

Full Fact submission: Committee for Standards in Public Life: Standards Matter 2

Summary

An honest person will get their facts straight, back up what they say with evidence, and correct the record when they need to.

These qualities are not reflected in the present descriptor of the principle of Honesty and sadly they are not reliably found in public life.

Shockingly, no official mechanism even exists for MPs who don't hold ministerial roles to correct the record when they make a mistake in the House of Commons. This is one practical and easily fixable consequence of the vagueness of the current Honesty descriptor.

The Committee for Standards in Public Life should set clear expectations in the descriptor of the Honesty principle to ensure that such basic mechanisms as a corrections process for the official record must be available to everyone in public life. It is hard enough to be seen as honest in public life without our standards mechanisms working against you as a public office holder.

Our evidence shows that the existing Honesty descriptor stands in contrast to standards set out by other fields with a serious commitment to honesty and truthfulness. The Honesty descriptor needs to be strengthened to set the expectation of accuracy on a basis that others can assess, and to correct the record when necessary. Honesty should also include the obligation for public office holders to actively demand the same behaviours of those around them.

Beyond this there is a wider problem with honesty and accuracy in public life, and a distinct problem with the huge gap between what the public expect and what we collectively believe is actually happening. The Committee's own research has repeatedly identified telling the truth as one of the highest concerns the public has about standards in public life.

The time has come for the Committee to conduct an inquiry into honesty in public life. This submission offers some initial evidence to show how varied the pressures on honesty in public life are. There are clear paths to addressing some, and some will always come down to individual behaviour.

An inquiry into honesty in public life would draw on themes and understanding of novel pressures that the Committee has developed expertise in during recent inquiries, including online abuse, election law, and the role of AI.

About Full Fact

- Full Fact fights bad information. We're a team of independent fact checkers, technologists, researchers, and policy specialists who find, expose and counter the harm it does.
- Bad information damages public debate, risks public health, and erodes public trust. So we tackle it in four ways. We check claims made by politicians, public institutions, in the media and online and we ask people to correct the record where possible to reduce the spread of specific claims. We campaign for systems changes to help make bad information rarer and less harmful, and we advocate for higher standards.
- Full Fact is a registered charity. We're funded by individual donations, charitable trusts, and by other funders. We receive funding from both Facebook and Google. Details of our funding can be found on our website.¹

Response

Question 1: Standards of Conduct in the UK

A. How well do you think ethical standards - as enshrined by the Seven Principles of Public Life - are upheld in public life today?

1. People generally do not trust public figures to tell the truth, and that's a tragedy. A lot of the time when Full Fact begins to investigate claims in public debate, we actually find that what most people have said is accurate. The idea that everybody is lying to us all the time is wrong. But you don't have to be lying all the time to be untrustworthy.
2. Throughout a decade of fact checking, Full Fact has collected evidence on how well the standards of public life are upheld in the UK, with a particular focus on honesty and openness. We have observed the shifting patterns of behaviour of public actors and institutions and found that, although good behaviour persists and should be championed, there is significant poor behaviour that needs to be addressed by an improved standards system.
3. Public distrust is reasonable because we are regularly misled. The thousands of fact checks that Full Fact has published routinely show serious inaccuracies in public life. Mistakes happen, and we cannot know the intentions behind any claim, but it is reasonable to say that there is clear evidence of careless, reckless, and wilful inaccuracy. It is not credible to claim that the honesty of people in public life can be relied upon.
4. A shared challenge for Full Fact and the Committee now is how to go about tackling the behaviours by those in public life that lead the public to a justified sense of distrust, while at the same time tackling the causes of the public's cynicism in our public figures and institutions.

