

**Good Practice Advisory Committee
Fourth Report**

December 2017

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. 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. 0002491ΕΞ2016) in March 2016 appointing new members for the period 2016-2017 inclusive. Details of the members appointed to the re-convened Committee are given in Appendix 1. Under the Decision, Ms. Christina Karamichalakov from ELSTAT was appointed as Secretary to the Committee. Mr. Athanasios C. Thanopoulos, who was

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-4a53-8a5c-bcff2165e810

appointed as President of ELSTAT in February 2016 in succession to Mr. Andreas Georgiou, participated in GPAC meetings in accordance with Article 4.5 of the Law.

The first meeting of the new Committee took place on the 24th of June 2016 and Mr. Gerry O’Hanlon, former Director General of the Irish Central Statistics Office and nominee of ESGAB, was re-elected as Chairman. The Committee met subsequently on the 6/7th October 2016 and finally on the 13th January 2017 to formally adopt its third annual report, which is published on the ELSTAT website³.

In 2017, the Committee met on 30/31 May and 6/7 September when it considered a range of issues relevant to its mandate during a number of interactions with senior ELSTAT staff and a number of external stakeholders. A particular focus was put on Principle 4, Commitment to Quality, and a range of issues relating to the improvement of quality throughout the statistical system were addressed. GPAC held its final meeting in 2017 on the 14th of December to formally adopt the Fourth Annual Report of GPAC.

The current report follows the structure of the 3rd Annual Report in concentrating on: a systematic review of the implementation of Principle 1 to 6 of the European Statistics Code of Practice in the Hellenic Statistical System, with a particular focus on ELSTAT; and an examination of progress in the certification of official statistics produced by Other National Authorities.

Part 1: Review of Implementation of Principles 1 to 6 of ES CoP

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

As mentioned above, 2017 marked the second year in office of the second President of ELSTAT, Mr Athanasios C. Thanopoulos, who took up his position in February 2016. GPAC is pleased to note that ELSTAT continues to function, under his leadership, in full conformity with the principle of Professional Independence by producing high quality statistics in an objective manner that is free from external influence. This is important to note as some commentators, notably in the international press, made some inferences to the contrary in commenting on the continuing court proceedings against his predecessor. In particular, it was suggested in one article that his appointment was political in nature whereas, in fact, it was the opposite in that he was selected by an independent selection

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

board (including statistical experts from outside Greece) who followed the very detailed and transparent process set down in Article 13 of the Greek Statistical Law (no. 3832 of 9 March 2010, as in force). On a personal basis, the President has committed himself to ensuring that ELSTAT performs its tasks to the maximum extent in conformity with all aspects of the European Statistics Code of Practice.

Public trust in ELSTAT would appear to be relatively high. One incident that would attest to this is the reaction to the discontinuation in early 2017 of the production of flash estimates of quarterly GDP. This decision was taken solely by the President, in line with indicator 1.4 of the Code, when it became clear that the flash estimate was not performing as a reliable estimator of the quarterly trend. This was potentially a very sensitive decision as the quarterly GDP growth indicator is a key indicator that is much anticipated in Greece and, all the more so, as it had been fluctuating around zero in recent quarters. GPAC received some feedback from key users to the effect that they believed that the decision had been made by ELSTAT for the right reasons and that it had not been influenced by outside interests.

GPAC is pleased to note that all members of the Advisory Committee of the Hellenic Statistical System (SYEPELSS) were confirmed in 2017 and that the committee met on two occasions. The composition and mandate of SYEPELSS were set down in an amendment to the Statistical Law (Article 3) in 2015 that was adopted to assist ELSTAT in taking users' needs into account in the formulation, co-ordination, and implementation of the strategic goals and priorities for the national statistical system, most notably in regard to the preparation of the Hellenic Statistical Programme and the annual work programmes of ELSTAT. GPAC considers this is a very important development, not only from the point of view of giving users a greater role in shaping the development of the statistical system but also in raising the profile of, and trust in, ELSTAT and the Other National Authorities amongst key stakeholders.

Unfortunately, the court proceedings against the former President of ELSTAT, Mr Andreas Georgiou, continued throughout 2017 and do not show any sign of reaching a conclusion. The proceedings are now in their seventh year and a chronology of developments over the entire period is presented in Appendix 2. While GPAC has not detected to-date any negative impact on the functioning of ELSTAT or the wider National Statistical System, it nevertheless remains concerned that the proceedings have the potential to adversely affect the public perception of the credibility and objectivity of Greek official statistics, both within Greece and to a greater extent amongst international stakeholders. In short, such a perception will continue to be a concern as long as the criminal charge against the former president of ELSTAT, and two senior colleagues, that the 2009 debt and deficit figures were artificially inflated, is maintained before the courts.

With regard to the developments in the court proceedings during 2017, the Committee would draw attention to two that are of major significance.

The first relates to the acquittal in May 2017 of Mr Georgiou, and his co-accused, by the Council of the Appeals Court on the criminal charge of having artificially inflated the 2009 Government debt and deficit figures, thereby causing damage in excess of €170 billion to the Greek economy, and the subsequent recommendation by the Chief Prosecutor of the Supreme Court in July 2017 that the acquittal order should be annulled. This was the second time that the Council of the Appeals court had issued an acquittal order on this charge and also the second time that the same prosecutor had recommended that the order should be annulled. The first annulment recommendation was made in September 2015 and it is, therefore, extraordinary that after almost two years of detailed examination of the charge at the highest levels by the Greek judicial system that the whole process could be about to be repeated again. Viewed solely from an official statistics perspective, the acquittal decisions of the Council of the Appeals Court were to be expected as the figures in question, and the underlying methodologies, were validated by Eurostat from the outset as fully meeting exacting standards for European statistics. Indeed, the methodology that was introduced for the first time in respect of the 2009 figures, has been used by ELSTAT in each subsequent year up to the present and the resultant figures have been validated by Eurostat. Furthermore, the figures have been publicly accepted by the Greek authorities (including by the Prime Minister and Government) as providing an accurate statistical assessment of the debt and deficit situation in Greece. From the statistical perspective, therefore, the stance of the Chief Prosecutor is difficult to understand and, while GPAC is not aware of the reasons she may have put forward for her recent recommendation, it would be helpful if the reasons for any concerns she may have with the data were made more explicit. On a related issue, GPAC was also advised that little progress would appear to have been made with the parallel investigation ordered in September 2016 by the Chief Prosecutor to examine media allegations that there was a conspiracy between EU, IMF and Greek officials to artificially inflate the 2009 government deficit figures. This is surprising in view of the serious nature of the allegations in calling into question the integrity of highly regarded international bodies such as Eurostat and the IMF in dealing with statistical matters.

The charge against Mr Georgiou and the conspiracy investigation are obviously linked in that they both allege, at their core, that the 2009 debt and deficit figures were artificially inflated. Leaving such charges unresolved over a prolonged period is damaging to the credibility and reputation of Greek statistics, both within Greece and internationally. GPAC would, therefore, urge the Greek authorities to find some means to bring the controversy over the 2009 figures, and the related figures produced prior to 2009, which were previously the subject of severe criticism by Eurostat⁴, to an early conclusion.

⁴ http://ec.europa.eu/eurostat/documents/4187653/6404656/COM_2010_report_greek/c8523cfa-d3c1-4954-8ea1-64bb11e59b3a

The second development in 2017 was the conviction, at the beginning of August, of Mr Georgiou by the Appeals Court of the misdemeanour charge of not putting up the 2009 EDP figures for approval by the former ELSTAT Board prior to their public release. The Court imposed a two-year suspended prison sentence. GPAC is concerned that this conviction seems to take little or no account of indicator 1.4 of the Code, which states that the Head of the National Statistical Institute has “*sole responsibility for deciding on statistical methods, standards and procedures, and on the content and timing of statistical releases*”. The Committee notes that Article 1, section 4 of the Greek Statistical Law, as then in force, required that the Code should be followed in the development, production and dissemination of official statistics.

Finally, GPAC is pleased to note the acceptance of the recommendation in its 3rd Report that the President of ELSTAT, or senior officials acting on his/her authority, should be indemnified against any legal costs arising from challenges to professional decisions taken in the course of undertaking their duties. The implementing measures adopted in July 2017 also have a retrospective aspect and this is particularly welcome in the present circumstances.

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.

The Committee has 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.

In its third annual report, the Committee noted that administrative tax data on enterprises for the reference years 2011-2015 had finally been transmitted to ELSTAT in 2016. The Committee welcomed this development as essential for upgrading the entire production of business statistics in Greece.

However, some problems with the received data have been detected in terms of the completeness and the quality required for statistical use. In addition, there have also been significant delays in the regular transmission of the data compared to the agreed

provisions in the Memorandum of Cooperation signed between ELSTAT and the Independent Authority of Public Revenue (IAPR), the General Secretariat for Information Systems (GSIS) and the Social Insurance Institution (IKA). ELSTAT has pointed out the necessity of establishing a working group or working groups with representatives from ELSTAT and the relevant data providers to deal promptly with these problems on an ongoing basis. The Committee would support this and recommends the setting up such working groups as an urgent priority.

The Memorandum of Cooperation recognised the importance of the data as a key input to the updating of the Statistical Business Register (SBR), the conduct of the Structural Business Surveys (SBS) and the compilation of the Greek National Accounts. The Committee would therefore strongly urge the administrative data providers to give priority to meeting the commitments set down in the Memorandum and to establish an accommodating and fruitful cooperation with ELSTAT.

GPAC also welcomes the fact that various other memoranda of cooperation are being negotiated, or are planned to be negotiated. According to the Annual Statistical Work Programme 2017, these memoranda will cover access to administrative data required for Labour Cost Indices, the Statistical Register of Vehicles, the Statistical Farm Register, and statistics on tertiary education.

