

# Transport Focus compliance with the Code of Practice for Statistics

## Statement of compliance with the code of practice for official statistics

Transport Focus will produce the following 'Official Statistics in Development' from June 2026, with the intention that they will become 'Official Statistics'. Such statistics are produced in line with the Principles and Protocols set out in the Code of Practice.

- Rail Customer Experience Survey

None of the Transport Focus Official Statistics in Development are National Statistics/Accredited Official Statistics. National Statistics /Accredited Official Statistics are the sub-set of Official Statistics that have been formally assessed by the UK Statistics Authority as being fully compliant with the Code of Practice. Nevertheless, the principles set out in the Code of Practice and Protocols are adhered to as far as possible by those who prepare statistics not designated as National Statistics/Accredited Official Statistics.

Where contractors are involved in the production of Official Statistics in Development, Transport Focus will ensure that they understand and apply their responsibilities under the Code of Practice and Protocols and comply with the procedures set out in this statement.

## **Role of lead official, insight and evidence team/ statisticians and communications**

The Lead Official, in consultation with the National Statistician, has final responsibility for the content, format and timing of all Official Statistics releases. It is the responsibility of the project team at Transport Focus and all others involved in release of Official Statistics to follow the correct procedures and alert the Head of Profession at our sponsoring organisation of any difficulties.

### **Statements and Policies**

As well as complying with the Code of Practice and its supporting Protocols, all our Official Statistics in development are also produced and published in accordance with the following statements and policies, each of which forms an integral part of this Compliance Statement:

- Statement on Confidentiality and Access
- Statement on User Engagement, Customer Service and Complaints
- Data Management Policy
- Statement on Releases Practices and Publication Strategy
- Revisions and Corrections policy

## **Statement on confidentiality and access**

### Transport Focus' policy on openness

Transport Focus is committed to operating in an open and transparent way. Disclosure of information will be the norm. We will aim to publish actively any information or advice we provide to others.

We will treat all requests for information on a fair and equal basis and without prejudice, considering the public interest and the Freedom of Information Act (FOIA). Where we are unable to provide the information requested, we will explain why.

### Use of Contractors

Where contractors are involved in the production of Official Statistics in Development, Transport Focus will require them to understand and apply their responsibilities under the Code of Practice and associated protocols and to comply with the requirements set out above.

### Arrangements for maintaining the security of confidential statistical data and for controlled access to data

Where external contractors are used to collect survey data, they are responsible for ensuring that security and confidentiality is maintained on an ongoing basis. The Transport Focus team review their plans to deal with relevant security issues before these are included in the contract.

When the data concerns individual households or persons, the external contractors will remove addresses and other identifiers before the results are sent to Transport Focus.

Consequently, Transport Focus only possess the data in anonymised form with insufficient information to identify individual people.

The anonymised data underlying Transport Focus' official statistics is currently made available via registration with the Customer, Revenue and Growth team at Network Rail.

Public access to the underlying data from surveys will only be made available following the publication of the relevant statistical release.

## Technical security

All computers require a username and password (Windows Authentication) to login. Passwords are changed regularly and must be of a suitable strength.

All Transport Focus issued laptops are encrypted to protect data.

Transport Focus uses a secure cloud content management service for the storage of all business information. All processed data and analysis to produce official statistics are stored within a secure area of that system, which can only be accessed by designated members of the production team. No data are held on laptops or other portable devices or kept on unprotected storage media.

## Physical security

- All staff and visitors must be registered to enter the building to pass security; there is no public access to the building.
- Visitors must wear visitor badges at all times and must be accompanied at all times. Visitors are not allowed within the main Transport Focus working area and are only allowed access to the meeting rooms which are in a separate part of the office.
- Transport Focus offices have security doors which only staff can unlock with their pass.

## Freedom of Information Act (FOIA)

While we will treat requests under the FOIA on a case-by-case basis, our presumption is that requests for statistical records about individual people will be rejected. The legislation contains exemptions and processes that protect confidential information.

# Statement on user engagement, customer service and complaints

## Service to Data Suppliers

We will endeavour to operate efficiently by placing the minimum load necessary on data providers and by integrating our statistical work across government. We will take good care of all the information provided to us and we will respect the confidentiality of all identifying information in accordance with the accompanying Statement on Confidentiality

## Service to users

We will maintain the relevance of all our statistical activities so that they meet, where practicable, the needs of all our users, and where possible, make sure that the information we provide is equally accessible to the whole community.

## User engagement

We welcome any comments and feedback on everything we do because that will help us to improve our service.

*Specific feedback* - All Transport Focus official statistics (in development) releases include a contact email address which can be used to provide feedback on specific products at any time.