¹ <https://fullfact.org/about/funding/>

5. When we are talking about the principle of Honesty, this must begin with having the imperative to seek out and present the truth, whatever it might show. Through our fact checking work Full Fact has seen too many examples of what could be characterised as ‘dishonest accuracy’. If you provide accurate data but frame it in such a way as to conceal or ignore the truth, you are not being honest. In September 2020, during an intense period of spotlight on the government’s Covid-19 testing system, both the Health Secretary and the Prime Minister presented figures to parliament that said that the average distance travelled to a test site was about five miles.² This is indeed what the data showed, albeit measured in straight lines rather than journeys. However, more crucially, it did not account for anyone who attempted to book a test but then declined to make an appointment once they see how far away their recommended testing site is, which is what the significant level of public concern and media reporting was focused on at that time. In this case the Office for Statistics Regulation (OSR) did pick this up with the Department of Health and Social Care (DHSC) in a letter.³
6. Polls conducted by politicians on social media which are then used to make sweeping claims are another example of twisting ‘accurate’ information to a cause. These kinds of polls are prone to being poorly designed and unrepresentative. In 2019 we checked a poll run by then Labour deputy leader and MP Tom Watson on his personal website,⁴ which asked about the party’s Brexit policy. He claimed that “84% of Labour members and supporters who took the survey” want an all-member ballot to decide the party’s future policy. But not only was the question framed in a leading way, there was no way of ensuring that respondents were Labour members or supporters, or that they only responded once; neither was there evidence that the sample was weighted, meaning the sample was not guaranteed to be representative of the group Watson claimed it was. These problems did not stop the poll being reported uncritically by the media.⁵
7. As this example shows, this phenomenon is by no means unique to politics, and we have seen plenty of examples of media reporting and academic literature that fall into the same traps. In July 2016, a headline splashed across the front page of the Express read: “98% say no to EU deal”. However, it failed to say that this referred to the 5,765 people who had voted in the Express’s premium rate phone poll, advertised on page seven of the paper the previous day,⁶ thereby failing to provide even the most basic context that would allow the public to judge the information in front of them.
8. That this pattern of behaviour exists in the media and wider public debate should act as an even greater imperative for those in public life to uphold standards and to be better. Whatever the motivation or intention, the dangers of ‘dishonest accuracy’ are

² <https://fullfact.org/health/distance-travelled-coronavirus-tests/>

³ <https://osr.statisticsauthority.gov.uk/wp-content/uploads/2020/09/Ed-Humpherson-to-Stephen-Balchin-Publication-of-ad-hoc-statistics.pdf>

⁴ <https://fullfact.org/europe/labour-mps-brexit-poll-meaningless/>

⁵ https://www.huffingtonpost.co.uk/entry/vast-majority-of-labour-members-want-online-ballot-to-stop-brexit-watson-poll-finds_uk_5ceeb416e4b07666546fa2b7

⁶ <https://www.pressgazette.co.uk/daily-express-forced-to-run-second-front-page-correction-over-anti-eu-coverage-in-space-of-a-week>

perhaps even graver than that of outright inaccuracy because it undermines the role that evidence plays in public debate. If information can be so easily manipulated to conceal what it really shows without fear of consequence by those in positions of power, then that same information loses its value in keeping us informed.

9. The Covid-19 pandemic has reinforced our concerns about the openness of government and brought them to the public's attention. There must, of course, be recognition of the amount of pressure that the government has been under, especially in the early stages of the pandemic, that mistakes will be made, and that some data will not be published as swiftly as it should. However, our biggest concern has been an unwillingness by some parts of government to engage with questions of accuracy. For example, in June, the Prime Minister claimed that all tests at testing centres and mobile testing units at the time were turned around within 24 hours⁷. We asked the DHSC about this figure at the time, and were told that it was correct. However, data published at a later date showed that the number of tests turned around in that time was much smaller. When we put this to DHSC, it did not respond to this point of accuracy. We brought our concerns about both the inaccurate figures and the poor communication in a letter to the OSR,⁸ and were told that the matter had been raised with the department.⁹ The Prime Minister has failed to correct the official record on this and a number of other inaccuracies over the course of 2020.
10. But there is cause for hope. Our work also allows us to see the very best of the upholding of public standards, and in particular of Honesty. One of Full Fact's key expectations of anyone in public life is that if a mistake or inaccuracy is pointed out, you quickly correct it. Wherever we can we follow up our fact checks with a correction request. By doing this, we seek to affect attitudes and behaviours and encourage a culture of accuracy. Over the course of 2020, we intervened or requested a correction 161 times, with 72 of these being successfully resolved; this is compared with 126 interventions, of which 51 were fully resolved in 2019.
11. There are lots of examples within that number of where public figures have responded positively, and sometimes with haste. In November 2020, the Labour MP Ruth Jones responded quickly to a request for a correction to some figures she had got wrong on test and trace,¹⁰ and back in January 2020 former Secretary of State for Health Jeremy Hunt MP corrected a figure he had got wrong on botched surgeries.¹¹ In 2016, the then Prime Minister David Cameron issued a correction following a fact check we wrote about incorrect figures on school capacity,¹² showing that even corrections from the very top are not beyond the realms of possibility. However, out of