ELSTAT is confronted with very low response rates to business surveys. For example, during the period 2012-2014 the survey response rates were consistently around 40-50 per cent for the SBS. ELSTAT therefore decided to use another data collection strategy in order to minimize the burden on enterprises, to save resources and to improve the quality of data. For the compilation of SBS 2015, the tax data were used as the main data source. For the estimation of the statistical variables that are not available in the tax data, a limited survey confined to large enterprises was used. Therefore, the number of enterprises surveyed for the 2015 SBS was significantly reduced, with corresponding savings in staff and other costs. The Committee welcomes the new data collection strategy as it brings ELSTAT into line with the data collection procedures adopted in well-developed national statistical institutes in other countries. To improve the quality of enterprise data, the Committee would recommend that a proactive strategy be developed to improve the response of enterprises to the reduced surveys. This might include: activating the legal provisions for imposing fines on persistently non-responding enterprises; seeking the assistance of Unions of Enterprises, Chambers etc. in promoting among enterprises the necessity and usefulness of responding to statistical surveys; and making response easier through the introduction of electronic questionnaires

The Committee was informed about a new organizational structure proposed for ELSTAT. A key change will involve the creation of a new division for the Collection of

Primary Data. The new division will have the responsibility for the collection and validation of administrative data, business survey data, household survey data and big data in a coordinated and integrated manner. GPAC considers that the creation of this new division is of fundamental importance in enabling ELSTAT to develop its data collection procedures in a cost-effective and harmonised manner. It is to be expected, that the new division in ELSTAT will be developed gradually as the staff will have to be transferred into it from the various subject matter divisions and this change will represent a major organisational challenge. In short, the Committee very much welcomes the creation of the new Collection of Primary Data Division and expects that it will deliver substantial savings and efficiencies in the not too distant future.

Nowadays it is generally recognised by statistical offices and governments that the exploitation of administrative data in both the economic and social spheres for statistical purposes provides a cost-effective way of compiling official statistics and also provides opportunities for improving the quality of the statistics. The Committee would therefore encourage ELSTAT to continue its efforts to get access to administrative data on physical persons to improve statistics in relation to social issues, healthcare, crime, migration and the labour market etc. Similarly, the Committee would encourage the Government, Ministries and other owners of administrative data to recognise the value of such data for statistical purposes and to facilitate the granting of access to ELSTAT in accordance with the provisions of the Statistical Law.

Principle 3 – Adequacy of Resources

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

In its 3rd report, GPAC drew attention to the fact that staffing levels were approximately 30% below 2010 levels and, notwithstanding some significant efficiency gains, were assessed by ELSTAT to be up to 200 in number below the current required level. The Committee is disappointed to note that there has not been any real change in that position over the past year. This situation, of course, places extreme pressure on ELSTAT to implement its statistical programme and, in particular, meet the demands of the European Statistical Programme. However, GPAC is not aware of any major concerns with either the availability or quality of the key statistical outputs that ELSTAT is required to produce. Furthermore, the Committee is pleased to note that most (13 out of 16) of the non-compliance issues that were raised by Eurostat in September 2016 have been resolved. This would point to a commendable resilience within ELSTAT in meeting its

obligations but GPAC would have serious concerns about the longer-term sustainability of this position.

GPAC welcomes the proposed adoption of legislation by the Greek Government, following agreement with the Funding Partners, to introduce a number of measures to support ELSTAT. This includes provisions to:

- give the President of ELSTAT greater autonomy and flexibility in deciding how to spend the agreed budget of the organisation, including the possibility of transferring appropriations between budgetary headings within agreed limits; and
- increase the budget of ELSTAT [from the first of January 2018] to facilitate the recruitment and retention of highly qualified staff.

GPAC also welcomes the preparation of a new organigram for ELSTAT, which the Committee believes will help ELSTAT operate in a more efficient and effective manner. As mentioned in the previous chapter, the main change is the creation of a new Division for the Collection of Primary Data aimed at optimising the collection of primary data by ELSTAT. Moreover, responsibilities have been merged in a number of areas in order for ELSTAT to be in a position to address the new consolidated European regulations on agricultural, business and social statistics. The new plan was drafted on a cost-neutral basis, which means that it does not increase the number of positions, and specifically management positions, within ELSTAT. It will be essential for ELSTAT to maximise the potential gains to be made from implementing the new structure. In this regard, the Committee would recommend that consideration be given to strengthening the internal corporate management structures within the organization. In particular, it would recommend the establishment of a “Top Level Management Committee”, consisting of the top managers and selected senior managers (e.g. those with direct responsibility for horizontal activities such as human resources and finance). Such a committee, in line with practice in other NSIs, would have responsibility for directing the ongoing work of the organisation, with a particular focus on planning and managing change in an integrated and coordinated manner.

The implementation of the new organigram will also require the filling of a number of key senior positions in ELSTAT. GPAC would stress the importance of finding the best candidates for these positions. In this context, the Committee understands that the current criteria for filling senior level posts in the Greek public service may be somewhat restrictive. Accordingly, GPAC recommends that alternative approaches should be explored with a view to adopting more appropriate procedures.

