
Ed Humpherson, Director General for Office for Statistics Regulation**Mr Jeremy Balfour MSP**
(by email)

07 August 2024

Dear Mr Jeremy Balfour MSP

Thank you for your correspondence regarding the Walking and Cycling Index produced by Sustrans. Your concerns have been raised with you by a constituent who has also raised their concerns directly with the Office for Statistics Regulation.

Below I hope to address the questions you posed.

Is this situation of a lobby group also being a provider of Official Statistics unique to Scotland?

Sustrans is a registered charity and one of a few charities that appear on the Official Statistics Order.

Organisations that have their specific business or policy agendas can be included on the Order – other examples include commercial organisations such as the Student Loans Company and Skills for Care, and other interest groups such as Meat Promotion Wales and Skills Development Scotland. We recognise that many charities undertake lobbying activities as part of their work, but do not consider that their organisational objectives (to promote a particular policy perspective) mean that their statistics cannot be produced in line with the Code of Practice for Statistics. It is compliance with the Code which matters, to which I now turn.

What the OSR's position is on registered active lobby groups also being providers of Official Statistics and whether this aligns with the Code of Practice aim that organisations producing Official Statistics are viewed as trustworthy?

We expect all organisations who produce official statistics to act in a way which demonstrates their trustworthiness in line with the Trustworthiness pillar of the Code. At an organisational level, this requires that the organisation act with integrity in the handling of data and is transparent about its plans and decision making in relation to its statistics. Complying with this pillar of the Code will ensure that there is a clear distinction between the professional autonomy and judgement of the statistical professionals in the organisation, and the organisation's overall purpose and interests. This distinction between professional judgement and overall purpose is particularly important for Government statistics, where statisticians work in organisations headed by Ministers, who have clear and stated policy objectives. Statisticians must be able to produce data and statistics free from the particular interests of the Government of the day.

In this sense, our view is that compliance with the Code should insulate the statistical outputs from the wider interests of the organisation.

In addition, being on the Order enables us as the regulator to take greater action to ensure official statistics are produced in line with the Code. We would not have the same leverage otherwise.

For all these reasons, OSR does not have a position on the type of organisation that can, or cannot, produce official statistics.

What action the OSR is taking with Transport Scotland and Sustrans around the Walking and Cycling Index 2023 which was launched a couple of months ago and will be regularly used as a reference by policy makers for the next two years?

The crucial question, then, is compliance with the Code of Practice.

Sustrans is listed as a producer of official statistics. However, only statistics produced by Sustrans on behalf of the Scottish Ministers are specified as official statistics. The Walking and Cycling Index therefore does not constitute official statistics but is published as a statistical publication and is a high-profile output intended to inform the public. To support the public good we believe that all statistics benefit from being produced in line with our Code of Practice for Statistics and we consider that while Sustrans does follow good practice in many areas, there are improvements which could be made to Sustrans's statistical outputs.

As with all statistical outputs, hearing feedback from users of the data is very important as part of producer organisations making improvements to the statistics. We have raised the concerns regarding the presentation of data with Sustrans which has agreed to act on this feedback in future publications. Regarding the survey design, Sustrans works with methodologists in [NatCen](#) (the survey supplier) when developing or revising survey questions, with questionnaires being finalised after consultation with survey suppliers and the participating city partners. We consider that Sustrans' approach to question design could be more fully documented and made accessible alongside the reports so any user of the statistics could better understand their processes and decision making.

For impact data, which are derived from models, Sustrans provides information on the models used in its [Data sources and methodologies](#) document which signposts to further details, including to a user guide on the Sport England MOVES tool used to estimate savings to the NHS. There are opportunities for Sustrans to enhance the methodology information by setting out why it has chosen the methods it has and by including any caveats directly within the report.

We have shared these identified improvements with Sustrans and Transport Scotland. We have also recommended Transport Scotland should have greater involvement in the production of these statistics going forward to help support better understanding and application of the Code principles.

What action will be taken for the next wave of research in 2025 for publication in 2026?

I cannot be specific in advance on what action, if any, might be taken for the next wave of research in 2025. However, we have recommended to Sustrans that they publish a development plan so this will be available to users of the research.

We will continue to engage with Sustrans and Transport Scotland over the coming months on its plans for future reporting.

If you would like further clarity on OSR's position regarding official statistics production and our remit as the statistics regulator, do please contact my private office.

I am copying this letter to Sustrans and Transport Scotland to place our analysis and recommendations formally on the record.

Yours sincerely

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

Ed Humpherson
Director General for OSR