STOCKTAKE OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS STEERING GROUP

ST(16)13

Agenda

1. Purpose

1.1. This paper details the agenda for the Steering Group on 17 May 2016.

2. Recommendation

2.1. To note the agenda.

3. Discussion

Table 1. Steering group agenda, 17 May 2016

Item	Title	Lead
1	Welcome, minutes, progress against actions	David Levy (Chair)
2	Progress, focus and objective of today **Paper 9**	Richard Laux
3	External challenges to the Code – The Bean Review **Paper 10**	Ed Humpherson
7	Emerging Themes **Paper 11**	Richard Laux
8	Organisational Change **Paper 12**	Ed Humpherson
10	AOB/DONM	David Levy

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

May 2016

STOCKTAKE OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS STEERING GROUP

Progress, focus and objectives

Purpose

1. This paper summarises progress with the Code stocktake, and summarises the intended focus and objectives of the second meeting of the Steering Group.

Recommendations

2. Members of the Steering Group are invited to note the progress made by the Stocktake team, and to endorse the proposed focus and objectives for the current (second) meeting of the Steering Group.

Discussion

Progress

3. The initial Engagement phase is now complete. Between December 2015 and March 16, the Stocktake team:
    a. Conducted a 'survey monkey' questionnaire, which gathered over 600 responses – approximately two thirds from government, and one third from users and other stakeholders.
    b. Held 12 workshops in 8 cities, with a combined audience of over 150 – see annex A. These provided the opportunity for detailed engagement with a range of practitioners from across the Government Statistical Service (GSS).
    c. Held numerous meetings with a range of stakeholders – see annex B – to explore their perspectives.

4. Emerging insights from the Engagement activity helped us to shape a series of analytical packages. The initial analytical phase culminated in a team workshop on 6 May, at which we discussed a suite of analytical papers produced by different subsets of Authority staff. The workshop discussions were the basis for paper 11 (Emerging Themes). The workshop itself concluded that there was clear emerging evidence to support a substantial review of the scope, content and presentation of the Code, with a view to making it more transformational.

5. We published[1] further information about the Stocktake on the Authority's website on 18 April, including the papers from the first Steering Group. To date we have not received any queries about these.

Focus and objectives for the second meeting of the Steering Group

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[1] https://www.statisticsauthority.gov.uk/monitoring-and-assessment/code-of-practice/code-of-practice-stock-take-latest-news/

6. The primary focus of the second meeting is to discuss the Emerging Findings, in particular to explore the extent to which they would lead to a strengthening of the National Statistics brand by stimulating an increase in the trustworthiness, quality, and public value of official statistics. We envisage this discussion being framed, in some respects, by the Authority's emerging thinking following the Bean review.

7. The specific objectives are:
    a. To identify the broad areas where the Steering Group might endorse recommendations for change;
    b. To identify proposals for further analytical work, and contacts with whom we should be engaging; and
    c. To advise on ongoing communication activity.

Richard Laux
Monitoring & Assessment

May 2016

List of annexes

Annex A   Details of workshops held to date
Annex B   List of stakeholders engaged with during the initial engagement phase

Details of workshops held to date

Date	City	Number of participants
4 February 2016	Edinburgh	24
10 February 2016	Titchfield	5
16 – 18 February 2016	Leeds	18
25 February 2016	Cardiff	14
9 –10 March 2016	Belfast	31
18 March 2016	London	21
21 March 2016	Newport	10
23 March 2016	London	19

List of stakeholders engaged with during the initial engagement phase

Date of meeting	Stakeholders	Organisation
December 2015	Bill Oates ONS	ONS
December 2015	Pam Davies	ONS
January 2016	Glenn Everett ONS	ONS
January 2016	Glyn Jones WG	WG
January 2016	Kate Sweeney	PSE
February 2016	Kate Davies	ONS
February 2016	Lucy Vickers	ONS
February 2016		RSS
February 2016	Kate Chamberlain, Ruth Studley	Health in Wales
February 2016	Will Moy and Phoebe Arnold	Full Fact
March 2016	Guy Goodwin, Jay Lindop ONS	ONS
March 2016	Kieron Mahony	ONS
March 2016	Laura Dewis and Darren Waters	ONS
March 2016	David Fry DCLG	DCLG
March 2016	Siobhan Carey and Frances Pottier	BIS

STOCKTAKE OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS STEERING GROUP

Impact of the Bean Review

Purpose

1. This paper updates the Steering Group on the recommendations related to the Authority's regulatory function arising from the Bean review, and their relevance for the Code of Practice stocktake.

Recommendations

2. Members of the Steering Group are invited to note the envisaged impact of the Bean recommendations on the Code Stocktake.

Discussion

3. The *Independent Review of UK Economic Statistics*, led by Charlie Bean was published on 11 March 2016.[1] Its main focus was on the production of economic statistics by ONS. It included a consideration of the governance of economic statistics, and as part of that made recommendations for changes to the Authority's regulatory function (Monitoring and Assessment).

4. The recommendations relating to governance are set out below. Of these, 18, 19, 21 and 23 relate directly to development of the regulatory function. The recommendations were:

    - Recommended Action 18: The government should delegate to UKSA the power to decide that a piece of data be classified as an official statistic; high-profile releases of management information by departments should be treated as official statistics and be compliant with the Code; UKSA should decide whether official statistics should be assessed against the Code for the purposes of National Statistic status.
    - Recommended Action 19: The independence of departmental statistics Heads of Profession should be reinforced, with any abuses highlighted by the Independent Regulation and Evaluation Office (see Recommended Action 24 below); there should be a formal role for the National Statistician in the appointment and performance management of the Heads of Profession.
    - Recommended Action 20: In the event of greater use being made of administrative data in producing economic statistics, UKSA should, after consultation with other departments, put in place suitable policies governing their use, together with the appointment of an independent person or body to oversee their application and adjudicate on any difficult cases.

