

Hellenic Statistical System

Good Practice Advisory Committee

Second Annual Report

December 2014

Introduction

The Good Practice Advisory Committee (GPAC), hereinafter referred to as the Committee, was established under the provisions of Article 4 of the Hellenic Statistical Law (no. 3832 of 9 March 2010, as amended). The Law stipulated that the Committee should be comprised of five members as follows:

- a) One member nominated by the Hellenic Parliament;
- b) One member nominated by the European Statistical Office (Eurostat);
- c) One member nominated by the European Statistical Governance Advisory Board (ESGAB);
- d) One member nominated by the European Statistical System Committee (ESSC); and
- e) One member nominated by the Hellenic Data Protection Authority.

The President of the Hellenic Statistical Authority (ELSTAT) is entitled to participate in the Committee on a non-voting basis.

The task of the Committee, as stipulated in the Law, is to prepare an annual report on the implementation of Principles 1 to 6 of the European Statistics Code of Practice in the Hellenic Statistical System. The report is to be submitted to the Hellenic Parliament, having informed the European Statistical Governance Advisory Board accordingly, and shall be made public following submission to Parliament.

In accordance with the Law, and having consulted with the various nominating bodies, the Minister of Finance issued a Decision (Ref. No. Δ6Α1001384ΕΞ2013, as amended) in January 2013, convening the Committee and appointing five members for the two year period 2013-2014 inclusive. Details on the appointed members are given in Appendix 1. At the first meeting in February 2013 the members elected Mr. Gerry O’Hanlon, former Director General of the Irish Central Statistics Office and nominee of ESGAB, as Chairman and agreed that Ms. Christina Karamichalakou from ELSTAT should act as Secretary to the Committee.

At the February 2013 meeting the Committee decided that it should limit its first report to an examination of ELSTAT only and that the other statistical agencies, and the functioning of the overall statistical system, should be reviewed in its second report in 2014. The first report was finalised and published in accordance with the Law in September 2013¹. Subsequently, in reviewing its approach towards its second report, the Committee decided that the report should consist of two parts. The first part should review the 2013 report relating to ELSTAT in the light of developments since September 2013 while the second part should provide a first examination of the implementation of Principles 1 to 6 in the wider Hellenic Statistical System (ELSS). With regard to the latter, the Committee decided to limit itself to a strategic overview of the overall system in order to avoid duplication with the detailed Peer Review of

¹<http://www.statistics.gr/portal/page/portal/ESYE/PAGE-codepractice>

the ELSS, which was scheduled for the end of 2014 as part of an EU-wide programme of such reviews of the statistical systems of Member States.

The Committee met on three occasions in the second half of 2014. The first meeting was held on the 14-16 July and involved a detailed review of developments since completion of its first report in September 2013 and also a first discussion with representatives from the three Ministries selected for inclusion in the Peer Review of the ELSS². The second meeting, on 3-4 November, continued discussions with ELSTAT and the three Ministries. On this occasion the Committee also met senior officials from the Prime Minister's office and Ministry of Finance and separately officials from the economic adjustment programme partners (i.e., the International Monetary Fund and the EU Commission). The purpose of the latter meeting was to hear the views of these institutions as representatives of major international users of ELSTAT and ELSS statistics. The Committee extended an invitation to the Bank of Greece but was disappointed that the Bank was unable to accept. The second annual report of GPAC was formally adopted at a third meeting on 30 December 2014.

Part 1: Review of First GPAC Report

Principle 1 – Professional Independence

Professional Independence of statistical authorities from other policy, regulatory or administrative departments and bodies, as well as from private sector operators, ensures the credibility of European Statistics

In its first report GPAC commended the Greek Government and Parliament for the range of legal and organisational measures that had been put in place to underpin a professionally independent and, by extension, credible national statistical system. These measures include in particular: Law no. 3832 of 9 March 2010 on the Hellenic Statistical System (ELSS), as in force, and the establishment of the Hellenic Statistical Authority (ELSTAT) as an independent authority; and the Commitment on Confidence in Statistics signed by the Government in February 2012 after being approved by Parliament and enshrined in Law 4051/2012. However, the Committee stressed that, on their own, legal and organisational arrangements were not sufficient to ensure that professional independence is achieved in practice. Instead, the Committee argued that such arrangements “must be accompanied by wider cultural acceptance and understanding amongst politicians, administrators, the media and indeed the public at large of what professional statistical independence actually entails in practice”. The Committee opined that Greece was some considerable distance from achieving such a favourable external environment and fell well short of what would be considered best practice in other countries. The Committee made some recommendations regarding the urgent need to address some of these shortfalls, notably in regard to the need to bring the