Finally, the Committee notes that approximately 200 of the 750 employees in ELSTAT are located in regional offices. The adoption of new procedures and processes, notably in regard to the collection of data, will have a major impact on the work of these employees. GPAC was informed that many of these staff are highly qualified and it is therefore

important that their skills and knowledge are retained within ELSTAT to the maximum extent through the adoption of flexible deployment strategies.

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 earlier reports, the Committee commended the strong commitment to quality in ELSTAT and the many practical and other measures that had been initiated in this regard. In its last report the Committee noted that the high-level Group for Supervision and Management of the Quality of Statistical Works at ELSTAT (the Quality Committee for ELSTAT) was established, an internal self-assessment process was introduced at the level of the Divisions, Quality Guidelines were developed for use throughout ELSTAT, and measures related to the coordinating role of ELSTAT within the Hellenic Statistical System (ELSS), including the certification of statistics produced by Other National Authorities, had been initiated.

In 2017, GPAC undertook a closer examination of current and planned quality procedures within ELSTAT and its findings are presented in the following paragraphs.

1. High-level Group for Supervision and Management of the Quality of Statistical Works at ELSTAT:

The intention of ELSTAT to render the role and importance of quality management within ELSTAT more visible is welcomed by the Committee: The draft of the future organization chart contains a Methodology, Studies and Quality Management Division and, within this Division, a Quality and Certification of Statistics Section. This section will have a key role in analysing risks to the quality of statistical products and in developing improvement actions in conjunction with the subject matter areas. GPAC would recommend that the Quality and Certification of Statistics Section should report directly to the High-level Group in order to ensure that quality management is supported at the highest levels within ELSTAT

The Committee was informed about various activities in which the High-level Group has been or, it is planned, will be involved. Examples are:

- The High-level Group monitors the progress made in the implementation of actions agreed in the course of the internal self-assessment processes for the improvement of compliance of the divisions of the General Directorate of Statistical Surveys with the principles of the European Statistics Code of Practice.

The achieved progress is recorded by each of the divisions on a quarterly basis, while the monitoring by the High-level Group is conducted once every year.

- The development of a programme of quality audits of the statistical production within Divisions and Sections will be supervised and monitored by the High-level Group.
- Divisions and sections of ELSTAT will have to assess the quality of the data sources of their statistical products, based on a checklist “Quality of Data Sources”, and report to the High-level Group, which will discuss follow-up actions. The Committee welcomes this promising initiative.
- A Working Group, including some regional managers, on the “Improvement of the Quality of Survey Data” was established recently. The Working Group will, under the guidance of the President, discuss the potential to improve quality and the efficiency of data collection following an audit-type approach.

The Committee recommends that the High-level Group should produce and publish annually a report that gives: a) a detailed overview of the quality initiatives and engagements undertaken; b) the results of its supervising and monitoring activities; and c) highlights of the corresponding achievements. Ideally, this report should be part of the ELSTAT Annual Report.

2. Internal Self-Assessment Program

In 2014, the internal self-assessment process of the divisions was introduced, comprising the completion of a self-assessment questionnaire and ending with the adoption of an assessment report and a decision on identified improvement actions in agreement with the High-level Group for Supervision and Management of the Quality of Statistical Works. In the GPAC meeting of May 2017, the Committee was informed that the divisions of the General Directorate of Statistical Surveys had made progress in implementing the improvement actions and meetings will take place between each division and the High-level Group to discuss progress.

For the internal assessment of the divisions of the General Directorate of Administration and Organization, a separate questionnaire was developed and certification teams were established to conduct the assessment of the compliance of each division with the European Statistics Code of Practice. The assessment reports will be basis of action plans for each of the divisions that will be agreed with the High-level Group.

GPAC would recommend that a time-schedule for the whole internal assessment programme should be provided. The activities of this programme should also be mentioned in the Annual Statistical Work Programme of ELSTAT. In addition, a report

which summarizes the status of the compliance of ELSTAT divisions with the European Statistics Code of Practice and the progress achieved due to the agreed activities should be made available to the public on the ELSTAT website and in the annual report of ELSTAT.

3. Quality Guidelines

The Committee appreciates that ELSTAT has developed Quality Guidelines 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. Quality Guidelines describe the various steps of the statistical production, such as: the determination of the necessity for the production of statistics; the planning of the statistical survey/work; the design of the statistical survey/work; data collection; data processing; production of statistics; dissemination of statistical data; and the assessment of the statistical survey/work.

Quality Guidelines should provide detailed information to statisticians to help them comply with methods and rules that should be uniformly followed in all production units. However, the Quality Guidelines produced by ELSTAT cover most of the topics so generally that the guidance is far from giving clear directives. Moreover, some relevant topics are not adequately covered e.g. classifications, sampling methods, disclosure control methods, sampling weights, presentation of statistical data in tables and charts, seasonal adjustment, index construction, documentation, archiving, publication of statistical data, evaluation of the quality (criteria, procedures) of statistical data, and others. The fact that ELSTAT has just started to gain deeper experience in the use of administrative records and registers may also explain that this topic is somewhat underdeveloped.

The Committee recommends that the Quality Guidelines of other NSIs, that are more advanced in these areas, are consulted so that potential improvements might be systematically identified and applied.

