

# **Good Practice Advisory Committee**

## **Sixth Report**

December 2019

## 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 (ESCoP) 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 2013<sup>1</sup> and December 2014<sup>2</sup> 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 2016<sup>3</sup> and December 2017<sup>4</sup> respectively over the course of its term of office, which terminated at the end of 2017. Once again, the Minister of Finance issued a Decision (Ref. No. 2/20895/0004) in March 2018 appointing new members for the period 2018-2019 inclusive. Details of the members appointed to the re-convened Committee are given in Appendix 1. Ms. Christina Karamichalakov from ELSTAT was appointed Secretary to the Committee. Mr. Athanasios C. Thanopoulos, who was appointed as President of ELSTAT in February

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<sup>1</sup> [http://www.statistics.gr/documents/20181/1195539/report\\_adv\\_2013\\_EN.pdf/ade26414-2d3d-4eb8-9752-731663065fdf](http://www.statistics.gr/documents/20181/1195539/report_adv_2013_EN.pdf/ade26414-2d3d-4eb8-9752-731663065fdf)

<sup>2</sup> [http://www.statistics.gr/documents/20181/1195539/report\\_adv\\_2014\\_EN.pdf/198f48ca-2b5b-4a53-8a5cbcff2165e810](http://www.statistics.gr/documents/20181/1195539/report_adv_2014_EN.pdf/198f48ca-2b5b-4a53-8a5cbcff2165e810)

<sup>3</sup> [http://www.statistics.gr/documents/20181/1195539/report\\_adv\\_3rd\\_EN.pdf/594fae41-5542-4bf3-bee9-6e878752586d](http://www.statistics.gr/documents/20181/1195539/report_adv_3rd_EN.pdf/594fae41-5542-4bf3-bee9-6e878752586d)

<sup>4</sup> [http://www.statistics.gr/documents/20181/1195539/GPAC\\_4th\\_Report\\_2017.pdf/63133c54-37f4-478b-baab-116ce53239e4](http://www.statistics.gr/documents/20181/1195539/GPAC_4th_Report_2017.pdf/63133c54-37f4-478b-baab-116ce53239e4)

2016 in succession to Mr. Andreas Georgiou, participated in GPAC meetings in accordance with Article 4.5 of the Law. In September 2019, Ms. Karamichalakou was replaced by Ms. Katerina Kalioti as Secretary to the Committee.

The first meeting of the new Committee took place on the 5th of June 2018 and Mr. