistics Authority

The UK Statistics Authority is an independent body operating at arm's length from government as a non-ministerial department, directly accountable to Parliament. It was established on 1 April 2008 by the *Statistics and Registration Service Act 2007*.

The Authority's overall objective is to promote and safeguard the production and publication of official statistics that serve the public good. The Authority is accordingly required to promote and safeguard the quality and comprehensiveness of official statistics, and good practice in relation to official statistics.

The Statistics Authority has three main functions:

- Oversight of the Office for National Statistics (ONS) – the executive office of the Authority
- Monitoring and reporting on all official statistics, wherever produced, and
- Independent assessment of official statistics

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Foreword

Sir Michael Scholar, Chair of the UK Statistics Authority

The *Statistics and Registration Service Act 2007* underscored the importance of official statistics to society. It established new arrangements under which the production and publication of those statistics are now governed. It created the UK Statistics Authority and gave us the right to determine a Code of Practice and to assess compliance against that Code.

This report presents the first edition of the Statistics Authority's *Code of Practice for Official Statistics* and the associated *Principles and Procedures for Assessment*. Neither the Code nor the Procedures are set in stone. They will continue to evolve and there will be further editions as necessary.

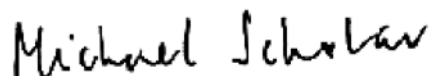
A particular feature of the Code is that it applies to all UK bodies that are responsible for official statistics, not just to those people directly involved in the production of such statistics. Under the Act, compliance with the Code is a formal requirement on bodies that produce statistics that have been designated as 'National Statistics'. Compliance with the Code offers a powerful reassurance that the statistics have been produced and published to high professional standards. With the introduction of the Code, we want to see the 'National Statistics' label recognised as a clear signal of assured standards.

Of course, statistics by their nature are rarely ideal for all purposes and a central requirement of the Code is that their strengths and weaknesses should be well explained in relation to their potential uses. Compliance with the Code means that, as far as we can establish, a set of official figures is as good as it reasonably can be, that the statistics serve one or more identifiable purpose of public value and that they are well explained to the user. It does not mean that they are faultless and, if previously unidentified weaknesses come to light, we will re-assess them.

The text of the Code has followed a lengthy evolutionary path. It has roots in both internationally agreed guidelines and in the former National Statistics Code of Practice. In 2006, the then Statistics Commission consulted on a revised Code and subsequently issued its *Proposals for a Code of Practice for Official Statistics*. Our own proposals, in turn, built on those of the Commission and were again the subject of a consultation document, *Official Statistics serving the public good*, issued in July 2008.

An account of the responses to the consultation is included in this report. The comments received have been influential and a substantial number of changes have been made. Inevitably, we cannot accommodate everyone's advice or preferences. But I hope that the account of what was said and our responses to those points will show the care with which we have considered every comment made.

I would like to offer sincere thanks on behalf of the Statistics Authority to the many people inside and outside government who helped us in refining the Code of Practice and, more generally, laying these foundations for the new supervisory structure.



January 2009

Introduction

1. The consultation document, *Official Statistics serving the public good: Consultation on the code of practice*, was published by the UK Statistics Authority in July 2008 and consultation closed at the end of September 2008. As well as consulting on the draft text of the Code of Practice, it also invited views on a draft Statement of Principles and Procedures for Assessment which, like the Code, is a requirement of the *Statistics and Registration Service Act 2007*.
2. This report presents the final text of both the Code itself and the Statement of Principles and Procedures. It includes an account of the responses to the consultation, the Authority's views on the issues raised, and links to every response received. To avoid overburdening this report, the latter documents are published on the Authority's website rather than included in the body of the report.
3. The Code and the assessment process will play a central role in the fulfilment of the Authority's statutory objective to promote and safeguard the production of official statistics that serve the public good. The Authority will keep the Code and its implementation under review and propose amendments as necessary. Any material amendments will be subject to further consultation.
4. The Authority's assessment process will be breaking new ground and it is inevitable that much will be learnt in the early years, allowing the assessment arrangements to be refined over time. In this respect, the Authority will systematically review the value of the process and refine it as it develops.

Context and legacy

5. The genesis of the current Code goes back at least ten years. A government consultation document published in 1998¹ said:

"Quality needs to be assured. Official statistics must be sufficiently accurate and reliable for the purposes for which they are required ... the production and presentation of official statistics needs to be free from political interference, and to be seen as such, so that the objectivity and impartiality of statistics is assured".

¹ Statistics: A Matter of Trust

6. Both the Government and the Authority have more recently endorsed that statement. However, the statistical service is more than just the figures themselves. Statistics must, of course, be as accurate and reliable as they reasonably can be, and free from political interference, but they must also be planned to meet the future needs of society and communicated in ways that are as helpful as possible to those who rely on them to inform their decisions – and, in some respects, that is all of us. The Code of Practice reflects this broad interpretation of what it means to say: ‘Quality needs to be assured’. It is the quality of a well-rounded service, responsive to the changing needs of decision-makers and society, not simply the quality of each set of figures as they are produced.

7. Following publication in 2000 of a Government White Paper, the *Framework for National Statistics*, the National Statistics Code of Practice was developed and published in stages². That Code took account of the diverse aspects of statistical planning, production and dissemination that needed to be covered but it was in essence a voluntary code, open to liberal interpretation, and was too long and otherwise unsuited to a statutory assessment regime. The new Code of Practice, which owes a lot of its core content to the previous one, is much shorter, whilst still covering much the same wide range of aspects of good practice. It is also designed specifically to support the assessment process.

The producers

8. The Office for National Statistics (ONS) is the UK’s National Statistical Institute but it is far from being the only producer of official statistics. Statistical production occurs across a wide range of government departments, the devolved administrations and other public bodies, covering all areas of public policy.

9. This highly decentralised approach, whilst uncommon internationally, offers some real benefits. But it also creates challenges in organisation and management. These challenges are, in some respects, different from those faced by more centralised statistical systems in other countries. In particular, the assurance of common standards and a common approach to planning to meet future needs, and to coherent communication of the statistics to the user, require an approach that can work across a large number of substantially autonomous organisations. The UK’s new Code of Practice and the assessment process, backed by the force of legislation, have been developed with the characteristics of the UK’s decentralised system in mind.

² Further information on this superseded Code is given in Annex 1.

The application of the Code

10. Section 12 of the *Statistics and Registration Service Act 2007* requires the Authority, at the request of ministers, to assess and determine whether the Code of Practice has been complied with in relation to any official statistics. Where the Authority determines that the Code has been complied with, it is required to designate the statistics as 'National Statistics'. Otherwise, it must decline to designate them. Section 14 of the Act places a similar duty on the Authority to assess existing National Statistics, of which there were some 1200 identified sets at the time the Act came in to force in April 2008.

11. For a set of statistics designated as 'National Statistics', the body responsible for their production is under a statutory duty to continue to comply with the Code. The Authority must re-assess, from time to time, whether those statistics continue to be Code-compliant. The Code places different obligations on different groups of officials within bodies that produce official statistics: those with direct responsibility for statistical functions have obligations in relation to professional independence and for quality assurance; other officials need to ensure an environment in which statistical production and professional independence are supported.

12. The requirements of the Code are specific but, given its conciseness, there will often be a need for interpretation and professional judgement. The National Statistician, as the professional head of the Government Statistical Service, will provide supplementary advice and guidance to assist producers of statistics. However, as required by the Act, the process of assessment and determination of compliance with the Code will be conducted independently under the authority of the Head of Assessment³, who may also offer guidance.

13. The establishment of the Code and robust assessment processes will, in addition to helping to ensure the objectivity and impartiality of official statistics, help the Authority to promote and defend good practice and to support statisticians in pointing out misuse of statistics. The United Nations *Fundamental Principles of Official Statistics* states that:

"While statistics can be used and interpreted in many different and acceptable ways, it is important for the maintenance of trust and credibility of official statistics that attention is drawn by statistical agencies to obvious public incorrect use or interpretation, along with the correct use."

³ The Head of Assessment is a statutory office holder – a post established under Section 33 of the *Statistics and Registration Service Act 2007*.

And the UK Code of Practice requires bodies responsible for official statistics to:

“Promote a culture within which statistical experts in government can comment publicly on statistical issues, including the misuse of official statistics.”

Structure of the Report

14. The main body of this Report is in three parts.

Part 1 sets out more of the background to the Code of Practice and includes the full text in the form that has been adopted and will be published by the Authority.

Part 2 introduces and sets out the Statement of Principles and Procedures for Assessment.

Part 3 describes the consultation process and presents the Authority’s views and conclusions in relation to the issues raised.

15. The annexes contain background information on the, now superseded, National Statistics Code of Practice, relevant international codes, and details of the respondents to the consultation exercise.

Part 1

Code of Practice for Official Statistics

The international context

1. The United Nations *Fundamental Principles of Official Statistics* (see Annex 2) were agreed at a Special Session of the UN Statistical Commission in April 1994. Although the main driver behind the Fundamental Principles was a desire to help the new democracies of Eastern Europe to establish statistical systems that supported their new political environments, the Principles have had a much broader impact as a globally agreed-upon codification of statistical professionalism. Stimulated by their publication, many countries have reflected them in their legislation and in their own statistical codes of practice. This has had the effect of raising and harmonising international standards of statistical governance, production and dissemination.