² The three Ministries selected for inclusion in the Peer Review of the ELSS were: the Ministry of Finance; the Ministry of Labour, Welfare and Social Insurance; and the Ministry of Environment, Energy and Climate Change.

ongoing and lengthy judicial proceedings against the President of ELSTAT and two senior officials within the Authority regarding the alleged inflation of the 2009 fiscal deficit figures in agreement with Eurostat to an early conclusion. It is a matter of considerable regret to the Committee to report that there has been no improvement in the general situation and recent developments in respect of the court proceedings and some other matters constitute a serious deterioration when viewed from the perspective of ensuring the current and perhaps, more importantly, the future professional independence and credibility of the Hellenic Statistical System and ELSTAT.

In regard to the court proceedings, the Committee is informed that the initial Interrogator (investigating judge) assigned to the case concluded in July 2013 that the case be “put to file”, in other words be discontinued. However, following a number of objections by political and other interest groups it was decided to re-open the case and a Prosecutor of the Appeals Court was assigned to conduct further investigations. This Prosecutor also recommended to the Appeals Council in May 2014 that the case be put to file. This again caused widespread objections from political and other interest groups, who demanded that the Prosecutor’s recommendation be rejected and the case be referred to open trial. The Council of the Appeals Court decided not to accept the recommendations of the Prosecutor and instead issued Ordinance No. 1212/2014 to continue the investigation. As part of the investigation, the Appeals Council called for further testimony on the accuracy of ELSTAT’s calculation of the government deficit. In particular it called for further evidence from the former Secretary General of the National Statistical Service of Greece and from the former Director of National Accounts. Under these circumstances, the President of ELSTAT felt obliged to take the unprecedented step of issuing a public statement protesting against the Ordinance and defending the production of statistics by ELSTAT during his tenure. He drew particular attention to the fact that prior to his arrival the reliability of Greek statistics was questioned by the competent European institutions whereas they were now consistently accepted without reservation.

The Committee was informed that towards the end of 2014 there was a proposal to separate, and pursue separately, two aspects of the charge against the President of ELSTAT. The first part would focus only on the charge that the President was allegedly in violation of his duty in not seeking the approval of the then collective body of ELSTAT before issuing the revised EDP government deficit figures in November 2010. The second part is the criminal charge that he deliberately falsified the facts in revising upward the 2009 government deficit figure. In line with the proposal, the case regarding the violation of duty charge was separated and assigned to a Prosecutor who was to make recommendations to a lower (felony) court. However, despite a recommendation from this Prosecutor that the charge should be dropped, the lower court decided that it did not have competence in the matter and decided that the violation of duty charge should be referred back to the Council of the Appeals Court for continued investigation in conjunction with the falsification charge.

In regard to the falsification charge, GPAC expressed its surprise in its first report that “statistical methodological decisions, which have been formally validated in accordance with EU regulations, are the subject of legal proceedings” and this continues to be the position of the Committee. With regard to the question of seeking the approval of the then existing collective body of ELSTAT, the Committee would point out that Principle 1, Indicator 1.4, is very clear when it states that the Head of the NSI shall “...have **sole** (our emphasis) responsibility for deciding on statistical methods, standards and procedures, and on the content and timing of statistical releases”.

