



Office for  
Statistics Regulation

# Office for Statistics Regulation: Annual Report 2019/20

July 2020

# Office for Statistics Regulation

## 2019/20

### **Director General for Regulation's Report**

I look back at 2019/20 with a mixture of pride and an unfulfilled ambition to do more. The pride comes from the achievements of the team at Office for Statistics Regulation (OSR).

This report outlines delivery of a huge range of activities – the highlights summary on page 6 conveys the range of outputs that the team has delivered: assessment of statistics that inform fundamental public debates like migration; high profile comments on the use of statistics by politicians on health, education, crime and the economy, including during a General Election campaign; and the voluntary adoption of the Code of Practice by a range of organisations.

We've not just delivered assessments of individual statistics. We've looked systemically too – at whole areas of policy like social care, and at underpinning concepts like the National Statistics designation. And these activities have impact: throughout this report, you will read about OSR driving improvements in the coherence of statistics; in their quality; and in the publication of new statistics and data to inform public debate (for example, health funding, education funding, police numbers). This drive to ensure the public has the fullest picture of what's going on has also been at the heart of our work during the COVID-19 pandemic.

And to understand the real source of my pride, as you read this report keep the following figure in mind: all this work is done by a team that numbers no more than 40 people. It's an extraordinary achievement.

There are of course areas for improvement. The report by the Public Administration and Constitutional Affairs Committee highlighted the need to enhance our visibility and separation. This report outlines how we have addressed the Committee's recommendations through a clearer public voice, better engagement with Parliament and a clearer relationship with the rest of the UK Statistics Authority. Beyond these governance changes, we know that there is always more to do to ensure the public have access to the best possible data and statistics. Moving forwards, we will seek to pick up momentum in those areas where we did not fully deliver our plans in 2019/20, in particular, progressing our research programme to understand the public good of statistics and whether statistics reflect people's lived experience.

Standing up for the public's right to good statistics and data has of course meant we have been incredibly busy during the COVID-19 pandemic. Public access to trustworthy data has been one of the stories of the pandemic. My team has adapted brilliantly to this challenge. They have continued to deliver regulation while working from home. Their work has secured both improvements in the way data are explained and used, and the publication by Government of new datasets – and demonstrates an independent, dynamic regulator in action.

I hope that as you read this report, you can see that our work really matters. I hope you will see why I'm proud of the team's achievements and our growing confidence. And I hope you will sense our continued, unrequited appetite to support the best possible statistics that serve the public good.



**Ed Humpherson**

Director General for Regulation

June 2020

# Our Purpose and Vision

The Office for Statistics Regulation (OSR) is the Authority's independent regulatory function, established by the Statistics and Registration Service Act (2007).

With offices in England, Scotland and Wales, we provide independent regulation of all official statistics produced in the UK, and aim to enhance public confidence in the trustworthiness, quality and value of statistics produced by government.

We do this by setting the standards official statistics 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.

## Our Governance

The legislation which established the UK Statistics Authority requires strict separation of the functions of production and regulation, where those involved in the production of statistics are not involved in the assessment of statistics against the Code.

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.

## Our Vision

Our vision is simple. Statistics should serve the public good

## Our Mission

To help us deliver our vision, we have set out a 3-part mission:



Our vision and mission set the context for what we aimed to achieve in 2019/20.

For more information about our organisation: what we do and why; how we work and the tools we use; and our broad ambitions for future development, please refer to our published Vision Statement:

[www.statisticsauthority.gov.uk/publication/osr-vision/](http://www.statisticsauthority.gov.uk/publication/osr-vision/)

# 2019/20 Highlights

We publish a package of outputs and videos about [the Public value of devolved public finance statistics](#) (May 2019)



8 Systemic Reviews completed

We publish a series of reports on [Adult Social Care](#) (from June 2019)



7 new National statistics

Department for Education [commit](#) to, and [deliver](#) on our call for school funding statistics (June 2019, March 2020)

We publish an update on [Joining Up Data for Better Statistics](#) (October 2019)

We publish the [preliminary findings](#) of our assessment of the 2021 census (October 2019)



[OSR Twitter](#) account launched

We publish [our Vision](#) and host our [first OSR Conference](#) (November 2019)

20th Statement of [Voluntary Adoption](#) published (November 2019)

We are active in [protecting the role of statistics in public debate](#) in the lead up to the 2019 General Election



100 casework cases completed

We [call for action](#) to improve official rail passenger satisfaction measure (January 2020)

We [launch joint award](#) with RSS to reward excellence in the voluntary application of the pillars of TQV (January 2020)

We publish an [update on our Housing and Planning Review](#) (February 2020)



8 Assessment Reports published

We write to ONS with the findings of our [Employment and Jobs Assessment](#) (March 2020)



45 Compliance Checks published

We publish our [initial exploratory review](#) of the National Statistics designation, to understand what it means to people (March 2020)

At the invitation of HMRC, we review the principles underpinning the quality of all their official statistics ([report](#) published April 2020)

We issue [a package of guidance for producers](#) and adapt our regulatory tools for COVID-19 pandemic (March 2020)

# Our Performance

## Delivery of commitments in our 2019/20 Business Plan

### Enhance trustworthiness, quality and value of key official statistics

**15 assessments of key statistics** PARTIAL DELIVERY: We published 8 assessment reports in 2019/20 including ONS's employment and jobs statistics and Census 2021 preliminary findings. We designated 8 new sets of National Statistics. ONS Migration statistics de-designated – now published as Experimental Statistics

**Programme of around 40 Compliance Checks** FULL DELIVERY: We published 45 Compliance Checks in 2019/20. In March we announced a new form of rapid regulatory review for any new outputs published by producers which inform the public about the Covid-19 and its economic and social impacts. The first rapid review of Covid-19 statistics from the Opinions and Lifestyle Survey was published by 7 April 2020.