2. In 2005, the European Statistical System (ESS) – the partnership of Eurostat and the National Statistical Institutes (NSIs) of the Member States – endorsed a new European Statistics Code of Practice (see Annex 3). At the same time, the European Commission outlined a strategy to implement and monitor compliance with the Code. This strategy, supported by the Statistical Programme Committee, is characterised by self-assessment (of compliance against the Code) and NSI reporting, reinforced by peer reviews to help identify areas in which NSIs and Eurostat should take steps to improve their compliance. Economic and Finance Ministers of EU Member States endorsed the ESS's approach to improving the independence, integrity and accountability of the national and Community statistical authorities. The first round of peer reviews is now complete, and all reports have been published by Eurostat.

3. The *Code of Practice for Official Statistics* presented here has been informed by, and is consistent with, both the UN Fundamental Principles and the European Statistics Code of Practice. The Authority has adopted a structure broadly similar to the European Code, which sets out a number of high-level principles, each of which is further amplified by a series of more detailed practices (or 'indicators' in the European Code). The European Code has proved an effective basis for the international process of 'peer review' and the Authority believes that a similar approach will provide a sound foundation for the Authority's assessment function.

The nature of the Code

4. The Authority agrees with the arguments put forward by the former Statistics Commission, in its 2007 report *Proposals for a Code of Practice for Official Statistics*, that the new statutory framework would require a code that, while covering much the same ground as the (now superseded) National Statistics Code of Practice, should be different in some respects – that the Code should:

- be shorter, simpler and more imperative in style – both so that individuals might find it easier to understand and remember, and also so that bodies that produce statistics are more readily able to establish whether their practices are Code-compliant;
- as far as possible, provide an unambiguous and structured basis for independent assessment;
- benefit from being closer in style, structure and content to the European Statistics Code of Practice, compliance with which is expected of all producers of European statistics;
- be drafted to apply to all bodies that produce official statistics, not just to statistical staff or to the statistics themselves; and
- not set out exceptions and exemptions in the text of the Code. Instead, another mechanism should be adopted for agreeing and documenting necessary exceptions and special cases. This change would have the effect of substantially shortening the Code.

5. As has been noted earlier, the revised Code of Practice presented below, whilst containing some new requirements, covers much the same ground as the National Statistics Code of Practice. Among the aspects which differ from the National Statistics Code are:

- the requirement on producer bodies under Principle 1 of the Code to investigate and document the use made of official statistics and the types of decisions they inform. Investigation of these issues serves as an important contribution to planning and quality assurance of statistics;
- the inclusion of a principle on resources (Principle 7). This broadly follows the model of the European Code;
- the requirement that exemptions and exceptions to the application of the Code will be made only by agreement with the UK Statistics Authority (Preamble (xii), and Principle 2);
- the inclusion of three new Protocols containing fuller guidance on (i) user engagement, (ii) release practices, and (iii) the use of administrative sources for statistical purposes. The protocol on the use of administrative sources is a new aspect to be covered in the Code and addresses an area of growing importance, and it is desirable that the Code should set out how the Authority will seek to ensure that the use of such sources is being managed in the public interest;
- requirements relating to government statements that are released at the same time as official statistics;
- the removal of guidance to the granting of pre-release access to statistics in their final form, as required by section 11(1) of the Act; and
- the removal of the 12 protocols to the earlier Code which, other than where they are adequately covered in the revised Code, will be developed into supplementary guidance to help producers implement the Code.

6. The Act requires that bodies that produce National Statistics must ensure that the Code continues to be observed in relation to those statistics. For other official statistics, compliance with the Code will be expected but is not a formal requirement.

7. The Authority has considered whether it should offer, either in the Code or in this report, detailed formal definitions of terms such as 'statistics', 'statistical reports', and so on. On balance, it has concluded that such matters are best determined through a combination of statisticians' professional judgement and the supplementary guidance that will follow the Code's publication.

8. The Code consists of a preamble explaining the context within which the Code applies, eight Principles, and the three Protocols referred to above. Each principle is, in turn, supported by a statement of related practices. Where a practice supports several principles, it is not normally repeated.

9. The principles are expected to remain stable over time, but the statements of practices and the protocols may be revised from time to time. The Authority will consult publicly on any material revisions to the Code in the future. To indicate that the Code is subject to revision, and to aid its use, the Code will carry an edition number when it is published.

10. There is no implicit order of precedence or priority among the elements of the Code. The principles broadly follow an order reflecting the need to ensure that the range of official statistics meets the needs of users (mainly Principle 1), that the statistics are produced, managed and disseminated to high and published standards (mainly Principles 2 to 7), and that the statistics are explained well (mainly Principle 8).

11. The principles and practices of the Code are mostly not specific about what level of compliance will be regarded as sufficient. For example, the Code states that producers of statistics shall 'present statistics impartially and objectively' (Principle 2, Practice 2), but is not specific about how this should be done. Further guidance about steps that would constitute satisfactory compliance will be prepared, and this will be supplemented as the Assessment function develops experience of current practice.

Focus on the use of statistics

12. The Authority recognises that the needs of the users of statistics, now and in the future, should be central to standards set for the statistical service. Principle 1 (Meeting user needs) encapsulates the need to engage effectively with users in order to maximise the public value of official statistical activity.

13. In the consultation document, the Authority included a Protocol on Consultation, which set out a range of requirements concerning consultation with users about statistical methods and products. However, the consultation exercise suggested that this protocol was too narrow in scope. The Authority agrees, and the Code of Practice now includes a revised Protocol 1, on User Engagement. This Protocol draws together the relevant practices set out elsewhere in the Code and expands on the requirements in relation to consultation.

Quality of statistics

14. Quality in relation to a set of statistics might be said, like beauty, to be at least partly in the eye of the beholder. Statistics that are fit-for-purpose for one user, or for one purpose, may be less fit for another. The Code does not set down levels of quality. Instead, it requires producers to explain the quality of published statistics (Principle 4, Practice 2), against the quality dimensions agreed by the European Statistical System: relevance, accuracy, timeliness and punctuality, accessibility and clarity, comparability, and coherence.

15. Other elements of the Code complement this requirement. For example, producers are required to explore the *relevance* of their statistics, to users, in Principle 1, Practice 2 – “investigate and document the needs of users of official statistics ...”; and they are required to describe the *accuracy* of their statistics, in Principle 4, Practice 2 – “ensure that ... users are informed ... of ... estimates of the main sources of bias and other errors”. Indeed, reflecting its importance to users, the requirements for producers to ensure the *accessibility and clarity* of published statistics are covered by the whole of Principle 8.

16. These issues relate to what is often referred to as product quality. In addition to this, the Code sets out requirements related to quality assurance, quality guidelines, and process quality.

Government statements issued alongside statistics

17. The Code requires that ministerial or policy statements – of the kind which government departments commonly issue separately from, but at the same time as, the release of statistics – should not precede the publication of the statistics to which they refer (Principle 3, Practice 1). The intention here is that the Code should preclude any such statement, including background verbal statements to journalists, before the statistics are in the public domain. This would apply whether the statement contained the actual figures or just speculative comment about what they might show.

18. The Statistics Commission suggested, in its 2007 report *Proposals for a Code of Practice for Official Statistics*, that consideration should be given to including in the Code some basic standards for departmental statements issued in parallel to the release of statistics. Consequently, the Authority's 2008 consultation asked whether the Code should include a requirement that government statements relating directly to statistics (and issued at, or about, the time of the first release of those statistics) should:

- contain a prominent link to the statistical release;
- be clearly labelled as a policy statement (or ministerial statement) and be readily distinguished from a statistical release; and
- meet basic professional standards in the use of statistics within the policy statement (for example, statistics should be cited accurately; charts should be drawn in an accurate and impartial way).

19. There was support for the inclusion of appropriate statements, on the lines above, in the Code. Protocol 2, on 'Release Practices', now includes practices which are intended to ensure that government statements, issued at the same time, are consistent with, and refer to, the statistical release, and also that the presentation of statistics in such statements meets basic professional standards.

Publication Hub

20. ONS staff, working with statisticians from across the Government Statistical Service, have developed a new website, called the Publication Hub⁴. The Hub has been developed as a portal to all releases of National Statistics, and serves both to improve accessibility – helping users find statistical releases from a single, central location – and to reinforce the separation of policy comment by government from statistical releases. Protocol 2 to the Code requires (Practice 3) that all National Statistics should be accessible from the Publication Hub.

⁴ <http://www.statistics.gov.uk>

Pre-release access

21. Pre-release access is defined in the Act as ‘access to the statistics in their final form prior to publication’. Section 11 of the Act specifically prevents the Code of Practice from dealing with ‘any matter relating to the granting of pre-release access to official statistics’, which will instead be determined by Orders (secondary legislation) made under the Act. With this exception, there are no specific constraints on the content of the Code.

22. The Act states that ‘the Code shall apply in relation to any official statistic as if it included any rules and principles provided for in relation to those statistics’. This means that the Code has to be read as if the rules and principles relating to pre-release access were part of it – and thus the assessment process will take account of compliance with those rules, regardless of the fact that they are not set out in the Code.

23. Because pre-release access is defined in the Act to refer only to statistics in their final form prior to publication, the question of the treatment of statistics *before* they reach that final form remains a matter for the Code of Practice. Thus there are references in Protocol 2 of the Code to principles governing access to statistics before publication. These references do not apply to statistics in their final form.

