

Good Practice Advisory Committee

Seventh Report

December 2020

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. Δ6A1001384EΞ2013, as amended) in January 2013, convening the Committee and appointing five members for the two-year period 2013-2014 inclusive. In accordance with its mandate, the original Committee produced two annual reports in September 2013¹ and December 2014² respectively over the course of its term of office, which terminated at the end of 2014. In line with the Law as then applying, the future of the Committee was reviewed by the Greek Authorities and it was decided that the Law should be amended to establish GPAC as a permanent advisory committee, with members appointed by the Minister to serve for two-year terms. The Law was duly amended in July 2015 and the Minister of Finance issued a Decision (Ref. No. 0002491EΞ2016) in March 2016 appointing new members for the period 2016-2017 inclusive. This Committee produced two annual reports in December 2016³ and December 2017⁴ respectively over the course of its

¹ http://www.statistics.gr/documents/20181/1195539/report_adv_2013_EN.pdf/ade26414-2d3d-4eb8-9752-731663065fdf

² http://www.statistics.gr/documents/20181/1195539/report_adv_2014_EN.pdf/198f48ca-2b5b-4a53-8a5c9c9f2165e810

³ http://www.statistics.gr/documents/20181/1195539/report_adv_3rd_EN.pdf/594fae41-5542-4bf3-bee9-6e878752586d

⁴ http://www.statistics.gr/documents/20181/1195539/GPAC_4th_Report_2017.pdf/63133c54-37f4-478b-baab-116ce53239e4

term of office, which terminated at the end of 2017. In March 2018, the Minister of Finance again issued a Decision (Ref. No. 2/20895/0004) appointing new members for the period 2018-2019 inclusive. This Committee produced two annual reports in December 2018⁵ and December 2019⁶ respectively over the course of its term of office, which terminated at the end of 2019. Once again, the Minister of Finance issued a Decision (Ref. No. 35165/2020) in April 2020 appointing new members for the period 2020-2021 inclusive. Details of the members appointed to the re-convened Committee are given in Appendix 1. Ms. Katerina Kalioti from ELSTAT was appointed Secretary to the Committee. Mr. Athanasios C. Thanopoulos, President of ELSTAT, participated in GPAC meetings in accordance with Article 4.5 of the Law.

Due to the Covid-19-crisis, all proceedings of the new Committee in its first year had to take place by means of videoconferencing or by written procedure. Its first meeting took place by videoconferencing on the 29th of June 2020 and Mr. Stephan Moens, Honorary Advisor General at Statistics Belgium and nominee of the ESSC, was re-elected as Chairman. Given the extraordinary circumstances, the Committee decided to reduce the size of the report and to focus on those issues related to the Covid-19 crisis. Subsequently, the Committee formulated a series of questions to be addressed in the report, whereupon ELSTAT provided answers in several documents. After a written exchange of views, the Committee produced a draft report, which was discussed and formally adopted in a videoconference on the 18th of December 2020.

Under these circumstances, the drafting of this Report was subject to some important restrictions, such as the absence of discussions with Greek stakeholders (users and producers). Such discussions on various issues enable GPAC to go deeper into the matter or simply cross-check the information provided. Now, GPAC had to rely mainly on information provided by ELSTAT, complemented with additional clarifications by Eurostat. However, GPAC wishes to underline the completeness, efficiency and rapidity of both ELSTAT and Eurostat to provide the information it requested and to react to additional questions. Without this generous cooperation, this Report could not have been finalised.

In short, the current report does not follow the structure of the 6th Annual Report but concentrates, in a lighter form, on a series of particular issues. If circumstances permit, GPAC plans to prepare a more comprehensive report in 2021.

⁵ https://www.statistics.gr/documents/20181/1196143/GPAC_5th_Report_2018.pdf/f54e6c2b-b907-4f93-a008-5c0044bd373b?t=1545221986749

⁶ https://www.statistics.gr/documents/20181/1196143/GPAC_6th_Report_2019_en.pdf/5fdb6fd6-9f90-434c-0e86-71fb41b1c07c?t=1576571570270

A. Issues related to the Covid-19 crisis and relevant to the implementation of the Code of Practice in the Hellenic Statistical System

In the first quarter of 2020, the Covid-19 crisis struck all over Europe. Its first wave affected Greece somewhat less than many other European countries; nevertheless, its economic and social consequences were considerable. While the summer seemed to bring some relief, the pandemic struck again in autumn, and more severely than before, also in Greece. The economic repercussions were now dramatic.

These events had a big impact on the functioning of statistical institutes and, to a lesser extent, on official statistics as such. This was also the case for ELSTAT and the Hellenic Statistical System. This report does not have the ambition of measuring and assessing this impact in its entirety. But it is within the competence of GPAC to look into the effects that such events could have had on the performance of the Hellenic Statistical System in complying with principles 1 to 6 of the ESCoP and into possible issues that could arise.

Principle 1: Issues concerning professional independence.

The Covid-19 crisis seems not to have caused major problems concerning the professional independence of ELSTAT. ELSTAT confirms that there has not been any issue as regards political pressure on ELSTAT pertaining to the production of health data or any other data during the pandemic. In this context, it should be noted that data related to the Covid-19 pandemic such as number of cases, hospitalised, deaths along with data referring to the capacity and the occupancy of the hospitals were published on a daily basis by the National Public Health Organization (NPHO). On the question about political interference, the NPHO (just as all other ONAs) replied negatively. ELSTAT itself published each month data on the total number of deaths occurred on a weekly basis in the Greek territory due to various causes, i.e. the aggregate value of all causes including those deaths attributed to Covid-19. Furthermore, some new high frequency statistical products were compiled by ELSTAT on the basis of administrative data (see Principle 2).

In all its publications, ELSTAT incorporated information on the collection and processing of data (including seasonal adjustment) during the Covid-19 pandemic period. Moreover, in order to avoid misunderstanding and misinterpretations by users, explanations were provided when needed, such as, metadata on employment/unemployment based on the applied ESS definitions and special clarifications provided by Eurostat.

While these actions seem to have prevented direct political pressure on the publication of such sensitive data, there was some indirect criticism from the side of policy makers and the press on data on employment/unemployment and on the revision of national accounts.