**Initiate 3 – 5 Systemic Reviews** FULL DELIVERY: We published findings in the areas of adult social care, policing, post-16 education and skills and devolved public finance. We also conducted a review of the principles and processes in place to manage quality across all HMRC's official statistics. We published two follow up reports: on our 2017 review of statistics on housing and planning; and our 2018 review of data linkage.

**Insight programme: publish first report on Coherence** ONGOING DELIVERY: Following the development phase, during which a report on coherence was published, we relaunched a more ambitious and impactful Insight function. This means a move away from the focus on topic reports and instead focuses on how OSR uses the intelligence gathered in the course of our work to identify key themes that we can learn from and address across the statistical system.

### Advocate trustworthiness, quality and value inside and outside of government

**Promote voluntary application of the Code** FULL DELIVERY: We have 20 organisations on our voluntary adoption register that have published compliance statements about how they apply the TQV pillars. We launched, in partnership with the RSS, the Voluntary Application Award rewarding excellence in the voluntary application of the pillars.

**Provide advisory service, run workshops and establish community of practice among adopting organisations** FULL DELIVERY: We have provided training and advice to range of organisations and professionals. Our VA Community of Practice is now well established and led a session at our OSR Conference. We contributed to a course 'Statistics matters' released in June for ONS and new GSS staff. We published a blog on Experimental Statistics and have invited guest blogs from experts. We issued rapid Covid-19 guidance on factors that producers should consider when making changes to data collection, statistics production and release.

**Respond to findings of evaluation of online Code** FULL DELIVERY: We completed our evaluation of the online Code, published our findings, and implemented improvements in response to user feedback. The remaining enhancements will be delivered in 2020/21 as part of the project to develop the OSR website.

### Identify risks to the use of statistics in public debate and respond through casework

**Intervene where identify risk of misleading use or receive complaints** FULL DELIVERY: In 2019/20 we completed 100 casework cases; 32 published, of which 9 self-identified (figures provisional). Our statement on the £1.8 billion NHS Funding Statement received 90k views and 2k Twitter engagements. We made a range of important public interventions during 2019 General Election pre-election period

**Start to develop automated monitoring to identify the statistics and data used most in public debate** FULL DELIVERY: This new function is providing us with invaluable tools and insight. We published 'Use of Statistics in Public Discourse: Media Analysis' in October 2019 and provided analysis for our Mental Health Systemic Review. We have rolled out new tools for use by our regulators to aid horizon scanning – for example, Domain dashboards; and Twitter dashboards. Our Head of Data and Automation has started a programme of training for regulators to increase our capability in this field.



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**Develop understanding of the public good in collaboration with allies and develop a framework for judging misleadingness**

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**Identify/share research on public impact of statistics**      ONGOING DELIVERY: We have established our Research function and convened our new expert Research Advisory Group. We have developed research questions and commissioned work with Cabinet Office's Policy Lab and Open Innovation Team.

**Convene organisations with a focus on public good of statistics, data and analysis**      ONGOING DELIVERY: This work will progress as our Research Programme gains momentum. Our Vision document, published in November 2019, provided an excellent framework for a very successful first OSR Conference, where we showcased our work and strengthened our relationships with influential organisations and individuals who share our goals.

**Develop a framework for judging misleadingness**      ONGOING DELIVERY: We published an exploratory Think Piece on Misleadingness in May 2020 and will be engaging further in 2020/21

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**Understand the changing world and impact for statistics production**

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**Update our understanding of the role of National Statistics designation**      FULL DELIVERY: We published the outcomes of Phase 1: Exploratory Review in March 2020, focusing on understanding the role of NS designation. We published COVID-19 webpages which document our endorsement of new outputs; exemptions to the Code agreed; and National Statistics de-designations.

**Talk to influencers and monitor media to understand external changes**      ONGOING DELIVERY: We extended our Parliamentary reach in England, Scotland and Wales: Submission to Treasury Select Committee inquiry into Regional Imbalances; letter to House of Commons International Trade Committee about Foreign Direct Investment statistics; Response to Scottish Parliament inquiry into primary care; DGR presentation to Welsh Assembly. We recruited an expert digital communications team and launched our Twitter account in November 2019.

**Identify evidence on whether statistics reflect people's lived experience**      NOT DELIVERED. We highlighted the issue of lived experience across a wide range of our work, included on the rail passenger survey, rough sleeping, and homelessness. However we did not develop this work into a formal programme, preferring to inject the 'lived experience' emphasis into all of our projects.

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## Analysis of our Performance

Our 2019/20 business plan set out five broad aims for the year, within the context of our vision and mission:

- Enhance trustworthiness, quality and value of key official statistics
- Advocate trustworthiness, quality and value inside and outside of government
- Identify risks to the use of statistics in public debate and respond through casework
- Develop understanding of the public good in collaboration with allies and develop a framework for judging misleadingness
- Understand the changing world and impact for statistics production

## Enhance trustworthiness, quality and value of key official statistics

Our [2019/20 business plan](#) placed an emphasis on statistics that have the greatest public value, and considering the key policy debates and where there may be a lack of coherence or insight in the statistics which support these areas. We committed to:

- focus our assessment programme on key statistics, starting a further 15 assessments
- carry out 40 compliance checks, giving thought to how we group these checks to explore issues of coherence and broadening insight
- initiate 3-5 systemic reviews with a focus on cross-cutting issues which support enhanced trustworthiness, quality and value
- publish our first Insight report focused on coherence, along with related activity to share and reinforce messages from the report. Our new Insight programme will build on broad lessons and examples of best practice drawn from the breadth of our regulatory activity to support statistics that serve the public good
- balance our regulatory tools and other influencing approaches to maximise impact
- advocate for wider use of linked data under appropriate conditions.
- publish guidance on best practice when making important methods changes to support producers of statistics as they look to innovate and improve outputs

Assessments	Compliance Checks	Systemic Reviews
<ul style="list-style-type: none"> <li>• Initiated six assessments</li> <li>• Published eight Assessment Reports</li> <li>• Designated seven new sets of National Statistics</li> <li>• De-designated ONS Migration statistics (now experimental)</li> </ul>	<p>Published 45 compliance checks</p>	<ul style="list-style-type: none"> <li>• Initiated seven reviews</li> <li>• Published eight reports from reviews</li> </ul>

In 2019/20 we have not delivered the exact balance of projects that we envisaged at the start of the year. We did fewer assessments and more compliance checks and systemic reviews. However, we are confident that the flexibility we have employed in delivering our regulatory work programme has supported the outcomes we wanted.

A big step forward for us in 2019/20 has been the way we have used our compliance check programme. These short, focused reviews of the extent to which statistics meet the standards of the Code are now well

embedded. They take less time than Assessments (which examine every principle of the Code) but still provide challenge and highlight issues for producers to address. They allow us to cover the ground but also support a triage approach.

For example, a compliance check of ONS's Business Demography statistics provided a high-level investigation of the extent to which the statistics met TQV pillars. We quickly identified potential key improvements were needed and were able to provide helpful input to the ONS as they seek to make their own developments. We have then commissioned a fuller investigation of these important statistics through our programme of assessments to report in 2020/21.

Furthering our ability to adapt our approach, on 20 March 2020, we announced a new form of rapid regulatory review, to potentially including National Statistics status, for any new outputs published by producers which inform the public about the COVID-19 and its economic and social impacts. This has allowed us to provide users with assurances, or appropriate notes of caution, in a way that helps producers get information to the people who need it as quickly as possible. The first rapid review of COVID-19 statistics from the Opinions and Lifestyle Survey was published by 7 April 2020. We expect this type of rapid review will be a key aspect of our regulatory approach in 2020/21.

We also made an early move to review and adapt our planned work programme for 2020/21 within the context of our risk profile and the COVID-19 pandemic, and we have adjusted priorities and timetables to reflect the implications for ourselves and for producers of statistics – for example, delaying more routine projects in key departments like Department for Work and Pensions to allow it to focus on the most pressing priorities.

COVID-19 has caused us to reflect on whether our philosophy is still sound in a changing situation, is it robust? Based on early evidence, we feel that it has proved to be. We have been able to demonstrate leadership and support for the statistics system, who have been responding quickly and with agility to new demands. Rather than regulation being seen as a burden to producers at this time, adding to worries, we hope we have been able to take some of the worry away. We will carry out a formal review of our response to COVID-19 in 2020/21 and establish lessons for the future, and build on the renewed appetite for, and recognition of the importance of, statistics and data that deliver on trustworthiness, quality and value.

## Key outcomes from our work in 2019/20

### Employment and Jobs

In March 2020, we published a [set of documents](#) covering the trustworthiness, quality and value of the employment and jobs statistics produced by the ONS (Assessment Report) and statisticians in the Welsh Government, the Scottish Government and the Northern Ireland Statistics and Research Agency (Compliance Checks), to examine their value for all users across the UK. We supported this with [blogs](#) from our Director General for Regulation and our Economy Lead, to offer broader insight, drawing out recurring themes that can apply to other statistics, such as the potential of administrative data to generate insight and fill data gaps, and coherence of data and statistics. Our work will continue into 2020/21 as the producers set about implementing our requirements to improve these hugely valuable statistics.

### 2021 censuses in the UK – Preliminary Findings

The census is one of the most important sources of official statistics, informing decisions about almost every aspect of life within the UK. In October 2019 we published the preliminary findings of our assessment of the 2021 censuses, produced by the ONS, National Records of Scotland and the Northern Ireland Statistics & Research Agency. We expect census offices to act on these findings as part of enhancing the public value, quality and trustworthiness of the data and statistics from 2021 censuses in the UK and have encouraged census offices to work collaboratively. The real value of the censuses will be realised on the release of census outputs. Future phases of our assessment will report our findings.

### International migration

The availability of high quality international migration estimates to support decision making is crucial. In August 2019, following correspondence from the Deputy National Statistician [we concluded](#) that the Migration Statistics Quarterly Report (MSQR) should no longer be designated National Statistics. We supported the ONS's proposal to publish the MSQR as experimental statistics and urged the ONS and other government departments to prioritise development of the estimates, through data sharing, collaborative research work, or other sharing of expertise and resource.

The ONS engaged with us openly and professionally about the quality of migration statistics, and the shift to experimental status was handled effectively, with users appearing to understand the nature of the change. This represents an example of the maturing relationship between

statistics producers and OSR as the regulator, that they are increasingly coming to us to discuss potential concerns about their statistics.

Since the COVID-19 pandemic, and the suspension of the International Passenger Survey, the way forward for these statistics has changed. The ONS has [communicated to users](#) that the August 2020 MSQR will be the last set of migration statistics based on International Passenger Survey data, and the ONS and government departments continue to work together to explore administrative data source options – for example, DWP Registration and Population Interaction Database (RAPID) data, and adapt methods to deliver for a November 2020 release.

### Post-16 Education & Skills

This year we published [our review](#) into Post-16 Education and Skills in England focussing on further education and apprenticeships, higher education and skills and lifelong learning. Good quality and accessible information in this area is important to support the most fair, efficient and effective provision of education and training to meet the needs of both individuals and employers. Our review identified areas of good practice in producer bodies such as the Department for Education who are improving accessibility to their published statistics by developing their new data dissemination platform Explore Education Statistics. We continue to follow up on areas where we have recommended improvements – accessibility, coherence and availability of data – and we will be extending our review across Wales, Scotland and Northern Ireland.

### HM Revenue and Customs (HMRC) Quality Review

This is another example of a statistics producer engaging maturely with the regulator. In April 2020 we published the outcomes of a review we began earlier in the year. HMRC invited us to carry out this review after identifying a significant error in its Corporation Tax receipt statistics. This is the first time we have looked across all of a producer's outputs at once at the invitation of a producer. By inviting this review, HMRC has taken a proactive approach to strengthening the quality of its official statistics and we will continue to engage with them as they make improvements.

### National Rail Passenger Survey assessment

In January 2020, we published [our assessment](#) of the National Rail Passenger Survey (NRPS) statistics produced by Transport Focus. We concluded that the NRPS statistics, while including some areas of best practice, need development and investment to fully serve the

public good. This is to ensure that the NRPS statistics can be designated as a National Statistic. The NRPS statistics really matter as they are used as a key performance indicator for train operating companies, to hold the rail industry to account and to assess the quality of train services provided to passengers. This was illustrated by the wide reporting by the national and transport industry media of our findings. Our work has helped users of the statistics to understand their shortcomings, and, while recognising the innovations they have made, provided Transport Focus with recommendations on where they need to make improvements to ensure the statistics reflect the rail user experience.

## Adult Social Care Reviews

Statistics that support our understanding of people who need or provide care, the impact it has on their lives, how the adult social care sector is currently delivered and how this might need to change in the future are an essential element in an ideal model of care. Without adequate statistics it is also impossible to assess the extent to which social care provision is equitable. In 2019/20 we have published a series of reports on Social Care statistics in [England](#), [Scotland](#) and [Wales](#), supplemented by Compliance Checks, and informing our [submission to the Scottish Parliament's Health and Sport Committee's Social Care Inquiry](#). The COVID-19 pandemic has since brought into sharp focus that statistics and data about social care fall well behind what is available about health, reinforcing the recommendations we have made for improvements. Supporting improved data and statistics in this area will remain a priority in 2020/21.

## Public finances

In May 2020, we published the outcomes of regulatory work looking at the public value of devolved public finance statistics. This work also looked at the extent to which devolved investment statistics are seen as a priority for development in the UK's devolved countries. We captured our thoughts about the public value of these statistics in different ways – for example through [two presentations](#) we prepared about the two phases of our work, through [a YouTube interview](#) and in a [regulatory report](#) into our assessment of some of the key source statistics on public spending in the countries and regions of the UK from HM Treasury. We went on to submit written and oral evidence for the Treasury Committee's inquiry considering regional imbalances in the UK economy.

## Updates on [Housing Review](#) and [Data Linkage](#)

Our work doesn't end with the publication of a review report. This year we published two follow up reports: on our 2017 review of statistics on housing and planning; and on our 2018 review of data linkage.

These reports highlight progress, while drawing attention to areas where improvements are still needed.

Following our housing review, housing statisticians from the UK's four countries met to discuss a joint approach to the review's findings, forming a cross-government housing and planning statistics steering group, and associated Housing and Planning and Homelessness statistics working groups.

On data linkage, the update provides an assessment of current progress towards meeting the six outcomes necessary to build a safe and effective data linkage system outlined in our September 2018 report [Joining Up Data for Better Statistics](#). We welcomed and share the new National Statistician Sir Ian Diamond's stated ambitions to improve people's lives by delivering better insights from statistics and research via data sharing and linkage and committed to work with him to identify areas where we can add our support to his efforts. We will also continue to identify opportunities to champion the value of data sharing and linkage.

## Insight

In July 2019, we set out proposed plans to produce a series of OSR Insight reports to share lessons from our regulatory work with a wider audience in an accessible way. This was part of the development phase of the Insight Function. We published a [report focused on coherence](#) and since then have formally established our Insight Function. The focus has moved away from individual reports to how OSR uses the intelligence we gather from our work to identify key themes that we can learn from and address across the statistical system.

## Advocate trustworthiness, quality and value inside and outside of government

Wider adoption of the Code of Practice is a core part of realising our vision of statistics that serve the public good. Voluntary adoption of the pillars of the Code of Practice for Statistics has potential to offer significant benefits. It can raise standards of analysis and dissemination among organisations that use it and demonstrate transparency to users of these statistics and data used as evidence. In 2019/20, we committed to build on the 2018 launch of voluntary application of the Code for Statistics by promoting its benefits and encouraging wider adoption.

Voluntary adoption has proved to be very successful. We have seen a variety of organisations including public, private and third sector partners get involved and commit to Voluntary Application, with no obligation to do so. In an era of abundant data and misinformation

we have found that there is an important desire for organisations across different sectors to undertake simple and doable voluntary actions, to reassure their data users of trustworthiness, quality and value.

To mark one year since the official launch of Voluntary Application of the Code, we hosted an event in London for all the interested early adopters to meet and discuss how they could get involved in this new and exciting concept. We established a Community of Practice for adopters, and we have been inspired to see the leadership organisations have displayed in sharing experiences and learning, including hearing from them at our inaugural OSR Conference in November 2019.