⁷ <https://fullfact.org/health/new-data-reveals-pms-testing-speeds-claims-as-wrong/>

⁸ Will Moy, 'Letter from Will Moy to Ed Humpherson Regarding Test Turnaround Times', 14 July 2020, https://fullfact.org/media/uploads/200714_will_moy_to_ed_humpherson.pdf.

⁹ Ed Humpherson, 'Letter from Ed Humpherson to Will Moy', 6 August 2020, https://osr.statisticsauthority.gov.uk/wp-content/uploads/2020/08/DGR_letter_to_FullFact_August2020.pdf.

¹⁰ <https://fullfact.org/health/ruth-jones-wales-contact-tracing/>

¹¹ <https://bit.ly/37uB7UJ>

¹² <https://questions-statements.parliament.uk/written-statements/detail/2016-03-04/HCWS580>

12 requests Full Fact has made to ministers concerning statements on the Covid pandemic, only once did a minister attempt to clarify or correct them.¹³

12. Many structures in public life make it actively difficult for those in public office to be honest about when they get something wrong or to make corrections, even when they want to. Politicians have suggested to us that the hostile environment on social media means that they fear the potential for a pile-on of online abuse if they seek to correct or apologise for genuine mistakes on those platforms. We can't assume that politicians and others in public life will be willing to pay a price for honesty if they cannot see the reward. Incentives need to be built into systems that facilitate truth telling, including correcting the record. Full Fact would urge the Committee to open a public dialogue that looks at the big picture of how we as a society can go about building a culture where the costs of honesty in public life are lower, and the rewards higher.
13. There are some very basic changes that could move us forward. In parliament, there is an official process which was recommended by the Procedure Committee in a report in 2007¹⁴ and agreed to by the House that allows ministers to correct Hansard when they make an inadvertent error in speaking. However the process does not extend to non-ministers and therefore the vast majority of Members have no official means by which to correct the record. This even includes shadow ministers. Many from across the House have made efforts to do this anyway, usually through raising a point of order with the speaker or in the course of another debate. However, this is not the most efficient use of House time, and it means that readers of the original debate in Hansard will not see the correction.
14. We urge the Committee to recommend a review into parliamentarians' ability to correct the official record and propose a straightforward system that would allow all Members to do so, for which a model within the UK already exists. In the Scottish Parliament, a system¹⁵ was introduced in 2010 that allows all Members to put forward corrections to the official record when they misspeak. This is an example of an easy win that, by putting in place a simple mechanism, will enable a standard to be better enacted.

B. Do you believe that there have been any notable shifts in approaches or attitudes to ethical standards in public life in recent years?

15. Survey data on trust shows that the majority of the UK public generally says they distrust politicians, journalists and the government. This has, to a large extent, always been the case, despite reports to the contrary. However this year we have seen worrying trends in how the public views information from the UK government. Reuters Institute found that public trust in the UK government as a source of

¹³ <https://fullfact.org/blog/2021/jan/fix-information-failures-or-risk-lives-full-fact-report-2021/>

¹⁴ <https://publications.parliament.uk/pa/cm200607/cmselect/cmproced/541/54104.htm>

¹⁵ Scottish parliament guidance:
<http://www.parlamaid-alba.org/OfficialReport/CorrectionsGuidance.pdf>

information about coronavirus saw 'large and significant' drops between April and May last year, at the height of the first lockdown.¹⁶

