

Statistics that serve the public good

OSR's vision:
What we do and why

November 2019



Office for Statistics Regulation

We provide independent regulation of official statistics produced in the UK. Statistics are an essential public asset. We aim to enhance public confidence in the trustworthiness, quality and value of statistics produced by government.

We do this by setting the standards they must meet in the Code of Practice for Statistics. We ensure that producers of official statistics uphold these standards by conducting assessments against the Code. Those which meet the standards are given National Statistics status, indicating that they meet the highest standards of trustworthiness, quality and value. We also report publicly on system-wide issues and on the way statistics are being used, celebrating when the standards are upheld and challenging publicly when they are not.

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Foreword by the Director General for Regulation

The aim of this document is to set out what we do and why, and our broad ambitions for future development.

It is intended to provide a light touch guide for people who have not previously been aware of the Office for Statistics Regulation (OSR), and to clarify our ambitions for those producers and users of statistics who are more familiar with what we do.

In 2016, the Bean Review of Economic Statistics¹ recommended that the Authority's monitoring and assessment function should be transferred into a more separate regulatory office. OSR was established in November 2016. In July 2019, the House of Commons Public Administration and Constitutional Affairs Committee² made a series of recommendations to further strengthen the role of OSR and enhance our effectiveness. We welcome the reinforcement of our value and are implementing the Committee's recommendations.

Since our creation we have established a clear philosophy based around the importance of trustworthiness, quality and value:

Trustworthiness

Confidence in the people & organisations producing statistics

Quality

Data and methods that produce assured statistics

Value

Statistics that support society's needs for information

This philosophy is embedded in the updated Code of Practice for Statistics,³ which we launched in February 2018. It has infused the work of all public sector bodies that produce official statistics, and enthused organisations that have adopted the principles of the Code on a voluntary basis. The fact that organisations have adopted these principles even though they do not have to is one of the strongest testaments to their power.

This document sets out OSR's vision and mission.

Our vision is simple. Statistics should serve the public good.

What does the public good mean? It means far more than the traditional notion that statistics provide the evidence base for policy decisions by Ministers and Parliaments, important though this is. Statistics should meet the needs of a much wider range of users and this is the essence of how they serve the public good.

Statistics should help inform decisions made by a wider group of organisations, including charities, researchers, trade unions, businesses and community groups. And they help those civil society organisations hold governments to account. Statistics can also influence choices made by citizens: how they vote, where they live and a wide range of other decisions. And statistics inform many

¹ The independent review of economic statistics (the Bean Review), HM Treasury, March 2016

² The governance of official statistics: redefining the dual role of the UK Statistics Authority, Public Administration and Constitutional Affairs Select Committee, July 2019

³ The Code of Practice for Statistics, Edition 2.0, Office for Statistics Regulation, February 2018

public and political debates, sitting at the centre of discussions of health, education, the economy, crime, the environment and many other topics. This pervasive use means that statistics are a key part of the construction of a sense of place, society and democracy.

Statistics serve the public good when they meet all these uses. But sometimes they fail to do so. They can fail to be relevant or accurate; producers can fail to innovate or make their data widely available; the statistics can fail to give a sufficiently fine-grained picture of what is going on in society; there can be gaps, whereby key areas of policy and society are not described by statistical outputs; and data can be used in ways that jar with public attitudes and public consent. And statistics can be used in ways that also do not serve the public good: precise numbers can be used to give a misleading picture of what the statistics actually say; too much weight can be put on statistics; or they can be described incorrectly.

It is the role of OSR to support confidence in statistics by addressing these harms and ensuring that statistics fulfil the vision that they serve the public good.

This vision document sets out how we go about doing this.

Ed Humpherson

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Director General for Regulation, 5 November 2019

Introduction

What we do

OSR is the regulatory arm of the UK Statistics Authority, a body established by the Statistics and Registration Service Act (2007).

We are independent from government Ministers. We are separate from producers of statistics, including the Office for National Statistics ONS).