Administrative sources

24. A large and growing proportion of official statistics are produced from data originally collected for administrative purposes, such as school records, hospital records and payment of benefits. The Code includes requirements (Protocol 3) on all public bodies that produce official statistics from administrative sources to observe certain practices and to prepare a Statement of Administrative Sources that should be subject to consultation with the National Statistician before finalisation. These statements will set out how a range of practical matters are to be handled. Further advice on the form of the statements will be issued by the Authority.

Code of Practice for Official Statistics

Preamble

- i. Official statistics are fundamental to good government, to the delivery of public services and to decision-making in all sectors of society. They provide Parliament and the public with a window on society and the economy, and on the work and performance of government.
- ii. Observance of a common Code of Practice, by all the public bodies that produce official statistics, is central to maintaining a unified statistical service that meets the needs of government and society and is both trustworthy and trusted.
- iii. The *Statistics and Registration Service Act 2007* requires the UK Statistics Authority (the 'Statistics Board' in the Act) to prepare and publish a Code of Practice and to assess compliance against it. Official statistics assessed as compliant are to be designated as National Statistics. Bodies that produce National Statistics are required to ensure that the Code continues to be observed. For other official statistics, compliance with the Code is not a formal requirement.
- iv. 'Official statistics' are defined in Section 6 of the *Statistics and Registration Service Act 2007*.
- v. This Code is consistent with the United Nations *Fundamental Principles of Official Statistics*⁵ and the *European Statistics Code of Practice*⁶ (with which all producers of European Statistics are expected to comply).
- vi. It is also consistent with the Civil Service core values of integrity, honesty, objectivity and impartiality⁷. In relation to statistical work, these are interpreted as follows.
 - Integrity – putting the public interest above organisational, political or personal interests.
 - Honesty – being truthful and open about the statistics and their interpretation.
 - Objectivity – using scientific methods to collect statistics and basing statistical advice on rigorous analysis of the evidence.
 - Impartiality – acting solely according to the merits of the statistical evidence, serving equally well all aspects of the public interest.

5 United Nations Statistics Division *Fundamental Principles of Official Statistics* (2006)

6 Eurostat *European Statistics Code of Practice: For national and community statistical authorities* (2005)

7 Cabinet Office Civil Service Code (2006)
http://www.cabinetoffice.gov.uk/propriety_and_ethics/civil_service/civil_service_code.aspx

The National Statistician will publish a related code of conduct for officials working within the Government Statistical Service.

- vii. The Code contains eight principles and, in relation to each, a statement of associated practices. It also contains three more detailed protocols – on user engagement; on the release of statistics; and on the use of administrative data for statistical purposes. The Code has been framed to support the assessment of compliance by the UK Statistics Authority.
- viii. Taken together, the principles and protocols of the Code are intended to ensure: that the range of official statistics meets the needs of users; that the statistics are produced, managed and disseminated to high standards; and that the statistics are well explained.
- ix. As required under Section 11(1) of the Act, the Code does not cover requirements in relation to ‘pre-release’ access to statistics in their final form. Pre-Release Access Orders provide the rules and principles relating to the granting of such access. The Code will apply as if it included these Orders.
- x. The Code is specific but, in many cases, its requirements will need interpretation and professional judgement. The National Statistician and the Head of Assessment⁸ will provide supplementary guidance to assist bodies that produce official statistics.
- xi. Some practices set out in the Code are relevant to more than one principle. In the interests of conciseness, the practices are not normally repeated under different principles.
- xii. Under some circumstances it may be appropriate for the UK Statistics Authority to agree exemptions or exceptions to the practices, though not to the principles. Where a body that produces National Statistics is aware of a need for an exemption, it should make a case to the Head of Assessment. Details of all exemptions and exceptions will be made public.
- xiii. It is implicit in the Code that there will be sufficient managerial separation between staff responsible for official statistics and other staff of the organisation, to ensure clear lines of accountability for observance of the Code.
- xiv. The Code uses the following terminology.
 - *production, management and dissemination of official statistics* – refers to the entire statistical process from the identification of needs, to the decision to collect or compile data, through to providing advice to the user.
 - *statistical report* – means any statistical output, including any associated commentary and metadata.
 - *relevant statistical Head of Profession* – includes the Chief Statisticians of the Devolved Administrations. (‘Heads of Profession’ are the senior statistical advisers in government departments).

⁸ The National Statistician and Head of Assessment are statutory office holders with responsibilities set out in Sections 30 to 32, and Section 33 of the *Statistics and Registration Service Act 2007* respectively.

Principle 1: Meeting user needs

The production, management and dissemination of official statistics should meet the requirements of informed decision-making by government, public services, business, researchers and the public.

Practices

1. Engage effectively with users of statistics to promote trust and maximise public value, in accordance with Protocol 1.
2. Investigate and document the needs of users of official statistics, the use made of existing statistics and the types of decision they inform.
3. Adopt systematic statistical planning arrangements, including transparent priority setting, that reflect the obligation to serve the public good.
4. Publish statistical reports according to a published timetable that takes account of user needs.
5. Publish information about users' experiences of statistical services, data quality, and the format and timing of reports.

Principle 2: Impartiality and objectivity

Official statistics, and information about statistical processes, should be managed impartially and objectively.

Practices

1. Publish statistical reports in an orderly manner, in accordance with Protocol 2.
2. Present statistics impartially and objectively.
3. Make official statistics equally available to all, subject to statutory provisions for pre-release access.
4. Announce changes to methods or classifications well in advance of the release of the changed statistics.
5. Publish details of any exemption from the practices of the Code, as agreed by the UK Statistics Authority.
6. Publish a Revisions Policy for those outputs that are subject to scheduled revisions. Provide a statement explaining the nature and extent of revisions at the same time that they are released.
7. Correct errors discovered in statistical reports, and alert stakeholders, promptly.
8. Release all regular statistical reports on the internet without charge to the user.
9. For any supplementary statistical services for which a charge is made, adopt clear pricing policies that comply with legislation and relevant policy.

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.

Principle 4: Sound methods and assured quality

Statistical methods should be consistent with scientific principles and internationally recognised best practices, and be fully documented. Quality should be monitored and assured, taking account of internationally agreed practices.

Practices

1. Ensure that official statistics are produced according to scientific principles. Publish details of the methods adopted, including explanations of why particular choices were made.
2. Ensure that official statistics are produced to a level of quality that meets users' needs, and that users are informed about the quality of statistical outputs, including estimates of the main sources of bias and other errors, and other aspects of the European Statistical System definition of quality⁹.
3. Adopt quality assurance procedures, including the consideration of each statistical product against users' requirements, and of their coherence with other statistical products.
4. Publish quality guidelines, and ensure that staff are suitably trained in quality management.
5. Seek to achieve continuous improvement in statistical processes by, for example, undertaking regular reviews or releasing statistical work in progress such as *experimental statistics*¹⁰.
6. 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.
7. Where time series are revised, or changes are made to methods or coverage, produce consistent historical data where possible.

⁹ The six dimensions of the ESS Quality Framework are: relevance, accuracy, timeliness and punctuality, accessibility and clarity, comparability, and coherence.

¹⁰ Experimental statistics are new official statistics undergoing evaluation. They are published in order to involve users and stakeholders in their development and as a means to build in quality at an early stage.

Principle 5: Confidentiality

Private information about individual persons (including bodies corporate) compiled in the production of official statistics is confidential, and should be used for statistical purposes only.

Practices

1. Ensure that official statistics do not reveal the identity of an individual or organisation, or any private information relating to them, taking into account other relevant sources of information.
2. Keep confidential information secure. Only permit its use by trained staff who have signed a declaration covering their obligations under this Code.
3. Inform respondents to statistical surveys and censuses how confidentiality will be protected.
4. Ensure that arrangements for confidentiality protection are sufficient to protect the privacy of individual information, but not so restrictive as to limit unduly the practical utility of official statistics. Publish details of such arrangements.
5. Seek prior authorisation from the National Statistician or Chief Statistician in a Devolved Administration for any exceptions, required by law or thought to be in the public interest, to the principle of confidentiality protection. Publish details of such authorisations.
6. In every case where confidential statistical records are exchanged for statistical purposes with a third party, prepare written confidentiality protection agreements covering the requirements under this Code. Keep an operational record to detail the manner and purpose of the processing.

Principle 6: Proportionate burden

The cost burden on data suppliers should not be excessive and should be assessed relative to the benefits arising from the use of the statistics.

Practices

1. Report annually the estimated costs (for example, on businesses, service providers, or the public) of responding to statistical surveys and strive to develop methods that will reduce the costs to individual organisations or people.
2. Seek participation in statistical surveys through informed consent, rather than using statutory powers, wherever possible.
3. Promote statistical purposes actively in the design of administrative systems in order to enhance the statistical potential of administrative records.
4. Analyse the costs of proposed new data requirements (to data suppliers) against the potential benefits.
5. Evaluate existing data sources and estimation techniques before undertaking new surveys.

Principle 7: Resources

The resources made available for statistical activities should be sufficient to meet the requirements of this Code and should be used efficiently and effectively.

