

**STOCKTAKE OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS  
STEERING GROUP**

ST(16)1

**Agenda**

**1. Purpose**

1.1. This paper details the agenda for the Steering Group on 23 Feb 2016.

**2. Recommendation**

2.1. To note the agenda.

**3. Discussion**

3.1. Please note the agenda in Table 1 below. Item 6 is a presentation, there is no accompanying paper.

**Table 1.** Steering group agenda, 23 Feb 2016

Item	Title	Lead
1	Welcome	David Levy (Chair)
2	The Stocktake of the Code of Practice	Ed Humpherson (Director General, M&A)
3	Terms of Reference (Paper 2)	Ed Humpherson
4	Stocktake work packages (Paper 3)	Johanna Hutchinson
5	<i>Break</i>	
6	Initial findings from the questionnaire (Presentation)	Tegwen Green
7	Emerging Issues (Paper 4)	Richard Laux
8	Measuring change (Paper 5)	Johanna Hutchinson
9	Risks (Paper 6)	Richard Laux
10	AOB/DONM	David Levy

**Richard Laux / Johanna Hutchinson / Tegwen Green  
Monitoring and Assessment, UK Statistics Authority**

**February 2016**

# STOCKTAKE OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS STEERING GROUP

ST(16)2

## Draft Terms of Reference

### 1. Purpose

- 1.1. This paper details the draft Terms of Reference for the Steering Group overseeing the Stocktake of the Code of Practice for Official Statistics.

### 2. Recommendation

- 2.1. To discuss and agree the Terms of Reference for the Steering Group.

### 3. Discussion

#### Introduction

- 3.1. The regulatory function of the UK Statistics Authority – the Monitoring and Assessment (M&A) Team – is leading a stocktake of the Code of Practice. The objectives are to:
  - identify ways to raise the profile of the Code; and
  - to enhance its value.
- 3.2. A Steering Group has been established (Annex 1) to help shape the way M&A conducts the stocktake – bringing together expert knowledge of the Code from across the Government Statistical Service and external perspectives on the statistical system and on wider regulatory experiences - and to advise on priorities for further work. Once the stocktake has been completed, proposals (to raise the profile and enhance the value of the Code) will be presented to the UK Statistics Authority's Regulation Committee.

#### Responsibilities

- 3.3. The Steering Group, chaired by Dr David Levy (non-executive Director of the UK Statistics Authority) will, in line with the above objectives:
  - a. Advise on the coherence of M&A's stocktake activity, including the extent to which planned work will meet the objective of raising the profile and enhancing the value of the Code, and how the impact of the stocktake might be evaluated.
  - b. Suggest additional work, including further analytical/research projects and external contacts with whom M&A might usefully engage.
  - c. Advise on the communications aspects of stocktake work, particularly in relation to the implementation of any proposed change and /or re-launch.
  - d. Challenge M&A's approach to managing the risks associated with the stocktake.
  - e. Comment on draft reports of stocktake activity – both emerging progress reports and the final report to the Regulation Committee.

- 3.4. The Steering Group will meet three times, during 2016. The first meeting will be 23 February. The second meeting is proposed to be 17 May. The third meeting is proposed to be 7 September. All meetings will be held at UK Statistics Authority, Drummond Gate, Pimlico, commencing at 2.30pm. It is expected that the Steering Group will disband by the end of October 2016.

**Richard Laux / Johanna Hutchinson / Tegwen Green  
Monitoring and Assessment, UK Statistics Authority**

**February 2016**

**Members of the Steering Group***Chair***Dr David Levy** (UK Statistics Authority, non-Executive Director)

Table 1: Members of the Steering Group

<b>Name</b>	<b>Position</b>
<b>Paul Allin</b>	Chair, Statistics User Forum, Royal Statistical Society
<b>Phoebe Arnold</b>	Head of Communications, Full Fact
<b>David Blunt</b>	Head of Profession, Home Office
<b>June Bowman</b>	Head of Profession, Department for Transport
<b>Laura Dewis</b>	Deputy Director, Digital Technology, Office for National Statistics
<b>Tricia Dodd</b>	Deputy Director, Chief Methodologist, Office for National Statistics
<b>Lara Fielden</b>	Visiting Fellow- Reuters & IPSO
<b>Chris Francis</b>	Director of Government Relations, SAP
<b>Tegwen Green</b>	GSS Good Practice Team
<b>Neil Greenwood</b>	Director of Strategy, Ofsted
<b>Ed Humpherson</b>	Director General Regulation, UK Statistics Authority
<b>Johanna Hutchinson</b>	Statistical Assessor, M&A (Secretary to the Steering Group)
<b>Richard Laux</b>	Deputy Director, M&A

# STOCKTAKE OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS STEERING GROUP

ST(16)3

## Stocktake work packages

### 1. Purpose

- 1.1. To update the Steering Group on the planned activity phases and associated time periods proposed for the Code Stocktake, including the details of each work package and the broad communication plans

### 2. Recommendation

- 2.1. To note the current engagement and analytical plans and broad timescales.
- 2.2. Comment on the proposed scope of the user perspectives, deliberative research and communication plans.

### 3. Discussion

- 3.1. The Code Stocktake is planned as a twelve month programme, split into four distinct phases of activity (Table 1). The Steering Group is anticipated to meet three times at broadly equal intervals between February and September 2016 to discuss a) scope and remit of the Code Stocktake, b) broad analytical findings, c) recommendations to the Statistics Authority's Regulation Committee.

**Table 1.** The Code Stocktake; planned activity and scheduled Steering Group meetings

<b>Activity Phase</b>	<b>Time period</b>
Engagement	Dec 2015-Mar 2016
Steering Group	<b>23 February</b>
Analysis	Feb – May 2016
Steering Group	<b>May 2016 (proposed)</b>
Develop Recommendations	June- Sept 2016
Steering Group	<b>Sept 2016 (proposed)</b>
Implementation	Oct – Dec 2016

- 3.2. The content of each phase of activity is described in Annex 1. The Engagement phase is currently ongoing and the Analytical work is scoped and scheduled to begin in February 2016.
- 3.3. User Perspectives (Annex 1) is an Engagement activity proposed to gather the opinion of key users of official statistics. The aim is to meet a number of Think Tanks and research bodies, along with a number of key users, such as the Bank of England, HM Treasury and some academics,

to discuss the extent to which the Code is successful in ensuring that official statistics are meeting user needs, both now and in the future. The Steering Group is invited to comment on the scope of this work.

- 3.4. Deliberative research is a tentatively planned Engagement activity to ascertain how the Code can better support the general public in ensuring that official statistics meet their needs (Annex 1). It is envisaged that this could be achieved through the commissioning of a number of focus groups bringing together a wide range of the general public who, with sufficient briefing to understand the nature of official statistics and the remit of the Code of Practice, can present their views. This could be commissioned with a broad remit in March, or to review and discuss any recommendations in late summer. The Steering Group is asked to consider these plans and comment on the desirability and feasibility of such an approach.
- 3.5. The Analytical activity phase details fourteen autonomous pieces of work. However, we recognise that there is substantial cross over between them. So, while each piece of analysis is designed to have a specific focus and to produce a specific output, we recognise that there will be an important task to synthesise the material. One way in which we will achieve this is via a workshop of all of those involved in the analytical work: this will provide an opportunity to test emerging thinking from different perspectives.
- 3.6. The Steering Group should note that details of the Recommendations phase are still broad; more specific details will be planned over the next few months. We have not planned the Implementation phase at this stage, as this will be largely dependent upon the findings from the analytical work: we will return to this alongside the development of Recommendations.
- 3.7. The communication plans for the Code Stocktake are detailed in Annexes 2 and 3. These are designed to keep the Government Statistical Service engaged throughout the Stocktake process; encourage engagement from users of official statistics and encourage the contributions of these people to the questionnaire and workshops. The Steering Group is asked to comment on the scope and breadth of this work.
- 3.8. The Code Stocktake is led by Richard Laux (Monitoring and Assessment), Johanna Hutchinson (Monitoring and Assessment) and Tegwen Green (Good Practice Team). The Analysis phase of activity is resourced from 14 members of the Monitoring and Assessment Team; 4 members of the National Statistician's Good Practice Team, and 2 members of ONS's Quality Centre. The Monitoring and Assessment team has allocated 400 hours of resource to the Stocktake from April 2016, approximately 16% of the team's resource allocation.

- 3.9. All recommendations from the Code Stocktake will be considered by the UK Statistics Authority's Regulation Committee; the Committee has asked for our recommendations in September 2015.

**Johanna Hutchinson**  
**Monitoring and Assessment, UK Statistics Authority**  
**February 2016**

## Code Stocktake plan and broad timescales

Phase	Work Packages	Description	Status
Engagement	Questionnaire	Aim: to gather high level view of the Code from across the Government Statistical Service. 600 responses gathered.	Complete
	Internal bilateral discussions	Aim: to gather expert, practical opinion of the Code from senior users of the Code. Approx 20 conversations across government	Complete
	Workshops	Aim: to explore with statisticians area where the code is effective/less effective, specific to the remit of the government department. 10 workshops across UK, incorporating over 15 government departments	Ongoing
	Discussions with regulators	Aim: to share experiences of Stocktakes/revisions of other similar Codes of Practice	Ongoing
	International benchmarking	Aim: Although UK is unique in the Monitoring & Assessment regulatory function for government stats, the European Statistical System Canada and New Zealand are likely to have particularly relevant perspectives	Ongoing
	Communication of progress	Aim: to keep up the momentum of interest seen from the statistical community during the questionnaire, to keep the community abreast of emerging recommendations	Ongoing
	User perspectives	The Code of Practice has a strong emphasis on meeting user needs (e.g. Principle 1 and Protocol 1). Aim: to seek the opinion of experienced/key users of Official Statistics about how the Code could better support producers in meeting their current needs and anticipating future needs.	Commencing Mar
	Deliberative research	A tentative idea – for discussion. Focus groups consisting of members of the public. Aim: to understand how the Code can meet the needs of other users groups and the general public	Commencing Mar



