OSR consultation on proposed changes to the Code of Practice for Statistics (Edition 3.0): Response by the Royal Statistical Society

This response has been prepared by the RSS's National Statistics Advisory Group (NSAG), a group of volunteers with a strong interest in a range of policy issues surrounding the UK's official statistics system. It helps to develop the Society's policy on official statistics on behalf of RSS Council, and in an advisory capacity to the RSS President. The current membership of NSAG is [here](#).

NSAG is in the process of changing its name to the Public Statistics Advisory Group (PSAG) to reflect the Society's work on [public statistics](#). This examines how we can capitalise on the increasing amounts of data available and look beyond official statistics to help answer society's most important questions. (We are also aware that the term 'National Statistics' is no longer used for official statistics that OSR has independently reviewed and confirmed comply with the standards in the Code of Practice for Statistics: these are now described as 'Accredited official statistics').

We welcome the proposed revision to the Code and that OSR has undertaken an extended and extensive consultation on it. This has included holding an online roundtable jointly with the RSS in November 2024 (summarised on the current [consultation website](#)), following a joint event a year earlier, to discuss what makes a good code of practice for statistics (summarised [here](#)).

This response reinforces the views expressed at the roundtables, particularly focussing on user engagement and on public statistics, and expands on these using the latest consultation document format.

The RSS has long campaigned for more user engagement, and for more sustained and interactive engagement. Despite recommendations along these lines from PACAC and the establishment of a GSS User Engagement Strategy, we note that the issue was still included in Professor Lievesley's more recent review. This echoes our own observations and those of user groups we bring together in our Forum of Statistics User Groups. We acknowledge that FoSUG has also highlighted good practice but we still look for user engagement to be more firmly embedded across the official statistics system.

The commitment that producers must put users at the centre of decision making about the statistics is therefore hugely welcome but we are concerned that the list of associated standards do feel vague and perhaps do not add up to the headline ambition. We call on OSR to consider ways of strengthening these commitments, building on the energy and the feedback from the recent UK Statistical Assembly.

We also want to make it clear that public statistics calls for an enhanced role for the official statistics system (eg including collecting societal questions needing statistics to answer them), while still maintaining the quality of official statistics output. The Code is key to this and should be expanded to cover all aspects of public statistics.

The Code and how it is presented should also reflect as clearly as possible that there are three main audiences for the Code, as follows.

First, the Code has of course a statutory role in the official statistics system. This is not just as a documented set of requirements: accreditation should be the goal for all official statistics. (And de-accreditation used wisely by OSR, to show that accreditation has to be continually earned)

We raise the question as to whether or not the standards for official statistics should reflect an assumption (or is it an aspiration?) that all producers should seek official statistics accreditation for their statistics.

Second, the Code should be the inspiration and guidance for producers of statistics outwith the official statistics system. That currently 43 such producers have signed up as voluntarily applying the current Code is welcome. They and many others are part of the way forward on public statistics. They need a clear path for how to adapt to the revised Code, or how to apply it for the first time, and how to demonstrate the ways in which it is reflected in their processes, procedures, and outputs: corporate statements reporting that the code is being voluntarily applied are reassuring but not sufficient.

The third audience comprises users, potential users, and other stakeholders representing users, or acting as mediators between producers and users. They should be able to recognise what producers are required to do to meet the Code, and how to interpret the actions and outputs of producers, in order to hold them to account in terms of the Code.

Intelligent Transparency is one of the connections between these three audiences and we welcome the inclusion of Intelligent Transparency as a code of conduct for all who publish, report on, comment on, or just hear about official statistics. This is another way in which official statistics should be both distinctive (provided that official statistics producers always provide clear and usable information about their statistics, how and why they are produced, and their limitations) and exemplars to other producers and users.

Consultation questions: Proposed changes to the Code

1. Understanding the Code and how it supports the public good

Q1: How satisfied or unsatisfied are you that 'Understanding the Code and how it supports the public good' explains the importance of the Code?

☐ Very satisfied
☒ Quite satisfied
☐ Neither satisfied nor unsatisfied
☐ Quite unsatisfied
☐ Very unsatisfied

Please explain your response.

We see phrases in Annex A, and elsewhere in the document, that suggest the revised Code embraces the vision of more public statistics, for example that "Statistics should serve the public good … they are produced for the public".

While this might be reinforced if the structure of the Code was VQT, rather than TQV, and this could also signal a change of mindset within the statistical system (see next section), we accept that content is more important that structure here.

There is more to do to consider value to users, and the implications of putting that at the core of production activities and decision-making. We note with interest that the strategic priorities for the [Scottish Government Statistics Group](#) use phrases like "maximising the use of our data" and "chasing the value", as part of priority setting. Priorities have inevitably to be set and difficult choices made. This process should be reflected more in the Code and there is more to be done to explore how the value of official statistics can be better evaluated, including for when budgets need to be justified.

Before moving on to guiding principles and standards, we ask the question: is there an implicit assumption in the legislation - or is it perhaps a long-forgotten aspiration? - that all producers should seek official statistics accreditation for their statistics? It is our impression that the number and the proportion of non-accredited statistics has risen markedly over time, with the proportion now standing at over half (although this is based on a far from complete tracking. Over time).

We recommend that, as part of the suite of guidance developed in support of the Code, OSR should include an accreditation strategy – a strategy that records where we are now, where we want to get to, and how the transition will be achieved. This should address the processes, priorities and resources available to OSR for accreditation, as well as an analysis of the costs and benefits of

accreditation to individual producers. It is too soon to suggest changes to guiding principles and standards but these should be included in a future revision of the Code.

2. Guiding Principles from the Code

Q2a: How satisfied or unsatisfied are you that the 'Guiding principles from the Code' set out the essential practices for delivering <u>statistics</u> that support society?

☐ Very satisfied
☒ Quite satisfied
☐ Neither satisfied nor unsatisfied
☐ Quite unsatisfied
☐ Very unsatisfied

Please explain your response.

We call on OSR to consider ways of strengthening the commitment that is stated in the consultation document, that producers must put users at the centre of decision making about the statistics. This should build on the energy and the feedback from the recent UK Statistical Assembly. There are different ways to do this - but one would be to require producers to collaborate with colleagues covering the same topic area such that a single overview of the Official Statistics portfolio for that topic was always available to users. Similarly, the commitment to users would be strengthened if the Code required producers (again ideally collaborating with those covering the same broad topic) to publish a summary of the key unaddressed questions that have been raised by users so that the (currently) unmet need is visible

Although this section refers to the RSS vision of public statistics, it falls short of confronting how public statistics should be delivered. It appears to present two categories of producers of public statistics: those within the statistical system, to whom the code is primarily addressed; and those outside who might be producers of statistics that the public might value.

Unofficial producers are "encouraged" to be voluntary adopters of the Code. However, no-one seems to have overall responsibility for identifying the questions for which the public needs statistics. The prevailing mindset for official producers is likely to remain that they must make public the statistics that they produce to meet government needs. That is necessary but not sufficient to deliver public statistics. Official producers are best placed to identify the societal questions, as the recent UKSA/RSS Statistical Assembly set out to do. Official producers are also likely to be well placed to identify unofficial sources relevant to the questions and to publish analyses drawing on official and unofficial statistics.

Indeed, looking ahead to the practices related to the standards for official statistics, using data from existing governmental and non-governmental sources

must be explored before collecting new data. So, if there is a mechanism for collecting the questions to which the public needs statistical answers, then here is the prompt to incorporate a wider range of sources to help in compiling the answers.

We accept it will take time to deliver a vision such as public statistics. We welcome the steps taken in this revised version of the Code and we encourage and support OSR in ensuring that the ideals of public statistics are attained.

Q2b: How satisfied or unsatisfied are you that the 'Guiding principles from the Code' set out the essential practices for delivering <u>other types of evidence</u> that support society?

☐ Very satisfied
☒ Quite satisfied
☐ Neither satisfied nor unsatisfied
☐ Quite unsatisfied
☐ Very unsatisfied

Please explain your response.

We are aware of, and support, exploratory discussions between the RSS, Market Research Society, OSR and others on the potential value of agreeing a core set of guiding principles for quantitative evidence.

Q2c: What changes, if any, would you like to see in the 'Guiding principles from the Code'?

We set out our challenge in the response to Q2a. Meeting that challenge may depend more on how the revised Code is introduced (eg as a step along the way to public statistics) and how it is implemented, rather than on any further substantive amendment at this stage. However, we do draw attention in the following section to some specific presentational changes that could be made.

3. Standards for Official Statistics

Q3a: How satisfied or unsatisfied are you with the 'Standards for Official Statistics' in representing the required standards for official statistics?

☐ Very satisfied
☒ Quite satisfied
☐ Neither satisfied nor unsatisfied
☐ Quite unsatisfied

☐ Very unsatisfied

Please explain your response.

We welcome the opening ten statements on ensuring that official statistics serve the public good. They are all "must" rather than "should", which makes clear both to producers and to users what is mandated for official statistics to serve the public good. This is generally well supported by the guidance material.

Statement 10 for example, as we read it, encapsulates how to act in the spirit of public statistics, if we assume that (1) "other producers" includes unofficial producers of relevant statistics and that (2) "fuller insight for key topics" includes analyses to help answer the questions that the public has, as well as government needs.

We note that the ten statements follow the TQV sequence, presumably to segue into the standards for related practices. But this does mean that the very welcome statement about putting user at the centre of decision-making sits well down the list, at number 8. Is there any prospect of putting users not merely at the centre of this list but in the number 1 spot, even if the following section is not re-ordered?

We also have some concerns that some of the musts are very specific (eg on method and timing of releases) while others are looser or broader (eg behaving with integrity, etc). This particularly applies to the headline statements, which are generally explained more fully through the supporting bullet points under each standard. However, we encourage OSR to review the standards to make them as tight and specific as possible and to explain the rationale where broader statements are kept.