Practices

1. Ensure that statistical services have the staff, financial and computing resources to produce, manage and disseminate official statistics to the standards of this Code.
2. Consult users before changing the allocation of resources to statistical activities. Include specific resources for user consultation in budgets.
3. Ensure that records are maintained showing the relationship between the statistical planning process, the work programme, the allocation of resources, and the outcomes.
4. Monitor expenditure against work programmes and demonstrate effective stewardship of resources allocated to statistical work.
5. Seek to balance quality (for example, accuracy and timeliness) against costs (including both costs to government and data suppliers), taking into account the expected uses of the statistics.
6. Ensure that appropriately skilled people are employed in the statistical production process. Use an appropriate competence framework to set the requirements of statistical posts and the development needs of staff, and support staff in developing their statistical, management and subject area knowledge.
7. Where administrative sources are used for statistical purposes, follow the practices set out in Protocol 3.

Principle 8: Frankness and accessibility

Official statistics, accompanied by full and frank commentary, should be readily accessible to all users.

Practices

1. Provide information on the quality and reliability of statistics in relation to the range of potential uses, and on methods, procedures, and classifications.
2. Prepare and disseminate commentary and analysis that aid interpretation, and provide factual information about the policy or operational context of official statistics. Adopt formats for the presentation of statistics in graphs, tables and maps that enhance clarity, interpretability and consistency.
3. Make statistics available in as much detail as is reliable and practicable, subject to legal and confidentiality constraints, offering choice and flexibility in the format according to the level of detail required by the user.
4. Publicise official statistics in ways that enable users to identify and access information relevant to their needs. Make access to official statistics as straightforward as possible by providing easy-to-use entry points.
5. Ensure that official statistics are disseminated in forms that, as far as possible, are accessible to a range of different audiences, including those with disabilities.
6. Ensure that official statistics are disseminated in forms that enable and encourage analysis and re-use. Release datasets and reference databases, supported by documentation, in formats that are convenient to users.
7. Manage official statistics in accordance with relevant public records legislation and codes of practice on records management. Deposit official statistics (accompanied by information about their purposes, design and methods) with the relevant national archive as required in legislation.

Protocol 1: User engagement

Effective user engagement is fundamental both to trust in statistics and securing maximum public value. This Protocol draws together the relevant practices set out elsewhere in the Code and expands on the requirements in relation to consultation.

Practices

1. Identify users. Document their statistical needs, and their wishes in terms of engagement.
2. Make users aware of how they can find the information they need.
3. Take account of users' views on the presentation of statistics, and associated commentary, datasets and metadata.
4. Provide users with information about the quality of statistics, including any statistical biases.
5. Involve users in the evaluation of *experimental statistics*.
6. Seek feedback from users on their experiences of the statistical service they receive, data quality, and the format and timing of outputs. Review the feedback systematically.
7. Consult users before making changes that affect statistics (for example, to coverage, definitions, or methods) or publications. Consultations should be:
 - Informed – by relevant central guidance on how consultations should be conducted; and by the views of user groups on the best means of obtaining views;
 - Efficient – by balancing the importance of the issue and the likely impact of users' views against the time and resources available, so as to obtain good value for money from the consultation process; by liaising and co-ordinating with other producers to avoid duplication of effort and to minimise burdens; and by exploiting different methods of consultation;
 - Clear – by describing the consultation, and expressing the issues, as simply and concisely as possible; and by publishing the timetable for each consultation; and
 - Responsive – by publishing the records of decisions and actions following a consultation, together with explanations for them; and by publishing individual responses, unless anonymity is requested.

Protocol 2: Release practices

Statistical reports should be released into the public domain in an orderly manner that promotes public confidence and gives equal access to all, subject to relevant legislation¹¹.

Practices

1. Release statistical reports as soon as they are judged ready, so that there is no opportunity, or perception of opportunity, for the release to be withheld or delayed.
2. Publish a timetable of statistical releases for twelve months ahead.
3. Ensure that all National Statistics can be accessed from the National Statistics Publication Hub¹².
4. Issue statistical releases at the standard time of 9.30am on a weekday, to maintain consistency and to permit time for users to understand and respond to the information during normal working hours.
5. Draw public attention to any change to a pre-announced release date and explain fully the reasons for the change at the same time. The relevant statistical Head of Profession has the final decision and should not be influenced by non-statistical matters.
6. Include the name and contact details of the responsible statistician in statistical reports.
7. Subject to compliance with the rules and principles on pre-release access set out in legislation, limit access before public release to those people essential for production and publication, and for quality assurance and operational purposes. Publish records of those who have access prior to release.
8. Ensure that no indication of the substance of a statistical report is made public, or given to the media or any other party not recorded as eligible for access before publication. Report to the National Statistician immediately any accidental or wrongful release, and investigate the circumstances.
9. Ensure that government statements issued alongside official statistics, and referring to, or based upon, them:
 - a. contain a prominent link to the statistical release and clearly refer to the source of the statistics;
 - b. are labelled clearly as policy statements (or ministerial statements) and are readily distinguished from a statistical release; and
 - c. meet basic professional standards (for example, statistics should be cited accurately, and charts should be drawn in an accurate and impartial way).

11 http://www.opsi.gov.uk/si/si2008/draft/ukdsi_9780110832203_en_1

http://www.opsi.gov.uk/legislation/scotland/ssi2008/draft/sdsi_9780111000236_en_1

12 <http://www.statistics.gov.uk>

Protocol 3: The use of administrative sources for statistical purposes

Administrative sources should be fully exploited for statistical purposes, subject to adherence to appropriate safeguards.

Practices

1. Observe all statutory obligations and relevant codes of practice in relation to the protection of confidentiality and the handling of personal data.
2. Only base statistics on administrative data where the definitions and concepts are good approximations to those appropriate for statistical purposes.
3. Maximise opportunities for the use of administrative data, cross-analysis of sources and for the exchange and re-use of data, to avoid duplicating requests for information. Where possible, use common information technology and information management systems that facilitate the flow of information between producers of statistics.
4. Ensure that no action is taken within the producer body, or public statement made, that might undermine confidence in the independence of the statistics when released.
5. Prepare, in consultation with the National Statistician, a Statement of Administrative Sources which identifies the following.
 - a. The administrative systems currently used in the production of official statistics.
 - b. Procedures to be followed within the organisation to ensure that full account is taken of the implications for official statistics when changes to administrative systems are contemplated.
 - c. Information on other administrative sources that are not currently used in the production of official statistics but have potential to be so used.
 - d. Arrangements for providing statistical staff, whether inside the producer body or elsewhere, with access to administrative data for statistical purposes.
 - e. Arrangements for auditing the quality of administrative data used for statistical purposes.
 - f. Arrangements for ensuring the security of statistical processes that draw on administrative data.

Part 2

Principles and Procedures for Assessment

Introduction

- i. Section 17 of the *Statistics and Registration Service Act 2007* requires the UK Statistics Authority to prepare and publish a statement of:
 - (a) the principles to which it will have regard; and
 - (b) the procedures which it will adopt

in exercising its functions under Sections 12(1) and 14(1) of the Act. These are the functions of assessment and re-assessment of statistics against the Code of Practice.
- ii. The Authority's Monitoring and Assessment Team will systematically review the evidence from producers, users and other stakeholders against the Code of Practice. We do not propose that published reports should include detailed 'scores' against each part of the Code – instead reports will provide a considered assessment of the strengths and weaknesses of the statistical activities being assessed, highlighting good practice as well as areas for improvement.
- iii. The assessment against the Code of Practice will cover all aspects of the work leading to the statistical output/publication and its dissemination.
- iv. The statement, set out below, details the procedures that will be followed. It is likely that these will evolve as the Authority gains experience of the processes involved and the statement will be revised from time to time as required.
- v. Any substantive changes will be subject to further consultation and the statement will carry an indication of which edition it is.

Statement of Principles and Procedures for Assessment

January 2009

1. This statement covers:

- the aims of the UK Statistics Authority's assessment function;
- the principles which the Authority will adopt when assessing official statistics; and
- the procedures and methods which the Authority will follow.

Aims of assessment

2. In accordance with Section 7(3) of the *Statistics and Registration Service Act 2007*, the aim of the Authority's assessment function is to promote and safeguard the quality of official statistics, good practice in relation to official statistics, and the comprehensiveness of official statistics. Official statistics include those designated as National Statistics.

3. The specific requirements in relation to assessment are set out in Sections 12 and 14 of the Act: to "determine whether the Code of Practice for Statistics ... has been [or continues to be] complied with", and to "designate [or confirm the previous designation of] the statistics as National Statistics"; otherwise the Authority must "decline ... to designate them ..." [or "otherwise cancel their designation"].

4. The assessment function will further aim (i) to help the producers of official statistics to enhance the quality of the statistical service over a period of time, and (ii) to communicate the extent of compliance with the Code to Parliament and the public.

Principles of assessment

5. Assessments will be conducted in accordance with the following five principles.

- Risk-based – prioritising those areas of statistical activity which are considered to present a risk to the quality and reputation of official statistics.
- Proportionate – taking account of the concerns and priorities of users of statistics.
- Cost-effective – making use of existing documentation where available, and avoiding unnecessary burdens on producers or users of statistics. In the interests of efficiency, the Authority may group together ('bundle') related statistics, or statistics with common features, for the purposes of assessment.

- Transparent – operating in an open manner which inspires confidence in the Authority's work.
- Consistent – applying the same principles and standards in all cases.