*General feedback* - Please contact [Louise.Coward@transportfocus.org.uk](mailto:Louise.Coward@transportfocus.org.uk) if you want to provide views and suggestions on the range of statistics we provide and their presentation.

We will review all comments and suggestions as they arrive, although any substantial changes to our outputs or presentation will need to be prioritised as part of our broader planning process.

Occasionally, we will seek user views on specific issues, changes to particular statistical products or areas for development. When we do so, we will notify known user groups and allowing a minimum of four weeks for users to respond.

## Service Standards

If you get in touch with us, we will be polite, approachable and helpful, and identify ourselves. We will make every reasonable effort to ensure that you are provided with information that is timely, relevant and accurate.

## Complaints

If you have a concern about the quality of our service, or the treatment you have received from us, you should first approach the person or unit you have been dealing

with. If you remain dissatisfied, we encourage you to contact Transport Focus' Head of Insight and Evidence (Lead Official), Louise Coward. She can be contacted at:

**Transport Focus, 10th Floor, 25 Cabot Square, London E14 4QZ**

Tel 07718 570010

Email [Louise.Coward@transportfocus.org.uk](mailto:Louise.Coward@transportfocus.org.uk)

## **Data management policy**

Our Data Management Policy applies to all our Official Statistics in development. The policy also applies to any associated metadata or documentation. This policy does not apply to other data collected or used by Transport Focus.

### **Implementing Data Management**

Responsibility for the day-to-day implementation of this Data Management policy is vested in the Insight and Evidence team at Transport Focus; they operate under the overall direction of the Head of Insight and Evidence. Their responsibilities are to ensure that our organisation manages its data resources in accordance with the best practice principles and standards set out in the Official Statistics Code of Practice and its supporting Protocols; with the Statements and Policies which form part of this Compliance Statement; and in accordance with the organisation's statutory obligations.

## Publication strategy

The aim of our Publication Strategy is to make our Official Statistics accessible to the widest possible community and to maximise the use of our statistical information in all walks of life – subject to the need to comply with legal, ethical and confidentiality constraints. It comprises the following key principles:

### Knowing the users of our data

The content of our resources and products, and the supporting information we provide will be informed by an understanding of our users' needs - obtained through feedback, analysis of demand, and internal consultation.

### Informing our users

We shall help customers and users to understand and make the best possible use of our products by publishing supporting information and background material, where possible.

### Web focus

To promote widespread access and informed public debate, we will use the web as our main channel for the dissemination of statistics. This means that all our published statistics will appear on the Transport Focus website:

<https://www.transportfocus.org.uk>.

The content and format of our statistical outputs are kept under review, taking account of changing means of delivery and changing user expectations.

### Charging

All the information we publish online will be free at the point of use.

### Accessibility

We shall make it easy for users to find and understand our published data by using adequate signposting and standard documentation procedures.

### Format of releases

The presentation and layout of a statistical release is decided by the Head of Insight and Evidence in consultation with production team colleagues. In general, the format of each statistical release will retain a core of standard tabulations in each edition. However, content may vary to reflect the needs of users and allow proper presentation and analysis of any new or particularly interesting results. Where practical, users will be informed in advance of any significant changes in format for regular publications.

## Statement on release practices

It is the responsibility of all those involved in the release of Official Statistics to follow the correct procedures and alert the Head of Insight and Evidence (Lead Official) of any difficulties.

### Pre- announcement and timing of release

Release dates for all Transport Focus' Official Statistics releases are pre-announced on the Transport Focus website and on the Statistics release calendar <https://www.gov.uk/government/statistics/announcements>.

The aim is to announce the month of the expected release at least six months in advance. The exact date will be provided as soon as possible but no less than 4 weeks before release. (An explanation for the delay will be provided if the exact date is more than a fortnight after the end of the provisional month) All statistics will be issued at 9:30am on the day of release.

In a small number of cases, it may not be possible to meet the published pre-announced dates. For example, unexpected operational difficulties (relating only to production of statistics) may be experienced, certain aspects of the data may require further checking or other quality concerns may need to be addressed.

In such circumstances the Lead Official (Head of Insight and Evidence) will consider which components can be released on the pre-announced date, which can be published later, and which cannot be published at all. The new release plan with any alteration to release dates will be made public as soon as possible with a full explanation.

### Access to data related to official statistical outputs prior to publication

The Transport Focus Board and officials will have access to the organisation's own administrative or management data. Similarly, certain Transport Focus staff need to use analytical information for operational purposes. Some of this data subsequently may form the basis for published official statistics. These arrangements will be regulated by the Official Statistics Code of Practice.

Certain other people will have access to the official statistics in draft form and/or the data used to produce them. This includes:

- Transport Focus staff engaged in the process of producing and disseminating the official statistics in question (including those responsible for overseeing the process and some members of Communications staff)
- any persons requested to quality assure the statistics before their public release.