The Committee is also concerned at the content of some public statements of a political and populist nature that continue to be made around the court proceedings. These comments contend that official statistics in Greece should be produced in a manner that “best serves the interests of Greece and its people”. The inference behind such comments would appear to be that the choice of statistical methodology should be made primarily on the basis of what is perceived by some as “most advantageous” to Greece at a given time and in the prevailing political and economic circumstances. This, however, is a flawed argument that is at variance with the key tenets for the production of high quality official statistics, namely: that they should be produced in an objective and independent manner using previously agreed and standardised methodologies. It is indeed now one of the strengths of official statistics worldwide that such methodologies are increasingly developed at international level (for example, at EU or UN levels) and are thus independent of individual national, political and economic contexts. These tenets are embodied in the UN Fundamental Principles for Official Statistics and the Code of Practice for European Statistics and given legal effect in the national statistical laws (including Law No. 3832 of 9 March 2010 as in force). In line with the Commitment on Confidence in Statistics signed by the Greek Government, GPAC would once again call on Government and/or Parliamentary leaders to make it clear that the production of official statistics in accordance with these tenets is the sole and over-riding mandate of ELSTAT and the ELSS.

Overall in the view of the Committee, the long drawn out legal process against the President and senior staff of ELSTAT, and the circumstances and events surrounding it, continue to weaken the independence of ELSTAT both now and into the future as well as to damage its reputation and its capacity to perform its tasks within Greece.

On another issue, the Committee was informed that ELSTAT was approached towards the end of 2014 by some officials to delay introducing revisions to the EDP figures that take account of newly available high quality data. This incident is very disappointing for two reasons. Firstly, it demonstrates that there is still a lack of awareness of the complete impropriety of approaching ELSTAT in this manner in contravention of Principle 1. Second, it shows a lack of understanding of the obligation on ELSTAT to respect Principle 6 of the Code and ensure at all stages that the choice of sources and methods is informed by statistical considerations only.

In its first report GPAC commended the Greek Government for being the first administration to adopt publicly a Commitment on Confidence in support of its official statistical system.

Such Commitments have now been given a more formal basis in draft legislation that has just been agreed at EU level. In response to the issues raised in the preceding paragraphs, the Committee would urge the Government to fully honour the Commitment it signed in 2012 by implementing all envisaged actions, including respecting international statistical standards; guaranteeing, defending and publicly promoting the professional independence of ELSTAT; and supporting ELSTAT in upholding confidence in Greek statistics and defending them against any efforts to undermine their credibility.

In addition to the above issues, the Committee would also wish to draw attention to two further matters that have a bearing on the Professional Independence principle. The first concerns difficulties in the interpretation and implementation of the main statistical law, Law No 3832 of 9 March 2010 as in force, and to threats to its integrity either through amendments to the Law itself or through the adoption of other legislation that may have the effect of undermining some of its key aspects. Some of the difficulties are detailed elsewhere in the commentary below on Principles 2 and 3 and are indicative of an environment where the very clear provisions of the Law are being ignored and, in many cases, obstructed on a regular basis. With regard to the integrity of the Law, the Committee considers that it should be treated as a “reference framework” piece of legislation that sets down the key principles and actions required to ensure the existence and high quality performance of the Hellenic Statistical System and ELSTAT. In this context, the Committee believes that frequent amendments or extensions, particularly of a minor or operational nature, should be avoided as far as possible and proposed changes should only be entertained after careful consideration of all relevant factors and possible alternatives. The integrity of the Statistical Law must also be protected from the adoption of potentially conflicting provisions in other legislation. Law no. 4270 of 2014 “Principles of Financial Management and Monitoring (integration of Directive 2011/85/EE-Public Accounting)” was put forward as an example of legislation containing such conflicts relating to the role assigned to ELSTAT as an “agency with fiscal competencies”, the exchange of confidential data, and to risks to the principle of equal access to statistics for all users. The Committee was concerned to learn that, despite explicit references to ELSTAT in the proposed legislation, there was neither prior consultation with ELSTAT on the content nor any indication that the compatibility with the Statistics Law had been taken appropriately into account. The Committee must therefore urge, as a matter of priority, that appropriate steps are taken to ensure that the integrity of the Statistical Law is protected to the maximum extent.

Finally, in the context of the completion of the current term of office of the President of ELSTAT in mid-2015, the Committee would point to the need to improve the transparency of the appointment process for the position. GPAC would recommend that a transparent and objective selection process be put in place to assist in identifying the best candidate. Such a process should include the specification in law of the sole criteria for selection for the position, the preparation of a comprehensive job specification and the use of a legally mandated high level independent selection board consisting of national and international experts in the fields of statistics or related disciplines and management.