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[1] https://www.gov.uk/government/publications/independent-review-of-uk-economic-statistics-final-report

- Recommended Action 21: UKSA should provide a more nuanced assessment of the status of a statistic than is conveyed by the binary National Statistic designation.
- Recommended Action 22: ONS should establish an effective and transparent process for prioritising and allocating resources, supported by better management information.
- Recommended Action 23: A high-level group comprising representatives of HM Treasury, the Bank of England and other key stakeholders and users should be established to facilitate frank and open discussion with the UKSA Board.
- Recommended Action 24: The UKSA regulatory function should be subsumed within a new 'Independent Regulation and Evaluation Office' (IREO) charged with assessing the trustworthiness and quality of official statistics as well as ONS's effectiveness; the head of the IREO would report to the UKSA Board and publish an annual assessment of ONS performance and the whole statistical estate.

5. Taken together, we see these recommendations as an exciting opportunity to increase the impact and public value of the Authority's regulatory function. The recommendations recognise the crucial role played by regulation in supporting confidence in economic statistics; propose areas of development (e.g. on defining official statistics); and crucially set out the proposal for a more clearly independent entity in the form of the Independent Regulation and Evaluation Office (IREO). In line with this opportunity, we are adopting an ambitious approach to implementing these recommendations.

6. At the heart of the recommendations sits the proposal for a new identity, which the Review calls IREO. Accordingly, we have organised our response to the recommendations as a programme to develop a blueprint for IREO.

7. We have started by defining the *purpose* of IREO. We will propose to the Board that IREO establishes a clear purpose of enhancing public confidence in the trustworthiness, quality and value of statistics. In doing so, IREO will use the Code as the basis for the National Statistics brand, but extend its reach into a broader range of statistics and data (in line with recommendation 18); and will champion the public value of statistics.

8. To support this renewed statement of purpose, we have proposed to the Board that we will explore 4 areas of change from our current regulatory approach:

- How we conduct and report our **assessments**, to highlight not only the trustworthiness but also quality and public value of National Statistics;
- How we develop a clear **voice** and communicate a clear **identity** to the right stakeholders;
- How far we adopt an approach of setting standards on **methods** and conduct deep dives into methodological challenges;

- How we undertake **'evaluations**': reviews taking a holistic, systemic perspective (and not just reviewing individual Official Statistics)

9. The overall approach we are adopting to IREO, stating a core purpose based on public confidence and value, aligns closely with the Code stocktake:

- The stocktake has already highlighted important areas of potential change, effectively doing a lot of the IREO thinking up front. This is particularly true of the stocktake work on trustworthiness, quality and value, and work on the types of information that sit on the margins of our boundary (open data, research, published management information) - which Bean recommendation 18 addresses directly.
- The Code has a fundamental statutory role in statistical governance, so having the stocktake running in parallel to IREO allows us to consider all the key components of statutory framework at the same time.
- In particular, the Steering Group has recommended that public confidence and value is clearly articulated in the Code. It makes sense to align this refresh of the Code's purpose with a refreshed statement of the purpose of the regulatory entity that enforces the Code.
- Reconsidering the 'how' of assessment aligns well with considering the Code, which is essentially the 'what' of assessment (i.e. the principles against which we assess).
- During the stocktake we have encountered some questions which go beyond the Code to consider the type of regulatory model we want to adopt - having the IREO programme allows us to explore fully, rather than park, these questions.

10. We therefore see the two exercises - proposing a blue print for IREO and proposing a refreshed vision for the Code - as working in close harmony. Paper 10 sets out more information on the way the timelines for IREO programme and the stocktake come together.

11. There are of course logistical questions about how the two areas align, which we will address iteratively over the summer. However, our main conclusion is that, at a strategic level, we see the IREO proposal and the stock take as mutually reinforcing, and a great opportunity to deliver a substantial increase in the impact of the Authority as regulator.

Ed Humpherson,
Director General,
Monitoring & Assessment
May 2016

STOCKTAKE OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS STEERING GROUP

Emerging Themes

Purpose

1. This paper describes in detail the rationale and progress made towards five main Emerging Themes from the Code Stocktake.
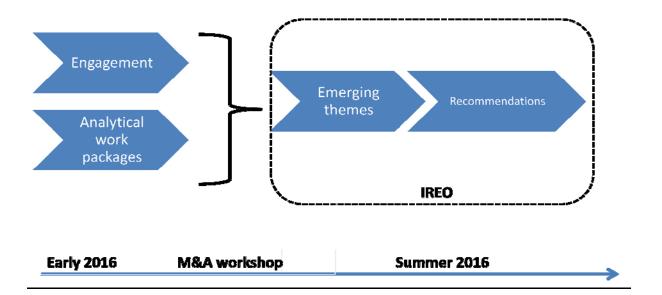
Recommendations

2. Members of the Steering Group are invited to;
    a. Note the progress made by the Stocktake team;
    b. Comment upon the direction of the work and the next steps in the context of our aim to increase the value of the Code of Practice;
    c. Advise on other people/organisations to engage with at this stage of the Stocktake

Discussion

Background

3. The Stocktake is comprised of four distinct stages; Engagement, Analysis, Developing Recommendations and Implementation. We are now moving into the third stage – Developing Recommendations, with a view to presenting our final recommendations at the September Steering Group meeting.

4. Our precursors to the recommendations are Emerging Themes. Emerging Themes were defined through engagement with a wide range of our users (mainly statistical producers from across government) and users and stakeholders (who responded to our questionnaire). Evidence from our engagement activities (see paper 9 Annex A & B for details) and analytical work packages were drawn upon for each Emerging Theme to define the rationale, assess the evidence and develop next steps. In this way we are ensuring that our recommendations will increase the public value of Official Statistics by ensuring the Code specifically addresses new developments identified by our users. See Figure 1 below.

5. The Emerging Themes and the recommendations are being developed in the context of an organisation restructure, (Independent Regulation and Evaluation Office - IREO) as prescribed by the Bean Review (see Paper 10). Recommendations must now also support the values and culture of this new organisation.

Figure 1. Method to develop recommendation in the Code Stocktake

Context

6. The Monitoring and Assessment team workshop on 6th May defined the high level parameters for a refreshed Code of Practice.