Procedures

6. Assessments will:

- take place in accordance with a published programme, although *ad hoc* assessments may be required from time to time in order to report on matters of public concern;
- take account of correspondence and discussion with the managers responsible for the statistics;
- take account of self-evaluation evidence from the relevant managers; and
- involve an opportunity for users of statistics and other stakeholders to contribute to the assessment, and explicitly consider any such contribution.

7. Assessment reports will also:

- be prepared in accordance with the Civil Service core values of integrity, honesty, objectivity and impartiality¹³;
- be completed within a reasonable timescale;
- reflect the views and needs of users of statistics and other external stakeholders, and take account of all the available information, comparing the evidence against published standards and criteria;
- give a brief account of the assessment of compliance against each of the Code's main principles and protocols;
- list proposals and recommendations which promote and support improvement;
- be relevant and accessible – reporting findings and conclusions fairly, clearly, and openly and in a manner which is useful to, and understood by, producers, users and the public;
- present clearly the Monitoring and Assessment Team's conclusions in relation to the degree to which the statistics comply with the Code of Practice; the nature of any improvements needed; and a recommendation to the Authority as to whether the statistics should be, or should continue to be, designated as 'National Statistics';
- be shown to the relevant producer body in draft form prior to publication, in order to ensure factual accuracy; and
- be published as soon as possible after completion.

¹³ Cabinet Office *Civil Service Code* (2006)
http://www.cabinetoffice.gov.uk/propriety_and_ethics/civil_service/civil_service_code.aspx

Evidence

8. Self-evaluations will be conducted using a standard template, based on the Code of Practice, and this will form the starting point for discussions between the Monitoring and Assessment Team and managers. This information will be supplemented by:

- any previously published reviews of the statistics;
- any other relevant information acquired by the Monitoring and Assessment Team at any time; and
- any information submitted by users or stakeholders.

9. The Statistics Authority's annual reports to the UK Parliament and devolved legislatures will list the assessments conducted in the previous year with their conclusions, as well as those planned for the coming year.

Prior notification

10. Managers in the producer body will normally be notified at least three months in advance of a planned assessment by means of updates to the Programme of Assessment, which the Authority will publish in accordance with the Act. Exceptions to this notification period will be explained publicly by the Authority.

Part 3

Consultation

Introduction

1. The Authority's consultation document '*Official statistics: serving the public good – Consultation on the code of practice*' welcomed views on both the draft Code of Practice and on the Principles and Procedures for Assessment. This consultation took place from 8 July 2008 to 30 September 2008.

2. The consultation document suggested that potential respondents might wish to consider the following questions.

- i. Does the draft Code achieve the right balance between being concise and offering sufficient clarity in what is expected of bodies that produce official statistics?
- ii. Are the 10 main principles in the Code the right principles to emphasise and do the associated 'practices' support them adequately?
- iii. Are there any further aspects of good practice that should be considered for inclusion in the Code?
- iv. With reference to the discussion (in the Consultation Document) of departmental policy statements issued alongside statistical releases, should the Code include requirements on the lines of those suggested?
- v. Is the treatment, in Protocol 1 to the (draft) Code, of access to official statistics before their publication, satisfactory, given the requirement that pre-release access to official statistics *in their final form* is specifically excluded from the coverage of the Code?
- vi. Should Protocol 3 to the Code, concerning the use of administrative sources for statistical purposes, be expanded to cover a wider range of issues?

3. The consultation was conducted in line with the Better Regulation Executive's *Code of Practice on Consultation*, which contains six criteria governing written consultation. Further information about this is available online at <http://www.berr.gov.uk/bre/>.
4. Respondents were asked to state whether they were responding as an individual or representing the view of an organisation. In the case of a response on behalf of an organisation, the respondent was asked to make clear who the organisation represented and, where applicable, how the views of the organisation's members were assembled.
5. All written responses have been made public on the Authority's website. No-one asked for their response to be withheld.

Response to consultation

6. In total, 31 responses to the consultation document were received. One of these, that from the Government Statistical Service (GSS) was a synthesis by the National Statistician, in her capacity as head of the GSS, of twenty separate responses from a range of departments, ONS directorates and Devolved Administrations. Annex 4 lists details of all respondents.
7. The section below summarises the responses received and presents the Authority's comments on each of the main issues raised. A full record of the responses received is available on the Authority's website.

Summary of issues raised in the consultation, and responses

8. A number of underlying issues were discernible within the body of responses. These are covered in more detail in the remainder of this section, but in summary:
 - the conciseness and clarity of the Code were welcomed;
 - many suggestions were made for inclusion in the Code of relatively detailed points. Some were more suitable for accompanying guidance material, but others have helped improve the Code itself;

- it was noted that compliance with the Code could, in some cases, be fairly onerous on the managers responsible, and there were calls to make clear that the Code should be implemented in a proportionate way;
- the consultation sought views on whether to include, in the Code, coverage of government statements relating to statistics, and of a set of requirements relating to the use of administrative data sources for statistical purposes. Both of these proposals were supported.

9. As a result, the following changes have been made to the Code of Practice.

1. The ten principles identified in the draft Code have been reduced to eight, by consolidation.
2. A number of the principles have been re-labelled, and the principles consequently rephrased.
3. The list of 104 practices identified in the draft Code has been reduced to 74, again by consolidation.
4. The wording of many of the practices has been tightened up.
5. A few new practices have been added, to address previous omissions – on topics such as timeliness, and revisions.
6. The principles have been re-ordered so that they are broadly in line with the statistical production process.
7. The principle and practices relating to Confidentiality have been extensively re-drafted.
8. The protocol on ‘Consultation’ has been re-focused on the broader topic of ‘User engagement’.

10. In addition, the ‘Principles and Procedures for Assessment’ have changed as follows.

1. Some small drafting changes have been made to the text.
2. Some additions have been made to the material on ‘procedures’.

11. The points below broadly follow the order in which they were raised in the consultation document *Official Statistics serving the public good – Consultation on the code of practice*.

1. Does the draft Code achieve the right balance between being concise and offering sufficient clarity in what is expected of bodies that produce official statistics?

Respondents generally welcomed the draft Code's conciseness and felt that it had been set at an appropriate overall level. There were some concerns that conciseness would lead to some variation in interpretation.

Authority response

We recognise this point, and attach importance to the provision of supplementary advice and guidance to help producers and users of official statistics understand what "code compliance" means in detail, and to help the Monitoring and Assessment Team calibrate standards.

Several respondents felt there was a need to define more tightly the Code's use of terms such as 'statistic', 'statistics', 'statistical output', 'statistics in their final form', 'official statistics', and 'national statistics'.

Authority response

We have discussed these definitional issues elsewhere in this Report (Part 1, paragraph 7). We believe that operational definitions should be included in the supplementary guidance. In general, we believe that in considering questions such as 'what is a statistic?' it is better to take a pragmatic view than to try to produce watertight definitions.

2. Are the 10 main principles in the Code the right principles to emphasise and do the associated 'practices' support them adequately?

and

3. Are there any further aspects of good practice that should be considered for inclusion in the Code?

There was general support for the principles, although several responses suggested that the Code would benefit from the inclusion of additions to the principles and practices, and its preamble and protocols, on matters including:

- the division between statisticians' and ministers' responsibilities;
- revisions;

- timeliness;
- professional competence;
- the need to cite measures of variation;
- confidentiality of personal information; and
- metadata (information about methods, process and quality).

In particular, Principle 8 (Confidentiality) and Protocol 2 (Consultation) received some significant responses.

Authority response

The close scrutiny given to the draft Code has helped identify a number of omissions, which have been addressed. The statement of principle (and associated practices) relating to Confidentiality has been substantively re-written, whilst the Protocol on 'Consultation' has been broadened to address the broader topic of 'User engagement'.

In addition, we have been able to structure the statements of practice more clearly, under eight (rather than the previous ten) principles. Statements of practice that previously appeared under the principles 'Value for Money' and 'Adequate resources' have been consolidated into a new principle, 'Resources', whilst statements of practice that previously appeared under the principles 'Communication', 'Presenting statistics', and 'Accessibility' have been consolidated under two new principles, 'Impartiality and objectivity' and 'Frankness and accessibility'.

In addition, many respondents made detailed suggestions for additions to the Code's practices, which the Authority considers more appropriate for inclusion in the supplementary guidance. These have been passed to the National Statistician, who will issue the guidance.

There was general support for the draft Code being founded on existing statistical codes of practice such as those of Europe, the UK and the UN. Some points of detail on the interrelationship of the European Statistics Code of Practice and the draft Code were raised by Eurostat.

Authority response

We have addressed the detailed point raised by Eurostat. We will continue to liaise with Eurostat to ensure that we are aware of, and can consider the implications of, any changes to the European Code.

Some respondents called for specific references to the need for statistical information at different (detailed) geographic levels.

Authority response

We fully recognise the importance of data at local level to many users, particularly local authorities, and we are acutely aware that the accuracy of small area statistical estimates from sample surveys is less than that of corresponding national estimates.

However, we have not included specific references to spatial or geographical levels in the Code; instead, we see these as implicit in terms of providing *relevant* statistics in order to meet user needs. We do think though that the point should be included explicitly in the supplementary guidance for producers that will accompany the Code, alongside the equivalent needs of other users.

The Royal Statistical Society (RSS) suggested that paragraph xi of the Preamble to the draft Code, about managerial separation between officials responsible for National Statistics and other staff, should be included within the main Code text.