## Pre-release access to official statistical outputs

The phrase 'pre-release access' covers privileged access to statistical releases in their final form prior to being placed in the public domain. In line with legislation, pre-release access to the organisation's official statistics is restricted to a maximum of 24 hours before their public release on the following day, which will be at 09.30.

Pre-release access to official statistics is limited to those needing to respond completely when questions arise at the time of release. This may include senior Transport Focus officials, members of the Transport Focus Board or representatives of industry. A record of people receiving pre-release access is available on request.

In exceptional circumstances only, and in accordance with Principle 5 of the Pre-release Access to Official Statistics Order 2008, the Lead Official may grant pre-release access in excess of 24 hours. They will only do this if, in their opinion, the public benefit outweighs the detriment to public trust, which is likely to result from such extended access. When this happens, the Lead Official must give their reasons for granting extended access and will also inform the National Statistician.

### Conditions of access

Those persons who are given access to Transport Focus' official statistics ahead of their release must keep the statistics secure and under embargo. They will be informed of the following conditions of access which they must abide by.

- They must not release the figures to anyone else or to report upon them until they have been officially released
- They must not provide any indication of the content, including descriptions such as "favourable" or "unfavourable". (They may indicate that a release is forthcoming).
- The information must be treated as Restricted and not made available under the Freedom of Information Act or the Environmental Information Regulations.
- Any accidental or wrongful release should be reported immediately to the Lead Official.

## Pre-release email procedure

Pre-release access to official statistics is labelled as 'OFFICIAL-SENSITIVE', as it has been judged there is a clear and justifiable requirement to reinforce the 'need to know' around these statistics. All pre-release access documents that are shared are appropriately security marked. An example is shown below:

OFFICIAL-SENSITIVE STATISTICS: Restricted access until 9.30am [publication date] DO NOT PASS ON TO ANY OTHER PEOPLE

The email and all file names of attachments containing the pre-release material are marked 'OFFICIAL-SENSITIVE'. The body of the email contains the following handling instructions:

*These official statistics will be published at 9.30am on {DAY MONTH YEAR} and must not be discussed or shared with anyone not on the pre-release access list until they have been published. Any accidental or wrongful release before publication could have damaging consequences and must be reported immediately. Wrongful release includes indications of the content, such as descriptions like 'favourable' or 'unfavourable'.*

In the event of a breach of the principles and rules set out in the legislation and described in this Statement, the Lead Official will notify the UK Statistics Authority of any breach and provide a written explanation. The National Statistician may decide to conduct and publish an inquiry as well as requesting remedial action to ensure future compliance.

## FOIA and EIR Considerations

Statistics which are made available under Privileged Pre-Access Release will be published at the date and time of the official release. This information cannot be made available under the FOIA as it is still in the course of completion.

## Statement on revisions and corrections

Corrections to statistics will be made if errors are found or if figures are amended because of changes to methodology or definitions. The revised report will be issued alongside the next version of the statistics output, or sooner if this is more appropriate.

(Currently, none of the official statistics outputs produced by Transport Focus contain provisional statistics. Therefore, none are subject to scheduled revisions.)

The front page of the revised report will summarise what revisions were made and at what time. This information will be repeated on the webpage hosting the report as well. However, some corrections will not directly affect the figures in the statistical report.

These amendments include correcting misspellings and formatting issues, updating contact details and re-wording confusing sentences. When such corrections are made, they will not be individually listed.

Errors in time series that appear in more than one edition will be corrected in the most recent edition only. Older editions will not need to be corrected.

After changes to the methodology or definitions, corrections to historical time series may be corrected to bring them into line with the new approach. This may not be possible and depends on the data availability and the amount of work involved. The requirements of the users will be considered when making such decisions.

The Head of Insight and Evidence (Lead Official) will advise the team responsible for the publication of any required corrective actions. We reserve the right not to publish corrections if the corrected figures are not yet available or if the resources required to issue them outweigh the benefits to stakeholders. In these situations, stakeholders will still be informed of the errors and their potential impact.

## **Code of practice breach report**

A breach of the Code of Practice for Official Statistics occurs where one or more provisions of the Code were not followed in situations where an exemption or exception had not been approved by the UK Statistics Authority's Head of Assessment.

It is for the relevant organisation producing the set of statistics to determine whether a breach has occurred, and to document it appropriately. Any breaches in relation to equality of access, integrity, confidentiality and release practices must be reported to the National Statistician.

Breach reports are published on the UK Statistics Authority website, and this document will be updated accordingly.

At the time of writing, as we have not yet published our statistics, there are no breaches to report.