Principle 2: Mandate for Data Collection

Statistical authorities have a clear legal mandate to collect information for European statistical purposes. Administrations, enterprises and households, and the public at large may be compelled by law to allow access to or deliver data for European statistical purposes at the request of statistical authorities.

In its first Report, the Committee noted that the Greek statistical authorities' mandate to collect information for the development, production and dissemination of European Statistics, their access to administrative data for statistical purposes, as well as their right to compel response to statistical surveys, are all comprehensively stipulated in the Hellenic Statistical Law as required by Principle 2 of the European Statistics Code of Practice. However, the achievement in practice of access to administrative sources for statistical purposes was considered slow and the Committee urged the Hellenic Parliament and Government to provide the necessary support to ELSTAT to overcome the remaining obstacles in a timely manner.

The Greek Tax Law 4174/2013 Article 17(1) was amended in 2014, providing a mandate to the Ministry of Finance to provide administrative (tax) data to ELSTAT. In April 2014, an updated Memorandum of Cooperation was signed between ELSTAT, the General Secretariat for Public Revenue (GSPR), the General Secretariat for Information Systems (GSIS) and the Social Insurance Institute (IKA) for the systematic flow of the necessary data from the above agencies to ELSTAT, aiming at better fulfilling national and European obligations concerning the production of economic and business statistics. Accordingly this memorandum, in combination with the relevant amendments in tax legislation, now allows ELSTAT to have access –after waiting for almost 3 years– to tax data on enterprises from the Ministry of Finance for the compilation of key statistics (structural and short-term business statistics) under strict conditions for observing statistical confidentiality.

Despite the above progress in improving the modalities for implementing the national and European statistical legislation as regards ELSTAT's access to administrative data, there still seem to be many problems and delays in the delivery of the data in practice. These problems—in addition to casting some doubts on the Greek Government's resolve to comply with the existing legislation—have a negative effect on the quality of many important economic and other statistics produced by ELSTAT. Some examples include:

- The refusal for over seven months of the Ministry of Finance to provide historical data for government finance statistics for the years 1995-2005 required by ELSTAT to fully comply with the reporting requirements of ESA 2010 regarding both content and timing.
- ELSTAT's request to the Ministry of Finance for information on the technical characteristics of the tax data to be provided (size, format, etc.), which are required to prepare and ensure the secure receipt, storage and processing of the data by ELSTAT, has not been acted on – instead further difficulties have been raised despite the recently agreed memorandum of cooperation.

- Delays since 2013 by the Ministry of Finance in providing non-confidential data to ELSTAT for updating its Enterprise Register – these data were provided previously without problems.
- Problems as regards ELSTAT’s access to non-economic administrative data. The Committee has an impression that the Greek statistics law is not considered to be enough by some Ministries to give ELSTAT automatic access to administrative data needed for statistical production. Instead, the Ministries have refused to allow access to certain individual data sets pending burdensome and time-consuming negotiations and, in some cases, changes to specific legislation to provide explicit mandates for the Ministries to provide the data.

For the purpose of clarification, the Committee would like to emphasise that according to good practice followed by many other EU Member States, the general Statistics Law gives the overall right to the National Statistical Institute to get automatic access to any administrative data needed for statistics production and, at the same time, it obliges the owners of administrative data (the Ministries and other governmental organisations) to allow and organise access of the National Statistical Institute to the administrative data in question. Memoranda of Cooperation between the owner of administrative data and the National Statistical Institute are only needed for further specification of the technical details and timetables of data delivery or direct access arrangements, for nomination of the contact persons and other similar conditions under which both parties can smoothly operate in practice.

Overall, the Committee welcomes those positive developments observed so far and encourages the Ministry of Finance to take immediate and appropriate measures for delivering the confidential tax and other data, as well as technical characteristics of the data, required by ELSTAT in a timely manner. The Committee also urges the Greek Government to remove the remaining obstacles and to facilitate ELSTAT’s timely access to administrative data needed for statistical production and for the implementation by Greece of the European statistical legislation.