Authority response

The Authority has considered this point very carefully. On balance, we think it is better to keep the statement in the preamble, as an observation rather than as a specific practice – though it is an issue we may return to in reviewing the effectiveness of the Code.

4. With reference to the discussion in the Consultation Document of departmental policy statements issued alongside statistical releases, should the Code include requirements on the lines of those suggested?

Most respondents, including government departments, supported the proposals in the consultation document to include such requirements.

A number of detailed concerns were raised. HM Revenue & Customs (HMRC) pointed out the resource implications, and the need for clear accountability. The Home Office suggested the inclusion of a reference to the Publication Hub, and pointed out that the 'basic professional standards' referred to have not been specified – and suggested some improved text. The Northern Ireland Statistics and Research Agency felt that this should not be part of the Code but, rather, should be covered by the Ministerial Code of Conduct or through training for policy colleagues.

Authority response

We were pleased that there was unanimous support for the principle of separating departmental policy statements from statistical releases, and that there was widespread support for the inclusion of appropriate statements in the Code.

The principle on 'Impartiality and objectivity' includes practices which are intended to ensure not only that government releases do not undermine or contradict the statistical release, but also that the use of statistics in government releases meets basic professional standards.

5. Is the treatment, in Protocol 1 of the draft Code, of access to official statistics before their publication, satisfactory, given the requirement that pre-release access to official statistics *in their final form* is specifically excluded from the coverage of the Code?

A few respondents suggested specific parts of the Protocol which they thought had strayed into commenting on the pre-release of statistics in their final form – the aspect which the Code is not allowed to cover under the provisions of the *Statistics and Registration Service Act 2007*.

Most respondents expressed the view that such a Protocol was helpful in clarifying and detailing good practice in relation to the release of statistics.

A number of respondents commented on the text of the Protocol too. Many important points of both principle and detail were raised. Eurostat reiterated their view that the pre-release arrangements set out in the Act lag behind common practices across the European Statistical System. The Audit Commission expressed concern that the Protocol mandates an approach to release that may conflict with the existing procedures of the organisation and may be perceived as reducing the independence of non-Crown bodies.

Several government departments stressed the importance of ensuring that the Protocol allows for pre-release access to statistics (not in their final form) for quality assurance, and for operational or management purposes.

The Scottish Government, Welsh Assembly Government and Northern Ireland Assembly expressed the view that statistics should be accessible from the Publication Hub, rather than released through it, to reflect their local arrangements and agreements made during the passage of the legislation.

Authority response

The Authority has published separately its views on pre-release access, and respects the need to ensure that – in accordance with the legislation – the Code only addresses issues relating to pre-release access to statistics *not in their final form*. The Authority also endorses the points described above, and has taken account of the large number of detailed drafting points made by respondents. We have amended the Protocol accordingly.

6. Should Protocol 3 to the Code, concerning the use of administrative sources for statistical purposes, be expanded to cover a wider range of issues?

Respondents were broadly supportive of this Protocol and, more generally, the use of administrative data for statistical purposes.

Some respondents pointed out that it is difficult, in practice, for statisticians to control actions taken (especially where the data are owned by a body that is not producing the official statistics) that might undermine confidence in the independence of the statistics when released. The RSS, however, suggested that the Authority should investigate the public use of 'management information' before the publication of the relevant statistics.

Several comments were made which will be considered for inclusion in the supplementary guidance.

Authority response

The Authority believes that the use of administrative sources for statistical purposes is central to the development of high quality statistics that minimise the burden on producers and data suppliers, and will lend its support to attempts to use such sources more fully. At the same time, it recognises the practical difficulties and tensions in doing so.

The Authority considers that the publication of Statements of Administrative Sources will shed light on existing practices, highlight potentially useful sources that are currently under-exploited for statistical purposes, and contribute to the more effective development of administrative sources and their informed use.

7. Other comments relating to the draft Code of Practice

A number of respondents commented usefully about a range of other issues. These are summarised below.

Proportionality and resource implications

Several respondents felt that the Code might lead statistics producers to take disproportionate action, suggesting, for example, that the number of situations in which the National Statistician was required to authorise matters was excessive and that the draft Code prescribed an excessive amount of administrative effort.

Authority response

We have considered carefully the additional administrative requirements placed upon producers, and the appropriate level of endorsement from statistics professionals, in the context of the need not only to establish standards of good practice but to ensure that these are adhered to. We have felt able to reduce the requirements in a few places.

Relatedly, several respondents commented that implementing the draft Code and its Principles and Procedures for Assessment would have significant resourcing implications for producer bodies. The Government Statistical Service (GSS), for example, noted the potentially large resource implications for providers, especially those statistical producers outside the GSS.

Authority response

The Code is a statement of good statistical practice, which producers should be following. However, we have reviewed the Code carefully in terms of the likely impact on resources, and we believe that the possible additional requirements are justified. We expect the supplementary guidance to the Code to indicate that the interpretation of the Code should be proportionate – that is to say, consistent with the public interest. For example, we expect that ‘user engagement’ might vary depending upon the breadth and needs of users.

The Authority is developing its assessment procedures to minimise burdens on producer bodies without losing effectiveness.

Responsibilities

Some respondents, particularly from within the Government Statistical Service (GSS), considered that matters such as complaints about professional integrity, quality or standards, and accidental or wrongful releases, were matters for the National Statistician rather than the Head of Assessment.

Authority response

We accept the validity of this point. The Head of Assessment clearly has a significant role in relation to matters of Code compliance, and will work with the National Statistician to agree ways of ensuring that their respective responsibilities are met.

Scope of the Code

There were several calls to clarify the scope of the Code – in terms of its applicability to bodies outside the Civil Service and as regards *ad hoc* statistics. The Audit Commission, for example, made the point that the draft Code appears to apply to large Civil Service producers and suggests that the Code’s applicability to other types of body should be tested, and called for a full costing of the impacts of complying with the Code, before it is introduced.

Authority response

The *Statistics and Registration Service Act 2007* is clear in establishing the scope of official statistics, and the Code applies equally to any body producing National Statistics or seeking designation as such. The Authority recognises, though, the need for proportionality in the way that it implements its assessment function.

8. Comments relating to the draft Principles and Procedures for Assessment

Most respondents welcomed the draft Principles and Procedures for Assessment while noting the potential resourcing implications and the need to avoid 'overkill'.

On the other hand, Eurostat expressed concern that, in some places, the language used might suggest that the assessment process would be less rigorous and independent than it should be.

Some respondents suggested that assessments should identify examples of good practice.

Authority response

We have reviewed the text, and understand the reasons for Eurostat's view. We are committed to ensuring that assessments are conducted rigorously, but believe that adopting a proportionate approach, and emphasising good practice and areas for improvement, rather than simply offering criticism, offers the best means of improving the statistical service offered by producers. We believe that this will be easier to see once the assessment reports start being produced.

We have clarified in the Principles and Procedures that we will seek to identify good practice.

Annex 1

National Statistics Code of Practice and Protocols

This annex lists, for the purposes of comparison, the main principles from the superseded National Statistics Code of Practice.

Main principles

The National Statistics Code of Practice contains eight Key Principles which embody a further 51 high-level principles. The Code is also supported by 12 Protocols which include a further 31 principles.

1. Relevance

National Statistics will inform significant decisions in government, business and the wider community and, in so doing, contribute to the quality of national life.

2. Integrity

National Statistics will gain public trust through being produced using objective and transparent methods.

3. Quality

National Statistics will be fit for purpose and of high quality.

4. Accessibility

Access to National Statistics will be fair and open.

5. Protecting confidentiality

Where data are collected or used for statistical purposes, we guarantee to protect confidentiality.

6. Balancing the needs of users against the burden on providers

Costs of compliance will be kept to an acceptable level and data collected only when the benefits of a statistical survey exceed the cost to providers.

7. Enhancement through integration, accumulation and innovation

National Statistics will emphasise coherence and common standards to maximise the value of available statistical and administrative sources.

8. Efficiency in costs, fairness in prices

National Statistics will strive to be efficient and to provide value for money in both its costs and its prices.

Annex 2

United Nations Fundamental Principles of Official Statistics

Preamble

The Statistical Commission,

- Bearing in mind that official statistical information is an essential basis for development in the economic, demographic, social and environmental fields and for mutual knowledge and trade among the States and peoples of the world.
- Bearing in mind that the essential trust of the public in official statistical information depends to a large extent on respect for the fundamental values and principles which are the basis of any society which seeks to understand itself and to respect the rights of its members.
- Bearing in mind that the quality of official statistics, and thus the quality of the information available to the Government, the economy and the public depends largely on the cooperation of citizens, enterprises, and other respondents in providing appropriate and reliable data needed for necessary statistical compilations and on the cooperation between users and producers of statistics in order to meet users' needs.
- Recalling the efforts of governmental and non-governmental organizations active in statistics to establish standards and concepts to allow comparisons among countries,
- Recalling also the International Statistical Institute Declaration of Professional Ethics,
- Having expressed the opinion that resolution C (47), adopted by the Economic Commission for Europe on 15 April 1992, is of universal significance,

- Noting that, at its eighth session, held in Bangkok in November 1993, the Working Group of Statistical Experts, assigned by the Committee on Statistics of the Economic and Social Commission for Asia and the Pacific to examine the Fundamental Principles, had agreed in principle to the ECE version and had emphasized that those principles were applicable to all nations,
- Noting also that, at its eighth session, held at Addis Ababa in March 1994, the Joint Conference of African Planners, Statisticians and Demographers, considered that the Fundamental Principles of Official Statistics are of universal significance,

Adopts the present principles of official statistics:

Principle 1. *Official statistics provide an indispensable element in the information system of a democratic society, serving the Government, the economy and the public with data about the economic, demographic, social and environmental situation. To this end, official statistics that meet the test of practical utility are to be compiled and made available on an impartial basis by official statistical agencies to honor citizens' entitlement to public information.*

Principle 2. *To retain trust in official statistics, the statistical agencies need to decide according to strictly professional considerations, including scientific principles and professional ethics, on the methods and procedures for the collection, processing, storage and presentation of statistical data.*

Principle 3. *To facilitate a correct interpretation of the data, the statistical agencies are to present information according to scientific standards on the sources, methods and procedures of the statistics.*

Principle 4. *The statistical agencies are entitled to comment on erroneous interpretation and misuse of statistics.*

Principle 5. *Data for statistical purposes may be drawn from all types of sources, be they statistical surveys or administrative records. Statistical agencies are to choose the source with regard to quality, timeliness, costs and the burden on respondents.*

Principle 6. *Individual data collected by statistical agencies for statistical compilation, whether they refer to natural or legal persons, are to be strictly confidential and used exclusively for statistical purposes.*

Principle 7. *The laws, regulations and measures under which the statistical systems operate are to be made public.*

Principle 8. *Coordination among statistical agencies within countries is essential to achieve consistency and efficiency in the statistical system.*

Principle 9. *The use by statistical agencies in each country of international concepts, classifications and methods promotes the consistency and efficiency of statistical systems at all official levels.*

Principle 10. *Bilateral and multilateral cooperation in statistics contributes to the improvement of systems of official statistics in all countries.*

Annex 3

European Statistics Code of Practice

Adopted by the Statistical Programme Committee on 24 February 2005

Preamble

Definitions

For the purpose of this document:

European Statistics shall mean Community Statistics as defined in Council regulation (EC) No 322/97 of 17 February 1997 on Community Statistics, produced and disseminated by national statistical authorities and the Community's statistical authority (Eurostat) in conformity with Article 285(2) of the Treaty.

The *Statistical Authority* shall mean, at national level, the National Statistical Institute (NSI) and other statistical bodies in charge of producing and disseminating European Statistics and, at Community level, Eurostat.

The *European Statistical System*, hereinafter referred to as the ESS, shall mean the partnership comprising Eurostat, National Statistical Institutes and other national statistical bodies responsible in each Member State for producing and disseminating European Statistics.

In coherence with the Treaty establishing the European Community, and in particular Article 285(2) thereof, with the Council regulation (EC) No 322/97 of 17 February 1997 on Community Statistics, and with the Fundamental Principles of Official Statistics adopted by the United Nations Statistical Commission on 14 April 1994, the present Code of Practice has the dual purpose of:

- Improving trust and confidence in the independence, integrity and accountability of both National Statistical Authorities and Eurostat, and in the credibility and quality of the statistics they produce and disseminate (*i.e. an external focus*);

- Promoting the application of best international statistical principles, methods and practices by all producers of European Statistics to enhance their quality (i.e. an internal focus).

The Code is addressed for implementation to:

- Governance authorities (i.e. Governments, Ministries, Commission, Council) – to provide guidelines for them to ensure that their statistical services are professionally organised and resourced to produce credible European Statistics in a manner that guarantees independence, integrity and accountability;
- Statistical authorities and their staff – to provide a benchmark of statistical principles, values and best practices that should help them in producing and disseminating high quality, harmonised European Statistics.

It is addressed for information to:

- Users – to show that European and national statistical authorities are impartial and that the statistics they produce and disseminate are trustworthy, objective and reliable;
- Data providers – to show that the confidentiality of the information they provide is protected, and that excessive demands will not be placed on them.

The Code of Practice is based on 15 *Principles*. Governance authorities and statistical authorities in the European Union commit themselves to adhering to the principles fixed in this code and to reviewing its implementation periodically by the use of *Indicators of Good Practice* for each of the 15 Principles, which are to be used as references.

The Statistical Programme Committee established by Council Decision 89/382/EEC of 19 June 1989 will regularly carry out peer review monitoring of the implementation of the present Code.

Institutional Environment

Institutional and organisational factors have a significant influence on the effectiveness and credibility of a statistical authority producing and disseminating European Statistics. The relevant issues are professional independence, mandate for data collection, adequacy of resources, quality commitment, statistical confidentiality, impartiality and objectivity.

Principle 1: Professional Independence – *The professional independence of statistical authorities from other policy, regulatory or administrative departments and bodies, as well as from private sector operators, ensures the credibility of European Statistics.*

Indicators

- The independence of the statistical authority from political and other external interference in producing and disseminating official statistics is specified in law.
- The head of the statistical authority has sufficiently high hierarchical standing to ensure senior level access to policy authorities and administrative public bodies. He/She should be of the highest professional calibre.
- The head of the statistical authority and, where appropriate, the heads of its statistical bodies have responsibility for ensuring that European Statistics are produced and disseminated in an independent manner.
- The head of the statistical authority and, where appropriate, the heads of its statistical bodies have the sole responsibility for deciding on statistical methods, standards and procedures, and on the content and timing of statistical releases.
- The statistical work programmes are published and periodic reports describe progress made.
- Statistical releases are clearly distinguished and issued separately from political/policy statements.
- The statistical authority, when appropriate, comments publicly on statistical issues, including criticisms and misuses of official statistics.

Principle 2: Mandate for Data Collection – *Statistical authorities must have a clear legal mandate to collect information for European statistical purposes. Administrations, enterprises and households, and the public at large may be compelled by law to allow access to or deliver data for European statistical purposes at the request of statistical authorities.*

Indicators

- The mandate to collect information for the production and dissemination of official statistics is specified in law.
- The statistical authority is allowed by national legislation to use administrative records for statistical purposes.

- On the basis of a legal act, the statistical authority may compel response to statistical surveys.

Principle 3: Adequacy of Resources – *The resources available to statistical authorities must be sufficient to meet European Statistics requirements.*

Indicators

- Staff, financial, and computing resources, adequate both in magnitude and in quality, are available to meet current European Statistics needs.
- The scope, detail and cost of European Statistics are commensurate with needs.
- Procedures exist to assess and justify demands for new European Statistics against their cost.
- Procedures exist to assess the continuing need for all European Statistics, to see if any can be discontinued or curtailed to free up resources.

Principle 4: Quality Commitment – *All ESS members commit themselves to work and co-operate according to the principles fixed in the Quality Declaration of the European Statistical System.*

Indicators

- Product quality is regularly monitored according to the ESS quality components.
- Processes are in place to monitor the quality of the collection, processing and dissemination of statistics.
- Processes are in place to deal with quality considerations, including tradeoffs within quality, and to guide planning for existing and emerging surveys.
- Quality guidelines are documented and staff are well trained. These guidelines are spelled out in writing and made known to the public.
- There is a regular and thorough review of the key statistical outputs using external experts where appropriate.

Principle 5: Statistical Confidentiality – *The privacy of data providers (households, enterprises, administrations and other respondents), the confidentiality of the information they provide and its use only for statistical purposes must be absolutely guaranteed.*

Indicators

- Statistical confidentiality is guaranteed in law.
- Statistical authority staff sign legal confidentiality commitments on appointment.
- Substantial penalties are prescribed for any wilful breaches of statistical confidentiality.
- Instructions and guidelines are provided on the protection of statistical confidentiality in the production and dissemination processes. These guidelines are spelled out in writing and made known to the public.
- Physical and technological provisions are in place to protect the security and integrity of statistical databases.
- Strict protocols apply to external users accessing statistical microdata for research purposes.

Principle 6: Impartiality and Objectivity – *Statistical authorities must produce and disseminate European Statistics respecting scientific independence and in an objective, professional and transparent manner in which all users are treated equitably.*

Indicators

- Statistics are compiled on an objective basis determined by statistical considerations.
- Choices of sources and statistical techniques are informed by statistical considerations.
- Errors discovered in published statistics are corrected at the earliest possible date and publicised.
- Information on the methods and procedures used by the statistical authority are publicly available.
- Statistical release dates and times are pre-announced.

- All users have equal access to statistical releases at the same time and any privileged pre-release access to any outside user is limited, controlled and publicised. In the event that leaks occur, pre-release arrangements should be revised so as to ensure impartiality.
- Statistical releases and statements made in Press Conferences are objective and non-partisan.

Statistical Processes

European and other international standards, guidelines and good practices must be fully observed in the processes used by the statistical authorities to organise, collect, process and disseminate official statistics. The credibility of the statistics is enhanced by a reputation for good management and efficiency. The relevant aspects are sound methodology, appropriate statistical procedures, non-excessive burden on respondents and cost effectiveness.

