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# Introduction

Official statistics that everyone can place trust in are an essential public asset. They provide a view on our society, the economy, our environment and on the performance of Government. A vast range of judgements and decisions are taken by government, businesses and other organisations, and official statistics play a key role in how Government is funded or how and what it spends, on whether a business makes an investment or whether there is an unmet need that a charity or other organisation might be able to fulfil.

This code is an essential part of that process by ensuring that statistics published by government command public confidence by demonstrating trustworthiness and enhance public value.

#### Who is the Code for?

- The Code benefits everyone, as producers and users of statistics and the general public. Compliance with the Code can give confidence that Government's statistics are of high quality and can be trusted to make decisions on. Whilst the general public may not directly use Government's statistics, they are affected by the decisions that are taken using them, and this Code is intended to build trust in that data they are taken on.
- This Code applies to public authorities and should be used by all those within them who produce and use statistics, including statisticians, data scientists, analysts, researchers, policy-makers and communications officers.
- The release of meaningful, and trustworthy, statistics into the public domain requires the commitment of not just those that have produced them, but also ministers, parliamentarians, communications officers and leaders throughout an organisation.
- The following code is consistent with other Codes of Practice such as the Office for National Statistics in the United Kingdom, international bodies such as Eurostat and the United Nations. It is also consistent with the 'seven principles of public life' which are often called the Nolan Principles<sup>1</sup>.

#### What is the framework for this Code?

A wide range of Codes of Practice governing official statistics exist and at the core of most codes are three pillars of a framework, which are **Trustworthiness**, **Quality** and **Value**.

• **Trustworthiness** is about the people, processes and systems of government organisations. However, no one can just expect to be trusted, an organisation, especially Government, must demonstrate competence, honesty and openness. The

<sup>&</sup>lt;sup>1</sup> The 7 Principles of public Life, Committee on Standards in Public Life, 31 May 1995, https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life-2

practices under Trustworthiness set out the key commitments to support independent statistics production.

- Quality is about the data itself and how it is processed into statistics. Whilst being
  produced independent of any interference is important, statistics must all be the best
  available estimate of what they aim to measure and should not be presented in a
  misleading way. The data must therefore by relevant, produced in a methodologically
  sound way and the outputs must be clear.
- Value is about placing an emphasis on ensuring that official statistics meet the test
  of 'practical utility'. Statistics are can be provided about almost any aspect of life,
  however if they do not answer key questions or are poorly presented, then they are
  of little use. Value places a focus on the user of statistics, what questions the
  statistics are seeking to answer and providing a coherent picture.
- The three pillars of this framework are separate, but also supporting of each other. Statistics that are produced to a high quality are more likely to be considered as trustworthy, compared to those that are not. Using the best available data means that statistics are more likely to provide useful answers to questions than those that use out of date information.

# **Demonstrating compliance**

Producers of statistics, and others, can demonstrate compliance of this code through their commitments to:

- 1. Transparency: this commitment is core to most of the practices within this Code, by explaining what judgements have been made about the data, the methods used, and their strengths and limitations, as well as what the statistics tell us about the world.
- 2. Coherence: producers of statistics should not just simply publish a set of numbers, instead they should also explain how they relate to other data or information on the topic, and how they might combine with other statistics to provide a more useful view of the world.
- 3. Accountability: producers of statistics hold themselves accountable by adhere to clear publication policies, such as pre-announcing statistics and sticking to that date or by notifying users promptly of errors and revisions that have taken place.
- 4. Public focus: by communicating what questions the statistics address and what the statistics say about the part of the world they describe and why.

# **Code of Practice for Statistics**

## **Trustworthiness**

T1 Honesty and integrity

T2 Independent decision making and leadership

**T3 Orderly release** 

T4 Transparent process and management

T5 Professional capability

T6 Data governance

# Quality

Q1 Suitable data sources

**Q2 Sound methods** 

Q3 Assured quality

#### Value

V1 Relevance to users

**V2 Accessibility** 

V3 Clarity and insight

V4 Innovation and improvement

V5 Efficiency and proportionality

# **Trustworthiness**

Trustworthiness is about the people, processes and systems of government organisations. However, no one can just expect to be trusted, an organisation, especially government, must demonstrate competence, honesty and openness. The principles below are designed to build trust in statistics produced by Government:

#### T1 Honest and integrity

People in organisations that release statistics should be truthful, impartial and independent and meet consistent standards of behaviour that reflect the wider public good.