7. The team agreed that;
   a. Significant changes in content, structure and presentation are needed for the Code of Practice to remain relevant to its users in the medium term.
   b. This is an optimum time to develop and launch a refreshed Code of Practice, alongside the organisational restructure.
   c. Transformational - As the organisation becomes more outward focused we envisage that the Code will become transactional in its stated principles, but more transformational in its application. Alongside our developing communications work strand and new website, we envisage a Code that will be interactive, that our users will look too for best practice examples and ideas, rather than just to comply to retain National Statistics status.
   d. Public Value - Enhancing public value will be a central theme of the Code, and the Code should be written from the perspective of a user of Official Statistics. In particular, Official Statistics should be defined by what is commonly understood by the public, not by Civil Servants. The Code will encourage statistical producers to be innovative and creative with data and technology, and to develop statistical products that users of government statistics want.
   e. Trust, Quality and Value - will be the central principles in our regulatory function, defined and enhanced by communication of our brand, but highlighted in outcomes through our regulatory function.

8. From the workshop we were able to collapse some of the Emerging Themes into broader categories (see Table 1).

Table 1. Defining which Emerging Themes continue and which collapse into broader categories

Emerging Theme (defined in Feb Steering Group papers)	New positioning of Theme
1. Boundary (definition and scope) issues	Continues as; Boundary (definition and scope) issues
2. "Digital" and data	Continues as "Digital" and data
3. Equality of access	Combined into 'Presentation of the Code'
4. Quality: accuracy versus timeliness; and coherence	Combines with 5. Methods to become 'Methods and Quality'
5. Methods – is the Code (and the assessment regime) too superficial?	Combines with 4. Quality to become 'Methods and Quality
6. Use of commercial data in the production of OS	Combined into "Digital" and data
7. Lack of clarity about the National Statistics brand, especially "value".	Continues as 'Brand and Value'
8. Confidentiality protection – whether/how to future proof?	Combined into "Digital" and data
9. Professional Independence in a ministerial department	Moved to 'Presentation of the Code'
10. Presentation of the Code and supporting information	Continues as 'Presentation of the Code and supporting information'

9. The five Emerging Themes that we are carrying forward (Boundary Issues; 'Digital' and data; Brand and Value; Methods and Quality; Presentation of the Code) are discussed in detail below in terms of the rationale to develop into recommendations, from a public value perspective.

Emerging Theme 1. – Boundary (definition and scope) Issues

The issues

10. 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".

11. 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.

12. 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'.

Rationale for activity (in the context of public value)

13. Our core proposition is that official numerical information is more likely to be trusted, and hence used, if that information is produced by organisations that are demonstrably trustworthy; if the information is of a level of quality that is fit-for-purpose; and if the information adds value by informing public debate, policy making, and decision making. At the same time, we consider that the public value of official statistics would likely become progressively diminished if government's use of non-OS sources of quantitative information – produced in ways that are not consistent with the notion of Trustworthiness/Quality/Value – becomes further established.

14. Inconsistent approaches by departments to the release and labelling of aggregated administrative data (some labelling them as management information, while others label them as official statistics) has the potential for confusion of users. Taking the perspective of users when releasing information is vital – users cannot distinguish between official statistics and management information. 'Official statistics' should be defined from the perspective of users, not producers.

15. This is not an abstract argument. The UK Government's transparency agenda has led to the release of large datasets that underpin the operation of central government and a number of other public sector organisations, through data.gov.uk[1]. Government departments also release summaries of the administrative data from management information systems. One respondent to our survey noted "Having data released is one thing, but if you can't provide an interpretation to the data, there is a risk of it being misinterpreted. It is occasionally important to provide some text to qualify and/or provide an interpretation to data being presented."

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[1] http://data.gov.uk/about

16. The OS/MI distinction (including the related issue of equality of access) is a major concern for the GSS, both from a practical perspective (*who can see what information, when?*) and because it can lead to the perception of statisticians as 'blockers' of information flows. A recent ONS-led cross-departmental task force has drafted guidance to clarify the ways in which civil servants should address requests to use MI publicly, for example prior to the release of related official statistics.

17. The MI/OS issue is a long-standing concern to the Authority too. The past approach has been to say that, should the Authority reach a view that a set of MI should in future be treated as OS, then it will say so publicly. While a reasonable policy position, it is inevitable reactive. It would be more elegant to say that a piece of MI becomes 'statistics' when it is published – so, the concept of published MI no longer holds.

18. Recommendation 18 of the recently-published Bean review was: "The government should delegate to UKSA the power to decide that a piece of data be classified as an official statistic; high profile releases of management information by departments should be treated as official statistics and be compliant with the Code; UKSA should decide whether official statistics should be assessed against the Code for the purposes of National Statistic status."

Broad shape of emerging recommendations

19. Either A: Numerical data and analyses used in public by government bodies to support their own decision making, or that of public services, business, researchers and the public, should be treated as 'official statistics'. A revised Code of Practice for Official Statistics would address the specific characteristics of different types of numerical information.

20. Or B: A revised version of the Code of Practice for Official Statistics, called simply the Code of Practice for Statistics, should apply wholesale to all types of numerical information (but only be formally regulated by the Authority for official bodies).

21. The Authority should provide guidance that sets out issues of proportionality – to help organisations decide how they should comply with the Code in relation to different types of numerical information being used for different purposes. While this guidance should be rooted in the enhancement of the public value of numerical information, it should not be unduly prescriptive.

22. It might be feasible to structure a revised Code in ways that make it clearer to both producers and users the extent to which a particular piece of numerical information is trustworthy, high quality, and of high public value.

Progress to date

23. The analytical work undertaken to date supports the expansion of the reach of the Code.

Next steps

24. We are considering whether to seek explicit agreement from the Cabinet Office that the Government accepts recommendation 18 of the Bean Review.

25. Analytical Paper 5 ("Reducing the National Statistics estate") considers arguments for and against an exercise to reduce the number of sets of statistics badged as National Statistics, for example because the large number and low value of some of these tends to dilute the power of the brand.

26. Such an approach might see the identification of a smaller number of sets of National Statistics that are demonstrably high in terms of trustworthiness, quality, and public value – those that shine a light on society's big questions.

27. At the same time we would expect a larger (and increasing) number of 'other statistics' – typically these will tend to be of less value (often those that are subject to 'collect and count').