However, this criticism was only indirectly related to the Covid-19 crisis and is therefore treated in the second part of this Report.

GPAC evidently **welcomes** the absence of interference, political or otherwise, in a period where statistical figures can be particularly sensitive. The Committee also **welcomes** the efforts of ELSTAT to prevent such interference by providing adequate information on the nature, scope and limitations of these data. It would **encourage** ELSTAT to continue and even strengthen its communication efforts.

Principle 1bis: Influence of the Covid-19 crisis on coordination

The Covid-19 crisis has once more highlighted the need for coordination within a given statistical system. In its 6th Report, GPAC mentioned steady progress in this principle. The question is if the crisis has impacted this progress. This concerns, specifically, the aspects related to the completion of the first stage of the certification process, namely: formal appointment of Statistical Heads; the production of Quality and Statistical Confidentiality policies; and the publication of annual work programmes and release calendars on agency websites. In a different chapter of this report we will address more general issues related to this principle; here we concentrate on those that are influenced by the outbreak of Covid-19. Regular contact and interaction of ELSTAT with the ELSS agencies continued during the pandemic outbreak. Eleven ELSS Agencies provided information on this topic: Ministry of Finance, Ministry of Interior, Ministry of Foreign Affairs, Ministry of Rural Development and Food, Ministry of Labour and Social Affairs, Ministry of Education and Religious Affairs, Ministry of Health, National Documentation Centre (EKT), the Hellenic Civil Aviation Authority (HCAA) and the Hellenic Telecommunications and Post Commission (EETT).

In the responses received, no issue concerning political pressure/professional independence was mentioned. Furthermore, most of the ELSS Agencies confirmed that the Covid-19 crisis had not seriously impacted on their statistical production. However, the Ministry of Health, the Ministry of Labour and Social Affairs, the Ministry of Justice and the Ministry of Rural Development and Food reported that the sanitary crisis had had some influence on their statistical production and/or certification process, basically in what concerns delays in data production or in the steps for the certification procedure. The Ministry of Health reported that, so far, data collection was not affected by the Covid-19 crisis. However, there is a delay in the implementation of statistical actions linked to the strategic objectives of the Agency for the period 2020-2022. There are also delays in the implementation of the basic steps that need to be taken for the certification of the Agency's statistics as official. These delays are mainly due to the increased workload of the Ministry due to the crisis.

Similarly, the Ministry of Labour and Social Affairs reported delays in collecting the data for the 'Monthly Statistical Bulletin on Employment of Single Social Security Entity (EFKA)' due to the extension of the deadlines for the payment of social security contributions, as well as in

processing the data for the production of Labour Market Policy (LMP) statistics. Moreover, delays occurred in the implementation of the basic certification steps, because of the increase in the workload of the employees of the Research and Documentation of Employment Policy Section, due to the management of issues related to the implementation of emergency measures to limit the impact of the sanitary crisis.

The Ministry of Justice reported a delay in the flow of data of civil and criminal justice cases and for indebted households, during the period of temporary suspension of the operation of the courts and prosecutors.

The Ministry of Rural Development and Food reported delays in the implementation of the basic certification steps, due to tele-working of the staff.

During the pandemic, new data needs appeared. They gave rise to some interesting developments within the ELSS.

The National Public Health Organization (NPHO) systematically collects epidemiological data on Covid-19 since March 2020. Results of epidemiological surveillance are presented on its website in the form of daily reports. These results concern the total number of cases, new cases, the number of intubated and the number of deaths. They are presented in total, and by gender and age group. The Ministry intends to consider the addition of Covid-19 statistical data to the 'List of statistics of ELSS agencies.

The National Documentation Centre (EKT) has produced new statistics on the effects of the pandemic. From 15.4.2020 to 5.5.2020, EKT conducted a survey on the daily life of young Greek researchers under the pandemic. The results were published in a special edition.

Moreover, EKT has added questions concerning the impact of the Covid-19 pandemic on R&D activities of enterprises to the questionnaire of the survey on Research & Development in order to capture the use of digital media, tools and practices to address the pandemic. The survey is ongoing, and the results are expected to be published in early 2021. The production of these new statistics is not currently covered by legislation; however, technical video-meetings with Eurostat and OECD showed a strong demand for such data.

In the context of supervising distance learning, the Ministry of Education and Religious Affairs has issued a request for relevant data from the providers of the network for distance learning. This is still pending.

Principle 1bis: Introduction of Covid-19 related data in the reporting for SDGs

In its 6th report, GPAC devoted a substantial part to the coordinating role of ELSTAT in the compilation of SDGs. While ELSTAT does not have a designated formal role in relation to the SDGs - the formal coordination been assured by the Presidency of the Hellenic Government -

it nevertheless participates actively in the Inter-ministerial Coordination Network for the SDGs and has taken the lead in developing, and ensuring the quality of, the national indicators for Greece that are developed across the system. Moreover, many of the indicators are produced by ELSTAT and other agencies that are part of the ELSS. This is positive as it means that the production of the indicators can be subject to the requirements of the certification process discussed above. Where indicators are produced by Ministries and agencies outside the ELSS, ELSTAT has been encouraging them to join the system. In its 6th report, GPAC welcomed this initiative as it will mean that, once certified under the ELSS procedures, the SDG indicators will automatically comply with the Fundamental Principles of Official Statistics, which is a requirement set down by the UN for SDG reporting.

The report also highlighted that ELSTAT had put in place an effective National Reporting Platform for the SDG indicators on its website, which includes direct access to the data, visualisation tools and the ability to make comparisons with other countries. Overall, GPAC welcomed ELSTAT's active engagement with the SDGs.

Taking all this into account, it is clear that issues such as the impact of the pandemic on the quality of SDG indicators provided by other agencies to ELSTAT; and the need of introducing new Covid-19 related data in the SDG dataset are relevant.

During the last meeting of the Inter-agency and Expert Group on SDG Indicators (IAEG-SDGs working group), it was discussed that many NSOs have had disruptions and delays in the collection of data used to support the SDGs. In ELSTAT there seem to have been no serious problems in the process of producing the indicators. In particular no delays occurred in the communication of the Authority with the custodian agencies regarding the provision of data or the examination of their methodology.