16. There is an important discussion to be had about what the optimum level of trust in public institutions and figures is. We do not want to be polling at 98% or 100% trust in politicians in a genuine democracy, because that would probably suggest something much more sinister was going on. As the TrustGov project says 'blind faith in the untrustworthy can facilitate abuse'.¹⁷ At the same time, low levels of political trust are not inevitable. In a European Commission public poll, 63% in Denmark and 68% in Luxembourg said they tend to trust their government in 2019.¹⁸
17. Although we know that low levels of trust are not a novel crisis in the UK, what we have seen is a clear shift in behaviour from politicians, which we believe is going in the wrong direction. As our information environment has become increasingly complex and fragmented, we end up with fewer sources of shared information and the accountability mechanisms that do exist are harder to use and understand. This has opened up an opportunity for those in public life with power to be dishonest without the same fear of the consequences of their actions or words. Full Fact has seen a range of examples of this behaviour, including: a Conservative candidate seeking office using unbranded campaign websites to mislead or conceal the person behind the campaign;¹⁹ political parties editing news headlines in digital advertising;²⁰ the Labour Party using misleading figures to make claims about how much the average family would save under a Labour government during the last election²¹; and politicians on all sides rendering almost any debate on poverty utterly meaningless by choosing to refer to whichever measure suits their argument most.²²
18. The Covid-19 pandemic has shifted the relationship between the public and government, with the public getting much more visibility of policy than ever before. When and how decisions are made, the data on which they are based and how contracts for public services are awarded are all under significant levels of scrutiny, which the public has had more access to through the media and mechanisms such as the government's Covid-19 press conferences. The impact of the pandemic on public expectations of government may take some time to properly understand, but the standards to which those in public life should ultimately look to adapt to reflect those expectations, wherever they land.

¹⁶<https://reutersinstitute.politics.ox.ac.uk/trust-uk-government-and-news-media-covid-19-information-d-own-concerns-over-misinformation>

¹⁷ *In praise of scepticism: Trust but verify*, Pippa Norris, Will Jennings, and Gerry Stoker
<https://trustgov.net/working-papers>

¹⁸<https://ec.europa.eu/commfrontoffice/publicopinion/index.cfm/Chart/getChart/chartType/gridChart/theMeKy/18/groupKy/98/savFile/895>

¹⁹<https://www.theguardian.com/politics/2020/nov/05/tory-london-mayoral-candidate-criticised-over-tfl-bailout-facts-site>

²⁰ <https://fullfact.org/news/conservative-ad-headline/>

²¹ <https://fullfact.org/election-2019/labour-claims-about-savings-under-their-policies-are-not-credible/>

²² <https://fullfact.org/economy/october-2020-poverty-rates/> and
<https://fullfact.org/blog/2020/jul/full-fact-calls-prime-minister-correct-record-poverty/>

C. What do you see as the most significant threats to ethical standards in public life today?

19. Honesty is threatened by the idea that it is incompatible with winning elections. We should take this challenge seriously, however much it offends. The Committee's own research shows that the public wants people in public life to be honest but does not actually expect them to be honest.²³ If the public believes that honesty is a dead letter, and those in public life don't believe it can be met, then we need to think again. There is a risk to pretending that this belief does not exist, and we need to challenge it head on however uncomfortable it might be.

Question 2: The Seven Principles of Public Life

A. Do the Seven Principles of Public Life accurately describe the appropriate ethical responsibilities for those in public roles, including both political and non-political office-holders?

20. Full Fact is a charity which, in effect, exists to support the seven principles of public life. We work to improve the information environment and the quality of public debate. Good public debate depends on honesty, and honesty depends on objectivity, accountability, openness, leadership, integrity and selflessness.
21. In general, the seven principles themselves seem right to us. We believe there is significant benefit to a stable and enduring set of principles, and we hope the Committee will balance that against any proposals for change. The problem we see is about behaviour and interpretation, and we believe that the descriptor of Honesty needs to be made clearer and more practical.