28. We want to explore this issue further, including to see whether it offers an approach to the treatment of MI as 'other statistics', as part of our thinking about the brand of National Statistics.

29. We will also want to explore the implications (impact) on ourselves as regulators, and the impact on producers, as well as the potential benefits that might accrue from enhanced public value.

30. We will also consider how the analysis above relates to the idea of 'voluntary compliance' – that is, an approach which allows (for example) third sector/business producers of statistical information to publicly report the extent to which they follow the good practice set out in the Code.

Emerging Theme 2. – 'Digital' and Data

The Issues

31. 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).

32. Since the Code was published in 2009 there have been developments in data linkage and the emergence of Big Data both of which are becoming more main stream and will soon become sources of data in Official statistics (e.g. data scraping from

websites is being trailed for use in estimating price changes in supermarkets for use in economic statistics).

33. For data linkage, the Code encourages the use and re-use of administrative data for statistical purposes; it does not explicitly address use of data from sources outside of government, or data linkage techniques to join multiple data sets. The sharing of data between government departments has traditionally been a lengthy process and as such is used relatively little in the production of Official Statistics. However, the current development of data sharing legislation[2] which may be presented in the Digital Bill in May 2016 could make data sharing easier and would then lead to greater data sharing activity by statistical producers.

34. Several sets of ONS's economic statistics already draw on private sector sources, and the use of private sector data is likely to increase in the next few years, especially if data sharing legislation is approved as it may give ONS specific powers to user private sector data to produce National Statistics. 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 and there may be issues in quality assuring data and processing systems from outside of government.

Rationale (increasing public value)

35. 'Data revolution' is the term coined for the current explosion in data production, along with the emergence of new technology and techniques to use this data to inform society. The trajectory is a society which uses data more and uses data in innovative ways. Government holds a large amount of data which is able to describe the state of our society and encouraging both an increase of use of this data and using this data in different ways, which will ultimately increase its value to the public. Our role here is in giving statistical producers confidence to develop new products and to create and be innovative.

36. If we retain the status quo with the current Code, which is perceived by some as restricting change to statistical products, we risk Official Statistics becoming irrelevant in society as other sectors gather similar data, but make it more applied or more readily available.

37. However, the emergence of new data methodologies is met with a lack of familiarity with the current tools and a lack of understanding by statistical producers regarding the level of quality necessary to ensure trust and high public value. Statistical producers (Ofsted and DfT) told us of instances where similar data sets to theirs are produced by others, but to a lower quality than the Official statistics, leading to poorer inference from the data. Likewise, to increase transparency government departments are obliged to follow the Open data strategy[3], releasing as much data as possible into the public domain. What is still missing across government, as evidenced from our work on statistical standards for Open Data, is a coherent understanding of how

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[2] http://datasharing.org.uk/
[3] https://data.gov.uk/sites/default/files/Cabinet%20Office%20Open%20Data%20Strategy_10.pdf

to produce a high quality Open Data set. As a regulator, supporting innovation is important, but ensuring consistent levels of quality in Official statistics, regardless of how they are produced and disseminated is essential for public confidence in the long term.

38. Another example of this is data linkage methodologies to link together two or more data sets using common identifiers, expanding the inference from the resultant data set. If data sharing legislation removed the barriers that restrict data movement government can be more efficient with the data that it holds and reduce the costs of survey and burden on the public to supply information. Best practice is being set by the Administrative Data Research Network[4].

39. These changes in data technology are recognised across the GSS, witnessed in the hiring of data scientists, re-training of existing statisticians, exploration of data external to government to support the production of statistical products, (e.g. the Census and economic statistics), development of searchable data dashboards open to the public (e.g. school performance tables[5]). The Code needs to represent how data is produced and how the public increasing use Official Statistics.

Broad shape of emerging recommendations

40. The Code should continue to ensure the production of high quality of Official Statistics, regardless of the data source or method of production. But it should not limit the scope of statistical production and dissemination either. This could be achieved by writing high level principles for the Code, supported by standards and guidance (perhaps written by us, or by other experts, which we could endorse), which could be altered to keep pace with best practice on data collection, methodologies and ways to disseminate to a wide range of user types. The emphasis would be on the statistical producer to demonstrate to their stakeholders the strengths and limitation of the methods which they have chosen (see Emerging Themes- Methods and Quality). In this way we would continue to support statistical producers creating traditional statistical products, support creativity and innovation and ensure that the Code is able to accommodate developments in the future.

41. We see a specific role for IREO in leading best practice on new statistical developments such as open data and data linkage, but also to determine acceptable standards for the underlying quality of data in these new products, particularly when data comes from a source external from government.

42. For the Code to be successful as described above there is a dependency for the regulatory staff to be up skilled to understand and keep up to date with developing methods and dissemination techniques, to discern high and low quality statistical products. An alternative could be to hire consultants to review certain statistical products that are emerging or new to us, to ensure we are able to ensure high quality in our regulatory function.

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[4] https://adrn.ac.uk/
[5] http://www.education.gov.uk/schools/performance/

Progress to date

43. The analytical work to date is evidenced in the recommendations above. The recommendation is in line with perceived changes to the Code to accommodate an enhancement of methods and quality in future assessments. Work on statistical standards in 2015 ensures that we are aware of the development of standards and guidance for emerging technologies. The work on standards and guidance. We are trailing the first design of a statistical standard on Open Data, linked with ONS and Government Digital Service. Analytical Work Package 10 on standards and guidance demonstrates current developments in this area which we can continue to keep abreast of.

Next Steps

44. The next steps are envisaged to be;
    - Discern the areas of the Code which would pertain to Digital and Data
    - Determine if and where statistical standards exist for emerging methodologies/technologies
    - Identify how to train our staff to distinguish high quality in digital data products

Emerging Theme 3. – Brand & Value

The issues

45. We have been using the language of trust, quality and (public) value to describe the National Statistics brand for some time. Most of the people we have spoken to 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'.

46. The understanding of the value of the NS brand is further complicated by the proliferation of quantitative information available across government. The definitions of management information, official statistics and NS are not clearly articulated and the distinction and interaction between these different elements is widely misunderstood and may be irrelevant to a wide audience. The NS brand is part of a family of UK Statistics Authority brands and the meaning and marketing of NS may need to be considered alongside wider branding issues being actively considered by ONS and the Authority in light of the Bean review.

47. The ownership of the NS brand is not well understood. Whilst the Authority Board are the owners of the NS brand, ownership is delegated to the Regulation Committee and the power to give and take away the NS designation lies with the Director General for Regulation. There is an implicit extension of 'ownership' that happens at the point of designation of a NS, with an expectation that the producer will share responsibility for the brand and safeguards its reputation for the period of time the statistics have the NS designation. The producer will do this by maintaining the standards of the statistics and keeping trust, quality and value at the heart of what

they do. Whilst this transition is implicit in designation of the statistics, the extension of 'ownership' and acknowledgement of ongoing maintenance is not celebrated or clearly communicated to producers, or publicised externally.

Rationale for activity (in the context of public value)

48. We need to do more to understand the significance and meaning of the NS brand from a wide ranging user perspective. The NS brand is at the heart of what we do and will represent a core element of any new style independent regulation and evaluation office. In our current communication it represents a promise that the statistics are:
    - trustworthy because they are produced by statisticians who are acting with professional integrity and objectivity, and are not swayed by any other interests;
    - quality because the data are sound and well understood, methodologies appropriate, and presentation effective;
    - valuable because they are relevant, going beyond merely counting things and help people understand what is going on in the world.

49. The meaning of 'value' and 'public value' is highly subjective and is subtly different from the term 'valuable'. If public value is to be articulated as a key element of official statistics production then we need to be transparent with producers and users of these statistics, about what we mean by 'public value' and how this will be reflected in assessments of specific statistics or sets of statistics and what it means for the NS brand.

50. Recognition of different user 'personas' and the need to differentiate products to cater for the needs of these different personas are considered key elements of addressing wide public value. For example, catering for the needs of those looking for detailed statistics compared to others who just want to understand the big picture.

Broad shape of emerging recommendations

51. To ensure appropriate interpretation of the NS brand, the Authority should provide guidance on what the NS brand means, how it should be used and how it interacts with other statistics and data. This should include a definition of 'value'. As an integral part of defining the elements of NS as trust, quality and value we may ask producers of NS to justify that status by explaining the 'value' element of each set of NS.

52. In communicating with the GSS and our wider audience we will need to provide clear, consistent messages about the NS brand and our perception of public value. These messages should be tailored to a range of target audiences.

53. We are likely to examine the dimensions of value that are not currently enshrined in the Code and seek to include them. We may also consider a broader change to the

Code of Practice which might have its structure based around trust, quality and value (TQV), or enable on line filtering by these (or other) themes.

54. There is an opportunity to clarify ownership of the NS brand, highlight the joint responsibilities of the Monitoring and Assessment team (M&A), the Authority and producers of official statistics and define the ongoing expectations associated with the granting of NS status.

55. There is also demand for a proportionate approach to Code compliance. To accommodate this we may look at mocking up a TQV version of the Code with equality of access and protection of confidentiality at its core. This could kick in progressively and accumulatively up the hierarchy of quantitative information - from data through to MI, OS and finally NS. There may be a wide range of monitoring and evaluation interventions that M&A could consider dependent on the standing of the data within the hierarchy.

Progress to date

56. The analysis and engagement undertaken to date supports the communication of clearer branding of National Statistics and there is some evidence that the definition of official statistics may also need simplifying or broadening.

57. More development of the recommendations is needed alongside further analysis of the branding element of NS. Branding will be central to all other work streams in the stocktake.

58. We have drafted the following definition of value as a starting point for wider discussion:
   - *'Statistics are valuable when they not only meet high standards of quality and trust, but also are relevant to addressing a wide range of user questions, well presented , set in a broad context and accessible in different ways for different users; such statistics provide real insight and can reliably inform public debate and decision making'.*

Next steps

59. Clarify our thinking in terms of the NS brand regarding its importance and public value and seek advice from a Comms expert in relation to communicating the NS brand.

60. Consider the key generic features of value and seek to incorporate them into a revised Code.

61. Identify the implications of the size of the NS estate in enhancing or diluting the power of the NS brand

62. This work package is closely linked to aspects of communication and the provision of guidance and will evolve in conjunction with development of these work strands.

The Issues

Quality: accuracy versus timeliness; and coherence

63. 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.

64. 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.

65. 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.

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

66. 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.

67. A more general issue, related also to the 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.

Rationale for activity (in context of public value)

68. Statistics cannot be of public value if they are not trustworthy and of high quality. Quality is, of course, multi-faceted with the focus often on 'accuracy and reliability'. The need for statistics to be relevant, accurate and reliable means, in essence, that we are confident that the patterns shown by the statistics reflect real-world phenomena, and are not artefacts of the way that the statistics have been assembled. But these considerations also need to take into consideration that without being accessible or timely, statistics fail to add as much public value as they might otherwise. Assured, sound methods are needed to establish a bedrock for statistical production. Quality assurance procedures need to be appropriate to identify and deal with erroneous data that may materially affect the statistics in such a way that they do not reflect real-world phenomena. And of course, producer bodies need to

describe the quality of their statistics in ways that promote beneficial use, and prevent inappropriate use.

69. We need to ensure that the Code of Practice, its supporting guidance and standards, and its application through assessment, are sufficient to offer appropriate reassurances to users of official statistics about their quality. This will include all aspects of methods used, quality assurance processes and statisticians' documentation about methods and quality. Our aim is to maximise the impact that the Code and assessment have in enhancing the quality and public value of official statistics.

70. This desire was reinforced by the recent Bean Review, which made observations such as:

> "*Despite recent progress, greater emphasis on quality issues – in their broadest sense - is needed. The Review team was told repeatedly by producers of statistics that the current assessment process did not fully cover all dimensions of 'quality', as described in the five dimensions contained in the ESS.*"

and

> "*Looking forward then, it seems clear that a further strengthening of emphasis on assessing quality – in its broadest sense – is called for.*"

Broad shape of emerging recommendations

71. The development of the work under these packages will be taken forward together given the close relationship between methods and certain aspects of quality. We consider that the discussion about statistical quality could be extended beyond the remit proposed by the Steering Group to incorporate all of the five dimensions of output quality as defined by the European Statistical System[6]; the trade-offs between them; and where practical to do so at this stage, aspects of input and process quality.