During the same period, the investigation for the data referring to the specific national indicators was completed (as regards the data which are produced by ELSTAT), while the other bodies of the Hellenic Statistical System took responsibility for their indicators. The national reporting platform, created by ELSTAT, is continuously updated. A new electronic publication presenting to the general public the evolution of national indicators is planned to be published by the end of the year.

Concerning new variables, a phenomenon that will need to be covered is the impact of the pandemic on vulnerable persons such as women, poor and marginalised groups. The list of national indicators already includes such breakdowns and therefore does not need to be revised.

GPAC therefore **concludes** that Covid-19 did not give rise to major issues in ELSTAT's role in supporting the Presidency of the Hellenic Government as coordinator of SDG indicators and **encourages** the Authority to continue ensuring smooth compilation, quality assessment and publication of the datasets and, as already mentioned in the 6th Report, **recommends** that the appropriate procedures should be put in place to strengthen and make sustainable the system already put in place.

Principle 2: Progress concerning access to administrative and other data in the light of the difficulties with surveys

The importance of access to and use of administrative data for the production of European statistics is paramount, as it can reduce the response burden on citizens and enterprises and improve data quality. This access became even more important during the Covid-19 pandemic, since the containment measures taken by governments made direct data collection more difficult.

Regular data transmission from administrative sources to ELSTAT was maintained without significant problems, so that the regular production of official statistics was not disrupted and their quality could be maintained. In addition, further progress was made in several cases on access to administrative data. Earlier monthly provision of tax data facilitates more detailed processing of administrative data and cross-checking with collected data from surveys, thus ensuring the overall quality of business statistics in terms of accuracy and coverage. In addition, ELSTAT used these tax data and other administrative data to produce new and high-frequency ad hoc statistics to be published on its Covid-19 webpage:

- Evolution of the Turnover of Enterprises in Accommodation and Food Service Activities Section (monthly)
- Evolution of the Turnover of Enterprises under Suspension of Operation due to the COVID-19 pandemic (monthly)
- Evolution of Turnover of Enterprises in Retail Trade (monthly)
- Data on Weekly Deaths (monthly)
- Estimation of the Expectations of Greek Export Enterprises

These statistics are accompanied by short methodological notes integrated in the relevant press releases.

While **GPAC supports** the provision of ad hoc releases based on experimental statistics to adequately reflect socio-economic developments during the Covid-19 crisis, it **underlines** the importance of clearly communicating their quality to users.

ELSTAT also succeeded in obtaining earlier data on deaths from the Civil Register Offices, which made it possible to compile ad hoc statistics on total weekly deaths. Data on weekly deaths are transmitted to Eurostat and published accordingly at national level.

Progress was also made in the provision of data on registered unemployment, data from Overnight Stay Tax Database and annual data from the financial statements of enterprises. However, demographic data of enterprises have not yet been obtained, as the appropriate infrastructure is under development.

GPAC takes note that ELSTAT is increasingly successful in negotiating with governmental authorities to obtain administrative data for the production of official statistics. **GPAC agrees** that negotiations with the competent authorities, followed by the definition of all technical procedures for the transmission of administrative data and the adaptation of the IT system may take a long time, in some cases even several years. **GPAC** therefore **encourages** ELSTAT to continue its efforts to obtain more administrative sources as well as to extend the content of the data provided or to receive them earlier.

In addition, **GPAC recommends** that ELSTAT not only cooperate with the administrative authorities in obtaining their data, but also, as it is provided for in Article 11, paragraph 7 of the Hellenic Statistical Law 3832/2010 as in force, be involved in the design of new administrative data sets or to influence the content of existing administrative registers. The inclusion of relevant data could in some cases permit to put an end to part or the entirety of a survey.

The digital transformation generates ever larger amounts of data, which provides an opportunity to create new statistics, to complement those existing, and to increase their granularity or quality.

In this field, ELSTAT intensified its efforts to explore the use of web-scraped data and scanner data for statistical production, in particular for price statistics. Web-scraping techniques are being tested for collecting prices of furniture and appliances. ELSTAT stresses that there are still technical and legal aspects that should be addressed, as web scraping is not always allowed without the consent of the website owner.

GPAC recommends that ELSTAT continue to test different techniques for collecting data from various new sources and to develop methods to integrate them into the production process. ELSTAT could also participate in the exchange of experiences acquired in other Member States and contribute to the discussion within the ESS, with the aim to influence the establishment of clear and fair rules for access and re-use of data which is taking place at EU level.

Principle 2: Use of administrative or other data in the Census

In April 2020, ELSTAT managed to obtain from the Electronic Governance for Social Security a datafile containing individual data, such as name, family name, father's and mother's name, sex, date of birth, country of birth, citizenship, postal address of the persons residing in Greece who have been assigned a social security number. ELSTAT is exploring the possibility of using these data for the pre-census works of the Population and Housing Census. ELSTAT is also

examining the possibility of obtaining other specific datasets that could facilitate the census and perform at an early stage quality controls on the information collected.

GPAC supports ELSTAT in gaining access to as much administrative data as possible that could be used for the compilation of the 2021 population and housing census.

GPAC welcomes that ELSTAT is currently working closely with the Ministry of Digital Governance, which has an interoperability plan with various administrative databases. This involvement is in line with indicator 2.2 of the ESCoP. If the interoperability allows the linking of data from different registers, this will represent a great opportunity for ELSTAT to use these data not only for censuses but also for other statistics. **GPAC emphasises** that this process requires the development of different methods that need to be tested to ensure the quality of the data produced. It therefore seems that even if such a wide use of different administrative databases would not be possible for the 2021 census, it could be implemented in the production of population statistics from 2024 onwards, provided for by the draft regulation under discussion on European Statistics on Census and Population (ESOP).

Principle 2: Other influence of the Covid-19 crisis on the Census (change of date and collection mode)

In order to respect all necessary measures to protect public health, the Agricultural Census, which was scheduled to be conducted from October to December 2020, was postponed to the spring of 2021. The new data collection plan is mainly based on electronic self-enumeration of the holders of agricultural holdings. In cases where this is not possible, data collection will be carried out either by telephone interviews, or face-to-face interviews that will be held on the premises of municipal/community authorities or rural cooperatives. All face-to-face interviews will be carried out in accordance with public health protection measures.

Similarly, the collection mode has been adjusted for the Population and Housing Census. The census will be based on self-enumeration of the households via a web application. In parallel, those who will not be self-enumerated will be enumerated via personal interviews, after having arranged an appointment with the interviewer, at the premises of municipal or community offices or even in their own homes, subject to the security measures in force. According to the new plan, the Population and Housing Census will be carried out in October 2021 instead of May 2021, in order to have sufficient time to adapt to the new method and to avoid overlapping of workload with the Agricultural Census.

GPAC supports the efforts of ELSTAT to redesign the censuses and to try to carry out the population and housing census in 2021. The Committee **urges** the Greek Government to guarantee the necessary resources for the timely and effective taking of the Agricultural and the Population-Housing Censuses.

Principle 3: Influence of the Covid-19 crisis on the budget and the allocation of resources in ELSTAT and the ELSS

As stated above under Principle 2, both the Population and Agricultural Censuses were replanned to new dates and new data collection modes, due to the Covid-19 pandemic.

On the one hand, these changes resulted in a move of some expenditures from 2020 to 2021. ELSTAT had already requested and received 50% of the approved financing from the Ministry of Finance and will receive the remaining part to be used in 2021, following the approval of the Minister of Finance. For the year 2020, this means a net surplus in cash.

Another effect of the Covid-19 pandemic on ELSTAT's budget of 2020 is the replacement of face-to-face meetings of Eurostat with written consultation and teleconferences. This again increased ELSTAT's cash. Moreover, some planned actions have been postponed or cancelled, such as the attendance of ELSTAT's staff in seminars hosted by Eurostat or other Statistical Offices and the cancellation of the 85th Thessaloniki International Fair, in which ELSTAT successfully participates every year. This resulted in saving the corresponding budgeted funds.

On the other hand, the new plans partially increased the cost of the Censuses. Therefore, during the submission of the 2021 State Budget, ELSTAT requested a fund increase. In addition, additional expenditures have been projected, due to the recent approval to recruit new staff, because of the new organisational structure. If however, as planned and approved, the budget of both years will be disbursed, it should suffice to cover the costs.

GPAC would encourage all those responsible for providing the necessary financial resources to continue showing the sense of urgency and the needed flexibility to ensure that adequate resources are available to the Hellenic Statistical System and more in particular for the Censuses, in accordance with the Commitment on Confidence in Statistics adopted in 2012.

Principle 4: Quality issues emerging from new forms of data collection during and after the Covid-19 crisis (Shift from personal to remote interviews).

As in most other countries, national lockdown measures were announced by the Greek Government with the objective to stop the propagation of Covid-19. These measures implied the need to substantially change the work of the statistical office and, in particular, the form of data collection from reporting units, be it individuals, enterprises or holdings. One important aspect of this change was the shift from personal to remote interviews (mainly by email or telephone). Another one is the complementary use of administrative sources in order to fill data gaps or enhance the quality of the statistics produced.

ELSTAT took measures to ensure the quality of the produced statistics. Specific instructions and guidelines, as well as the necessary auxiliary material for each statistical survey were compiled and provided to the regional staff of ELSTAT and to the interviewers. Moreover,

special attention was paid to checking the collected information by means of additional or/and specific validation and quality controls.

In some cases, additional information derived from administrative sources could be used. Examples are:

- Tax data (VAT and Overnight Stay Tax data)
- Data from the Health Certificate Database in the context of the accommodation establishment survey
- VAT data for Short Term Statistics

In the Labour Force Survey, an additional questionnaire was introduced in order to collect supplementary and more accurate information for employment/unemployment, as well as for the compilation of COVIDE and COVIDA. These are two specific variables introduced in the survey to deal with Covid-19 implications on the employment status of individuals, and also to enable quality checks.

Concerning business statistics many enterprises were, at least partially, in teleworking status and could therefore easily adjust to remote and electronic modes of communication with ELSTAT. This was especially the case for Short Term Statistics, as these collections have the highest frequency.

In general, web questionnaires were already used in several surveys before the pandemic. However, the crisis accelerated their use and made it more extensive. Based on the structure and the content of such questionnaires, cases of misreporting will not easily occur, as enterprises are already adjusted to teleworking conditions and have available all the information needed for the completion of the questionnaire. The accuracy of the collected data was cross-checked with data available from other sources, mainly administrative tax data. No substantial divergencies between collected and administrative data were observed during the pandemic period.

GPAC concludes that no major quality issues emerged from shifting from personal to remote interviews in the different statistical domains. **GPAC points out the opportunity** given by the Covid-19 crisis to make a strong and sustainable move towards electronic data collection while simultaneously improving checking algorithms, and to rely on merging a multiplicity of data sources. Reflection is needed on possible new quality checking methods to ensure that these new types of data collection remain reliable. International exchanges may prove useful in this context.

Principle 5: Privacy issues due to the demand for sensitive data in the context of Covid-19

ELSTAT is not currently involved in the processing of health or other sensitive data in the context of Covid-19. This task is performed by the Ministry of Health and the General Secretariat of Civil Protection.

As to Covid-19 related health data of ELSTAT's personnel, ELSTAT has specified internal procedures for handling suspicious or confirmed Covid-19 cases. These procedures have been communicated to the personnel through an internal circular. In all cases personnel's data is processed under the basis of legal obligation and public health protection (Article 9 of GDPR), complying with the rules and protocols issued by the competent authorities, as well as with the data protection principles foreseen in the legislation. It should be stressed that ELSTAT collects the bare minimum data required (not including Covid-19 related health data) for issuing leaves of absence, if required.

Moreover, according to its reports, ELSTAT rejected plans on the operation of thermal cameras or other body temperature measuring devices, at its premises, due to personal data protection considerations.

GPAC would recommend to ELSTAT, in case of future involvement in the production of Covid-19 related statistics, to consult the relevant guidelines issued by the National Data Protection Authority and the European Data Protection Board⁷.