Principle 3 – Adequacy of Resources

The resources available to statistical authorities are sufficient to meet European Statistics requirements

In its first report GPAC noted that the resources available to ELSTAT were not sufficient to enable it to discharge fully in a satisfactory manner its obligations in respect of the European Statistical Programme. Some progress was made in recruiting new staff – for example, 46 staff were redeployed to ELSTAT in the first half of 2014. This was a welcome development but fell short of meeting the numbers sought by ELSTAT through redeployment – this was mainly due to a lack of candidates with the basic qualifications required. Another negative feature is the long length of time (in some cases over 15 months) taken to source and transfer

the redeployed staff. These delays reflected a combination of unduly long bureaucratic procedures, lack of real co-operation on the part of the Government to advance the process through appropriate measures and reluctance on the part of some Ministries to release the designated staff in line with agreements.

Following the completion of the redeployment campaign, ELSTAT sought to recruit an additional 67 staff from outside the government sector. In July 2014 the Ministers of Finance and Administrative Reform and Electronic Governance formally sanctioned the initiation of the process to recruit half (33) of this number. While this is welcome, it is expected that it will take many months and well into 2015 before the new staff will actually arrive in ELSTAT. With regard to the remaining 34 positions it would appear that a range of legal and organisational requirements will have to be satisfied before any sanction will be forthcoming. ELSTAT at some point was told that these requirements may include a new external evaluation of ELSTAT's overall staffing needs – despite previous detailed submissions and earlier agreements on the staffing levels required. At best this means that there will be further long delays before any additional staff can be acquired. Between 2010 and September 2014 ELSTAT lost approximately 215 staff (net) and this trend is continuing as ELSTAT's staff—who already have a high average age—are seeking early retirement fearing further government pension scheme cuts and other changes. Thus the failure to fill approximately one third of this number in a timely manner means that ELSTAT will continue to have difficulty in meeting its obligations in respect of the Statistical Programme. The Committee would therefore, once again, call on the Government to take all necessary action in line with the Commitment on Confidence in Statistics, as well as other commitments it has made under the economic adjustment program, to address the ongoing shortfall in ELSTAT's staffing resources in a timely manner.

In the 2013 report GPAC also drew attention to the clear link between budgetary autonomy for ELSTAT and its ability to act fully in a professionally independent manner. It was clear that this was fully understood and allowed for in the adoption of the Statistical Law and the Commitment on Confidence in Statistics. However, the Committee has been made aware of many instances where these clear legal and governmental decisions have been misunderstood, disputed or indeed wilfully ignored. These include inter alia: efforts by the Ministry of Finance to introduce ex ante infra-annual budgetary implementation controls for ELSTAT; insistence on classifying ELSTAT in public documents (such as the 2015 Government Budget) as an entity supervised by the Ministry of Finance; refusals by the Court of Auditors to sanction payments ex post by ELSTAT for services already rendered on the basis solely of not agreeing with managerial decisions; and the non-acceptance of the right of the President of ELSTAT to recruit and deploy resources in accordance with his legal mandate (notably the Legal Advisor of ELSTAT, specialized scientific personnel, etc.). The Committee is firmly of the view that this lack of coherence between the letter of both the law and the Commitment on Confidence in Statistics and their implementation in practice needs to be addressed at the highest level in an unequivocal manner.

Principle 4 – Commitment to Quality

Statistical authorities are committed to quality. They systematically and regularly identify strengths and weaknesses to continuously improve process and product quality.

In its first report, the Committee commended the strong commitment to quality in ELSTAT. The high-level Group for Supervision and Management of the Quality of Statistical Works at ELSTAT, acting as the Quality Committee for ELSTAT, aims at identifying risks to the quality of statistical products of ELSTAT and is developing corresponding improvement actions; this important activity has been continued in regular meetings of the Group.

As a new initiative, an internal assessment process has been introduced in order to screen for compliance with the Principles of the European Statistics Code of Practice at the level of the Divisions. The assessment process contains several steps, starting with the completion of a self-assessment questionnaire and ending with the adoption of an assessment report and a decision on identified improvement actions. GPAC was informed that the assessment of all Divisions involved in statistical production has commenced and for two of the Divisions reports have already been finalised. A similar self-assessment process will be introduced for other ELSTAT Divisions in early 2015. GPAC welcomes this initiative and considers that it has the potential to greatly increase the awareness of quality issues throughout ELSTAT.