The standards should be based on a clear statement of who counts as a user. Producers should not just be focussed only on their current users, but should also be alert to all potential users – and be prepared to reach out to them. There is also the issue of the emerging use of any website material by AI, where Large Language Models are presenting as a new set of "users" who do not (currently) fit in the tradition model of user engagement. Further work is needed on all of this. We would be keen to continue working with OSR on this.

Q3b: What changes, if any, would you like to see in the <u>standards</u> in the 'Standards for Official Statistics'?

In addition to re-ordering, tightening, and further work on how user engagement is addressed, we have the following specific changes to suggest:

8 "… listening to their requirements, understanding the questions which need statistics as part of the answer, and acting …"

9 "… freely available to all at the same time" – we accept this is currently not achieved due to pre-release access rules and principles. The RSS continues to challenge the need for such rules and principles. Until that is widely accepted, there would need to be a qualification added to our suggested amendment.

10 to make explicit our assumptions noted in Q3a, if necessary.

We also urge OSR to review how the standards are composed and presented, so that their applicability to all three audiences we have identified (official statistics producers, other producers, users) is clear and accessible.

Q3c: What changes, if any, would you like to see in the <u>practices</u> listed under the 'Standards for Official Statistics'?

Changes consequent on the acceptance of our suggestions in Q2b. In particular, we draw attention to the need to upgrade active user engagement across official statistics, drawing on best practice elsewhere, such as in the Government Digital Service, which will "work in the open as we go, seeking input and collaboration from colleagues across central government, the wider public sector, civil society, and tech companies", according to a recent [blueprint for modern digital government](#).

As noted above, we also call for more on-going discussion about the nature of users, potential users, and AI users.

4. Standards for Intelligent Transparency

Q4a: How satisfied or unsatisfied are you with the 'Standards for Intelligent Transparency' in setting the required standards for using statistics in the public domain?

☐ Very satisfied
☒ Quite satisfied
☐ Neither satisfied nor unsatisfied
☐ Quite unsatisfied
☐ Very unsatisfied

Please explain your response.

The material here, including the linked regulatory guidance, concisely but comprehensively sets out what is needed. But there are still cases where this is not followed, so we ask the questions: How effective are these standards? What

more can be done to reinforce them and to support them with training, advice, and regulation?

Q4b: What changes, if any, would you like to see in the 'Standards for Intelligent Transparency'?

A minor presentational point, but the linked regulatory guidance contains some of the material in Annex D, along with pertinent 'questions to ask yourself'. These questions could usefully be included in Annex D. They also apply to people listening to, reading, or reporting official statistics.

5. Guidance for producers and users

Q5a: What areas of guidance would you like provided through the Code Hub?

Guidance on all the standards and broad principles enshrined in the Code,

Guidance based on what works and which can be tailored to different levels of awareness and experience.

Guidance that is supported and extended through the exchange of good practice.

Guidance on accreditation.

Q5b: Would you be open to helping us test guidance materials as we develop these further? Please provide your contact details at the end of the consultation.

☒ Yes
☐ No

Please indicate what topic areas you would be particularly interested in testing.

Those particularly related to public statistics and user engagement. We also envisage involving other RSS groups and sections in areas, say of methodology, in which they have expertise and experience.

6. Any other feedback

Q6a: How satisfied or unsatisfied are you that the draft refreshed Code of Practice for Statistics meets your needs?

☐ Very satisfied
☐ Quite satisfied
☐ Neither satisfied nor unsatisfied
☐ Quite unsatisfied
☐ Very unsatisfied

Please explain your response.

Sorry, impossible to answer in terms of the range of interests and interest groups (users, producers, ethics and governance experts, etc) reflected in the RSS. membership

Q6b. Please let us know any further comments on the draft refreshed Code of Practice for Statistics.

Nothing to add at this stage. We look forward to continuing the conversations on this.

Q6c. The refreshed Code of Practice for Statistics has been primarily written for the web. Would you also require a printed version? If so, which elements of the Code would you like to see included [please tick each that applies]:

☐ Yes – I would like a booklet version of the Code containing:
    ☐ Understanding the Code and how it supports the public good
    ☐ Guiding Principles from the Code
    ☐ Standards for Official Statistics statement list (without practices)
    ☐ Standards for Official Statistics statements including practices
    ☐ Standards for Intelligent Transparency
    ☐ Other: please indicate what other information you would find helpful

☐ No – I do not need a booklet

We can see that there might be a need for printed versions, say in training sessions or events introducing users to official statistics.

7. About you

Q7a: What is your full name?

Paul Allin

Q7b: What is your email address?

p.allin@imperial.ac.uk

Q7c: Are you responding as an individual or on behalf of an organisation?

On behalf of an organisation.

Q7d: What is the name of your organisation?

Royal Statistical Society

Q7e: What is your role?

Honorary Officer for Public Statistics

Q7f: Are you happy for OSR to contact you about your submission?

☒ Yes
☐ No