Principle 6: Issues regarding timeliness of data

In the light of the new conditions that prevailed due to the Covid-19 crisis, ELSTAT undertook specific measures in order to ensure the health of its staff, while at the same time initiating new actions regarding the conduct and elaboration of its statistical surveys. Despite the difficulties originating from new working conditions and remote data collection in most of the surveys, no major timeliness issues were observed.

Slight timeliness problems in the field of business statistics and some social statistics were not directly linked to the Covid-19 pandemic. On the contrary, in the case of the new statistics on weekly deaths, great efforts were made to set up a system for their production and improve their timeliness as well.

The only notable impact on timeliness was observed in tourism statistics. The lockdown of tourist accommodation establishments during March, April and May 2020 did not allow the supplementary collection of data on arrivals and nights spent from mainly seasonal establishments, in order to address non-response to the monthly data collection of the previous year. For the compilation of the final data for the year 2019, additional data from administrative sources were used in combination with statistical methods for addressing non-

⁷ E.g. https://edpb.europa.eu/our-work-tools/our-documents/ohjeet/guidelines-032020-processing-data-concerning-health-purpose_en

response. As a result, the relevant data on the capacity and occupancy of tourist accommodation establishment were submitted with a delay, i.e. after the deadline of 30 June. Moreover, a small delay occurred in the transmission of data for the reference year 2019 on national tourism and its qualitative characteristics due the fact that additional quality controls and analysis of the data were required in order to maintain the quality of the produced statistics.

As a whole, timeliness was not severely impacted by the Covid-19 crisis and efforts were undertaken to address any arising issues.

Principle 6: ELSTAT communication on the Covid-19 crisis

From the beginning of the Covid-19 crisis in March, ELSTAT has pursued a very active and comprehensive communication strategy, the elements of which can be seen on a timeline provided on its website⁸. These elements are, among others: administrative announcements on the suspension of face-to-face interviews and of access to the headquarters and regional offices, referrals to online services, a series of infographics on Covid-19-related subjects on ELSTAT's social media accounts. In addition, a dedicated webpage gives immediate and easy access to scheduled and published new statistics compiled by ELSTAT during the period of the pandemic, as well as useful information about changes in the operation of ELSTAT and the conduct of its surveys. Furthermore, ELSTAT developed a series of new statistical products, as mentioned above under Principle 2.

Of special interest are efforts in the field of fostering statistical literacy. In the framework of its strategy in this field, ELSTAT created an online educational platform⁹ for students and their teachers with quizzes, statistical exercises and educational material, providing very useful material, notably in times when schools were closed.

GPAC welcomes the proactive attitude taken by ELSTAT in providing valuable information and statistical material to the public at large. Some elements could be exemplary for other NSIs. As the Committee already pointed out in its 6th Report, **GPAC encourages** ELSTAT to intensify such actions.

Cross-cutting issues: European dimension during the Covid-19 crisis

The Covid-19 crisis struck simultaneously, albeit with different intensity, all EU Member States. As a result, there are many points in common in the response that society expects from national administrations in general and in particular from statistical organisations. These range from parallel needs of new datasets, demand for comparable data across countries,

⁸ <https://www.statistics.gr/en/covid-19>

⁹ <https://www.statistics.gr/en/edu-games>

similar challenges in what concerns important changes in the collection of basic information, and the derived quality challenges that all these entails. Therefore, it is reasonable to enquire as to whether useful coordinated actions driven by EU Institutions have taken place.

ELSTAT reports that it is highly satisfied about the way EU institutions, specifically Eurostat have reacted, both in time and essence. The specific section on the Eurostat web site¹⁰ includes at 3rd December 2020 nearly 30 guidelines, more than a third of which were issued during the lockdown period of March-May. Additional relevant guidelines compiled by other international bodies, such as IMF and OECD, were made available through Eurostat to the ESS.

In addition, EU-survey questionnaires, several virtual meetings of working groups, workshops and dedicated fora were organised where issues of common interest were discussed aiming at the exchange of experience and practices among experts from different Member States as regards the new situation emerging from Covid-19.

The following most important methodological issues were addressed and corresponding guidance provided:

- **National Accounts:** allocation of transactions for 2020 Q1 & 2020 Q2 in Accounts of General Government; new ad-hoc adjustments for 'deferral payments' for taxes and social contributions; 'metadata' of Eurostat for Government Finance Statistics GFS 2020 Q2.
- **Business Statistics:** lower response; shortage of data from enterprises under suspension of operation; seasonal adjustment of Short-Term Statistics; replacement of missing data in price and other indices; adequacy of primary data for the compilation of International Goods in Trade Statistics.
- **Agricultural Statistics:** issues pertaining to the implementation of the Agricultural Census (method and timetable)
- **Population and Social Statistics:** specific methodological issues regarding the new planning of the Population and Housing Censuses; introduction of innovative tools in Household Budget Survey and Time Use Survey; coding of Covid-19 in Accidents at Work and Occupational Diseases statistics; treatment of unemployed, labour costs, etc.

It is worth noting that optional questions have been integrated into the new SILC questionnaire in order to capture the impact of the pandemic on population's living conditions (tele-working, tele-education, changes in income etc.). According to an informal agreement these variables are expected to be transmitted to Eurostat by 15 December 2020.

ELSTAT considers that support from Eurostat was sufficient and useful as regards completeness and timeliness. **GPAC underlines** that these common approaches enhance the quality of the results and particularly their comparability across countries. **GPAC** also

¹⁰ <https://ec.europa.eu/eurostat/data/metadata/covid-19-support-for-statisticians>

welcomes that ELSTAT took active part in EU level exchanges on common interest issues in the context of the pandemic, and **recommends** that resulting methodological notes and guidance be followed in all cases when it is relevant for the quality of statistics.

B. General issues and progress in the implementation of the ESCoP in the ELSS

Cross-cutting issues: Progress in the functioning and organisation of ELSTAT (Principles 3,4)

In its 6th Report, GPAC indicated that it was confident that the resources offered to the statistical authorities, in terms of sanctioned posts, were sufficient to satisfy the national and European statistics' requirements. GPAC also stressed the importance of ensuring that prioritised vacancies were filled, in a timely manner, with competent and qualified staff and that important delays in recruitment could be avoided.