72. We expect the detailed recommendations to group under three broad headings:

- *Enhancing the way that the Code and accompanying guidance describe methodological and quality standards.* We expect to recommend that more detail be included within the Code (or associated guidance) about the nature of methods used, the importance of methodological review, and the need for effective quality assurance arrangements. For example, we could build on the success of our Quality Assurance of Administrative Data guidance to apply the underlying principles more broadly to other data types such as management information. We also want to revise the Code to require statisticians to provide a greater exposition of the various aspects of quality as they relate to their statistics, and to the approach that they have taken to balancing the various attributes of quality. As part of this work, we will consider the role of Regulation in prescribing standards to be adopted.

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[6] The five quality dimensions of the European Statistical System (ESS) are: Relevance; Accuracy and Reliability; Timeliness and Punctuality; Accessibility and Clarity; and Coherence and Comparability.

- *Extending our deep dives into methodological issues during the course of assessment.* In some recent assessments, we have investigated and identified some methodological issues. Most recently, Assessment Report 322 covered Consumer Price Inflation including Owner Occupiers' Housing Costs (CPIH). This assessment dealt extensively with the concepts and methods that are used to produce CPIH, and noted the following:
    - o That ONS needs to take time to strengthen its quality assurance of the private rents data sources that it obtains from the Valuation Office Agency (VOA) in order to provide reassurance to users about the quality of CPIH. This is particularly important given the unusual production arrangements between ONS and VOA.
    - o That ONS needs to monitor how CPIH behaves over time in a way that facilitates users' understanding of the statistics and what they measure.
    - o That there is a contested space of potential CPIH methods, with legitimate arguments for all sides of the debate. Taking this into account, ONS needs to engage more positively and openly with a wide range of users and to do much more to explain and articulate its own judgements about the concepts and methods that it uses as a coherent package.
    - o Our deep exploration of methodological and quality issues was in direct response to a lack of widespread user acceptance of the index. We anticipate that we will want to extend this kind of approach more widely, and will consider how we might do so. In doing so, we will explore greater alignment of regulatory work with existing methods and quality reviews. Among the options being considered, in addition to our own deep dives, would be to formally commission methodological input from external experts, and to more explicitly ask users (as part of the assessment) to raise any methodological concerns that they may have, for us to follow up with the statisticians. We are also actively considering methods and quality issues as we develop our thinking about Evaluation.
- *Enhancing the way that we present our findings in assessment reports.* We expect to develop detailed recommendations that will lead to a fuller description of methods and quality issues in assessment reports, and to changing the format of assessment reports in order to draw out quality issues more clearly.

Progress to date

73. The Code stocktake work packages have generated a range of ideas for how we can develop our approach to methods and quality in the Code and in assessment. These have been discussed by a small team at the Code stocktake workshop, and developed into an emerging list of candidate recommendations.

Next steps

74. Following the Code stocktake workshop, we are working up a range of detailed suggestions relating to methods and quality, for further discussion and review. We anticipate that these will either form specific recommendations for changes that need to be made in any future revision to the Code itself, or its supporting guidance. A

small group within M&A has been assembled to take this work forward, and will liaise with colleagues in ONS's Quality Centre.

Emerging Theme 5. – Presentation of the Code and supporting information

The Issues

75. 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.

76. The Code does not have a high profile. Statisticians are often unaware of its existence, or they use it only when their statistical products are undergoing assessment. Non-statisticians in government, (analysts, economists, ministerial support teams) are often unaware of the obligations of the Code, leading to conflict between statisticians and their colleagues.

77. The Code is good at supporting professional independence in ministerial departments, for example 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.

78. The Code refers to the need to 'follow all statutory obligations and internationally endorsed guidelines' implying Data Protection Act, Freedom of Information, European Data Protection Regulations, but does not provide further details on what is required. Users comment that there is a lack of clarity on how to interpret seemingly conflicting standards.

Rationale (increasing public value)

79. Increasing the profile of the Code across the GSS, other similar professional groups and ministers and their offices will enhance the impact of use of the Code. However, fundamental to increasing public value is creating a Code which people want to engage with, find easy to engage with and which is helpful to them.

80. We have found that effective codes of practice are designed to try to encourage good behaviour, which is supported by appropriate guidance and includes elements that are future-looking and aspirational. Principle-based codes, rather than prescriptive codes are viewed as much more effective in driving changes to positive behaviours, and there appears to be a 'shift' in regulation in the UK to increase the use of a principle-based style.

81. Currently we assess sets of statistics and alongside this take a look at the organisational environment in which the statistics are produced. An alternative

method that we are scoping is to assess organisations' statistical capacity and capability separate from their statistics. Organisational assessment offers particular opportunities to effect organisational transformation at a more senior level, by both asking for information about statistical transformation within producer departments, but also through our interactions with Head of Professions and other senior statisticians and the messages that we convey to them.

82. We need to develop more credibility with statistical producers; to encourage increased use of the Code, for example;
    - The Code should be published using means by which we would expect statistics to be disseminated
    - We should be unambiguous in how to apply the Code, this should be transparent
    - We need to embrace differences due to devolution, and the wide range of statistics being produced without compromising a desire to enhance the public value of statistics by presenting a UK-wide picture, where it is appropriate to do so.
    - We need to ensure we further develop consistency in assessment both within and across government departments

Broad shape of emerging recommendations

83. We respect our users' need for paper copies of the Code and will continue to publish these; however, we aim to move to interactive, searchable version of the Code, to be published on the website.

84. The Code should be written for users of statistics, our brand and values should be clear and understood. The Code should encourage producers to increase the Trust, Value and Quality of the statistics that they produce.