<b>Analysis</b>	Questionnaire analysis	Qu: What is the general opinion of the Code, where are the areas of high contention/agreement?	Commencing Feb
	Workshops analysis	Qu: What are the main themes from across the Government Statistical Service	Commencing Feb
	Code of Practice; principals & protocols	<p>Qu; Are all 74 principles and protocols of the Code of equal importance/value?</p> <p>Multiple mappings of each practice of the Code, onto:</p> <ul style="list-style-type: none"> <li>• the “must do’s”, “should do’s”, “could do’s”</li> <li>• Trust / Quality / Value.</li> <li>• Organisation (split between corporate, and HOP/statistical team), and product/service.</li> <li>• Generic Statistical Business Process Model (GSBPM).</li> </ul>	Commencing Feb
	Strengthening our thinking about the NS Brand	<p>The National Statistics brand promotes Value, Trust and Quality in government statistics.</p> <p>Qu: How do we enhance value, trust, quality in a changing world? Value - what does it mean with respect to Trust and Quality?</p>	Commencing Feb
	Boundary Issues	<p>Defining the boundaries between management information, Official Statistics and National Statistics.</p> <p>Qu: What data represents official statistics in government? Where should there be mandatory compliance with the Code versus aspiration/expectation. Should all Official Statistics be trustworthy, with higher standards of quality and (especially) value for National Statistics? What is the distinction between management information and Official Statistics? What elements of the Code do we think should apply to Management Information? How might the Code apply to other types of output, e.g. from data science work, or methodological research, social</p>	Commencing Feb

	Research (and the GSR Code), and Economic Research.	
Reduction of the NS estate	<p>We currently have over 1000 sets of statistics badged as National Statistics.</p> <p>Qu: Should this be reduced? How might this work, in law and in practice? Could we implement a tier system? Could we accept different levels of compliance for different elements of the Code?</p>	Commencing Feb
Voluntary compliance	<p>Qu: Could/should we encourage non-governmental organisations to voluntarily comply with the Code? How might this work, for different types of organisation? Is there a specific angle that we might develop to try to extend the Code to (NGO) providers of data to support the Sustainable Development Goals?</p>	Commencing Feb
Organisational assessment	<p>Qu: Rather than assess individual statistics, should we also assess organisations, ensuring an acceptable level of business and technological functionality which would be beneficial to all statistics produced by this department?</p>	Commencing Feb
Challenging the Code of Practice	<p>An internal review of current working practices with a view to determine changes to internal application of the Code and to think about positioning and relevance for the future.</p> <ul style="list-style-type: none"> <li>• A clear distinction between ‘standards’, ‘guidance’, and our own ‘operating / decision making criteria’</li> <li>• Where are new standards most needed? In particular, do we need standards for ad hoc statistical releases, and standards relating to managerial separation, and professional independence – especially for Arm’s Length Bodies?</li> <li>• Where is guidance most needed?</li> <li>• How should we integrate</li> </ul>	Commencing Feb

	<p>existing/new standards (eg SSR, QAAD, Presentation &amp; Dissemination), new guidance (eg targets) and our own operating criteria (eg recommended sources)?</p> <ul style="list-style-type: none"> <li>• Reconciliation / rationalisation of National Statistician and GPT guidance.</li> <li>• Review of ONS interpretations of the Code – eg, error handling.</li> </ul> <p>How could we update the material we have which provides examples of ways that practices have been implemented - for all 74 practices?</p>		
	Perceptions and reality	Myths and successes. How to counter the former and make more of the latter?	Commencing Feb
	Revisiting earlier proposals to revise the Code.	What still seems relevant?	Commencing Feb
	Statistical Standards	Qu: What makes a good statistical standard for static products such as tables and charts and emerging fields like open data?	Ongoing
	Recommended sources	Qu: when two similar sets of data are produced can statisticians advise on what each is best used for?	Ongoing
	Develop recommendations & implementation plans	Recommendations for the Code, to be viewed and discussed by the Steering group and UK Statistics Authority Regulation Committee	TBA
	Design additional guidance and standards	Linked to statistical standards and preferred sources above	TBA
<b>Recommendations</b>	Redesign the Code	Design the code to be interactive for the website, make it searchable, and provide best practice guidance alongside principles and protocols. Make it clear how any guidance and standards are applied.	TBA
	Developing a BAU	Developing regular mechanisms to be in touch with the GSS and user communities. Ensure a regular review period	TBA
	Launch activities	Aim: to raise the profile, ensure	TBA

	others know the value and for the GSS and user communities to be aware of how the Code will be applied in the future
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## Communication Plans

Phase	Work package	Communication strategy	Participants
<b>Engagement</b>	Stocktake launch	Advertising the start of the Stocktake – <ul style="list-style-type: none"> <li>• Director General Launch Heads Of Professions meeting &amp; newsletter, Presentation Dissemination Committee, National Statistician</li> </ul>	Government Statistical Service & external colleagues to the Director General
	Questionnaire	The questionnaire was advertised through; <ul style="list-style-type: none"> <li>• Social media- Tweet from GPT, RSS, UK Statistics Authority,</li> <li>• LinkedIn,</li> <li>• RSS website,</li> <li>• StatsUserNet, ONS intranet</li> <li>• GSS website</li> <li>• UKSA website</li> <li>• Mail to Good Practice Team contacts</li> <li>• Reminder a week before closure</li> </ul>	Government Statistical Service, researchers, academics, charities, other known interested parties & users of statistics
	Workshops	Advertise workshops & signup <ul style="list-style-type: none"> <li>• Through emails submitted on Questionnaire</li> <li>• Through email cascade of known regional host</li> <li>• Through associated HOP</li> <li>• Twitter</li> </ul>	
	Bilats	One to one conversations	A range of identified experts of the Government Statistical Service, key statistics users
	All	Emailed document to select which areas people had	M&A, GPT, Quality Centre (ONS)

<b>Analysis</b>		interest in developing Groups meet with Stocktake team to determine scope Workshop – M&A, bringing together analysis, sense checking, ensuring consistent understanding across the team, agreeing areas to focus on recommendations,	
	All	Stocktake team to coordinate all contact with others external to the team to ensure effective communication and avoid consultancy fatigue	Government Statistical Service experts
<b>Recommendations</b>		Focus groups – to assess impact of any recommendations	Government Statistical Service experts, statistics users
		Inter-administration Committee group	Senior Civil Service and Devolved representatives from Wales, NI & Scotland
		Senior stakeholders at UK Statistics Authority	Paper to Regulation Committee/Authority Board
<b>Implementation</b>		Launch events	Government Statistical Service/ statistics users
		Questionnaire	Government Statistical Service/ other interested parties
		Director General to engage Heads of Profession & other senior stakeholders	
		Best practice examples published with Code of Practice	Website launch, advertised through GSS, GPT, RSS
		Ongoing communication to embed/raise the profile	Core script to be designed and delivered by GPT, PDC and Presentation champions across GSS on behalf of the

UK Statistics  
Authority  
Users of statistics –  
from across a range  
of statistics types,  
including Think  
Tanks and Key  
statistics users, such  
as Bank of  
England/HM  
Treasury

## General Communication plans

<b>Communication</b>	<b>Frequency</b>
<b>Steering group invitation &amp; briefing</b>	Three times
<b>Monitoring &amp; Assessment updates</b>	Weekly via Cascade, fortnightly via email
<b>Statisticians across government (website, social media)</b>	Fortnightly through <i>Engagement</i> , monthly during <i>Analysis/Recommendation development</i> , fortnightly during <i>Implementation</i> . Monthly Government Statistical Service website updates
<b>Statistical Committees (Presentation &amp; dissemination committee; Head of Profession meetings)</b>	Quarterly updates
<b>Conference presentations</b>	Presentation and Dissemination – May Government Statistical Service conference – Sept (Audience mainly government statistical service) Royal Statistical Society conference - Sept (Audience is largely academics; independent research organisations and government)
<b>Engagement with international statistical community</b>	At implementation – For interest and advice
<b>Engagement with key users and general public</b>	Through user engagement and deliberative research in March and again in 2017 during implementation



# STOCKTAKE OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS STEERING GROUP

ST(16)4

## Emerging Issues

### Purpose

1. This paper summarises the main issues identified from our initial review of the results of the stocktake survey and from discussions with (mainly GSS) stakeholders.

### Recommendations

2. Members of the Steering Group are invited to comment on the range of emerging issues (para 4, and annex A).

### Discussion

3. At the time of writing we have the following information base:
  - a. The results from over 600 responses to the stocktake survey, which has recently closed.
  - b. Discussion at GSS workshops held in Edinburgh (Scottish Government, Public Health Intelligence, and National Records for Scotland), in Titchfield (ONS), and Leeds.
  - c. Discussion at 20 bilateral meetings during January and February with a range of senior GSS officials.
4. The ten most salient issues appear to be as follows.
  1. Boundary (definition and scope) issues
  2. "Digital" and data
  3. Equality of access
  4. Quality: accuracy versus timeliness; and coherence
  5. Methods – is the Code (and the assessment regime) too superficial?
  6. Use of commercial data in the production of OS
  7. Lack of clarity about the National Statistics brand, especially "value".
  8. Confidentiality protection – whether/how to future proof?
  9. Professional Independence in a ministerial department
  10. Presentation of the Code and supporting information

**Richard Laux**  
**Monitoring & Assessment**

**February 2015**

## Brief description of the issues emerging from early stocktake engagement activity

### 1. Boundary (definition and scope) issues

Official Statistics are defined in the legislation as statistics produced by the Statistics Authority (ONS), by government, or by another organisation specified by a Minister. So, while the “official” aspect is clear, the legislation does not define “statistics”.

This apparently arcane issue is important, because the Authority’s statutory reach, and the scope of the Code of Practice, is “official statistics”. By implication numerical information that is labeled in other ways is beyond the Authority’s purview. We have seen aggregated information (typically drawn from government’s administrative systems) published as “management information” (MI); also examples of “research” covering the outputs of surveys and of modeling and forecasting. We have sometimes commented on aspects of MI and research from the perspective of the principles of the Code.

There is also a set of issues relating to the use of MI that are subsequently published as OS – Ministers have access to this information as a right, and it can be challenging (and appear restrictive) for statisticians to adopt the line that Ministers shouldn’t use the latest information publicly because much the same information is scheduled for subsequent release as statistics. The argument that MI is ‘quick and dirty’, and that quality assurance and contextualization are the hallmarks of official statistics, might become increasingly tenuous in a world in which many decision makers purport to be happy with ‘quick and dirty’.

### 2. “Digital” and data

The Code was published in January 2009, in an era when most statistical information was disseminated in pdf bulletins and data tables. Since then we have interpreted the Code in order to apply its principles to data visualization/infographics, and online/interactive databases that make large amounts of detailed MI available in Open Data formats. We use the Berners-Lee five star scale to comment on UK Government statisticians’ release of information in Open Data formats, although this is not a fully-accepted standard (and it is not referred to in the Code).

While the Code encourages the use and re-use of administrative data for statistical purposes, it does not explicitly address data sharing or linkage.

There may be an argument for delineating good practice in relation to aggregate (statistical) information, and good practice in relation to the use of data.

### 3. Equality of access

The important statistical principle of ‘equality of access’ is undermined by the statutory arrangements that allow pre-release access<sup>1</sup> (PRA) to certain individuals. The pro’s and con’s of PRA are well-rehearsed, but the availability of MI (see 1, above) and a lack of clarity about how to interpret the statutory concept of ‘statistics in their final form’ – which is what PRA arrangements apply to – complicate statisticians’ decision making and might undermine their credibility. This is exacerbated by the Code’s rather vague references to data access before publication for ‘quality assurance and operational purposes’ – which are exemptions to the formal PRA strictures.

We have heard the argument that statistics which are not market sensitive might be released under embargo, in order to maximise their impact in the news media.

#### 4. Quality: accuracy versus timeliness; and coherence

The Code approaches the subject of ‘quality’ largely by emphasizing the importance of published documentation: the logic is that this supports users in their decision-making.

The Code also requires statistics to be produced to a level of quality that meets users’ needs. One of the classic trade-offs is between accuracy and timeliness – but the Code says little about this other than “release statistical reports as soon as they are judged ready”. We have been told that the absence of guidance about how to make judgments about ‘readiness’ exacerbates the MI issue referred to above, and can make statisticians seem ponderous.

Arguably one of the main ways in which statistical work can add value (to simple counts of observations) is by drawing upon multiple sources of information in order to present a coherent picture. The Code mentions ‘coherence with other statistical products’, but does not talk about coherence *within* a set of statistics.

#### 5. Methods – is the Code (and the assessment regime) too superficial?

The Code requires the use of scientific methods, and regular methodological review. While methodological choices are normally non-controversial, there are a few sets of statistics – about price indices – for which different methodologies are propounded by different groups of experts, and there is clearly no single ‘right’ method.

A more general issue, related also to 4 above, is that various reviews of quality and methodology are conducted by different teams within ONS – but these are not currently well-aligned with the regulation team’s activity.

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<sup>1</sup> Pre-Release Access refers to the statutory arrangements which allow Ministers to determine who is eligible to see statistics “in their final form” a short time (up to 24 hours, for UK Government departments – the arrangements are different in the Devolved Administrations). Those involved in the production of the statistics are, of course, allowed to see them before they are published. In addition, the Code clarifies that access may also be allowed for quality assurance and operational purposes.

6. Use of commercial data in the production of OS

Several sets of ONS's economic statistics draw on private sector sources, and the use of private sector data is likely to increase in the next few years. While the Code requires producers to quality assure the data used in producing statistics, we originally envisaged that this would apply only to public sector data.

7. Lack of clarity about the National Statistics brand, especially "value".

We describe the National Statistics brand in terms of high standards of trustworthiness, quality, and public value. Most of the people we have spoken to so far have a clear sense of trustworthiness and quality, but are less clear what we mean by value, and about which elements of the Code support our considerations of 'value'. Another issue raised with us is that each of the three estimates of GDP – estimates that improve with quality each month, as more data become available – are badged as National Statistics despite the quality (accuracy) of the first estimate being lower than that of the third. (This is related to the accuracy/timeliness issue at 3 above).

8. Confidentiality protection – whether/how to future proof?

The Code requires the protection of the privacy of individual information. However, the ever-increasing volume of published statistical information, which theoretically could be linked after publication by third parties, coupled with the release of personal information by individuals on social media, would seem to increase the likelihood that at some point in the future an individual will be identifiable in a set of statistical information that was originally published by a Government department. This makes the job of the statistician (today) difficult, and may well make statisticians more risk averse in what they choose to publish than they, and users, would prefer. There is currently no clear guidance for statisticians on whether they should aim to protect data in the short term (only) or the medium-long term.

9. Professional Independence in a ministerial department

Several senior statisticians in departments have emphasised that the Code can be a vital bulwark on occasions when Ministers might want to exert pressure on the content or timing of statistical releases. But we have also heard a view that statisticians' professional independence is restricted by the necessity to gain Ministerial approval for statistical work plans.