The report also highlighted that, since finding professionals with the adequate skills might be difficult, especially in some domains where expertise evolves very quickly, as is the case of IT functions. GPAC suggested that in this, and perhaps other cases, outsourcing might prove to be a possibility to ensure the availability of staff with the capacity to quickly adapt to constantly changing technology. Therefore, the Committee recommended that ELSTAT explore, and if suitable put in place, procedures to flexibly shift from direct recruitment to specific contracts of specialist teams in appropriate situations.

According to ELSTAT, on 11 November 2020, the number of staff holding an organic post in the Statistical Authority, excluding staff on secondment, amounted to 687 employees.

Procedures to recruit new staff are in place and the following recent developments are relevant in this regard:

Date/Period	Action
16/7/2020	Approval by the Ministry of Interior for filling, at a first stage, 6 out of the 10 organic posts of specialised scientific personnel, by virtue of Article 20 of the Greek Statistical Law. The publication of the relevant call is pending.
August 2020	Preparation and submission by ELSTAT of a request for the hiring of 281 permanent employees.
30/9/2020	Approval by the Council of Ministers of the hiring by ELSTAT, in 2021, of 127 out of the above 281 permanent employees.
2/11/2020	Request by ELSTAT for filling another 66 organic posts by transfers, through the Unified Mobility System in Public Administration.

It should be noted that the recruitment of 9 more employees in ELSTAT is imminent, following approval decisions of the Ministry of Interior. For 5 out of the above 9 employees the decision

on their appointment to ELSTAT is expected to be forwarded for signature upon the issuing by the Ministry of Interior of the allocation decision of the appointees to the various Public Services. The process for the appointment of the remaining 4 employees is expected to start once the relevant lists of appointees is issued.

Regarding the hiring of 115 fixed-term staff for the needs of the 2020 Agricultural-Livestock Census, the relevant call for applications has been prepared, following the approval by the Supreme Council for Civil Personnel Selection (ASEP), and is to be published. Similarly, the preparation and publication of the corresponding call for applications for the hiring of 301 fixed-term staff for the needs of the 2021 Buildings and Population-Housing Censuses will follow.

Despite the short time left until the launching of Agricultural-Livestock Census, ELSTAT is confident that the recruitment procedure, already started with a wide press publication, and fixing the deadline of 15/12 for applications should allow that 115 fixed-term new staff assume its duties in due time for the Census operation scheduled for mid-January 2021.

GPAC urges ELSTAT to be attentive that no further problems hamper the satisfactory initiation of the Census operation with full and well-trained human resources.

Compilation status of the Regulation on the Operation and Administration of ELSTAT

GPAC notes that the amendment of the current Regulation on the Operation and Administration of ELSTAT¹¹ in order to reflect the developments that have taken place since 2012 pertaining to, inter alia, the financial management and the new Organisation of ELSTAT is pending. The above amendment mainly concerns the following:

- i. Incorporation of the quality management system of ELSTAT in Chapter 1
- ii. Updating of Chapter 8 on the Financial Management of ELSTAT

Regarding the quality management system, the Quality and Certification Section of ELSTAT is elaborating a proposal on a more flexible and proactive quality management system.

Moreover, the Financial Services Division of ELSTAT is preparing the updated text to be included in Chapter 8.

Point i was already a matter of concern for GPAC. In its 6th Report, the Committee stressed that the limited details provided about ELSTAT plans did not allow to fully assess to what extent the quality management system envisaged by the Authority was in conformance with the standards established in the ESCoP. While it is acknowledged that during the transitional period of the implementation of the new organisation of ELSTAT, time is needed for designing and making operative the new quality management system, **GPAC recommends** that further

¹¹ <https://www.statistics.gr/en/legal-framework>

progress be made available as early as possible. GPAC will continue including this point as a pending issue for its 8th Report.

Cross-cutting issues: Issues concerning the perception of employment/unemployment figures (Principles 1, 4, 6)

The monthly results of the Greek Labour Force Survey (LFS) announced in the beginning of June 2020 showed a significant decrease in the unemployment rate for the reference month March 2020, i.e. the month in the second half of which lockdown measures were implemented in Greece. These results were the subject of considerable debate in Parliament, on social networking platforms and in some media outlets.

Incredulity towards the unemployment figure was motivated mainly through the surge in the number of ‘economically inactive’ persons reported from one period to the other. In spite of the explicit definition of this technical term in the EU Regulation and routine reporting in the LFS monthly releases, it was considered by the aforementioned media outlets to be opportunistically coined ‘by the Government’ in order to disguise the ‘actual’ size of unemployment. Consequently, unemployment would allegedly be the subject of serious underreporting (by the Government) in order to ‘blur the picture of grim reality’.

ELSTAT anticipated the reaction that would be triggered by the ‘counterintuitive’ nature of the results and took a considerable time to communicate on the front page of its press release and to signal the differences between the March 2020 estimation of unemployment and the previous rounds. ELSTAT highlighted the special circumstances under which data collection took place during the second half of the reference period (March 2020). ELSTAT equally pointed out that methodological checks of compatibility of alternative data collection methods were underway, as a result of which, revisions could follow.

It is indeed to be noted that employment and unemployment as defined by the International Labour Organisation (ILO) concept are, in the Covid-19 context, not entirely sufficient to describe all the developments taking place in the labour market. In the first phase of the crisis, active measures to contain employment losses led to temporary absences from work rather than dismissals. In addition, individuals could not search or were not available for work due to the containment measures, thus not counting as unemployed, but as economically inactive according to the ILO concept. To address this issue, Eurostat has started publishing a set of additional labour market indicators, such as underemployed part-time workers, persons seeking work but not immediately available and persons available to work but not seeking, hours worked, etc. **GPAC recommends** that ELSTAT consider if such additional indicators could be relevant in the Greek context as well.

The aforesaid criticism did not explicitly target ELSTAT but rather the Minister of Labour, who had, in a public statement, credited the observed drop in the LFS unemployment rate to the

‘successful and efficient unemployment-fighting policies implemented by the Government’. **GPAC** also **points out** that, insofar that such interpretations could suggest collusion between ELSTAT and the Government, they could damage the reputation of ELSTAT as an independent authority in the sense of Principle 1 of the ESCoP.