In the same month, our 20th adopter published their statement of compliance with the pillars of Trustworthiness, Quality and Value, and through our engagement we know that there are a range of organisations that are applying the Code, several of which are working to produce their own published statements of compliance, including ONS's Data Science Campus.

We have published a [list of organisations](#) that voluntarily apply the Code and four case study examples of voluntary application in action. For example, [Department for Work and Pensions](#) has sought and gained buy-in across the department in areas that do not produce official statistics, so that they now have management information, forecasts and social research all making and publishing commitments to TQV. These initiatives are raising awareness of TQV with senior executive endorsement.

Another example, outside the world of official statistics is [UCAS](#), who support young people making post-16 choices, as well as those applying for undergraduate and postgraduate courses. UCAS has made a lot of progress in revamping their data presentation to make it clearer to students in supporting their choice of university. The pillars were central to their decision making on how to make improvements.

In January 2020, we launched the Voluntary Application Award. The award given jointly by OSR and the Royal Statistical Society rewards excellence in the voluntary application of the pillars of the Trustworthiness, Quality and Value (TQV) of the Code. The results have not yet been released but we have been excited by the number and quality of applications.

During the COVID-19 pandemic we have seen the range of important management information and data that has been called upon to supplement official statistics to inform awareness and decision making, and how important it is that we can have trust in that information.



For official statistics, in August 2019, we published [a guide](#) setting out our expectations regarding the production and handling of experimental statistics, a subset of official statistics going through development and evaluation, in line with the Code of Practice for Statistics.

## **Identify risks to the use of statistics in public debate and respond through casework**

Protecting the role of Government statistics and data in public debate is a crucial part of our role. We want to make sure that, in political debate, the underlying statistics are not being misrepresented – and if we think they are, we want to clarify how they should be interpreted.

In 2019/20 we committed to proactively identify risks around the use of statistics in public debate and broaden our understanding of how debate is informed by statistics. We also sought to deliver lessons and share insight, including through an Insight report.

As is our usual practice, the Authority will publish a full review of our casework interventions in 2019/20, later this year, but provisionally, we can say that in 2019/20 we closed 100 pieces of casework. We published the outcomes of 32 cases, we responded privately to 39 cases and we noted the outcomes of the others but determined no further formal action was required. 9 of our published pieces of casework were self-generated based on our horizon scanning, with the remainder being brought to us by the general public and expert users of statistics. Where a response remains private, we record it on our published [Issues log](#), which summarises anonymously all the issues brought to our attention.

Threats to the good use of statistics may be particularly visible in times of electoral campaigning, and so the Authority, led by OSR, continues our public work throughout election periods. We were very proactive during the 2019 General Election campaign period – monitoring manifestos, debates, interviews, statements and social media – and we have continued to build on this model as we moved into 2020.

We began the 2019 General Election campaigning period with a letter from Sir David Norgrove, the Authority's Chair, to the [leaders of the UK's political parties](#) reminding them of their duty to use statistics accurately and fairly in the forthcoming election campaign. And we published [a blog](#) on how best to think about the various claims about public expenditure that political parties typically make during election campaigns, to help voters interpret funding statements. We published interventions on topics including [homelessness](#), [violent crime](#), [school funding](#) and [youth unemployment](#).

In January 2020, we published [a blog](#) summarising our role in the General Election, including the approach we employed and the judgements we made.

Our interventions in 2019/20 had significant impact:

### NHS Funding Statement

In August 2019, the government announced the provision of £1.8 billion funding for the NHS. We wrote to the Head of Profession for Statistics at Department of Health and Social Care to encourage them to release a statement as soon as possible in order to enhance transparency and support public understanding of the funding structures underpinning this announcement. The level of engagement with our website and social media indicated the importance to the public of transparency on this issue, and the Head of Profession responded to us in October 2019 setting out the detail.

### School Funding

In June 2019, as part of a continuing dialogue with Department for Education, we wrote to the Permanent Secretary, noting that the Department did not produce a comprehensive set of official statistics on the funding of schools, formally recommending it do so. When a wide range of data sources are used to inform debate, it can mean that statements using data are hard to verify and replicate, creating a risk of undermining the perceived trustworthiness of those making the statements. In March 2020, we wrote welcoming the publication of experimental statistics by the Department for Education, sharing the findings of our review of these new statistics.

### Police Officers

In January 2020, the Acting Home Office Chief Statistician wrote to us, within the context of our continued focus on policing and the need for official statistics to inform understanding and debate, to share plans to publish a new output that will allow the public to track the government's progress in recurring an additional 20,000 police officers in England and Wales by March 2023.

### Rough sleeping

We have sought ongoing assurances about the transparency and comparability of the rough sleeping statistics produced by Ministry for Housing Communities and Local Government (MHCLG). We have continued to publicly voice our concerns that official statistics about rough sleeping should offer a richer and better integrated picture

of rough sleeping. We have been encouraged that MHCLG made improvements to the content and presentation of their February release, and that the statistics producers across all four UK countries are now working together to a joint work plan to enhance the available range of comparable UK homelessness and rough sleeping statistics. We will continue to pursue this issue across all countries of the UK. In June 2020, we wrote to the Permanent Secretary of MHCLG about repeated reference to unpublished figures relating to rough sleepers and homeless people within the context of the COVID-19. This led MHCLG to publish this information and commit to publish any figures that are used in future public statements.

### Accident and Emergency (A&E) statistics

Director General for Regulation discussed the [proposed changes in recording A&E performance](#) from NHS England, and highlighted the considerations in establishing public confidence in A&E statistics.