- T1.1 Everyone who is involved in producing statistics should handle and use those statistics and the data behind them with honesty and integrity, guided by established principles of appropriate behaviour in public life.
- T1.2 The collection, access, use and sharing of statistics and data should be ethical and for the public good. Those producing and releasing statistics should be free from conflicts of interest, including political and commercial pressures, that might otherwise influence the production and release and sharing of the statistics and data.

- The principles of Open Data<sup>2</sup> should also be considered when sharing statistics and data and released under the Open Government Licence<sup>3</sup>.
- T1.3 No action should be taken, nor public statement made, that might undermine the confidence in the independence of the statistics when released.
- T1.4 Statistics, data and explanatory information should be presented impartially and objectively.

#### T2 Independent decision making and leadership

Organisations should assign a head of practice who upholds and advocates the Code, strives to improve statistics and data for the public good and challenges their inappropriate use.

- T2.1 The head of practice should have the sole authority for deciding on methods, standards and procedures for producing statistics and on the content and timing of the release of regular and ad hoc statistics. This includes: determining the need for new statistics, developing experimental statistics and ceasing the release of statistics.
- T2.2 The head of practice should actively advocate the application of the code to all those producing, publishing and using statistics and data in the organisation.
- T2.3 The head of practice should encourage collaboration, harmonisation and innovation with other organisations, both inside and outside of the organisation and across professional groups.
- T2.4 The head of practice should challenge the inappropriate use of statistics and data and reflect upon how further misuse can be prevented.
- T2.5 The head of practice should report any concerns about independence, the application of this code or the accidental or wrongful release of statistics to their Chief Executive Officer.

#### **T3 Orderly Release**

Organisations should commit to releasing their statistics in an open and transparent matter that promotes confidence.

- T3.1 The release of both regular and ad hoc statistics should be pre-announced, giving a specific release date, at least four weeks in advance where practicable.
- T3.2 Changes to pre-announced release dates should be announced promptly and provide a reason for the change.

<sup>&</sup>lt;sup>2</sup> Open Data Policy, Isle of Man Government, August 2019, https://www.gov.im/media/1366718/council-of-ministers-open-data-policy-111219.pdf

<sup>&</sup>lt;sup>3</sup> Open Government Licence, Isle of Man Government, <a href="https://www.gov.im/about-this-site/open-government-licence/">https://www.gov.im/about-this-site/open-government-licence/</a>

- T3.3 Access to statistics before their public release should be limited to those involved in the production and preparation for release of statistics and also for quality assurance and operational purposes. Accurate records of those who have access before the statistics are finalised should be maintained. A list of individuals or organisations that might be granted pre-release access can be found in Appendix 1.
- T3.4 Statistics and data should be released on a timely basis and at times which meet the needs of users as far as practicable. Statistics should be released as soon as they are considered ready.
- T3.5 Statistics should be released to all users in the morning of a standard business day (Monday to Friday excluding bank and public holidays).
- T3.6 Ministerial, policy and press statements referring to regular or ad hoc statistics should be issued separately from the statistics, and should include a prominent link to those statistics. The statements should meet basic professional standards such as accuracy, clarity and impartiality. Advice from the lead officer for that statistic should be sought if necessary.
- T3.7 Revisions or corrections to statistics and data should be released as soon as practicable.

#### **T4 Transparent processes and management**

Organisations should have effective business processes and appropriate resources to support their statistical functions and be open about their plans, priorities and progress.

- T4.1 Organisations should be transparent about their approach to public engagement with users, potential users, and other stakeholders with an interest in the public good served by the statistics.
- T4.2 A work programme should be established and regularly reviewed. Statistics producers should be open about the progress towards meeting priorities and objectives. Users and other stakeholders should be involved to help development and prioritise statistical plans.
- T4.3 Sufficient human, financial and technological resources should be provided to deliver statistical services that serve the public good.
- T4.4 Good business practices should be maintained in the use of resources. Where appropriate, producers of statistics should take the opportunity to share resources and collaborate to achieve common goals and coherent statistics.
- T4.5 Organisations should be open about their commitment to quality and make clear their approach to quality management. They should ensure that the organisational structure and tools are in place to management quality effectively and to promote appropriate quality standards.