Without entering into a more detailed methodological discussion on the figures as such (which passed the regular validation and plausibility checks of Eurostat), **GPAC regrets** any misuse of statistical information for whatever reason, political or other, and **wishes to remind** that, according to Indicator 1.7 of the ESCoP, ELSTAT has the right to “comment publicly on statistical issues, including criticisms and misuses of statistics as far as considered suitable”.

Cross-cutting issues: Issues concerning the perception of the Benchmark Revision of National Accounts (Principles 1, 4, 6)

In October 2020, ELSTAT announced the revised National Accounts data from the year 2010 on, according to the provisions of the European System of National and Regional Accounts ESA 2010 (Regulation (EU) No 549/2013 of the European Parliament and of the Council - ESA 2010). This type of revisions is a regular work carried out every five years in all EU Member States and may incorporate methodological changes and improvements, including new data sources.

The present revision pertained to the incorporation of new and updated data from sources (e.g. administrative data) as well as methodological improvements according to ESA 2010. In practice, the revision resulted in a lower GDP level and subsequently higher value of the debt/GDP ratio.

ELSTAT and Eurostat have published the revised data on their respective websites. In the case of Eurostat, this took place after carrying out the regular validation and plausibility checks applied to data from all Member States.

The publication of these new figures attracted the interest of the institutional users and stakeholders (Government, Central Bank, political parties, etc.) and thus gave rise to discussions in the press and on political forums. These discussions did not necessarily entail criticism of ELSTAT, but some comments of policy makers could, in some instances, give rise to misunderstanding. In particular, some comments were ambiguous and inconsistent with the detailed methodological information provided by ELSTAT.

Since the benchmark revision was carried out following international standards, it should be a priority for all institutional users and stakeholders not to question its results but rather to promote the impartiality and independence upon which the official statistics and in particular the main macro-economic indicators are compiled in Greece. In the case of the Government, this is explicitly provided for in the “Commitment on Confidence in Statistics” (signed by the Prime Minister in 2012 on behalf of the Hellenic Government and being in force since then).

This instance highlights once more the necessity of a precise and proactive communication on such sensitive matters. GPAC was informed that ELSTAT undertook extensive actions in order to inform stakeholders on the nature and possible effects of the revision. These actions included, among others, the provision of very detailed information about the nature of the revision in the relevant Press Release issued by ELSTAT as well as in bilateral meetings of ELSTAT with main stakeholders prior to the revision. Unfortunately, this kind of actions could not entirely prevent misunderstandings and even misuses of the official statistics.

GPAC, therefore, **recommends** that ELSTAT continue its communication efforts, as well as its strategy in fostering statistical literacy with policy makers and journalists. Here again, in such cases it can be considered whether, additionally, a public comment on these matters, as advocated under Indicator 1.7 of the ESCoP, is suitable.

GPAC also **recommends** that the Greek Government constantly uphold the principles of the “Commitment on Confidence in Statistics” in its public discussions regarding official statistics (Greek Law N. 4051/2012).

Principle 1: General remarks

GPAC is satisfied that ELSTAT continues to comply to the fullest extent with Principle 1 of the ESCoP. In addition, it is clear that ELSTAT has now largely established itself in the public mind as an independent statistical agency that is free, in particular, from any direct political or inappropriate governmental influence on its professional work. This favourable situation is due in large part to the strength of the statistical legislation underpinning the Authority and also to the firm commitment of senior management, as demonstrated by the appropriate procedures that have been put in place to ensure compliance in line with international recommendations and standards. However, some recent incidents such as the ones cited above concerning employment/unemployment figures and the revision of national accounts, where unsubstantiated allegations concerning ‘Greek statistics’ were suggested, prove that vigilance remains required.

Consequently, **GPAC recommends** that ELSTAT remain vigilant towards misuse and misinterpretation of its statistics and takes appropriate measures to counter such actions.

Principle 1: Changes to the legislation in practice

GPAC takes note that no progress was made as regards the implementation of measures to ensure the payment of bonuses to newly hired employees at ELSTAT, as provided by law. This results in ELSTAT losing competent staff through transfers c.q. secondments to other Services, where such exceptions to the uniform wage grid policy were granted. **GPAC urges** the

authorities in charge to implement these measures swiftly, so as to ensure the proper functioning of ELSTAT in the future.

Principle 1bis: Progress in the adjustment of the certification process to the restructuring of Ministries and in guidelines concerning the appointment of Statistical Heads

In its 6th Report, GPAC noted that the Law No 3832 of 9 March 2010 on the Hellenic Statistical System (ELSS) and the Establishment of the Hellenic Statistical Authority (ELSTAT) as an independent authority, as amended, already provides a very strong basis for ELSTAT to coordinate the work of Other National Authorities within the ELSS. In particular, Article 11, paragraph 6, of the Law stipulates that ELSTAT has the responsibility for certifying as “official statistics” statistics produced by the other designated agencies of the ELSS. This has led to a multi-stage certification process that has been underway since 2015.

According to information provided by ELSTAT for that 6th Report, certifying work was pursued with 17 Ministries and 4 other national authorities addressing both their statistical procedures and outputs, a process that is very comprehensive and intensive and is, therefore, both onerous and time consuming on both the Agencies and ELSTAT. Nevertheless, steady progress continued to be observed, particularly in relation to the completion of the first stage relating to the institutional environment. This stage includes: formal appointment of Statistical Heads; the production of Quality and Statistical Confidentiality policies; and the publication of annual work programmes and release calendars on agency websites. The report noted that the change of Government in Greece in mid-2019 had given rise to some difficulties. First, the composition and structure of a number of Ministries and public authorities had been changed with consequential changes to the organisation of the statistical functions. In addition, the restructuring of some Ministries that took place after the change of government meant that a number of senior officials, who were nominated as Statistical Heads, were no longer in position. ELSTAT had therefore to adjust the certification process to take account of these changes. GPAC noted that not all the certification work that had already been undertaken had to be repeated from scratch but a pragmatic and efficient response should be followed. In particular, the 6th Report encouraged ELSTAT to draw up guidelines, in accordance with the ESCoP, governing the performance of the role and functions of the holders for presentation to Government so that new appointments could be made quickly in a manner that does not compromise the professional independence of the new appointees.