### Developments in our approach

Since establishing our Automation and Technology function in 2019 we have taken steps forward in developing tools to help our domains with horizon scanning to identify risks around the use of statistics in public debate and to broaden our understanding of how debate is informed by statistics. An app provides the team with daily updates on changes to the statistical release calendar, domain dashboards that gather intelligence relevant to each of the domains are being piloted, and to help us during the COVID-19 pandemic the team quickly developed a daily Twitter dashboard.

We have committed to a review this year of all we have learned during the pandemic that will inform how we continue to adapt and operate as a regulator.

### Develop understanding of the public good in collaboration with allies and develop a framework for judging misleadingness

Leading a better understanding of the public good is the foundation of our vision.

Our focus for 2019/20 was to define public good and to identify existing research and interested partner organisations, and to develop our thinking around misleadingness.

In respect of our work to define the public good, we established our new research function in 2019/20. The early part of the work has centred

around literature reviews and engaging with a range of stakeholders to gain their perspective and share expertise. Highlights include a Research Lab on public value of statistics, facilitated for us by the Cabinet Office's Policy Lab, and a session at our inaugural OSR Conference. We have also established an expert advisory group for our research programme and plan to publish our first think pieces around public good in early 2020/21

The risk of statistics being used in a misleading way recurs in our work. Yet "misleadingness" is a slippery and complicated concept. To explore questions around this, we worked in 2019/20 with a philosopher, Jenny Saul from the University of Sheffield, who has written about misleadingness, and tried out various approaches and ways of thinking. We also engaged with organisations for whom misleadingness is relevant to their field – for example, the Advertising Standards Agency. We published an [exploratory think piece](#) in May 2020 that aims to set out our thought process – both to understand better what we do, but also help others to consider for themselves how to identify, address and mitigate the risks of misleading uses of statistics. We are exploring this thinking further to inform our future work on this topic.

We expect that our automation and technology programme will play an important part in supporting our work on the public good and misleadingness moving forwards. We are already using tools developed to help us scan social media, and we are working to extend this to other areas such as blogs and press reports.

## **Understand the changing world and impact for statistics production**

Statistics can only provide value when they reflect the world we live in and the experience of those in it. This includes ensuring the way statistics are developed, disseminated and designated adapt to the external environment. In 2019/20 we committed to: update our understanding of the role of National Statistics designation; talk to key influencers and monitor key media to understand external changes (e.g. society, economy, international context, use of data); and identify evidence on whether statistics reflect people's lived experience.

In 2019, we initiated a joint review with the Government Statistical Service of the National Statistics designation. We want to find out how the designation is understood, particularly outside the official statistics system. 'National Statistics' are the most important official statistics that have been demonstrated to meet the very highest standards of trustworthiness, quality and value, set out in the Code

of Practice for Statistics. Only they carry the unique logo of the National Statistics tick mark, having been designated by OSR, as the regulatory arm of the Authority.

We commissioned focus groups with members of the public and we spoke to 25 stakeholders from a wide range of backgrounds, including journalists, academics, think tanks, policy and communications officials, at a round table event. We obtained the views of statistics producers through a series of meetings, including with the Chief Statisticians of two devolved administrations, the GSS Statistical Policy and Standards Committee, GSS Policy and Dissemination Committee, and through workshops with ONS staff.

In March 2020 we published our [initial exploratory](#) review and we are now seeking to engage a wide range of stakeholders, including through further round table events and general public focus groups. We will make any recommendations from this work to the Authority Board on late 2020/21.

## **Our engagement**

2019/20 has been a breakthrough year for us as a regulator. We have developed our confidence as a regulator and we are more in the consciousness of those produce and use statistics. This has in part been driven by our work and our judgements, but also by the way we have sought to engage with key influencers and with the world around us. As a result, people come to us now – we are building a strong dialogue.

Our inaugural [OSR conference](#) in November 2019 was the flagship event of the year. As well as sharing our vision and showcasing our work, we were able to invite in a range of expert speakers to discuss topics important to our vision, such as the public good of statistics. The audience of around a hundred was made up of a variety of our stakeholders, from inside and outside government, including statistics users, producers, analysts, fact checkers, and journalists. [A Civil Service World podcast](#) reported on the event and we received a number of very positive [testimonials](#) for the speaker line-up and the thought-provoking discussion generated.

We also held events in all four countries of the UK to share our vision, building positive engagement with a wider range of stakeholders.

2019/20 also saw us starting to build up our Parliamentary engagement, and the dialogue we started has laid an important foundation for the important role we have been able to play during the COVID-19 pandemic. Examples include:

- OSR has contributed to parliamentary scrutiny through engagement with UK Select Committees extensively in 2019/20. We submitted written evidence for formal inquiries such as the Treasury Committee's inquiry considering regional imbalances in the UK economy (June 2019) and the Digital Culture Media and Sport sub-committee looking at online harms and disinformation (April 2019).
- our Director General for Regulation, Ed Humpherson, has also been invited to give further evidence in person. The Public Administration and Constitutional Affairs Committee in April 2019 was considering Governance of Statistics, and most recently in May 2020 they looked specifically at COVID-19 statistics. He also gave evidence in October 2019 following the written submission to the Treasury Committee for their inquiry on regional imbalances in the UK economy, and to the Lords Democracy and Digital Technologies Committee in January 2020
- we engaged with the Scottish Parliament, namely the Health and Sport Committee, for their separate inquiries on primary care in July 2019 and social care in February 2020. Our Director General for Regulation also visited the Scottish Parliament to explain to MSP's the role OSR plays and how we can help inform their constituencies
- the Authority at the National Assembly of Wales – Sir David Norgrove, Ed Humpherson and Iain Bell spoke on a panel in September 2019, to Assembly Members and statistics-based stakeholders, about how the Authority can support them
- beyond formal inquiries, OSR have worked closely with the Authority Parliamentary Unit to ensure Committees are kept up to date on interventions related to the relevant subject matter of the Committee, in line with the recommendation made by PACAC in their Governance of Statistics report (published July 2019). This has been extremely broad, including the Work and Pensions Committee regarding DWP use of unpublished management information in April 2020; the Health and Social Care Committee regarding NHS access and adult social care reviews, both in January 2020; the Transport Committee regarding the National Rail Passenger Survey assessment, also in January 2020; a variety of relevant Committees including PACAC regarding the preliminary census assessment in October 2019; and sustained engagement with the Housing Communities and Local Government Committee regarding rough sleeping statistics over June and July 2019, including a meeting with the Chair