B. Would you amend or replace any of the principles or their descriptors? If so, how?

22. An honest person will get their facts straight, back up what they say with evidence, and correct the record when they need to. Full Fact believes that the original Nolan descriptor of Honesty was strikingly limited: "Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest."²⁴ The current Honesty descriptor is straightforward but tautological: "Holders of public office should be truthful."²⁵
23. As it stands, the existing descriptor of Honesty stands in stark contrast to standards set out by other fields with a serious commitment to honesty and truthfulness. Take

²³ <https://www.gov.uk/government/collections/cspl-surveys-of-public-attitudes>

²⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/336840/1stInquiry_Summary.pdf

²⁵ <https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2>

healthcare, where the professional duty of candour²⁶ requires that all healthcare professionals must be open and honest with patients when something goes wrong, including informing them and their families, apologising and offering an appropriate remedy. In the media, IPSO's Editors' Code²⁷ puts significant emphasis on not publishing inaccurate or misleading information or images, and where this does happen, this 'must be corrected, promptly and with due prominence, and — where appropriate — an apology published.' These professions make clear and relevant demands of their members to uphold these standards in their work, including correcting mistakes. Being seen to be honest in public life is hard: let's not make it harder by failing to provide basic parameters.

24. We suggest a more down-to-earth description of the principle of Honesty could make it more credible to those it applies to, more practical to uphold, and easier for the public to believe in.
25. Holders of public office should be truthful, but this is insufficient. The Committee should amend the Honesty descriptor to add an imperative in addition to simply being truthful: an obligation or requirement to seek out, share and present information accurately. Honesty is about more than just looking at your own behaviour, it is also about taking the lead and tackling the adversaries of honesty in public life, and this will only become more and more important as people are exposed to more and more sources of information online that may appear credible without being trustworthy. We believe that this addition is necessary for this principle to fulfil high standards and lead to better societal outcomes. This can be done in a way that complements and enhances the principle that information should not be withheld from the public under Openness.
26. Full Fact suggests a formulation of words for the Honesty descriptor to reflect these needs, such as: 'Holders of public office should be truthful. They should seek out and present information honestly in a way that others can assess, correct mistakes and demand the same of those around them.'
27. Full Fact believes that the time has come for the Committee to conduct an inquiry into honesty in public life. The pressures on honesty in public life are evident and while there are clear paths to addressing some of these pressures, some will always come down to individual behaviour. An inquiry into honesty in public life would draw on themes and understanding of novel pressures that the Committee has developed expertise in during recent inquiries, including online abuse, election law, and the role of AI. These issues are by no means small or easily fixed, but the time has come for a fresh look at how honesty fits into public life.

Question 3: The UK's arrangements for regulating standards

²⁶<https://www.gmc-uk.org/-/media/documents/openness-and-honesty-when-things-go-wrong--the-professional-duty-of-candour.pdf-61540594.pdf?la=en&hash=EEB52EBEDBFA0EA421F4736F4C36BAB730A9E567>

²⁷ <https://www.ipso.co.uk/editors-code-of-practice/#Accuracy>

A. Are you confident that the UK's arrangements for regulating ethical standards are robust and effective? and B. Are there any areas of public life where regulation on issues of ethical standards is not strong enough?

28. We are not confident that arrangements are robust or effective enough. We have found that in too many places there is insufficient meaningful sanction for those who choose to deceive or mislead the public, or protest ignorance from a position of power. While we know that many people in public life recognise the importance of high standards and try to uphold them, those who don't have too easy a ride.
29. Even in areas where there are clear accountability mechanisms in place, often these are not able to provide sufficient sanction to influence behaviour. We've seen lots of examples of where public actors have been able to disregard recommendations or requests from the UK Statistics Authority and continue to repeat the same behaviour. We've lost count of the number of times that the OSR has called on individual ministers and government departments to ensure that they publish management information when it is used to make claims in public debate. However departments continue to brief ministers using this unpublished information, including in June of last year when the Prime Minister used unpublished management information to make claims about the number of Covid-19 tests being turned around within 24 hours²⁸. Again, the OSR called for the information to be published. The pattern of behavior seems never ending, despite the fact that there is clear guidance on the requirement to publish management information that is used to make public statements.²⁹ Information that isn't published can't be used by others, meaning its full value may not be realised. It also can't be scrutinised: crucial facts are hidden from those who want to hold the powerful and their decisions to account.
30. Once again this demonstrates that there are good reasons for public distrust. Upholding standards in public life requires confronting valid concerns as well as tackling unjustified cynicism. We believe that the Committee can lead in doing both.

Question 4: Best practice in standards regulation

A. What makes an effective standards regulator? And B. Do the UK's standards regulators have the right powers and remit to act effectively? And C. Should the independence of standards regulators be enhanced and protected, and if so, how?