10. Presentation of the Code and supporting information

The Code is published in pdf form, and supported by a range of (pdf) documents providing guidance and (out-of-date) examples of how producers have complied with different elements of the Code. There is an argument that the Code might be brought to life and its value enhanced by more modern dissemination techniques – while recognizing that many people value having a hard copy of the Code to show to Ministers.

# STOCKTAKE OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS STEERING GROUP

ST(16)5

## Evaluating change

### 1. Purpose

- 1.1. This paper details a work stream which will determine the success of the Code Stocktake in meeting the objectives of;
  - Raising the profile and
  - Enhancing the value of the Code of Practice

### 2. Recommendation

- 2.1. To note the current direction described in the paper.
- 2.2. To provide challenge on this developing work to ensure it will meet the objectives above

### 3. Discussion

- 3.1. The team hope to evaluate a number of indicators collected through the Code Stocktake and after implementation, to build an understanding of the impact of the Code Stocktake on the Government Statistical Service and users of Official Statistics.
- 3.2. This will be achieved through documenting evidence of both attitude change and change in statistical production in 2017 and comparing this to similar information either held in the business at present or collected as part of the stocktake. We intend to build an understanding of where and how change has happened, and have some good examples of this. It is not the intention to be able to quantify total change through this process.
- 3.3. The plans are considerate of the need to be efficient with resource and time in the Monitoring and Assessment team and thus are largely dependent on information collected during implementation and business as usual processes in 2017.
- 3.4. The details of this work remain at a high level due to being dependent upon; a) what recommendations are agreed to be put into operation by the Steering Group and Regulation Committee; b) the implementation process, including the length of time to develop the Code, in line with agreed recommendations and the length of the roll out.
- 3.5. It is proposed that after taking comment from the Steering Group in February more detailed plans to measure change will be developed and presented at the September Steering Group, alongside recommendations from the Code Stocktake and an implantation plan.

**Johanna Hutchinson**

**Monitoring and Assessment, UK Statistics Authority**  
**February 2016**

## Annex 1. Scope to evaluate change

Measure	Mechanism of evaluation
<b>An increase in positive attitude towards the Code</b>	<ul style="list-style-type: none"> <li>• Comparison of word cloud from 2015 to a similar word cloud in 2017</li> <li>• Bilats with Heads of Profession/senior GSS members</li> <li>• Repeat questionnaire from Jan 2016 in mid 2017, compare results</li> <li>• Gather evidence during M&amp;A business as usual; during events, through user engagement during assessment</li> <li>• From Director General through regular catch ups with senior stakeholders</li> <li>• Strengthening of the brand</li> <li>• Reduction of myths, collect evidence of successes</li> </ul>
<b>Greater application of the Code to;</b> <b>a) Government data (non Official Statistics)</b> <b>b) Non government data</b>	<ul style="list-style-type: none"> <li>• a) Collect evidence/case studies of where the Code (&amp; any supporting guidance) have been applied to non-Official statistics government data</li> <li>• b) through engagement with organisations regarding voluntary compliance &amp; application of QAAD to administrative sources of data (private sector &amp; third sector) during assessments</li> </ul>
<b>Better application of the Code to existing Official Statistics</b>	<ul style="list-style-type: none"> <li>• A change in the types of requirements seen during the assessment/compliance check process</li> <li>• Understanding areas of importance to focus on e.g. Value – data quality and meeting user needs</li> <li>• A change in the type of compliance to the Authority – casework</li> <li>• Evidence through strategic interventions</li> <li>• Organisation assessment</li> <li>• Strengthening the brand</li> <li>• Understanding compliance of the Code to a range of data types (OS, MI), collect case study examples</li> <li>• Reduction of myths, collect evidence of successes</li> </ul>
<b>Better understanding of the Code remit</b>	<ul style="list-style-type: none"> <li>• Attitude and uptake at the launch events</li> <li>• A greater understanding of any recommendations, and where changes have not been implemented (e.g. pre-release is written into legislation and is beyond remit of the Code), case studies of where this has been successful</li> <li>• Strengthening the brand</li> <li>• Better application of the Code</li> <li>• Understanding the Code compliance across different data types</li> </ul>
<b>Application of any recommendations into BAU of statistical processing</b>	<ul style="list-style-type: none"> <li>• Collect evidence/case studies of where application of the recommendations has led to a positive impact on an Official Statistic product</li> <li>• Reduction of myths, collect evidence of successes</li> </ul>
<b>Use of (or increased use of) guidance/supporting</b>	<ul style="list-style-type: none"> <li>• Contact with Good Practice Team or Quality Centre</li> <li>• Website hits on the webpage</li> </ul>

<b>material</b>	
<b>Seeking support from M&amp;A</b>	<ul style="list-style-type: none"> <li>• Evidence of statistical producers contacting M&amp;A more to explore how to apply the code to new or changing official statistics</li> <li>• Change in the types of work processes in some types of statistics (e.g. greater application of digital technology; changing lengths/style of statistical bulletins)</li> <li>• More communication with users of Official Statistics</li> </ul>
<b>Increased profile of the Code with key users and external organisations</b>	<ul style="list-style-type: none"> <li>• Measured through; contact with M&amp;A</li> <li>• Website hits</li> <li>• M&amp;A work profile change, inc time spent with external data producers</li> <li>• Reduction of myths, more successes known about</li> </ul>



# STOCKTAKE OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS STEERING GROUP

ST(16)6

## Risks

### 1. Purpose

- 1.1. This paper presents initial thoughts on risks associated with the Code stocktake activity, for comment by the Steering Group.