Quality Guidelines have also been developed for use throughout ELSTAT, covering the whole statistical production process from the planning of the statistical production to the dissemination of the statistical products and their assessment. The issuance of the Guidelines in November 2014, the use of which is compulsory for all statistical production in ELSTAT, constitutes an important advance in ensuring the compliance of ELSTAT with the European Statistics Code of Practice.

User-oriented quality reports are available on the ELSTAT website for most statistical products. These quality reports provide summary information on definitions, data sources, methodology and legislation. For many statistical products the metadata are provided using the Euro-SDMX (ESMS) format. ELSTAT is also working on more comprehensive producer-oriented quality reports which are already available for many statistical products. ELSTAT has been implementing a detailed plan to achieve in the beginning of 2015 complete coverage of its statistical products with user oriented quality reports, metadata, and producer oriented quality reports.

In response to a GPAC recommendation, ELSTAT has expanded its programme of training courses on quality issues such as quality management in NSIs, quality-related statistical methodology and quality reporting. In the 2nd quarter of 2014, ELSTAT started the preparation of another six training courses to be financed from its own resources; unfortunately, these have to be organised without funding from the ESF, for which a request had been submitted to the relevant government institution more than two years ago. An on-the-job-training for the teams responsible both for certification of official statistics produced

by other agencies of the ELSS and for the assessment of Divisions within ELSTAT has also been conducted under the guidance of a high level expert from the UK.

Further improvement actions include:

- In the development of the procedure for the certification of official statistics produced by ELSS agencies, important milestones were achieved: the basic document “Principles and Procedures for Certification” was produced and two pilot certification exercises were undertaken with two Ministries producing European Statistics, one in November 2013 and another in July 2014.
- The rules for the selection of temporary survey workers and their assignment to survey units have been reviewed and recalibrated; this has been an established periodic exercise that takes place every 8 months.

Overall, the Committee is very impressed at the commitment to quality within ELSTAT as evident from the actions outlined above and looks forward to further concrete progress in this area.

Principle 5: Statistical Confidentiality

The privacy of data providers (households, enterprises, administrations and other respondents), the confidentiality of the information they provide and its use only for statistical purposes is absolutely guaranteed.

In its 2013 Report, the Committee concluded that the requirement for maintaining statistical confidentiality is comprehensively covered in the Hellenic Statistics Law and the Regulations on Statistical Obligations of the Agencies of the Hellenic Statistical System and in the Operation and Administration of ELSTAT, and that the importance of statistical confidentiality is understood and respected in ELSTAT. It noted the many measures already established to ensure the observance of statistical confidentiality in ELSTAT, such as: the Committee on Statistical Confidentiality; the implementation of relevant policies on statistical confidentiality, IT security and data protection; as well as staff training programs. The Committee recommended that ELSTAT should further document and communicate detailed guidelines on preserving statistical confidentiality in the dissemination of disaggregated statistical results and in the release of statistical micro-data to researchers and develop and put in place procedures with respect to data breach management.

GPAC is pleased to note that ELSTAT has made considerable progress over the past year both in responding to the Committee’s recommendations and in upgrading its security infrastructure and policies. In particular, ELSTAT updated its information security and data protection policies, developed an incident management policy, acquired and put into operation a firewall system, conducted penetration tests in order to identify the vulnerabilities of its portal and notified all its network users about basic security rules and is advanced in the process of establishing encrypted data transfer and secure storage for data to be received from General Secretariat of Public Revenue, General Secretariat of Information Systems and the

social security fund IKA. Moreover, ELSTAT compiled and circulated information on access to confidential data for scientific purposes to all staff and uploaded relevant information to its portal addressing researchers and other users. The uploaded information included: information on accessing confidential data of ELSTAT for scientific purposes; information on accessing anonymized data of ELSTAT; a list of anonymisation criteria for specific surveys; contract templates to be signed by researchers and ELSTAT; the Declaration on Statistical Confidentiality to be signed by researchers and their collaborators; and the authorization forms to be signed by additional researchers involved in the research project; and a pricing policy for the statistical products of ELSTAT. Furthermore, staff training in statistical disclosure control programmes τ -Argus and μ -Argus has been arranged for January 2015.