31. An effective standards regulator needs to give the public the confidence that they are just that: effective. The public's trust in those in public life and their trust in those who hold them to account are inextricably linked.
32. Standards regulators need effective sanctions. If those in public life know that they can push the boundaries of ethics without feeling the consequences, they will just

²⁸ <https://fullfact.org/health/new-data-reveals-pms-testing-speeds-claims-as-wrong/>

²⁹ <https://code.statisticsauthority.gov.uk/national-statisticians-guidance-management-information-and-official-statistics-3/>

keep pushing. As the Health Secretary said recently on regulatory interventions in a pandemic: “worrying about a letter from the stats authority that might come through in a few weeks’ time is not top of the in-tray”.³⁰ Even understandable behaviour change during febrile times can lead to a long-term shift that is difficult to reverse. If those in public life make excuses now for how well standards are upheld, we may find in years to come that we struggle to get back to a place where there is even the aspiration to uphold standards fully.

33. Standards regulators also need a fact finding capability. The creation of the Office for Budget Responsibility has improved public finance information partly because of its ability to obtain operational information from government departments to validate their assumptions and data. For a longer time the National Audit Office has played a vital role in scrutinising government activity and spending. However these are exceptions. Many standards regulators either do not have the capacity for fact finding at the necessary scale or are limited to information volunteered by those they scrutinise.
34. We believe that the Committee has an opportunity to provide independent leadership in defining and assessing what an effective standards regulator looks like. At present there is a need for greater coherence in the standards regulation landscape of the UK, and the Committee can play a crucial role in providing that clarity. We believe the Committee for Standards in Public Life should:
- Define what a good standards mechanism looks like and conduct an rolling series of assessments of all areas of public life and test those mechanisms that exist against that criteria
 - Call attention to weaknesses in, or lack of, standards, standards mechanisms, and behaviour.

Question 5: Creating ethical cultures

A. How can the Seven Principles best be embedded within a public sector organisation's working culture? and B. What are the most significant obstacles to embedding high ethical standards in a public sector organisation?

35. As Full Fact is not a public sector organisation, we can only offer an outsider’s perspective, but one based on a decade of working with public sector organisations on questions of honesty, openness and accountability. The Covid-19 pandemic has put a huge amount of strain on the public sector in so many ways, making fulfilling the demand of openness and accountability more challenging. Yet the public, sometimes through the media, has also rightly demanded more scrutiny of the decisions that directly affect their lives than ever before. Full Fact has made recommendations³¹ before about the need for government departments to take steps to encourage a culture that emphasises the importance of transparency and

³⁰ Matt Hancock, ‘Science and Technology Committee Oral Evidence: UK Science, Research and Technology Capability and Influence in Global Disease Outbreaks, HC 136’ (2020), <https://committees.parliament.uk/oralevidence/761/pdf/>.

³¹ The Full Fact Report 2020: Fighting the Causes and Consequences of Bad Information, Rebecca Hill <https://fullfact.org/media/uploads/fullfactreport2020.pdf>

evidence, including practical measures that can be straight-forwardly put in place like regular refreshers courses in statistics and evidence for staff and a template for fact checking of speeches and announcements. But most importantly embedding a culture of standards requires real leadership - yes, this is a standard in and of itself, but it is also crucial to the success of the other standards.

36. In our experience, there are a lot of barriers to embedding ethical cultures into the public sector in a way that has a genuine impact on society. The political pressures in government are acute and this can impact everyone from the top to the bottom of an organisation. For example, Full Fact has witnessed worrying examples of the apparent politicisation of public information, such as around vaccines,³² that seems to fall short of demonstrating the kind of leadership we need on accountability, openness and honesty. There is also a lack of the kind of consistent independent scrutiny of organisations that helps to build an ethical culture. Full Fact exists to hold those with power in public life to account for what they say and in doing so we hope to incrementally change behaviour within organisations for the public benefit. But the challenge goes much wider than that and more scrutiny is needed.
37. For this reason we reiterate our ask that the Committee conduct an inquiry specifically into the issue of honesty in public life, reflecting the consistent evidence of public concern around this issue.

³² <https://fullfact.org/health/coronavirus-vaccine-brexit/>