4. Use of Administrative Data

The Committee appreciates the activities of ELSTAT to make data from administrative sources available for statistical production. These activities will help to: improve the quality and timeliness of the statistics produced, save human and financial resources and reduce the burden on respondents.

As the Annual Statistical Work Programme 2017 explains in detail, the first experiences in using the tax data has been a learning process in that it has identified a number of practical and other problems that must be resolved in order to use the administrative data effectively. Accordingly, ELSTAT needs to further develop the necessary technical and

physical infrastructure for dealing with administrative data. Some adaptations of the cooperation agreements with data providers might be required as a result.

A special centralised unit should deal with the specific issues of aligning administrative data with the needs of the statistical production processes. The Administrative Data Collection Section, identified in the proposed new organization chart under the Collection of Primary Data Division, should ideally take on this role and acquire the necessary experience and competencies to provide the required service. The Section should establish and update a register of administrative data holdings used for statistical purposes, detailing in case the use and potential use of the data in the production of statistical outputs.

The recently announced initiative whereby the divisions and sections of ELSTAT will systematically assess the quality of the administrative data sources is welcomed by the Committee. The information provided by the statistical units in using the checklist “Quality of Data Sources” can be a valuable basis for establishing the register of administrative data.

5. Communication with Users

ELSTAT considers that the Council of the Hellenic Statistical System (SYEPELSS) will be an important source of information on user needs and that the Council will play an important role in monitoring whether these needs are being met and reflected in the statistical programme. The Committee welcomes this approach and also the fact that ELSTAT is prepared to develop the role of SYEPELSS in the light of experience gained.

As it is stated in the most recent report of the Joint Overall Statistical Greek Action Plan (JOSGAP), ELSTAT should aim to develop its organisational culture to put more emphasis on the value of open dialogue with different user communities. The feedback from users would support statistical planning, foster a better understanding of user needs and stimulate the greater use of statistical products. The Committee recommends that in addition to the existing annual SYEPELSS conference, meetings of thematic user groups should be organized. Topics can be statistical domains like price indices, labour market statistics, tourism statistics, etc. Horizontal meetings might also address the needs of special user groups such as journalists.

In this context, GPAC is pleased to note that two thematic conferences for journalists have been held; on Excessive Deficit Procedure (EDP) data in April 2017 and on GDP data in October 2017. In addition, on the occasion of the European Statistics Day, a wide user conference on migration statistics was held on the 20th of October 2017.

GPAC also recommends that ELSTAT put special weight on intensifying its relationship with the academic community: Further promotion should be given to the use of microdata and the analysis of results of official statistics, a task which can be fruitfully done in cooperation between ELSTAT and academia.

6. Improvement of the Website

The website of ELSTAT provides the users with a rich offering of statistical tables. However, various measures would render the website more user-friendly and allow a more efficient use of the statistical products.

In most cases, the tables presented on the website contain the data of just one calendar-year; time-series are reported only exceptionally, mainly by the National Accounts Division. It is likely that this approach does not meet the needs of many users.

ELSTAT does not provide access to detailed statistical data in an interactive way, so that the users may select from a hypercube those variables they need, explore data patterns with visual tools, and download only that amount of data they need and in the format, that is most appropriate for their particular needs. PC-Axis or a similar tool for the dissemination of statistics would make this possible.

It should be mentioned in this respect that in May 2015, the Peer Review Report requested further improvements of the ELSTAT website “making use of new methods for data presentation and handling in order to make it more user-friendly”.

7. Quality and Metadata Reports

The Committee appreciates the availability of methodological information and quality reports for most of the published statistical products. Unfortunately, only limited metadata are available for some key areas such as national accounts, external trade and farm structures.

The format used for most of the metadata reports is the Single Integrated Metadata Structure (SIMS) format. User oriented quality reports are often short - describing concepts, legal basis, etc., but not always quality criteria. A uniform format should be developed by the High-level Group for Supervision and Management of the Quality of Statistical Works and used throughout ELSTAT. Moreover, the production of user oriented quality reports, producer oriented quality reports, and metadata in SIMS (and other formats) should be undertaken on a consistent basis across all statistical domains.

The degree of detail available and the comprehensiveness of the SIMS quality reports seem to vary substantially. Guidance of the experts in the documentation of the statistical products should be facilitated by an appropriate treatment in the Quality Guidelines. It is recommended that the metadata reports are used as a basis for discussing the presentation of the statistical products with expert users; such discussions should be organized by the High-level Group for Supervision and Management of the Quality of Statistical Works and scheduled over a longer period of several years.

It might be noted again in this context that the Peer Review Report requested in May 2015 “that the documentation of statistical processes is given high priority within all its divisions”.

8. *Response burden*

A crucial problem of ELSTAT is the rather low response rate of enterprises. The response burden is known from many countries to affect the response rate in a negative way. ELSTAT is recommended to establish a policy and strategy regarding the burden posed on the respondents. As an initial step, it should develop a coherent and public system for assessing the response burden. Measurements of the response burden can facilitate the identification of ways of reducing the burden in an effective manner and ELSTAT should learn from the experience gained by other European NSIs in this regard. This corresponds to a similar recommendation of the CoP Peer Review Report from May 2015 that ELSTAT should “devote more efforts to develop a coherent and public system for assessing response burden”. Measurements of the response burden will also allow the tracking of efficiency gains as ELSTAT increasingly obtains access to and uses administrative data for statistical purposes. GPAC welcomes the fact that ELSTAT has commenced work in this area and would encourage it to further develop it.

Overall, GPAC would stress the importance of maintaining and developing all these quality related initiatives as part of a co-ordinated effort to improve the quality, in the widest sense, of official statistics in Greece. In particular, the Committee would recommend that: the activities of the High-level Group for the Supervision and Management of the Quality of Statistical Works should continue to have priority; the communication with, and the service to, users should be further developed, with a focus on increased contact with users; and further improvements should be made to the ELSTAT website and to the quality and metadata reports.

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 previous reports, GPAC recommended that ELSTAT and other statistical agencies should continue to systematically address issues related to data protection and security. The need for ELSTAT’s staff to sign a specific commitment on statistical confidentiality was also stressed. Moreover, GPAC urged ELSTAT to be prepared to fulfil its obligations deriving from the new General Data Protection Regulation, which enters into application on 25 May 2018, and in particular to appoint a data protection officer.

As in previous reports, the Committee is pleased to note ELSTAT's improved approach to data protection and security related issues in general. As to the designation of a data protection officer, ELSTAT has responded effectively and included a specific post in its proposed new organisational structure.

Regarding the signing of a confidentiality declaration by the staff, there is still no progress since the relevant decision of the Administrative Court, to which the disputed issues were referred, is still pending. The Committee welcomes that ELSTAT management is willing to reach a common understanding and agreement with the Staff Union on this issue.

In 2017, GPAC discussed in more detail the relevant provisions of the European General Data Protection Regulation and in particular the new processing principle of 'accountability', according to which a data controller is responsible for, and should be able to demonstrate compliance with, this Regulation. The main obligations on data controllers, including NSIs, are likely to include the following requirements:

- a. to apply the approach of data protection by design and by default when creating new or modifying existing information systems, taking into account the purposes of the processing as well as the risks of varying likelihood and severity for the rights and freedoms of natural persons posed by the processing;
- b. to maintain a record of processing activities under its responsibility;
- c. taking into account the state of the art, the costs of implementation, and the nature, scope, context and purpose of the processing on the one hand and the risks of varying likelihood and severity for the rights and freedoms of natural persons on the other, the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks;
- d. to establish a procedure for the notification of the supervising Authority in cases of personal data breaches;
- e. to carry out an assessment of the impact of the envisaged processing operations on the protection of personal data (data protection impact assessment) in cases where the processing is likely to result in a high risk to the rights and freedoms of natural persons, as for instance when sensitive data are processed;
- f. to appoint a Data Protection Officer; and
- g. on a voluntary basis, to create codes of conduct and/or get relevant certification demonstrating compliance.

The Regulation also contains provisions for the use of data for scientific, historical and research analysis, which are of relevance to an NSI.

GPAC recommends that ELSTAT should take appropriate steps to prepare itself for fulfilling all the above-stated obligations that might apply, taking also into account any other specific legal provisions. Accordingly, it will be necessary to adapt current

organizational and technical measures such as processes, procedures and methodologies, or create new ones, to comply with the new data protection regime.

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 reports 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 is satisfied that this continues to be the case and therefore commends the measures and encourages ELSTAT to continue its efforts to publicise its statistics and to promote the use of its high-quality outputs.

ELSTAT publishes an annual release calendar in advance (for example, the calendar for 2018 was already on the website in November 2017⁵) that gives the expected dates of release for all statistical outputs. This is in line with indicator 6.5 of the Code of Practice. However, the Committee notes that there appears to be a regular requirement for ELSTAT to notify postponements of individual statistical press releases. Notifications of this nature are also, of course, in conformity with the Code. However, when they appear regularly and frequently they may give an unnecessarily negative impression of the Authority. GPAC believes that the problem may lie with the annual calendar being too ambitious in specifying actual release dates for all outputs too far in advance. The Committee would recommend that ELSTAT adopt a more realistic approach towards pre-announcing its release times. For example, it might only publish indicative times (e.g. month of release) in its annual calendar and complement this with a more precise monthly advance calendar that is based on more concrete information. GPAC also recommends that a record of the number of postponements is published in the ELSTAT Annual Report. The example of other NSIs shows that the publication of the postponement statistics is an efficient instrument in managing the punctuality of dissemination.

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http://www.statistics.gr/documents/20181/5346500/elstat_press_releases_calendar_2018_en.pdf/9db7341f-d544-4db6-9401-3a52df9b43d4

GPAC has stressed in previous reports the necessity for ELSTAT to adopt measures to ensure that its policy of no pre-release access to its data is respected in practice to the maximum extent. No breaches of this policy in 2017 were brought to the attention of the Committee. On the contrary, it was informed of a high-profile incident that would tend to confirm the effectiveness of the no pre-release policy. This arose in March when the Prime Minister, in a public statement, anticipated that new economic data would show that the economy was growing, only to be contradicted within hours by new figures from ELSTAT showing the opposite. This incident was widely reported in the media, and while such conflicts are usually best avoided, it was encouraging that the general reaction was an acknowledgment of ELSTAT's independence and impartiality.