T4.6 Independent measures, such as internal and external audits and peer review, should be used to evaluate the effectiveness of statistical processes. Statistics producers should be open about areas for improvement.

#### **T5 Professional capability**

People producing statistics should be appropriately skilled, trained and supported in their roles and professional development.

- T5.1 Those involved in producing and releasing statistics and date should be able to demonstrate sound judgement. They should act professionally, work collaboratively and behave responsibly.
- T5.2 The roles and responsibilities of those involved in the production of statistics and data should be clearly defined with supporting guidance provided to help staff carry out their roles.
- T5.3 Suitably skilled staff should be recruited using a relevant professional competency framework as appropriate and with consideration given to future organisational needs.
- T5.4 All staff involved in the production of statistics and data should be provided training on secure data handling and management.
- T5.5 Staff should be provided with the time and resources required to develop their skills, knowledge and competencies.
- T5.6 Staff should be free seek statistical advice and guidance.

#### **T6 Data governance**

Organisations should look after people's information securely and manage data in ways that are consistent with relevant legislation and serve the public good

- T6.1 All statutory obligations governing the collection of data, confidentiality, data sharing, linking and release should be followed. Relevant international guidelines should also be considered as and when appropriate.
- The rights of data subjects must be considered and managed at all times, in ways that are consistent with applicable legislation. When collecting data for statistical purposes, those providing their information should be informed in a clear and open way about how that data will be used and protected.
- T6.3 Organisations, and those acting on their behalf, should apply best practice in the management of data and data services, including the collection, storage, transmission, access and analysis. Personal data should be kept safe and secure, applying relevant security standards and keep pace with changing circumstances.

T6.4 Organisations should be transparent and accountable about the procedures used to protect personal data when preparing statistics and data, including making choices when balancing competing interests. Appropriate disclosure control methods should be applied before releasing statistics and data.

# Quality

Quality is about the data itself and how it is processed into statistics. Whilst being produced independent of any interference is important, statistics must all be the best available estimate of what they aim to measure and should not be presented in a misleading way. The data must therefore by relevant, produced in a methodologically sound way and the outputs must be clear

The following principles are to ensure that statistics are fit for purpose:

#### Q1 Suitable data sources

Statistics should be based on the most appropriate data to meet intended uses. The impact of data limitations should be assessed, minimised and clearly explained.

- Q1.1 Statistics should be based on data sources that are appropriate for the intended uses. The data sources should be based on definitions and concepts that are suitable approximations of what the statistics aim to measure, or can be processed in such a way that they become suitable.
- Q1.2 Producers of statistics should establish and maintain constructive relations with those involved in the collection, recording, supply, linking and quality assurance of data.
- Q1.3 A clear statement of data requirements should be shared with the organisations that provide data, setting out decisions on timing, definitions and format of that data and explaining how and why the data will be used.
- Q1.4 Source data should be coherent across different levels of aggregation, consistent over time and comparable between geographical areas, whenever possible.
- Q1.5 The nature of data sources, and how and why they are being used should be clearly explained. Any potential for bias, uncertainty or distortion in the source data should be identified, addressed where possible, and the impact clearly explained. Producers of statistics should be open about the extent of to which these can be overcome.
- Q1.6 The impact of changes to the source data of statistics over time should be evaluated and clearly explained to users.

#### **Q2 Sound methods**

Producers of statistics and data should use the best available methods and apply recognised standards and be open about their decisions.

- Q2.1 Methods and processes should be based on international good practice, scientific principles and established professional consensus.
- Q2.2 Statistics, data and metadata should be compiled using recognised standards, classifications and definitions. They should be harmonised to be consistent and coherent with related statistics and data where possible. Any deviations from these standards should be clearly detailed and any impact on use should be given.
- Q2.3 Statistics producers should be transparent about the methods used, giving the reasons for their selection. The level of detail of the explanation should be proportionate to the complexity of the methods chosen and reflect the needs of different types of users and uses.
- Q2.4 Any limitations arising from the choice of method, including bias and uncertainty, should be clearly identified and explained. An indication of their likely scale, where possible, and the steps taken to reduce their impact, should be given.
- Q2.5 Producers of statistics and data should provide users with advanced notice of changes to methods, explaining why the changes are being made. Where possible, consistent time series of data should be produced using the changed methodology to aid users.
- Q2.6 Statistics producers should collaborate with topic and method experts and producers of related information where possible.

