Regulatory Guidance

Intelligent transparency

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Office for Statistics Regulation

We provide independent regulation of all 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 government 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.

Regulatory guidance on intelligent transparency

This guidance sets out the principles and practices that governments and organisations should follow to ensure the transparent release and use of data and statistics. It is informed by the Code of Practice for Statistics and supports the Office for Statistics Regulation's interventions policy.

Why is transparency important?

Statistics and data produced by governments should serve the public good. They should allow individuals and organisations to reach informed decisions, answer important questions and provide a mechanism for holding governments to account.

Transparency supports public confidence in, and understanding of, the numbers used by governments and Ministers and any policy decisions based on them. Taking a transparent approach to data and statistics enhances the reputation of, and trust in, the departments and organisations that use them. Transparency also ensures that public conversations focus on the important issues, rather than a lack of transparency becoming the story, and minimises the risk of misinterpretation or misuse of statistics and data.

What is intelligent transparency?

For statistics and data to serve the public good, they must be available in the first place. However, this on its own isn't enough – even if the source for a figure is published, it could be hard to find or the methods, definitions or limitations might not be explained clearly enough to support understanding and appropriate use. This is why we talk about intelligent transparency.

Intelligent transparency involves proactively taking an open, clear, and accessible approach to the release and use of data and statistics. Intelligent transparency ensures that:

- data and statistics can be easily accessed in a way which suits user needs
- data and statistics are used appropriately
- figures can be scrutinised in order to assess their quality and verify claims made based on them

Intelligent transparency should be the default approach to communicating all statistics, data, and wider analysis. Everyone in government has an important role to play in achieving this, not just analysts and statisticians. Departments and organisations need strong analytical leadership, within and beyond analytical professions. For example, communications professionals will support intelligent transparency by seeking advice from analytical colleagues when using data and statistics in public communications. Senior leaders can champion intelligent transparency and create a culture which supports it when promoting the work of governments or reporting on operational activity.

What are the guiding principles?

Intelligent transparency is informed by three principles:

1. **Equality of access:** Data used by government in the public domain should be made available to all in an accessible and timely way. This includes, for example, figures quoted by Ministers in parliaments or the media, and figures used in government publications such as press releases, blogs, and infographics.

2. **Enhancing understanding:** Data and statistics should enhance public understanding of societal and economic issues, including the impacts of policy. To enhance understanding and support appropriate use, it is also important that sources for figures are cited and that appropriate explanation of context, including strengths and limitations, are communicated clearly alongside figures.

3. **Independent Decision Making and Leadership:** Decisions about the publication of statistics and data, such as content and timing, should be independent of political influence and policy processes. These decisions should be made by analytical leaders, whose expertise and decision-making authority should be endorsed by senior leaders, including Permanent Secretaries and Ministers. Analytical leaders should build relationships within their department or organisation to embed intelligent transparency as widely as possible.

How can I implement these principles?

1. Consider data needs from the outset and seek analytical advice and input at the earliest stage

It is important to think about what data will be needed to understand impacts of the policy and to enable the public to hold governments to account. Professional advice should be sought from analysts when developing and implementing new performance measures or making changes to existing measures. This was highlighted in OSR's work on the importance of involving statisticians in the evolution of NHS performance measures.

When developing policies and management systems, you should:

- Determine the desired outcomes and specify what data will be used to monitor whether the outcomes are being achieved.
- Engage with a range of users, internal and external to Government, to understand their future data needs.
- Be open about plans to develop data and analysis and share progress against them.
- Review your understanding of data needs and the data collected at regular intervals.

The Code of Practice for Statistics states that an organisation's Head of Profession for Statistics (or equivalent) has authority for deciding on how and when official statistics are published, including determining the need for new statistical outputs. The advice of analytical professions should be central to decisions about transparent publication of other research and analysis outputs.

2. Publish data used publicly in an accessible and timely way

Where possible, public statements should draw on the latest and most reliable published official statistics. In some instances, using only the most recent figure may be unhelpful, or even misleading, if it is not representative of the wider trends or other available evidence.

Access to official statistics should be limited before their public release, and data should be published in line with the guidance set out in the Code of Practice for Statistics. When making public statements that refer to data, regardless of the status of the data, governments should comply with the following principles:

- Data to support any public statement should be published in advance or at the same time as the statement is made, with a clear explanation of strengths and limitations.
- Where unpublished data are referred to unexpectedly, the information should be published as soon as possible after any statement has been made – ideally on the same day as the analysis should already be available and a grid slot should not be required, given the data have already been quoted publicly. This can be done via an ad-hoc release, for example on GOV.UK. For example, the Department for Work and Pensions has a [page dedicated to ad hoc statistical analyses](#).
- The data or analysis should be published separately from the related policy statements.
- Where a figure is quoted in a publication (for example, in a policy document, official press release or on social media), a link to the source of the figure cited should be provided to allow people to easily access the underlying analysis.
- As far as possible, data should be published in structured form and accessible to a wide range of users. For example, following [best practice for releasing statistics in spreadsheets](#).
- The principles of the Code should be applied whether the output is statistics or other analysis. [Voluntary application (VA) of the Code](#) is available for any producer of data, statistics and analysis which are not official statistics, whether inside government or beyond, to help them produce analytical outputs that are high quality, useful for supporting decisions, and well respected.