### 2. Recommendation

- 2.1. Members of the Steering Group are invited to:
  - a. Comment on the risks and proposed mitigating actions (paras 3 and 4)
  - b. Suggest any additional risks that should be taken into account.

### 3. Discussion

Our initial thinking is that we need to manage the following risks:

- 3.1. **Misunderstanding of the scope.** External commentators might interpret the Stocktake activity as a review of the content of the Code, and argue publicly for changes to it – which might build up pressure for change before the Authority Board itself has considered the pro's and con's of the issues.
  - In mitigation we are ensuring, and will continue to ensure, that we explain clearly to stakeholders the boundaries of the Stocktake exercise, both orally and in writing.
- 3.2. **Over- expectation.** The activity of discussing possible options for change with external stakeholders (particularly from the Government Statistical Service (GSS)) may give rise to expectations that turn out not to be met.
  - In mitigation we will ensure that we carefully plan our communications to summarise and publicise the 'hot topics' and explain the reasoning behind any changes that are being considered and that subsequently are (or are not made) to ensure that the wider GSS continue to believe their views are valued.
  - We will be very careful in external engagement to emphasise that we are exploring issues, and that on most issues there are a variety of perceptions that we will bring to the Authority Board.
- 3.3. **Loss of momentum.** We are already seeing signs of enthusiasm for the stocktake across the GSS, but this enthusiasm and associated goodwill could dissipate. And, particularly as we take forward analytical work, key stakeholders in the GSS might be fatigued by multiple requests for advice.
  - In mitigation we are explaining the timetable of activity with those we meet, and we are proposing to use the new Authority website (which is easier to update than previously) as the basis for regular communication about our work. We will also provide links via the GSS website.

- We will coordinate engagement between the M&A team and the GSS, to minimise burdens on individuals.

3.4. **Creating new ‘myths’**. While part of the purpose of the stocktake is to dispel some of the myths about what the Code doesn’t allow producers to do, it is possible that in doing so, or in producing any new standards or guidance, that we will allow new myths to be created.

- In mitigation we are proposing that, once we have taken forward the main strands of engagement and analysis, we will invite a small team of people from across the GSS to provide a ‘Red Team’ challenge: part of their brief would involve critiquing our emerging thinking from the myth-creation perspective.

3.5. **Insufficient resource** within M&A to take forward the analytical and subsequent work.

- In mitigation we are undertaking several iterations of engagement with members of the team about the analytical activity, to ensure that they can factor in the work in which they have expressed interest to their schedules for the next three months. We are also involving members of the Good Practice Team (with which we already have an established strategic alliance) and ONS’ Quality Centre (with whom we are working increasingly closely), and are looking to involve experts from ONS’ Legal team.
- We are also planning a variety of different ways to communicate across the team, including regular discussions and set-piece workshops, so that everyone is aware of how the work is developing and has the opportunity to provide leadership.

4. In summary, mitigation of the risks we have identified above will be achieved by regular and open communication – being led by Tegwen Green – and effective coordination (led by Johanna Hutchinson).

**Richard Laux**  
**Monitoring and Assessment, UK Statistics Authority**

**February 2016**

## STOCKTAKE OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS STEERING GROUP

### Minutes of the meeting of 23 February 2016

#### Attendees

**Dr David Levy**, Non-Executive Director, UK Statistics Authority - Chair  
**Phoebe Arnold**, Head of Communications, Full Fact  
**Roeland Berteen**, Royal Statistical Society  
**David Blunt**, Head of Profession, Home Office  
**June Bowman**, Head of Profession, Department for Transport  
**Laura Dewis**, Deputy Director, Digital Technology, Office for National Statistics  
**Tricia Dodd**, Deputy Director, Chief Methodologist, Office for National Statistics  
**Lara Fielden**, Visiting Fellow- Reuters & IPSO  
**Chris Francis**, Director of Government Relations, SAP  
**Tegwen Green**, GSS Good Practice Team  
**Neil Greenwood**, Director of Strategy, Ofsted  
**Ed Humpherson**, Director General Regulation, UK Statistics Authority  
**Johanna Hutchinson**, Statistical Assessor, M&A (Secretary to the Steering Group)  
**Richard Laux** Deputy Director, M&A

#### Apologies

Prof. Paul Allin, Royal Statistical Society.

#### Introduction

1. David Levy welcomed attendees. He anticipated three Steering Group meetings, the final meeting being scheduled for September, and described the role of the Steering Group as setting direction and providing challenge, in order to give the Authority Board assurance that the experts in the Authority's Monitoring and Assessment team have considered different perspectives and drivers for any proposed change in the scope, interpretation or application of the Code.