In line with the Statistics and Registration Service Act (2007) our principal roles are to:

- Set the statutory Code of Practice for Statistics
- Assess compliance with the Code of Practice
- Award the National Statistics designation to official statistics that comply fully with the Code of Practice
- Report any concerns on the quality, good practice and comprehensiveness of official statistics

Why we do this: statistics serving the public good

What do we mean by serving the public good? Statistics published by public sector bodies should be produced in a trustworthy way, be of high quality, and provide value by answering people's questions: providing accountability, helping people make choices and informing policy. And statistics are part of the lifeblood of democratic debate.

Statistics therefore should serve a very wide range of users. When they meet the needs of these users, they serve the public good.

But they do not always fulfil these ambitions. Their value can be harmed – through poor production, lack of relevance and coherence, and through misuse.

It is our role as regulator to minimise these problems. By championing high standards, we uphold public confidence in statistics that serve the public good.

Our history

The Statistics and Registration Service Act (2007) created the UK Statistics Authority and within that, the role of assessing statistics against the Code of Practice. Between 2009 and 2016, the work was led by a team within the Authority called the Monitoring and Assessment team.

In 2016, the Bean Review of Economic Statistics recommended that the Authority's regulatory function be established as a separate office, and in November 2016 OSR was launched.

In 2019, the House of Commons Public Administration and Constitutional Affairs Committee (PACAC)² endorsed the role of OSR and recommended OSR's separate role should be more visible.

We are independent from government Ministers.

We are separate from the Office for National Statistics.

We do not produce official statistics.

Our widening scope

Our core focus is on official statistics – statistics produced by government which must comply with the Code of Practice for Statistics. But the greater abundance of data and new approaches to analysis mean that increasingly government bodies and other organisations publish a wider range of data outputs: open data, management information, data science outputs, ad hoc analysis. These outputs aim to inform public understanding and public choices, and seek to serve the public good – and thereby playing the role of statistics. They also raise new questions about data ethics and governance.

This document

Through this history of organisational development, and widening scope, our enduring vision has been that statistics must serve the public good. But how we do this has not always been clear.

So, this document sets out our enduring vision and our mission. It is mainly aimed at people unfamiliar with OSR's work and role, but it also clarifies our ambitions for producers and expert users of statistics.

Our vision, philosophy and mission

Our vision

Statistics that serve the public good.

Our mission

To ensure that statistics serve the public good we focus our work on three areas:

We develop a better understanding of the public good of statistics We uphold trustworthiness, quality and value of statistics and data used as evidence

We protect the role of statistics in public debate

Our philosophy

In a world of abundant data, we want people to have confidence in statistics produced by the public sector. Our vision and mission are underpinned by the three pillars set out in the Code of Practice for Statistics:

Trustworthiness is a product of the people, systems and processes within organisations that enable and support the production of statistics and data. Trustworthiness comes from the organisation that produces statistics and data being well led, well managed and open, and the people who work there being impartial and skilled in what they do.

Quality means that statistics fit their intended uses, are based on appropriate data and methods, and are not materially misleading. Quality requires skilled professional judgement about collecting, preparing, analysing and publishing statistics and data in ways that meet the needs of people who want to use the statistics.

Value means that the statistics and data are useful, easy to access, remain relevant, and support understanding of important issues. Value includes improving existing statistics and creating new ones through discussion and collaboration with stakeholders, and being responsible and efficient in the collection, sharing and use of statistical information.

Upholding the trustworthiness, quality and value of statistics

What we do

Our core regulatory work ensures that official statistics command public confidence through trustworthiness, quality and value. We confer the National Statistics designation, and we drive producers to innovate and improve continuously. The House of Commons Public Administration and Constitutional Affairs Committee report re-emphasised the central role that users must play in the development and delivery of statistics. In line with this, our work supports user confidence.

Our primary focus is on official statistics – statistics produced by government in line with the Code of Practice for Statistics. We are ambitious in advocating improvements to the existing statistical system in areas such as quality, data gaps and user engagement. But we are also ambitious in extending our reach: other types of analytical output, not classified as official statistics, are published by government to explain policy and describe policy outcomes.

So in addition to driving improvements to the current portfolio of official statistics, we will apply our core principles to a wider range of data outputs that inform public understanding and seek to serve the public good – and which thereby play the role of statistics.

Why it's important

This is an age of increasingly abundant data. Data are available more quickly from a wider range of sources. This includes growing use of open data and administrative data sets which often bring with them new ethical questions about the appropriate use of data. Data are continually amassed about our lives in ways that were unimaginable not long ago. There are concerns about the abundance of data – that it's hard for people to sift what's reliable from the unreliable, and that bad data may drive out the good. Statistics producers need to demonstrate leadership and adapt to this environment: to ensure their statistics remain relevant and accurate in a changing society; and to enable much wider reuse of data by users. Data ethics are more important than they ever have been. And users want access to meaningful statistics that join up data across a huge range of issues including migration, the economy, health, crime, education and many more. All this requires OSR to uphold the trustworthiness, quality and value of official statistics and of wider data published by the public sector.

Activities

- Assess official statistics against the Code of Practice for Statistics, including their quality and relevance to users
- Promote adoption of the Code of Practice's principles more widely
- Review appropriate data ethics and governance for new data outputs
- Ensure that statistics are relevant and meet user needs, including for access to the underlying data so that users can generate their own disaggregated analysis (e.g. by region, sex or other characteristics)
- Promote the need for producers to understand the nature of data sources, as well as the methods and processes for producing the statistics⁴
- Review the statistical system, focusing on gaps in coverage; coherence in areas like health and income; data linkage; and statistical leadership

⁴ Through our Quality Assurance of Administrative Data – QAAD – guidance

Protecting the role of statistics in public debate

What we do

We identify and form judgements on risks of misuse of statistics in public debate. This is not an all-purpose role of commenting on the quality of public argument. Rather it is focused on the risk that confidence in official statistics is undermined by the way they are presented and used. This is not about precise numbers or checking every fact: precision is often far less important than context. Confidence can be undermined when statistics are misquoted or used in a misleading way; or when statements are made that sound statistical but are not possible to verify; or when more weight is put on an individual statistic than it can reasonably bear. Our role is to defend the role of statistics from the risk of these types of misuse.

Why it's important

Statistics lie at the heart of many political and public discussions – of the economy, health, crime and many other topics. Yet there are concerns that we are living in a 'post-truth' environment. While we think that some of these concerns are overdone, we do recognise that public confidence in statistics can be undermined by the way they are used in public debate. They are often used appropriately. But claims can sometimes misrepresent what the statistics say; or can use statistics as "naked numbers", without proper explanation or sourcing; or place undue weight on a particular statistic. This can harm public confidence. We seek to raise awareness that people can approach us with concerns about quality and misuse. OSR intervenes to protect the role of statistics in public debate when these cases come to our attention – either through complaints or when our own monitoring identifies a risk to public confidence in statistics. In high profile cases of misuse by politicians, the Authority's chair will lead the intervention based on OSR's advice.

Activities

- Intervene where we identify significant or persistent issues with how statistics on a particular issue are being used
- Monitor how statistics are used in public debate, developing automated tools and dashboards to provide intelligence on how prominently statistics are used in social and mainstream media (e.g. whether a particular statistic is associated with an issue of topical interest, like policing)
- Maintain alliances with the wider range of organisations that lead on the use of statistics, data and evidence, such as Full Fact, Sense about Science and the Institute for Fiscal Studies
- Respond to complaints received from members of the public about uses of statistics in public debate. Where the concerns are material or bear on a matter of significant public interest, we publish our conclusions

Developing a better understanding of the public good of statistics

What we do

We gather empirical research to develop a clearer understanding of how statistics are used. This work, which we undertake in collaboration with others, is essential to highlight the role that statistics play in the choices that people make, consider the risks to the public value of statistics in a changing environment, and identify ways to improve how statistics are communicated. Research here is relatively sparse, and we will use our influence to stimulate others with capacity and expertise to focus on these crucial questions. And we will contribute to international debates on the value of statistics and the role they play in public debate, for example at OECD, the UN Economic Commission for Europe, and at European Statistical System conferences. By doing so, we want to transform how producers think about statistics – not just serving policy makers, but far more importantly providing insight and understanding to a very wide range of users.

Why it's important

The Statistics and Registration Service Act (2007), which established the Authority, places the public good at the heart of the UK's statistical system.

Statistics serve the public in several ways. They support key policy decisions made by public bodies, like economic decisions or decisions on the delivery of health services. But statistics producers sometimes stop here. We want to highlight the wider range of users of statistics – and ensure producers recognise them. Statistics also support decisions made by a very wide range of people in society: businesses, charities, community groups, trade unions and individuals. And they form part of the perceptions on which individual citizens make choices – about education, health, the economy, and many other aspects of life. This wider use is the essence of the public good. We want to lead producers of statistics to develop a much better understanding of how valuable statistics are in these uses, so they focus on what really matters.

Activities

- Identify the research base about the public impact of statistics on individual choice
- Gather evidence on the value of statistics, including where researchers have estimated their economic value and wider societal impact
- Develop clear framework for judging misleadingness how statistics are misused can undermine their value
- Convene organisations with a focus on public good of statistics and data, including Full Fact, the Royal Statistical Society and the Economic and Social Research Council
- Update our understanding of the role of National Statistics designation in conveying to users the value of individual sets of statistics

How the three components of the mission fit together

The three streams of activity work together. Leading a better understanding of the public good is about the evidence that demonstrates why statistics should be **valued**. Upholding trustworthiness, quality and value is about production of statistics – whether the right statistics are **produced**, in the right way. Protecting the role of statistics in public debate is about ensuring that the way statistics are **used** does not undermine public confidence in them.



Our focus on the **production** of statistics is largely a planned activity, leading to rigorous judgements about trustworthiness, quality and value.

Our focus on **use** requires us to respond to emerging issues and form rigorous judgements about whether uses of statistics have the potential to mislead.

By contrast to the judgement-focused parts of our work, our consideration of how statistics are **valued** is more developmental and research-led.

What we will and won't do

OSR is a small body and we therefore need to be clear on what we can and cannot achieve. The table below illustrates how we define the extent of our role on key questions like whether we police political debate; how far the National Statistics designation extends; and our role on uses of data.

We won't: We will: Step in when the way statistics are Be an all purpose arbiter of the used could undermine confidence quality of political argument in statistics Sign off particular uses (e.g. provide Develop and clarify the assurance of statements like "schools National Statistics designation are better funded than ever") Advocate the Code's pillars where Be a regulator of all data for all uses data play the role of official statistics Undertake systemic reviews of Micromanage producers important cross-cutting issues Do this alone – many others (ONS, Lead understanding of the other producers, RSS, Full Fact) public good of statistics have a role here too

Annex: Background to OSR's work

The scope of our work

The scope of our work is statistics and data produced by government bodies. This includes:

 Official statistics – these are quantitative outputs published by government bodies, labelled as official statistics by those organisations, and produced in line with the Code of Practice for Statistics. Those which we assess to comply in full with the Code of Practice are designated as National Statistics. We focus on statistics and other forms of information that play the role of statistics, or are used in lieu of statistics, to inform public debate

Other data publications and uses that inform public debate. By "other data publications
that inform public debate" we do not mean all data for all uses. We include in our scope
quantitative, aggregate information that is published, for example to help people
understand the impact of a policy. Government publishes a wide range of data, including
official statistics; research and analysis; open data; transparency reports and
management information.