Principle 7: Sound Methodology – *Sound methodology must underpin quality statistics. This requires adequate tools, procedures and expertise.*

Indicators

- The overall methodological framework of the statistical authority follows European and other international standards, guidelines, and good practices.
- Procedures are in place to ensure that standard concepts, definitions and classifications are consistently applied throughout the statistical authority.
- The business register and the frame for population surveys are regularly evaluated and adjusted if necessary in order to ensure high quality.
- Detailed concordance exists between national classifications and sectorisation systems and the corresponding European systems.
- Graduates in the relevant academic disciplines are recruited.
- Staff attend international relevant training courses and conferences, and liaise with statistician colleagues at international level in order to learn from the best and to improve their expertise.
- Co-operation with the scientific community to improve methodology is organised and external reviews assess the quality and effectiveness of the methods implemented and promote better tools, when feasible.

Principle 8: Appropriate Statistical Procedures – *Appropriate statistical procedures, implemented from data collection to data validation, must underpin quality statistics.*

Indicators

- Where European Statistics are based on administrative data, the definitions and concepts used for the administrative purpose must be a good approximation to those required for statistical purposes.
- In case of statistical surveys, questionnaires are systematically tested prior to the data collection.
- Survey designs, sample selections, and sample weights are well based and regularly reviewed, revised or updated as required.
- Field operations, data entry, and coding are routinely monitored and revised as required.
- Appropriate editing and imputation computer systems are used and regularly reviewed, revised or updated as required.
- Revisions follow standard, well-established and transparent procedures.

Principle 9: Non-Excessive Burden on Respondents – *The reporting burden should be proportionate to the needs of the users and should not be excessive for respondents. The statistical authority monitors the response burden and sets targets for its reduction over time.*

Indicators

- The range and detail of European Statistics demands is limited to what is absolutely necessary.
- The reporting burden is spread as widely as possible over survey populations through appropriate sampling techniques.
- The information sought from businesses is, as far as possible, readily available from their accounts and electronic means are used where possible to facilitate its return.
- Best estimates and approximations are accepted when exact details are not readily available.
- Administrative sources are used whenever possible to avoid duplicating requests for information.
- Data sharing within statistical authorities is generalised in order to avoid multiplication of surveys.

Principle 10: Cost Effectiveness – *Resources must be effectively used.*

Indicators

- Internal and independent external measures monitor the statistical authority's use of resources.
- Routine clerical operations (e.g. data capture, coding, validation) are automated to the extent possible.
- The productivity potential of information and communications technology is being optimised for data collection, processing and dissemination.
- Proactive efforts are being made to improve the statistical potential of administrative records and avoid costly direct surveys.

Statistical Output

Available statistics must meet users' needs. Statistics comply with the European quality standards and serve the needs of European institutions, governments, research institutions, business concerns and the public generally. The important issues concern the extent to which the statistics are relevant, accurate and reliable, timely, coherent, comparable across regions and countries, and readily accessible by users.

Principle 11: Relevance – *European Statistics must meet the needs of users.*

Indicators

- Processes are in place to consult users, monitor the relevance and practical utility of existing statistics in meeting their needs, and advise on their emerging needs and priorities.
- Priority needs are being met and reflected in the work programme.
- User satisfaction surveys are undertaken periodically.

Principle 12: Accuracy and Reliability – *European Statistics must accurately and reliably portray reality.*

Indicators

- Source data, intermediate results and statistical outputs are assessed and validated.
- Sampling errors and non-sampling errors are measured and systematically documented according to the framework of the ESS quality components.

- Studies and analyses of revisions are carried out routinely and used internally to inform statistical processes.

Principle 13: Timeliness and Punctuality – *European Statistics must be disseminated in a timely and punctual manner.*

Indicators

- Timeliness meets the highest European and international dissemination standards.
- A standard daily time is set for the release of European Statistics.
- Periodicity of European Statistics takes into account user requirements as much as possible.
- Any divergence from the dissemination time schedule is publicised in advance, explained and a new release date set.
- Preliminary results of acceptable aggregate quality can be disseminated when considered useful.

Principle 14: Coherence and Comparability – *European Statistics should be consistent internally, over time and comparable between regions and countries; it should be possible to combine and make joint use of related data from different sources.*

Indicators

- Statistics are internally coherent and consistent (e.g. arithmetic and accounting identities observed).
- Statistics are coherent or reconcilable over a reasonable period of time.
- Statistics are compiled on the basis of common standards with respect to scope, definitions, units and classifications in the different surveys and sources.
- Statistics from the different surveys and sources are compared and reconciled.
- Cross-national comparability of the data is ensured through periodical exchanges between the European Statistical System and other statistical systems; methodological studies are carried out in close co-operation between the Member States and Eurostat.

Principle 15: Accessibility and Clarity – *European Statistics should be presented in a clear and understandable form, disseminated in a suitable and convenient manner, available and accessible on an impartial basis with supporting metadata and guidance.*

Indicators

- Statistics are presented in a form that facilitates proper interpretation and meaningful comparisons.
- Dissemination services use modern information and communication technology and, if appropriate, traditional hard copy.
- Custom-designed analyses are provided when feasible and are made public.
- Access to microdata can be allowed for research purposes. This access is subject to strict protocols.
- Metadata are documented according to standardised metadata systems.
- Users are kept informed on the methodology of statistical processes and the quality of statistical outputs with respect to the ESS quality criteria.

Annex 4

Respondents to Consultation

	Respondent	Attribution
1.	Dr David Gordon, Head of Public Health Observatory Division, NHS Health Scotland	Comments in a personal, professionally informed capacity
2.	David Spiegelhalter FRS OBE, Winton Professor of the Public Understanding of Risk, Statistical Laboratory Centre for Mathematical Sciences, Cambridge	A personal response
3.	Michael Hart	Represents the views of Software for Data Analysis Ltd – a small contractor providing statistical and related IT services to government
4.	Philip Watson BA (Econ), C.Stat.	A personal response
5.	Philip Eadie	Response as Chair of Association of Regional Observatories and Head of South East England Intelligence Network
6.	Walter Radermacher, Chief Statistician of the European Union and Director- General of Eurostat	Responding on behalf of Eurostat
7.	Chief Executive's Department, Economic and Urban Policy, Manchester City Council	Manchester City Council
8.	Paul Barton, Team Leader, Research and Intelligence Team, Luton Borough Council	An official response from Luton Borough Council

	Respondent	Attribution
9.	Office of the Chief Statistician, Scottish Government	Scottish Government
10.	Tim Andrews, Head of Profession for Statistics	Response on behalf of the Department for Business, Enterprise & Regulatory Reform
11.	Sean Whellams, Head of Profession for Statistics, HM Revenue & Customs (HMRC)	This response also includes the views of GSS colleagues within HMRC and the Department as a whole.
12.	Richard Price, Chief Economist, Director of Economics, Statistics, Social and Operational Research	Response of the Department for Environment, Food and Rural Affairs
13.	Steve Bundred, Chief Executive	Response of the Audit Commission
14.	Richard Willmer, Statistics Head of Profession, Department of Health	This is the response of the DH Statistics Head of Profession. The response represents his professional view, having consulted his professional colleagues.
15.	Ro Marsh, National officer, FDA	FDA – a Civil Service trade union
16.	Barry Ryan, Standards & Policy Manager	Market Research Society
17.	Nigel Goldie, Executive Director	Social Research Association
18.	Karen Hurrell	Equality and Human Right Commission
19.	Jill Leyland, Chair of the Royal Statistical Society's National Statistics Working Party	Royal Statistical Society
20.	Jenny Church, Chair of Statistics User Forum	Statistics Users Forum
21.	Andy Sutherland, Acting Executive Director of Operations	NHS Information Centre

	Respondent	Attribution
22.	John Coyle	A personal response
23.	Nigel Dodds, Office of the Minister, Department of Finance and Personnel, Northern Ireland	DFPNI, with additional detailed comments from the Northern Ireland Statistics and Research Agency
24.	Professor Sheila Bird, Chair of Surveys, Design and Statistics Sub-committee of the Home Office's Scientific Advisory Committee	Surveys, Design and Statistics Sub- committee of the Home Office's Scientific Advisory Committee
25.	Sir David Normington, Permanent Secretary	Home Office
26.	Peter Norris, Head of Data and Analysis, Local Government Analysis and Research	Local Government Association
27.	Martin Callingham	A personal response
28.	Ian MacLean, Chair, Business Statistics User Group	Responding as chair of the Business Statistics User Group
29.	Sir Leigh Lewis, Permanent Secretary	Department for Work and Pensions
30.	Andrew Davies AM/AC, Minister for Finance and Public Service Delivery	Welsh Assembly Government

	Respondent	Attribution
31.	Karen Dunnell	<p>Response as Head of the GSS. This reply is a synthesis of the views of a range of GSS members and ONS Heads of Profession. The GSS composite response includes the responses (direct to the National Statistician) of some of those listed above who also responded directly to the UK Statistics Authority, namely:</p> <ul style="list-style-type: none"> • Welsh Assembly Government • Scottish Government • Home Office • HM Revenue & Customs • National Health Service Information Centre • Department of the Environment, Food and Rural Affairs • Department for Work and Pensions • Department for Business, Enterprise & Regulatory Reform • Department of Health <p>Additionally, the organisations listed below responded directly to the National Statistician but not separately to the UK Statistics Authority. These responses were also incorporated in the GSS response:</p> <ul style="list-style-type: none"> • Forestry Commission • Health and Safety Executive • Department for International Development • Defence Analytical Services and Advice • Office for National Statistics (4 directorates) • Office for Standards in Education • Office of Manpower Economics • Department of Communities and Local Government

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