#### Background to the Code

2. Ed Humpherson noted that the Stocktake is a timely piece of work – the Code was published seven years ago, and since then there has been a great increase in the use of data, and in technological developments to support the production and dissemination of statistical information. At the same time, the statistical system has evolved, shaped in large part by the Code. And the lines between official statistics and other types of information have become blurred.
3. Given this evolution Ed described the Stocktake as an exercise to review the way in which the Code applies and is interpreted in 2016 and to address any perceptions that it is an inappropriate barrier, with a view to ensuring its ongoing relevance.

#### Terms of Reference (ST(16)2)

4. Ed Humpherson introduced the draft Terms of Reference. The following points were discussed:

- Whether enough meetings are planned for the Group to be able to give enough of a steer - the intention is for groups to meet outside the meeting for specific points relevant to each area and to call upon members' expertise as appropriate.
  - The fact that several small issues have led to the initiation of the Stocktake, rather than it being triggered by a single issue.
  - The interpretation of the concept of 'enhancing the value of the Code'.
5. The Terms of Reference were formally agreed; the membership list will be updated to include Roeland Beerten.

#### Stocktake work packages (ST(16)3)

6. Johanna Hutchinson presented a broad overview of the planned scope of work in 2016. Details were given of the anticipated themes for each of the Steering Group's meetings and the work that would feed into each meeting. The Steering Group's attention was drawn to the breadth of the work currently underway and proposed for the next few months. The following points were discussed.
- Whether there was sufficient engagement planned with stakeholders outside the GSS, e.g. policy officials.  
**ACTION 1 - Explore the perspectives of others who use or have a role in presenting statistics in government, e.g. policy officials, or press officers in departments.**
  - Clarification of who we mean by 'users'. It was noted that there was currently less focus on exploring the perspectives of less experienced/expert users.  
**ACTION 2 - Explore the perspectives of less experienced users of official statistics.**
  - That the focus of the stocktake should be on *public* value and how to position the Code in order to enhance the value to the public of official statistics. This will be addressed through the workstream exploring the concept of (public) value.
  - Whether deliberative research, with groups of academics or the media, might be a useful approach to develop a richer understanding of what people want from statistics and might inform our positioning of the Code.  
**ACTION 3 - Investigate the potential for deliberative research with academics or the media.**

#### Questionnaire presentation

7. Tegwen Green presented high level findings from the recent survey. The Steering Group discussed:
- The likely reasons for polarized views of the 9.30am release time set out in the Code.  
**ACTION 4 – to research the relative merits of different statistical release schedules.**
  - The development of standards and guidance – it was accepted that some new standards were necessary for emerging areas of statistical production, such as Open Data. However, the Group cautioned against becoming a 'standards body' and advised the use of existing standards and guidance.

#### Emerging issues (ST(16)4)

8. Richard Laux gave an overview of this paper and asked for comment on the most salient of the issues emerging from conversations with statistical producers. The Steering Group discussed a number of these issues, including:
- Boundary issues between data being classified as an official statistic or as management information. A discussion about the frequency of the release of data led to general agreement that MI used and published as a one off should not be treated as official statistics, but if there were a regular release of particular MI it should fall under the Code – as an official statistics.
  - Whether the Code might be interpreted as requiring more detailed scrutiny of methods and quality during the Assessment process, noting that M&A does not currently independently assess the methods underpinning each set of National Statistics, but instead relies on published material and user engagement with expert users on an ad hoc basis.
  - The ‘accuracy vs. timeliness’ trade-off in the production of statistics and whether there would be merit in seeking to capture such quality considerations through a tiered or star system.
  - Any decisions between different choices arising from the stocktake, and decisions about prioritisation, should be approached in terms of the likelihood of enhancing public value.

#### Evaluating change (ST(16)5)

9. Johanna Hutchinson gave an overview of the paper, emphasising that it was setting out early thinking and would be most relevant when the next meeting of the Group discusses emerging recommendations. General comments on the paper included:
- Agreement with the general direction of the paper and content
  - The need to reflect insightfully on the measurement of the impact of the enhanced profile of the Code.

**ACTION 5 - In determining how to measure impact, consider using case studies and/or focus on problems that users have had and how the stocktake has helped.**

#### Risks (ST(16)6)

10. Richard Laux introduced the paper, giving a broad overview of the perceived risks and the mitigations identified to date. The Steering Group were asked to comment and identify any other likely risks. The Steering Group endorsed the paper, suggesting a new risk that any changes to the Code might make it less interpretable.

**ACTION 6 - Add ‘clarity of the Code’ to the list of risks and ensure sufficient mitigation.**

11. The Group discussed whether, in the interests of transparency, the Steering Group papers should be published on the UK Statistics Authority website; there were no objections in principle.

**ACTION 7 - M&A to determine whether the Steering Group papers should be published.**

#### Any other business

12. The output of the final Steering Group meeting would be a paper for consideration by the Authority Board. The expectation was that the Board would respond to the Steering Group

formally and transparently. The Steering Group was complimentary about the quantity of work undertaken, and the quality of the material presented.