The Committee welcomes ELSTAT's aim to integrate the many security and data protection measures for its computing and communication infrastructure into a formal security (or statistical confidentiality) management system. The Committee has been informed that an ESF funded project, which will inter alia result in such a system, is already under way and will be completed by mid-2015. Furthermore, the Committee would encourage ELSTAT to periodically assess the effectiveness of the measures being applied and to improve them appropriately, utilizing, as appropriate, relevant third party expertise.

Finally, the Committee must once again voice its concerns regarding the still not fulfilled requirement for ELSTAT's staff to sign a specific commitment on statistical confidentiality. GPAC is of the opinion that this issue needs to be resolved urgently, with the staff of ELSTAT signing the Declaration on Statistical Confidentiality in order to have full compliance with the principle of statistical confidentiality of the European Statistics Code of Practice in ELSTAT.

Principle 6 – Impartiality and Objectivity

Statistical authorities develop, produce and disseminate European Statistics respecting scientific independence and in an objective, professional and transparent manner in which all users are treated equitably.

In its previous report GPAC concluded that ELSTAT demonstrates a strong respect for Principle 6 in that it produces official statistics based on sound methods and presents them in a professional statistical manner. In particular, the Committee noted that equality of access to data by all users is a core principle for ELSTAT and that statistical releases are simple and factual presentations of the data, without comments of a partisan nature. The Committee commended the measures and encouraged ELSTAT to continue its efforts to publicise its statistics and to promote the use of its high quality outputs.

The Committee is pleased to note that ELSTAT has included a number of relevant measures in its 2014 and 2015 Statistical Work Programmes. These include two user conferences in 2014 aimed at teachers and the press respectively and a conference for the Other National

Authorities of the ELSS on the use of the SDMX tool in the dissemination of statistical data and metadata.

On one specific issue of a negative nature, the Committee was informed that in October 2013, there was a leak in the Hellenic Statistical System of the EDP fiscal statistics before their pre-announced publication date. This leak was not due to ELSTAT but to other parts of the system. In conformity with what is required in the European Statistics Code of Practice, which states that “in the event that leaks occur, pre-release arrangements are revised so as to ensure impartiality”, ELSTAT took measures vis-à-vis pre-release access and no further leak has been observed since.

In order to protect the integrity and reputation of the ELSS, the Committee considers that this example points to the urgent need to ensure that all parts of the Hellenic Statistical System should be aware of the Principles of the Code of Practice and of the need to follow them in a uniform and consistent manner.

Part 2: Implementation of the European Statistics Code of Practice in the wider Hellenic Statistical System (ELSS)

As mentioned in the Introduction, Part 2 is limited to a brief strategic overview of the wider Hellenic Statistical System. The review focussed on the following national statistical authorities within the ELSS: Ministry of Finance; Ministry of Labour, Welfare and Social Insurance; and Ministry Environment, Energy and Climate Change. GPAC met representatives from the three Ministries to discuss their work in producing European and national statistics. The Bank of Greece was invited as another important national statistical authority within the ELSS but the Bank was unable to attend.

The review of the above Ministries was largely based on an examination of the Self Assessment Questionnaires completed, in respect of Principles 1 to 6 of the European Statistics Code of Practice as part of the Peer Review of the ELSS.

Principle 1 – Professional Independence

All three Ministries have relatively small and usually dispersed statistical units. In no case was there a senior person appointed with overall professional responsibility for coordinating statistical activities throughout the Ministry. On the contrary, the view was expressed to the Committee that such a role would not be practical in many Ministries as there was little or no overlap or commonality between the statistical areas. In all cases, however, the Committee was informed that the statistical units were enabled to undertake their work in a professionally independent manner.

GPAC would consider it desirable to have responsibility for ensuring that statistical production within each Ministry is undertaken in compliance with the European Statistics Code of Practice assigned to an appropriate senior official, who would be professionally

independent in discharging this function. It would not be necessary in all cases for this assignment to be on a full-time basis—the most important requirements would be that the person had an appropriate background and relevant experience and also sufficient standing within the organisation to ensure the production of high quality statistics. This person would have responsibility for representing the Ministry’s statistical production in the context of the certification of official statistics of the Ministry by ELSTAT.

Principle 2 – Mandate for Data Collection

For the production of their statistics, the three Ministries use mainly data that have been collected as part of their administrative obligations or directly via their own statistical surveys. Usually the data needed for statistics are readily available. However, it was reported that one authority has had problems in getting customs data from the Ministry of Finance for statistical purposes.