Part 2: Certification of Statistics produced by the Agencies of the ELSS

In accordance with the Greek Statistical Law, fifteen agencies, including ELSTAT and the Bank of Greece, are designated as Agencies of the Hellenic Statistical System (ELSS)⁶. Seven of these agencies⁷ are also designated as Other National Authorities for the purposes of producing European Statistics. Article 11, paragraph 6, of the Law stipulates that ELSTAT has the responsibility for certifying as “official statistics” statistics produced by the other agencies of the ELSS.

GPAC appreciates the substantial efforts that ELSTAT is investing in the implementation of the certification programme. The certification procedures set out in the manual are quite demanding and it is therefore not surprising that the implementation timetable is taking longer to complete than initially intended. However, the Committee is satisfied that considerable progress is being made and that the Agencies are responding positively to the programme. GPAC encourages ELSTAT to systematically continue its endeavours and ensure that all ELSS Agencies are participating in the programme and that priority is given to the certification of the most important statistical outputs.

ELSTAT has organized the certification process in two stages: In the first stage, the institutional environment for statistics is to be established within each Agency; in the second stage, the focus is on the quality of the individual statistical processes and products. As it was already stated in the 3rd GPAC report from 2016, this multi-stage procedure for assessing the individual statistical outputs is described in the manual “Statement of Principles and Procedures for the Certification of ELSS Statistics”⁸. The

⁶ http://www.statistics.gr/documents/20181/1195539/LIST_OF_AGENCIES_EN.pdf/3f0ee19f-6ef4-4c46-90f0-e0ec6e5da2c8

⁷ http://www.statistics.gr/documents/20181/301069/List_of_National_Authorities_02_EN.pdf/4e9b2a0b-5239-4525-9ae5-2ebf54b2f7b7

⁸ http://www.statistics.gr/documents/20181/1195539/Principles_ELSS_EN.pdf/afe2b4b7-a6ee-4156-9bf6-5c3f6a64c42b

procedure which each Agency has to follow contains the following steps: a) the Agency has to prepare quality reports for the statistics in accordance with Article 7, paragraph 2, of the Regulation on Statistical Obligations of the ELSS agencies; b) discussions take place with the representatives of the Agency who are responsible for the statistics; c) the Agency provides written evidence; and d) ELSTAT compiles observations in relation to compliance of the statistics with the requirements of the European Statistics Code of Practice. The Certification Report compiled by ELSTAT is the basis for certifying the statistical output as “official statistics”. A crucial point of the procedure is that a list of statistics that will be assessed for certification is agreed at the beginning.

In 2016, GPAC met with representatives of three Agencies that were undergoing the certification process: the Ministries of Finance; Rural Development and Food; and Education, Research and Religious Affairs. In 2017, GPAC met with representatives of the following three Agencies:

- Ministry of Rural Development and Food
- Ministry of Labour, Social Security and Social Solidarity
- Ministry of Migration Policy

The Agencies differ in the stage of the process which has been achieved. In the Ministry of Rural Development and Food, the deadline for the completion of the basic steps ended in March 2017. The Ministry of Labour, Social Security and Social Solidarity went through a major reorganization, merging the supervised social security funds into one; as a consequence, the statistical works of the funds had to be consolidated; a deadline end of September 2017 was envisaged for the completion of the basic steps. The certification process of the Ministry of Migration Policy is also at an early stage, since this Ministry was only established in November 2016. GPAC recommends the following:

- ELSTAT should systematically continue its endeavours and ensure that all ELSS Agencies are participating in the programme.
- The certification of the most important statistical outputs and of sensitive statistics should be given high priority in the certification process.
- ELSTAT and the Agencies should agree in advance on a set of objective criteria for the inclusion of statistics (e.g. relevance, coverage, repetition, statistics included in the European Statistical Programme, statistics to be transmitted to European organizations, production according to national/international standards, definition of official statistics in the Greek statistical law). This would facilitate the decision about the list of statistics and avoid unnecessary and lengthy initial discussions between ELSTAT and each Agency.

- The certified statistics should be publicly separated from the non-certified ones. In this way, pressure will be placed on agencies to complete the certification of all their important statistics.
- The certified statistics of the ministries should be hosted on the ELSTAT website (or the relevant links should be prominently displayed).The certified statistics should be included in the release calendar on the ELSTAT website.
- The certification process should move faster and an implementation timetable should be drawn up. The implementation timetable should be mentioned in the Hellenic Statistical Programme and in the ELSTAT Annual Statistical Work Programme, and completion of the process steps, and also delays in completion, should be reported in the ELSTAT Annual Reports.
- The certification process applied to any Agency should aim to minimise any disruption caused by a subsequent reorganization or reshuffle of the Agency. The manual “Statement of Principles and Procedures for the Certification of ELSS Statistics” should be adapted accordingly.