Our work in 2019 to develop our Public Affairs and Digital Communications function, independent from the Authority, has enabled us to strengthen and broaden the range of channels through which we engage with our stakeholders and the public. The team provides the

Director General and our regulators with expert communications support and advice and leads on our website, publishing and social media strategy.

Our new independent Twitter account, launched in November 2019, is approaching 1,000 followers. By end April 2020 we'd achieved around 260 thousand impressions.

We have been making developments in how we communicate online – focused on visual engaging contact to improve our reach and visibility. We now frequently publish blogs on our work and topics of interest, not only from our own team – for example, linked to our engagement through Twitter detailed above, we invited a guest blog in February 2020 by Dr Elizabeth Lemmon (University of Edinburgh) and Dr David Henderson (Edinburgh Napier University) on social care in Scotland.

We have not been able to progress our work to identify evidence on whether statistics reflect people's lived experience in 2019/20.

### **Our reflections on the state of official statistics**

Our work as a regulator of all official statistics puts us in a unique position to reflect on the UK government statistical system as a whole. In July 2020, we published a report that sets out our view on the current state of government statistics, based on our work in 2019 and 2020 so far. [osr.statisticsauthority.gov.uk/publication/the-state-of-the-uks-statistical-system/](https://osr.statisticsauthority.gov.uk/publication/the-state-of-the-uks-statistical-system/)

In the report, we emphasise that there are good examples of statistics produced by government that effectively support decision-making in many areas of everyday life, but that the statistical system does not consistently perform at this level across all of its work. We highlight examples of statistical producers doing things well, and the improvements we would still like to see to ensure government statistics better serve society's needs. We address eight key areas, under the three headings of Trustworthiness, Quality and Value, the three essential pillars that provide the framework for the Code.

The immediate target audience for the report is anyone using official statistics, whether that is to inform their own life decisions, to design, implement or review government policy, or to hold the government to account. But the review is also for everyone who produces official statistics – we want to champion the work statistical producers do, celebrate the things they do well, and encourage them to continue to improve the statistics they produce

## Our Capability

### Our People and Functions

We planned an expansion of our organisation from 31 to 42 people (Full-Time Equivalent) during 2019/20. The aim was to strengthen our domain teams and allow us to bring in additional expertise, particularly around research and data. By the end of the year we had 37 people in post (35 FTE) with committed start dates for two further people in July 2020. We have one remaining of the new posts to recruit, to support our work around the 2021 census. Any other vacancies are due to natural turnover. In 2019/20 we have:

- reshaped our domain structure, reducing the number of domains from 12 to 10, allowing us to operate with larger teams providing for greater sharing of expertise and stronger business continuity. We have increased the number of regulator posts in the domains from 21 to 25, five of which are vacant (two agreed terms, two recruitment underway and one out on loan to Welsh Government). In response to the COVID-19 pandemic our domains have operated more flexibly – for example, with our population and health experts joining forces – we expect this flexibility to become a mainstay of how we operate
- established our new Research and Automation and Technology functions. There has been staff turnover in our Research function – we are now recruiting a new Head of Research – but we have been able to bring in further dedicated expertise through a new Research Specialist role. As the research programme works to build momentum, we have committed to a smaller research budget for 2020/21 but the work to understand the public good is proceeding, supported by our expert external advisory group
- strengthened our Public Affairs and Digital Communications function, bringing in two communications experts. This team oversees OSR’s communications strategy and provides the Director General and his team with expert communications support and advice. The team also lead our website, publishing and social media strategy. To further bolster our strategic engagement, and to manage our growing Casework Programme, we have also increased our Private Office from one to two persons

We achieved an engagement score of 70 per cent in the Autumn 2019 Civil Service People Survey exercise – a decrease of 6 per cent on the 2018 results. Our people were very positive about our team, our work, and our organisational objectives and purpose. Areas highlighted for improvement were the line management relationship (around feedback and managing performance), delivering learning and development,



career opportunities, and managing wellbeing. Our Wellbeing and Development Committee, in consultation with our Senior Leadership Team and all staff, developed an action plan in response to the survey, and the results of our regular Pulse surveys of the team. We began to implement the plan in 2019/20 but we will continue our efforts into 2020/21. Action taken to date includes:

- ran our first Annual Learning Survey to understand the learning and development needs of the team and used this information to inform a prioritised Learning Action Plan – priorities for 2019/20 into 2020/21 are project management, report writing and engagement skills and learning sessions have been delivered in all these areas
- formalised our Induction Programme for new staff, with immediate learning supplemented by a series of modules that we run each month – for example, on the Code of Practice, working in Domains, and project and risk management
- continued our programme of shared learning, including case study learning, with fortnightly Wednesday afternoon learning sessions. Topics included: agile project management in the data science arena; writing for the web and social media; effective briefing; stakeholder management; fact-checking; identifying and scoring risk; line manager forums; and assertiveness
- encouraged staff to take charge of their personal and career development. We provide budgets for learning, conference attendance, and subscriptions to journals and professional organisations. We have also explored and shared opportunities for building relationships with mentors
- encouraged our team to undertake Mental Health First Aid training and have established a network of ambassadors across the site led by our Mental Health Champion. We also appointed a Diversity Champion
- hosted a two-day event for the team on Navigating a Changing World. The event aimed to understand some of the key innovations in the world that are having implications for our working lives and our personal wellbeing. Sessions included: being an ambassador for OSR; updates on technology and data science and how this affects our working environment and culture; equipping staff with hints and tips to support their mental health; and promoting joint understanding of equality, diversity and inclusion as our team grows and we have a diversity of experience and understanding

## Managing Risk

OSR's work is subject to internal audit review. Following a review of our risk management arrangements in 2018/19, this year we have developed and trained all staff in a new risk management policy; we have made project and risk management a core part of our induction training programme, and we have strengthened our challenge and reporting of our mitigation strategies for our key corporate risks. Our corporate risks are focused in four areas to help us as a regulator to best serve the public good:

- Maintaining our relevance
- Maintaining our voice
- Building our capability
- Maintaining our independence

Throughout this report we have demonstrated how we have sought to manage any threats and exploit our opportunities in these respects.

As part of our recent Corporate Governance Assurance Statement (CGAS) for 2019/20 we have recognised that we still have further to go to embed risk management in how we work and we are committed in 2020/21 to consolidate our approach and reporting at all levels of the organisation. Other areas for improvement we highlighted in our CGAS, where we have committed to take action are around aspects of:

- programme management: specifically around prioritising and scoping our work to optimise and not overcommit resources
- project management: focused on tight scoping, and streamlined assurance and sign off procedures
- succession planning: As a small organisation we have a lot of expertise vested in small teams and specific individuals – we need an effective strategy to maintain our skills, knowledge and corporate memory
- records and metadata management: building policies, processes and tools to enable us to optimise our use of the intelligence we hold, while maintaining appropriate security
- Extending our reach: through continuing to strengthen all forms of engagement and communication and using our work around the public good of statistics to build alliances and listen to those who we can give a voice.

In respect of our independence as a regulator, there were two important inputs in 2019 which have informed our development:

In July 2019, the Public Administration and Constitutional Affairs Committee (PACAC) published its report on the Authority's governance arrangements. Overall, the Committee recognised the importance of OSR's role, and endorsed a strong, more distinct identity for OSR as the Authority's regulatory arm. We have responded as follows:

- purpose: we published a new document that sets out the vision, mission and purpose of OSR, and launched it at our inaugural OSR Conference in November 2019
- strategy: we will publish our first 5-year strategy later in 2020, in support of but distinct from the Authority Strategy to be published at the same time
- communications: we launched our own Twitter channel @StatsRegulation in November 2019 and we are developing a OSR website that is distinct from the rest of the Authority for launch in 2020
- location: to more fully reflect our status as an independent decision-making unit under the Authority Board, while there is no strong case for change in Edinburgh or Newport, the OSR space in London could be more distinct. We have initiated the project to locate our staff separately within the Authority's space in London and this work will resume when restrictions relating to the COVID-19 pandemic are lifted.

In 2019/20, there has been one main engagement with Internal Audit: a review of the independence of OSR from ONS. The findings from this review, which gave a Moderate (amber) level of assurance, were coherent with those of the PACAC review. The internal audit reviewed: the extent to which OSR integrates with ONS shared services (HR, Finance, IT, etc.); and the governance operating over OSR to ensure that it supports independence from ONS.

The audit concluded that there is no evidence of any compromise to OSR's independence but identified steps to clarify lines of accountability and reporting and to ensure greater distinction on shared services.

In response:

- the terms of the Regulation Committee have been revised to reflect a formal role in overseeing OSR's budget and delivery
- the Director General for Regulation has been appointed as Additional Accounting Officer for the OSR budget from 1 June 2020
- a Memorandum of Understanding has been agreed to cover the delivery of shared services by ONS to OSR
- development work is underway to provide OSR with a website that is distinct from the rest of the Authority in 2020.

## Looking Ahead

We have published our business plan and associated work programme to share our focus for 2020/21. It does not aim to be a comprehensive document covering all we will do during the year – in the current circumstances that would be unrealistic. We plan to retain flexibility so we can respond to the changing environment of the coronavirus pandemic and its impact on society and the economy.

What we aim to achieve in 2020/21:

### **We uphold trustworthiness quality and value of statistics and data used as evidence**

- Challenge official statistics producers to answer society's questions, focusing on appropriate timeliness, granularity and data linkage.
- Challenge official statistics producers to offer insight, clarity of communication and coherence.
- Increase voluntary application of the Code beyond official statistics, particularly for government analytical outputs.

### **We protect the role of statistics in public debate**

- Focus on addressing data gaps and stepping in when statistics are being misrepresented.
- Increase the profile of OSR to support impact of our interventions.

### **We develop a better understanding of the public good of statistics**

- Clarify our role in regulation of data and AI.
- Build our evidence base on understanding of the public good.

Our work programme will be updated approximately every 4-6 weeks, linked to our internal Programme Review Board timetable. Any changes to National Statistics designations as a result of our work will be reflected on the List of National Statistics.

Later in 2020, we will publish the OSR Strategy 2020-25 which will set out how OSR will support the Authority's mission for the next five years.