Where data are playing the role of official statistics, we expect public sector bodies to adhere to the same broad principles that underpin official statistics. For example, where Ministers draw selectively on unpublished management information to explain a policy or its outcomes, the data are being used to inform public debate. And increasingly government uses the tools of data science to extract insight and value from data, and we have a role to ensure that these uses also serve the public good. These wider types of output should adhere to high standards of trustworthiness, quality and value.

So in summary, we focus on statistics and on other forms of information that are playing the role of statistics or are used in lieu of statistics to inform public debate.

How we engage

Our ambition is big. We cannot achieve our vision alone. We engage with a range of people to deliver the vision:

 We produce an annual business plan and work programme, on which we consult with producers, experts like the Royal Statistical Society and wider users of statistics. This business plan and work programme demonstrate how, in each year, we deliver the three parts of our mission.

In addition, as we carry out our work:

- We seek to influence producers of statistics to achieve trustworthiness, quality, and value, on behalf of users. So our approach to engagement recognises the complementary roles of organisations that are responsible for statistics, and those that use them.
- Through 10 regulatory domains, we interact with existing and new producers of statistics; policy makers; users outside government; and people who represent wider groups in societies:

- o Agriculture, Energy and Environment
- o Business, Trade and International Development
- o Children, Education and Skills
- Crime and Security
- o Economy
- Health and Social Care
- o Housing, Planning and Local Services
- Labour Market and Welfare
- Population and Society
- Travel, Transport and Tourism
- For each of our main regulatory outputs, we will adopt a specific user engagement strategy. Typically for assessments we will undertake a formal consultation with users, while for systemic reviews we will often convene workshops that bring users and producing organisations together.
- We liaise with Parliaments and with bodies that advocate for the best possible statistics, data and evidence like the Royal Statistical Society, Sense about Science and Full Fact.
- Beyond these direct engagements, we always look for evidence of the wider public use of statistics, and experiment with approaches like focus groups to learn more about this type of use.

How we are structured

OSR is led by the Director General for Regulation. The Director General is supported by a leadership team which includes the Deputy Director who leads the London site, and the heads of OSR site offices in Newport and Edinburgh. The offices in London, Newport and Edinburgh are broadly equal in size.

How we are governed

OSR is the regulatory office of the UK Statistics Authority. Our work is overseen by the Authority's Regulation Committee. The Committee's members are the Director General for Regulation, and non-executive directors of the UK Statistics Authority Board. No producers of statistics, including ONS executives, are members of the Committee.

The Regulation Committee reviews and approves our strategy, annual business plan, and budget, and approves all key regulatory decisions on assessment against the Code of Practice for Statistics. It agrees the broad content and communication of systemic reviews.

Our independence

We work within the UK Statistics Authority. Our ambitions for the best possible statistics are shared with the National Statistician. However, it is also essential that we are, and are seen to be, independent.

So, the capacity to make independent judgements is the cornerstone of OSR's governance. The PACAC report emphasised the need to ensure that OSR is separate from ONS, the Authority's production arm, and we are considering the best approach to demonstrating this separation in response to the report.

There are four key dimensions to our separation:

- Strategy: OSR establishes its own strategic plan in line with the overall UK Statistics Authority strategy, but separate to the strategy for the production of statistics set by the Office for National Statistics and for the wider Government Statistical Service (GSS).
- 2) **Resources:** OSR proposes its resourcing annually to the Authority's Regulation Committee.
- 3) Work plan: OSR consults publicly on its own workplan, to which ONS contributes in the same capacity as any other stakeholder, and the work plan is approved by the Regulation Committee acting on behalf of the Board.
- 4) Decisions: all regulatory decisions are proposed by the Director General for Regulation, and all key ones are reviewed and agreed by the Authority's Regulation Committee.

In addition, in line with the PACAC report, we are considering options for further emphasising our separate identity and role – for example, by creating separate communications and social media channels.