#### **Q3** Assured quality

Producers of statistics and data should explain clearly how they have assured themselves that the statistics and data are accurate, reliable, coherent and timely.

- Q3.1 Statistics should be produced to a level of quality that meets users' needs. The strengths and any limitations should be considered in relation to different possible uses and clearly explained.
- Q3.2 Quality assurance arrangements should be proportionate to the nature of the quality issues that have been identified and the importance of the statistics. Producers should be transparent about the quality assurance process that has been undertaken throughout the production process.
- Q3.3 The quality of statistics, and their related data, including accuracy, reliability, coherence, comparability, timeliness and punctuality should be monitored and reviewed regularly. Statistics should be validated against other relevant statistics and data sources.
- Q3.4 Revisions to data or unscheduled corrections resulting from errors should be explained alongside the statistics, clearly stating the scale, nature cause and impact they have had.

Q3.5 Systematic and periodic reviews of the strengths and limitations of the data and the methods used should be undertaken. Producers should be open in if and how these are being addressed.

#### **Value**

Value is about placing an emphasis on ensuring that official statistics meet the test of 'practical utility'. Statistics are can be provided about almost any aspect of life, however if they do not answer key questions or are poorly presented, then they are of little use. Value places a focus on the user of statistics, what questions the statistics are seeking to answer and providing a coherent picture.

#### V1 Relevance to users

Users of statistics and data should be at the centre of statistical production; their needs should be understood, their views sought and acted upon, and their intended use of the statistics supported.

- V1.1 Statistics producers should maintain and refresh their understanding of the use and potential use of the statistics and data. They should consider the ways in which the statistics might be used in the future and the decisions that might, or could be, informed by them.
- V1.2 Statistics producers should use appropriate ways to increase the awareness and use of the statistics and data, including communicating with the widest possible audience. They should also support users and potential users in identifying any additional statistics that might meet their needs.
- V1.3 User satisfaction with the relevance and usefulness of the statistics and data should be reviewed regularly. This should consider the timeliness, accessibility, clarity and accuracy of the statistics and data.
- V1.4 Producers should engage publicly, through a variety of means, with different audiences to understand how statistics are being used.
- V1.5 Feedback received from users, potential users and stakeholders should be addressed, where practicable. Consideration should be given to whether new statistics are required to address on information gaps that are identified. Information should be provided on how needs can and cannot be met, and the reasons for why this is the case.
- V1.6 Producers should periodically review whether to continue, discontinue, change or provide the statistics through other means.

#### **V2 Accessibility**

Statistics and data should be equally available to all, not given to some people before others. They should be published in sufficient detail and remain publicly available.

- V2.1 Statistics producers must provide free and equal access to regular and ad hoc statistics.
- V2.2 Statistics, data and guidance should be easily accessible to users. Different types of users and potential users should be considered when determining who statistics are released and presented.
- V2.3 The needs of people with disabilities must be considered. Statistics and data should be released using accessible communication formats which are compatible with the most commonly used assistive technologies.
- V2.4 Statistics, data and metadata should be released at the greatest level of detail that is practicable to meet user needs, whilst complying with any relevant data protection legislation. The releases should be consistent with common data standards and protocols.
- V2.5 Open and transparent information on supplementary statistical services should be made available. If an organisation chooses to charge for this, they should make the pricing policy publicly available.
- V2.6 Statistics, data and metadata should continue be to be publicly available, including when organisational websites change or are archived.

## V3 Clarity and insight

Statistics and data should be presented clearly, explained meaningfully and provide authoritative insights that serve the public good.

- V3.1 Statistics, data and explanatory material should be relevant and presented in a clear and unambiguous way that supports and promotes the use by all users.
- V3.2 Statistics should be accompanied by a clear description of the main statistical messages that explains the relevance and meaning of the statistics in a way that is not misleading. Data visualisation, such as charts, maps and tables, can help aid interpretation of the statistics.
- V3.3 Comparisons that support the interpretation of the statistics, both within the Isle of Man and wider, should be provided where useful. Users should also be signposted to other related statistics and how they are useful should be explained.
- V3.4 Advice should be given about the appropriate use of the statistics and data.

#### **V4 Innovation and improvement**

Statistics producers should be creative and motivated to improve statistics and data, using technological advances in all parts of the production and publication process.

- V4.1 Statistics producers should keep up to date with developments that may improve statistics and data.
- V4.2 Statistics producers should consider testing and releasing new statistics, initially, as experimental statistics<sup>4</sup>.
- V4.3 Users should be involved in the ongoing development of statistics and data, exploring and testing statistical innovations, so that the statistics remain relevant and useful.
- V4.4 Statistics producers should seek to collaborate with others, both in the Isle of Man and internationally, when developing statistics to overcome practical obstacles and sharing best practice.
- V4.5 Producers should commit to improving data presentation, enhance insight, and better meet the different types of users and potential users of statistics.

#### **V5 Efficiency and proportionality**

Statistics and data should be published in forms that enable their reuse. Producers should use existing data wherever possible and only ask for more where justified.

- V5.1 Opportunities for data sharing, linkage and cross-analysis of data sources and the reuse of data should be taken wherever feasible. Recognised standards, classifications, definitions and methods should be applied to data wherever possible.
- V5.2 Supplementary analysis should be made available for reuse where practicable, particular where they are the subject of regular requests.
- V5.3 The suitability of existing data, including administrative, open and privately held data should be assessed before undertaking new data collection exercises.
- V5.4 Voluntary participation in statistical data collection should be sought rather than using statutory powers, wherever possible.
- V5.5 Producers should be transparent in their approach to monitoring and improving the burden on those who are providing their information and also on those collecting and recording that data. The burden imposed should be proportionate to the benefits arising from the use of statistics.
- V5.6 Producers should analyse the impact of new data requirements or extending existing collections on those involved in collection, recording or supply of data, against the potential value of the statistics in serving the public good.

Experimental statistics. A subset of newly developed of innovative statistics undergoing evaluation. Experimental statistics are developed under the guidance of the head of practice and are published in order to involve users and stakeholders in the assessment of their suitability and quality at an early stage

<sup>&</sup>lt;sup>4</sup> Experimental statistics: A subset of newly developed or innovative statistics undergoing evaluation.

Experimental statistics are developed under the guidance of the head of practice and are published in

# Appendix 1 – Individuals or organisations who may be granted pre-release access.

As detailed in the Code of Practice, information should generally be given to all users at the same time, in order to ensure fairness. However, there are situations where pre-release access to statistics and data is appropriate, such as:

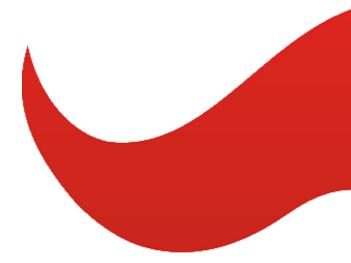
- So that responses to questions or the making of statements about a statistic at or shortly after the time of publication can be prepared; or
- An action may be taken before, at the time of, or shortly after the publication of that statistic which might change on the basis of the statistic being produced.

Pre-release access should not be considered an automatic right and must be balanced against the need to ensure fairness, however individuals who may be granted pre-release access might include:

- The Minister or Member of a government department involved with the production of the statistic;
- The head of a government department, or a senior officer who has delegated responsibility for the area the statistic relates to;
- A person or organisation, who is accountable to the public for the formulation or development of government policy or the delivery of public services to which the statistic has direct relevance;
- A person who needs pre-release access in order to advise any of the above;
- A person or organisation that might be the subject of that statistic, if the topic of the statistic is of a sensitive personal nature; or
- A bona fide representative of a news gathering or reporting organisation.

Pre-release access to statistics or data will usually be subject to an embargo until the date and time when the information will be publicly available and the breaking of an embargo may result in future pre-release access requests being refused.





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