The coordinating role of ELSTAT within the Hellenic Statistical System is formalized in a set of documents that can be found in the corresponding section “Certification of Statistics” of the Statistical Authority web site¹². Apart from references to the relevant legal texts, this section includes two important documents: ‘Statement on the principles and procedures for the

¹² <https://www.statistics.gr/en/certification-of-statistics>

Certification of ELSS statistics’ and ‘Guide to the Agencies of the Hellenic Statistical System for the implementation of the European Statistics Code of Practice’.

The Guide has been updated following the last revision of the CoP. It describes the obligations of: a) the Agencies, b) the statistical heads of the Agencies, c) the staff of the Agencies involved in the production and dissemination of statistics and d) ELSTAT towards the Agencies. As requested in the 6th Report, it contains in particular the guidelines concerning the appointment of Statistical Heads. In addition, it includes 4 Annexes with 4 templates on: (a) Quality Policy, (b) Statistical Confidentiality Policy, (c) SIMS v2.0 for Quality Reporting and (d) Documentation of Statistical Processes (internal guidelines).

Concerning the appointment of Statistical Heads, ELSTAT issued in February 2020 the corresponding requests from the following restructured Ministries: a) Ministry of Digital Governance, b) Ministry of Development and Investment, c) Ministry of Migration and Asylum and d) Ministry of Citizen Protection. This is a first step to proceed to the required further actions. The Ministry of Citizen Protection swiftly made the appointment and this was followed by discussions concerning the updating of their lists of produced statistics and the implementation of the basic certification steps. The updated list is expected to be provided by the end of 2020. However, the nominations from the other three agencies are still pending despite some reminders that has been sent since then, the last one beginning of December 2020.

In addition, there have been conversations with the Statistical Head of the Hellenic Telecommunications and Post Commission (EETT) and his team, with the aim to provide clarifications regarding the compilation of the Statistical Confidentiality Policy of the Agency.

GPAC expects that the remaining appointments are completed and encourages ELSTAT to continue exerting pressure on the agencies that are lagging in this regard. **GPAC also recommends** that a scoreboard indicating the level of progress in the certification of each agency be maintained up to date.

Principle 3: Progress in the recruitment of staff needed for the Census operations

Recruitment of staff required for two Censuses ‘2021 Agricultural-Livestock Census’ and ‘2021 Buildings and Population-Housing Census’ is under way.

According to the new census plan, taking into consideration the new circumstances arising from the Covid-19 pandemic and the corresponding constraints, mainly regarding the physical presence of interviewers within households, these censuses will mainly be based on self-enumeration of each household via an online application. Only for those who will not be self-

enumerated, data collection will be carried out either by telephone interviews, or face-to-face interviews. More details are provided in Chapter A under Principle 2.

The call for applications has been prepared by ELSTAT, after being approved by the Supreme Court for Civil Personnel Selection (ASEP), and will be published/advertised to recruit 115 employees with fixed-term contract for the needs of the 2021 Agricultural-Livestock Census. The planned recruitment actions will ensure that the new fixed-term staff will start fulfilling their duties shortly (mid-January 2021).

Furthermore, the preparation and publication of the corresponding call for applications to recruit 301 employees with fixed-term contracts for the needs of the 2021 Buildings and Population-Housing Censuses will follow.

GPAC welcomes the approval of the necessary recruitment of employees for the Agricultural-Livestock Census and **urges** ELSTAT and all other authorities involved to speed up the recruitment procedure for the Buildings and Population-Housing Census.

Principle 5: Progress concerning the inclusion of provisions in the statistical law or other relevant laws related to derogations on GDPR for statistical purposes

The National Law 4624/2019 (introduction of specific provisions for the implementation of Regulation 2016/679 and transposition of Directive 2016/680) has provided the legal basis for ELSTAT to access and process administrative data for statistical purposes. However, ELSTAT has raised further derogations on GDPR that could be required in the future.

The first one is on potential exemptions from exercising certain data subjects' rights. Specifically, ELSTAT refers to the "right of access" that the data subject may exercise for the data provided to ELSTAT through some form of survey, highlighting the fact that the statistical confidentiality and privacy principles, with which ELSTAT complies, provide the necessary framework for handling such requests and thus, for the time being, there is no need for a legal arrangement.

The second derogation on GDPR concerns the data retention period and more specifically the fact that data may be necessary to be retained for a period that exceeds the one specified from the primary purpose of processing. Currently, ELSTAT argues that it can adequately handle such cases, without the need for specific legal provisions, since for each particular instance (such as the Agricultural, Buildings and Population Registers) the relevant GDPR provisions are addressed by the corresponding specific legislation.

GPAC fully understands the concerns of ELSTAT. The Committee **recommends** that ELSTAT remain alert for cases where legal or other provisions could be needed to grant derogations to certain rights of data subjects. In the absence of such provisions, the satisfaction of data

subjects' rights remains the "overall rule", and any deviations from that should be clearly substantiated. More specifically, according to 4624/2019, Article 30, the rights of the data subjects are limited if their exercise is likely to make impossible or seriously impede the statistical purpose for which the data are processed. The same article provides that the right of access does not apply only in those cases where personal data are necessary for scientific purposes and the effort required for the satisfaction of that right is disproportionate.

Appendix 1

Information on the members of the Good Practice Advisory Committee

- *Stephan Moens, former Advisor General and Head of International Strategy and Coordination at Statistics Belgium, nominee of the European Statistical System Committee (ESSC), Chairman of GPAC*
- *Eleni Bitrou, Head of the Parliament Members Support Division of the Hellenic Parliament, nominee of the Hellenic Parliament, Member of GPAC*
- *Pedro Diaz Muñoz, former Director Sectoral and Regional Statistics at Eurostat, nominee of Eurostat, Member of GPAC*
- *Konstantinos Lambridounakis, Associate Professor, Department of Digital Systems, University of Piraeus, nominee of the Hellenic Data Protection Authority, Member of GPAC*
- *Genovefa Ružić, Head of the Administrative Burden Reduction and Better Regulation Service of the Republic of Slovenia, former Director General of the Statistical Office of the Republic of Slovenia, nominee of the European Statistical Governance Advisory Board (ESGAB), Member of GPAC*