The Committee got an impression that the exchange of data for statistical purposes between statistical authorities of ELSS is very rare and that the provisions of the Hellenic Statistical Law are not fully utilised for making the statistical system more effective in this respect.

Principle 3 – Adequacy of Resources

All three Ministries indicated that in the current budgetary circumstances resources were declining as currently only one in five vacancies can be filled. Meeting the existing statistical requirements was therefore very much dependant on the quality and dedication of the staff engaged in statistical production. The ability to meet new demands or to engage in quality improvement projects was, however, limited in current circumstances. GPAC considers that the adequacy of the resources available for statistical production should be subject to ongoing review in order to ensure that the required outputs are produced on a quality assured basis.

Principle 4 – Commitment to Quality

From the self-assessment questionnaires and from the discussions with representatives of the three Ministries, GPAC is satisfied that there is an awareness of the importance of high quality statistical production within the organisations. However, there is little evidence of a systematic approach towards quality management and assurance within any of the Ministries. For example, issuing an explicit Quality Commitment is not standard for the involved units, an exception being IKA the social security organisation within the Ministry of Labour, Welfare and Social Insurance. The Committee discerns that there are certain processes followed in practice for monitoring the quality of the statistical products but these processes are not systematically documented and published. Quality issues are in general handled solely within the units that are responsible for the statistical products; only the Ministry of Finance has a specific directorate that is also providing methodological guidance to other units of the

Ministry. Training activities for the staff at a systematic level are organised only by the Ministry of Finance, partly together with ELSTAT. Relations with users of the statistical products are not systematically maintained. So far, user satisfaction has not been surveyed by any of the Ministries or its supervised entities; the compilation and publication of a release calendar, metadata, and quality reports are not standard.

The Ministries and their supervised entities seem to have good working relations with ELSTAT. This is a good basis for facilitating the necessary improvements in the compliance with the quality requirements of the European Statistics Code of Practice.

Principle 5: Statistical Confidentiality

On the basis of the completed self-assessment questionnaires and the discussions with the representatives of the three Ministries, there would appear to be an awareness of the importance of, and the specific requirements imposed by, the Principle of statistical Confidentiality – although not to the same extent in all cases. The Ministries and their supervised entities have measures and procedures in place, not specifically for statistical purposes, for the protection of all data collected and processed under their general powers. These include, for instance, physical, technological and organisational measures to protect data security and integrity. In general, they produce and disseminate statistics based only on open or aggregated data and none of them at present permit access by third parties to confidential data for research or other purposes.

The Committee notes the general absence of specific instructions on the protection of statistical confidentiality in the production and dissemination of statistics and of a statistical confidentiality policy, to the extent Ministries collect data for statistical purposes. Moreover, the staff engaged in statistical production do not sign a Declaration on Statistical Confidentiality.

Principle 6 – Impartiality and Objectivity

Based on the information of the three Ministries producing national and European statistics, the Committee got an impression that their practices for the dissemination of statistics need to be developed in order to achieve better compliance with the European Statistics Code of Practice. The Committee would point in particular to the need to ensure that: errors discovered in published statistics are corrected at the earliest possible date and published; statistical release dates and times are pre-announced; advance notice is given on major revisions or changes in methodologies; and equal access to statistical releases at the same time is ensured for all users of statistics—including policy makers within the Ministry itself.

Appendix 1

Information on the members of the Good Practice Advisory Committee

- Gerry O' Hanlon, former Director General of the Irish Central Statistics Office, nominee of the European Statistical Governance Advisory Body (ESGAB), Chairman of GPAC
- Ioannis Chalikias, Professor at Athens University of Economics and Business, nominee of the Hellenic Parliament, Member of GPAC
- Dr. Peter Hackl, former Director General at the Austrian Statistics Office, nominee of Eurostat, Member of GPAC
- Heli Jeskanen-Sundstrom, former Director General of the Finnish Statistics Office, nominee of the European Statistical System Committee (ESSC), Member of GPAC
- Dr. Vasileios Zorkadis, Director of the Secretariat of the Hellenic Data Protection Authority, nominee of the Hellenic Data Protection Authority, Member of GPAC