85. A principle-based Code seems appropriate to encourage positive behaviour, whilst enabling us to support innovation and creation and enabling us to ensure the code will be fit for purpose in the medium term. The decision on whether to use a principle-based or prescriptive code can be very dependent on whether the profession is mature enough, and/or whether the regulatory body is mature enough. The Code was first launched in 2009, at which point both the GSS in its understating of the Code, and the Regulation function were in its infancy. Since 2009, and 322+ assessments later, there has been a growth in maturity of both sides, so there appears to be some scope for an increase in the use of a principle-based approach to the Code.

86. The principle based Code would be supported by additional standards and guidance, which could interpret the Code more fully. These could be updated more regularly than the Code, encouraging that the principles are written at a higher. Standards and guidance may be developed by the GSS and be endorsed by us, or alternatively created by us, this will depend on the outcome of the current Task and Finish group (assessing suitability of currently available standards and guidance) and the availability of standards on areas we feel are important to communicate to users.

Standards and guidance should all be hosted together and it should be clear where these can be found.

87. We propose that we use case studies to demonstrate best practice and common questions to help debunk some of the myths about the Code that have become apparent in our engagement.

88. By effectively interacting with statisticians through an organisational assessment, we can spell out more clearly the 'why' behind our work, to help them to live more fully by the values of the Code, and in turn, transform the cultures within their departments. This is in line with being more transformational in our work and more principle based in the Code, in that it will build collective understanding of practices across the Government Statistical Service. If organisational assessment is taken forward in IREO the Code would need to be written in such a way that reflects principles which affect organisations and those which affect the production of statistics.

89. Where other guidelines governing data exists we should be clear on what is a suitable application and be open to challenge in circumstances where this does not work.

90. The Code should be written to encourage creativity and innovation, during the engagement producers told us that they perceived the Code inhibited them from updating their methodology.

Progress to date

91. The analytical work packages and the M&A workshop on 6th May have been highly instrumental in helping to shape the broad recommendations above.

Next Steps

92. We propose to take a 'straw man' approach to beginning to refresh the Code over the summer. This could take the direction of beginning to define some high level principles, defining the standards and guidance that would be needed to support these and defining where we have gaps. We would test this with a range of statistical producers, and use an iterative approach to develop further. We expect to also iterate early plans based on the scope of IREO.

Richard Laux & Johanna Hutchinson
Monitoring & Assessment

May 2016

STOCKTAKE OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS STEERING GROUP

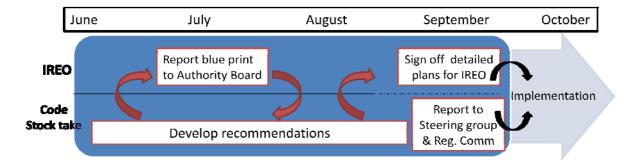**Organisational change through the Code Stocktake & Bean Review**

Purpose

1. This paper summarises the process for developing plans for organisational change over summer 2016, incorporating the Code stocktake.

Recommendations

2. Members of the Steering Group are invited to note the inter -dependency between these work streams, and the challenging timelines we are working towards.

Discussion

3. As detailed in paper 10 the Monitoring and Assessment team is developing an organizational change, which will change the scope and remit of the regulation of official statistics. Although this could not have been perceived as the Code stocktake commenced in December 2015 the timing is beneficial to both areas. The Code stocktake will act as a credible and detailed evidence base for the creation of IREO and the scope of the Code stocktake will become wider to encompass the aims of IREO. Together they enable a greater change at a faster pace, with the aim of positioning the regulation of official statistics to better enhance public value.

4. The work underpinning the stocktake and IREO is designed to be complementary, with the work stream planning aligned and proceeding in parallel. Our aim is to ensure that proposals for both the stocktake and IREO are coherent and consistent. Figure one shows the high level reporting dates for IREO and the stocktake and demonstrating the inter-dependency between them.

5. Evidence gathered for the stocktake will be used to support the blue print of IREO. The blue print and subsequent developments over the summer could in turn impact the scope of change envisaged for the refreshed Code of Practice.

6. We envisage that we will announce the outline vision for the regulatory office at broadly the same time that we publish the conclusion of the stocktake. This will mean

that the extent of our ambition to refresh the regulatory model sits alongside the extent of our ambition to refresh the code. Considering the similar timescales in which we are working the impact is expected to be minimal for the Code stocktake, with a re-launch envisaged for end 2016/beginning of 2017.

Ed Humpherson & Johanna Hutchinson
Monitoring & Assessment

May 2016

STOCKTAKE OF THE CODE OF PRACTICE FOR OFFICIAL STATISTICS STEERING GROUP

Draft minutes of the meeting of 17 May 2016

<u>Attendees</u>
Dr David Levy, Non-Executive Director, UK Statistics Authority - Chair
Prof. Paul Allin, Chair of the RSS's Statistics User Forum
Phoebe Arnold, Head of Communications, Full Fact
David Blunt, Head of Profession, Home Office
June Bowman, Head of Profession, Department for Transport
Lara Fielden, Visiting Fellow- Reuters & IPSO
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
Mike Hughes, Royal Statistical Society

<u>Apologies</u>

Chris Francis, Director of Government Relations, SAP
Roeland Berteen, Royal Statistical Society
Tricia Dodd, Deputy Director, Chief Methodologist, Office for National Statistics
Laura Dewis, Deputy Director, Digital Technology, Office for National Statistics
Tegwen Green, GSS Good Practice Team

<u>Introduction</u>

1. David Levy welcomed members of the Steering Group. He noted that the impact of the Bean Review was to change the context in which the Stocktake was being taken forward, and that this might impact on some aspects of the way that recommendations will be developed over the summer.

2. Minutes from the February Steering Group were approved by the Steering Group; actions were completed or will be rolled forward.

<u>Progress (ST(16)9)</u>

3. Richard Laux introduced the paper, giving a brief summary of work completed so far. He emphasised that the value of the meeting would mainly derive from discussion of the Emerging Themes paper, and invited challenge from the Steering Group on direction, scope and ongoing communications with the stakeholder community; Richard expressed a desire to engage in greater depth with external stakeholders and users of official statistics over the summer. Finally he reported that an interactive session at the GSS's Presentation and Dissemination Symposium earlier that day had received positive feedback from 30 members of the GSS community.