All statistics and data should be released in a timely way to help the public understand the impacts of policy and hold governments to account. As well as routinely introducing new data into statistics publications, producers should consider ways to be proactive and responsive in providing data to inform public debate such as making use of one-off and ad hoc releases. Ad hoc releases are an effective way of supporting governments announcements in fastmoving situations where new management information, research or analysis help explain or support the announcement. Such releases need not be long, or technical – they are a way of making the data available in line with the principles set out above. As these releases would simply be clarifying figures that have been or are due to be used in announcements, they should not require grid slots.

In line with the Code and our [guidance on using management information](#), we support a proportionate approach to the publication of ad hoc releases to support public statements. We recognise that it may not always be proportionate to publish an ad hoc release, but we would expect one to be published on a topic of high public interest or where people have expressed an interest in the underlying analysis. We would also expect an ad hoc release

to be published to support a planned statement. Examples of ad hoc releases which meet these criteria include [statistics relating to the Illegal Migration Bill](#) and [information published about Omicron infections](#) during the pandemic.

For more information, see OSR's previously published [Statement on data transparency and the role of Heads of Profession for Statistics](#) and guidance on [Production and use of management information by government and other official bodies](#).

3. Aid understanding and prevent misinterpretation through clear presentation and communication of statistics and data

Numbers are subject to interpretation and this will inform decisions made based on them. To support appropriate interpretation of data and analysis, the publication of data to support public statements or otherwise should include clear information on how the data or analysis have been produced, and how it can be used. Specifically, you should include information about:

- How the data have been produced and collected (e.g. whether the data are sourced from administrative or survey data, and the geographies covered)
- The definitions used within the data and any impact on how they can be interpreted (e.g. are financial data in real or cash terms?)
- Any notable strengths and limitations of the data which might impact interpretation or use of the figures.

Care should be taken to avoid selective use of data or use of data without appropriate context as this can lead to misuse which damages public trust. OSR's [Guidance for statements about public funding](#) provides further examples of things that should be considered in the context of public funding announcements.

Questions to ask yourself

If you are using statistics and data publicly, for example in a press release, policy document, blog, or public statement, ask yourself:

- ✓ **Is the source for the figure in the public domain?** If so, ensure you cite the source so others can easily find it. If not, engage with analytical colleagues to agree the best way forward – there may be better, published data which should be used instead, or an ad hoc release may need to be prepared.

- ✓ **Are there limitations or caveats which impact how the figure should be used?** If so, ensure you communicate any limitations and caveats clearly.

- ✓ **Is there context about the figure which impacts its interpretation?** If so, ensure you communicate the context clearly.

- ✓ **Could this figure be misinterpreted or misused if taken out of context?** If so, consider ways you can reduce the risk of this happening in advance – for example, consider where and how caveats are presented in your output and whether it is necessary to 'pre-bunk' anticipated misuse or misinterpretations. It might be helpful to stand in the shoes of a journalist and ask yourself which

single sentence you would quote in a news story. Satisfy yourself that these key lines are not too likely to mislead when taken out of context. The House of Commons Library has also published [excellent guidance on this topic](#).

- ✓ **Would further support to ensure intelligent transparency is achieved be helpful?** If so, your analytical colleagues, including your Head of Profession for Statistics, should be your first port of call. They will be able to provide expert advice and guidance. You are also always welcome to [contact us](#) at OSR if you want a view on whether your plans meet our expectations.

Annex:

Where else can I look for guidance on transparency?

The OSR offers specific guidance on the following topics:

- Publishing, pre-announcing and labelling statistics: OSR's [regulatory guidance on publishing official and National statistics](). The guidance includes information on publishing ad hoc releases.
- Models: OSR's [Guidance for Models]() provides information on how the principles in the Code can support good practice and transparency in designing, developing and using models. The guidance covers traditional statistical techniques and newer techniques including machine learning.
- Evaluation: OSR's explainer on [how the Code can help support evaluation]() highlights that users and the intended use should be at the centre of the evaluation. Published data and analysis should be made equally available to all, being open about the nature of the evaluation and how it serves the public good.
- Leadership: OSR published its review of [Statistical Leadership: Making Analytical Insight Count]() in February 2021, which looked at how statistical leadership can be strengthened across governments. Statistical leadership can help ensure the right data and analysis exist, that they are used at the right time to inform decisions, and that they are communicated clearly and transparently in a way that supports confidence in the data and decisions made on the basis of them.

The [Government Social Research: Publication protocol]() details five principles that should be adhered to in the publication and release of all government social research products. These are consistent with the Code of Practice for Statistics. It clearly sets out how social research conducted by or for government should be released; who should be responsible for the release; the timing of the release and the independence of the research.

While the guidance referred to in this document primarily relates to analytical professions, the key principles and thinking apply to many settings and professions. In the recent [Declaration on Government Reform](), Government committed to ensuring "all data is as open as possible to public and third parties".