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**Ed Humpherson, Director General for Regulation**Permanent Secretaries  
(by email)

23 May 2024

Dear colleagues,

**Transparency and Analytical Leadership**

On 21 April 2022, the Civil Service Chief Operating Officer and Cabinet Office Permanent Secretary, Alex Chisholm, wrote to Permanent Secretaries about transparency in the use of statistics and the need to ensure equality of access to data.

The letter launched the Office for Statistics Regulation's (OSR) principles of intelligent transparency. Intelligent transparency involves proactively taking an open, clear, and accessible approach to the release and use of data and statistics. This should be the default approach to communicating all statistics, data, and wider analysis. In practice, intelligent transparency means:

- Data used by government in the public domain should be made available to all in an accessible and timely way.
- Sources for figures should be cited and appropriate explanation of context, including strengths and limitations, communicated clearly alongside figures.
- Decisions about the publication of statistics and data, such as content and timing, should be independent of political influence and policy processes.

Since then, OSR has continued to promote intelligent transparency across government, working with a range of organisations and professions to embed the approach. We are very encouraged by the response and engagement from your organisations, and the commitment to supporting public confidence in government statistics and data through transparency. Our ambition is to continue take these principles to new audiences, including ministerial private offices and special advisors. While we have made good progress since 2022, there is still further to go for transparency to be the default approach for statistics.

Our latest report on [Analytical Leadership](#) reinforces these messages and states that government should publish its analytical evidence to support public accountability wherever possible, and every time analysis is used or quoted publicly. Demonstrating transparency and analytical integrity builds public confidence in how analytical evidence is used across government, and crucially, in the policies and wider decisions that are based on that evidence.

As heads of your organisations, I would welcome continued support from you and your colleagues in ensuring that analytical evidence is published wherever possible in line with the principles of intelligent transparency.

A UK General Election has been called for 4 July 2024. Taking a transparent approach to data will be particularly important during the pre-election period, when statistics are likely play a role in informing decisions made by the electorate but opportunities to publish new analysis are restricted. I recognise that your capacity to influence the use of analysis in Party campaign messages is inevitably limited. I do recommend, however, that you reiterate to Ministers and Special Advisors the expectations of intelligent transparency, especially that any public statements made during the pre-election period should only refer to statistics and data that are already in the public domain.

Further guidance on the use of statistics in a pre-election period is provided in the annex to this letter. OSR's role is to promote and safeguard the use of statistics in public debate. We do not act to inhibit or police debate. But we will be willing to highlight the importance of these principles during the pre-election period, including in some cases highlighting publicly where campaigning parties have made statements that draw on statistics and data that are not published or presented in a misleading way.

I would be grateful for your commitment in ensuring that your organisations take this on board and that Heads of Profession for Statistics and Chief Statisticians within your organisations are supported to make decisions around statistics and data, as champions and guardians of best practice.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ed Humpherson', written in a cursive style.

Ed Humpherson  
Director General for Regulation

## **Annex – Guidance on the use of statistics in a pre-election period**

The Cabinet Office and Devolved Administrations set pre-election rules in relation to making public statements or publishing new policies and outputs. Regular pre-announced statistical releases can continue to be published during the pre-election period, in accordance with the Code of Practice for Statistics. Statistics fieldwork and data collection activities can also continue during this time.

To align with these pre-election rules, OSR's threshold for public intervention is raised during a pre-election period. The guiding principle for intervening will be if a statement is materially wrong or misleading to the point it could significantly impact on the political debates that are presented to voters.

Producers should refer to this guidance when supporting briefing or public statements during the pre-election period. To adhere to the pre-election rules and our expectations around transparency, any public statements made during the pre-election period should only refer to statistics and data that are already in the public domain.

Where unpublished data are referred to unexpectedly during the pre-election period, OSR will write to the Head of Profession for Statistics in the relevant organisation if an ad-hoc publication providing a source for the claim or equivalent hasn't been published within 72 hours of the data being quoted. This applies to the unexpected release of official statistics and management information. While we take a broad scope in our intelligent transparency expectations, we understand that figures drawn from internal analysis or unpublished research may not be able to be published within this time frame. We would expect producers to provide an explanation if this is the case to support transparency.

Where misinterpretation arises from a lack of context rather than the figure not being in the public domain, OSR will work with producers to publish a clarification and any context on their behalf.

The UK Statistics Authority owns and maintains [guidance regarding the publication of statistics on polling day](#).