4. The Steering Group members congratulated the Stocktake team on the range of engagement to date. Mike Hughes noted that the RSS was very supportive of the

Code Stocktake and appreciative of Richard's recent presentation to the National Statistics Working Group.
ACTION 1 – Engage with external stakeholders and users of official and National Statistics

Organisational Change (ST(16)10)

5. Ed Humpherson summarised the way in which the publication of the Bean Review has led to the M&A team exploring an organisational (functional) change. The impact of this change was presented to the Steering Group. It was noted that the new organisation (currently being referred to as the Independent Regulation and Evaluation Office IREO)) would be positioned to support the public value of official statistics, consistent with discussions about the Stocktake at the Steering Group meeting in February. Whilst the exact details of the new organisation are still being developed it was noted that the Authority Board has accepted the recommendations from the Bean Review and that they are supportive of the broad direction of travel set out in the paper, and of a more wide ranging and visible regulatory function.

6. Ed described the Bean Review and current direction of the organisational change as complementing and being broadly consistent with the emerging findings of the Code Stocktake, which provides the opportunity to transform the whole regulatory regime simultaneously. The timings of both programmes are consistent. In discussion, Steering Group members were supportive of M&A seeking further independence and a broader range of functions.

7. The Group agreed the importance of determining the scope of statistics under the remit of Code, along with any assumptions about the likely reach of the Code in relation to other types of data. The impact of this in terms of cost and resource to government departments should be estimated.
ACTION 2 – determine the scope of statistics which will fall under the remit of the Code.

8. It was noted that the IREO-related context of the Stocktake may impact upon the Steering Group's TORs.
ACTION 3 – review the TORs and circulate to SG members.

9. The Bean Review states that economists are generally not aware of statistical issues; The RSS has begun engaging with economists to this end, it could be beneficial for the Stocktake to engage with economists more over the summer to build awareness of the Code of Practice.
ACTION 4 – explore the possibility of engaging with economists over the summer and gather their views on the Stocktake.

Emerging themes (ST(16)11)

10. Richard introduced the five main emerging themes collated from the analysis and engagement phase of the Stocktake, and invited comment.

Boundary

11. Two options for the boundary and scope of the Code of Practice were considered. The second option (rename as the 'Code of Practice for Statistics') was seen as more ambitious, in that it would encompass official statistics and other numerical information produced by Government, and would readily support other organisations' "voluntary compliance". Some SG members felt that this would increase the profile, reach and public value of the Code, and supported the proposal to encompass all

relevant numerical information under the auspices of a single Code. Other Steering Group members felt that increasing the range of government statistics that should comply to the Code could lead to increased bureaucracy within departments and become too great in number to regulate efficiently.

12. It was noted that much MI and other data types does not often fall under the current remit of HOPs, although they are often asked to consult on these products. It was suggested that there might be analytical value in considering the elements of Trust, Value and Quality (TVQ) in relation to different categories of information (National/Official Statistics, MI, 'open data' etc) to inform our thinking about the ways in which a revised/restructured Code might apply more generally.
ACTION 5 – Apply TVQ to the range of numerical information produced by government, and map onto the Code.
ACTION 6 – Explore the likely resource implications for departments of different options for the scope/reach of the Code.

Digital and data

13. The Steering Group was largely supportive of the proposals , but challenged the team to think broadly about others' (eg Full Fact, ODI) open data standards, and to engage with others across government, particularly the GDS, who may also be making developments in this field. The Steering Group suggested that the team explore precisely how digital developments play in to statistical production work.
ACTION 7 – Consider a range of approaches to Open Data standards promulgated by expert organisations.
ACTION 8 – Engage with GDS and others about ways of refining the Code to encourage more digital production and dissemination of statistics; ensure consistency with other government policies.
ACTION 9 – Define 'digital' for the purposes of the Code (and the Stocktake).

14. The Steering Group commented that producers may need to be incentivised to investigate the need for different access routes to their data.

Brand and value

15. The Steering Group agreed that the development of a clear statement of the NS brand should be the priority for the team over the summer, and that Stocktake recommendations should be aligned with the statement of brand. Members of the Group discussed whether the Code should be aspirational (trying to achieve high standards) or present a baseline (establishing a common acceptable standard for all) and that this was an important consideration in the development of the brand.
ACTION 10 – Develop and define the statement of the brand of National Statistics and use this in the development of all other recommendations.

Methods and quality

16. The Steering Group noted the importance of aligning Stocktake-thinking about methods and quality with work to articulate the functionality of IREO. Some members felt that greater scrutiny of methods and quality had been missing from regulation in the past, but it was recognised that it is beyond the capacity and capability of the M&A team to have a detailed knowledge of the range of methods used in the production of official statistics. Members suggested that it might be feasible to seek input from external experts more, or to ask the statistical production team more about their methodology.

17. Members questioned whether regulators should be conducting 'deep dive' methodological reviews at all - is it for the regulator to find and analyse the evidence, or for the producer to provide it to the regulator? It was agreed that any way forward should be based on increasing trust in government statistics and that a collective approach to providing assurance for the figures could be more beneficial from a public value perspective.

Presentation of the Code

18. Steering Group members discussed the merits of principles-based as opposed to rules-based regulation, and the implications for the Code and supporting material. It was agreed that whilst firm rules are necessary in some contexts, e.g. explaining responsibility to a minister, having a more fluid approach in other areas could enable more innovation and help support a perception that the Code is not unduly restrictive. **ACTION 11 – design and test some prototype Code formats with producers.**

Ways of Working (ST(16)12)

19. The collaborative approach to working and consistent timetables of the development of IREO and the Code Stocktake were noted by the Steering Group

Any Other Business

20. The Steering Group commented on the high calibre of work produced by the Code Stocktake team and noted the large amount of work that was needed over the summer. To keep abreast of this work it was suggested that some Steering Group members be invited to early discussion of Stocktake sub groups. **ACTION 12 - Involve Steering Group members in the development of recommendations over the summer.**

21. To keep absent members up-to-date it was suggested that the Code Stocktake team meet with them in the next few weeks to feed back on plans and developments. **ACTION 13 – Offer meetings with Steering Group members who were absent.**

22. The next meeting date was set for Wednesday 7th September 2.30pm- 4.30pm