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*
- *Eleni Bitrou, Head of Special Accounting Office and Budget Section of the Hellenic Parliament, 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*
- *Jan Plovsing, former Director General of the Danish 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*

Appendix 2

Chronology of Court Proceedings 2011-2017

- **September 2011:** The Prosecutor of Economic Crimes initiated an investigation to examine accusations that Andreas Georgiou and two senior ELSTAT managers conspired to artificially inflate the 2009 government deficit figures to the detriment of Greece.
- **January 2013:** The Prosecutor of Economic Crimes concluded that charges should be pressed against Mr Georgiou and his two senior managers for allegedly inflating the 2009 deficit, thereby causing damage amounting to 171 billion Euro to the Greek economy, and against Mr Georgiou for repeated violation of duty. An Investigating Judge was appointed to advance the process, including the taking of evidence and statements from witnesses and the defendants.
- **July 2013:** The Investigating Judge concluded that the case should be “put to file”, in other words that it should be discontinued and all charges should be dropped. However, following many 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.
- **May 2014 – August 2014:** The Prosecutor assigned to the case recommended to the Appeals Council in May 2014 that the case should be “put to file” and all charges be dropped. This again resulted in forceful public objections from political and other interest groups, who demanded that the Prosecutor’s recommendation be rejected and that the case be referred to open trial. The Council of the Appeals Court saw fit not to accept the recommendations of the Prosecutor and instead issued an Ordinance ordering a further major interrogation “... *to exhaust every possibility to investigate all aspects of the case on the basis of which a sufficiently founded judgement of the court could be formed*”.
- **May 2015 – July 2015:** following a further detailed investigation by a new Investigating Judge, a new Prosecutor assigned to the case recommended to the Council of the Appeals Court to “put the case to file” and drop all charges. This again resulted in public protestations. The Council of the Appeals Court issued an Ordinance acquitting Andreas Georgiou and his two co-accused of the criminal charge of conspiring to falsify the deficit figures and of causing damage of 171 billion euro to the Greek economy. However, the Ordinance decreed that Mr Georgiou should be put on trial for the misdemeanour charge of violation of duty on three counts, namely:
 - Not putting up the 2009 EDP figures for approval by the ELSTAT Board;
 - Not convening the Board after October 2010; and
 - Not being fully and exclusively occupied at ELSTAT for the initial three months of his term of office pending the formal termination of his employment in the IMF in November 2010.
- **September 2015:** The Deputy Prosecutor of the Supreme Court recommended the annulment of the Appeals Court Ordinance in respect of its dropping of the criminal charges of falsifying the deficit and causing damage to the Greek economy against Mr Georgiou and his co-accused. In summary, the reasons advanced by the Deputy Prosecutor for her decision were “*lack of specific and evidence-based reasoning and the erroneous implementation of substantive provisions of the criminal law*”.
- **November 2015 – August 2016:** The Supreme Court examined the annulment proposal of the Deputy Prosecutor of the Supreme Court and eventually instructed the Council of the Appeals Court to re-examine its acquittal ordinance thus re-opening the entire proceedings to fresh investigations.
- **September 2016:** The Chief Prosecutor of the Supreme Court (formerly the Deputy Prosecutor) ordered a new (parallel) preliminary criminal investigation, akin to the one initiated in September 2011, to examine media allegations that there was a conspiracy between EU, IMF and Greek officials to artificially inflate the 2009 government deficit figures.
- **November 2016:** The new Prosecutor appointed by the Council of the Appeals Court to re-examine the case in the light of the Supreme Court decision recommended once again to the Appeals Court that the charges be dropped.
- **December 2016:** The three misdemeanour charges of violation of duty against Mr Georgiou were unanimously rejected by three judges of the Court of First Instance at a trial on 6 December, with the concurring recommendation of the trial prosecutor.
- **December 2016:** The decision of the Court of First Instance to acquit Mr Georgiou in respect of the misdemeanour charges was annulled by another prosecutor and the case was referred to the Appeals Court for re-trial at the higher court level.

- **May 2017:** Once again the Council of the Appeals Court acquitted Andreas Georgiou, and his co-accused, of the criminal charges of falsifying the 2009 deficit figures and causing the Greek State damage amounting to 171 billion euro.
- **July 2017:** For the second time, the Chief Prosecutor of the Supreme Court proposed to annul the acquittal decision of the Council of the Appeals Court and recommended that the case be re-examined again by the Council of the Appeals Court with a different composition.
- **May 2017 – July 2017:** An Appeals Court sat on three occasions to try the misdemeanour charges of violation of duty on three counts against Mr Georgiou. The Court (on 1 August) acquitted him on two counts, namely: for not convening the Board of ELSTAT after October 2010; and of not being fully and exclusively occupied at ELSTAT for the initial three months of his term of office. The Court, however, convicted him on the third count of not putting up the 2009 EDP figures for approval by the former ELSTAT Board and imposed a two-year suspended prison sentence.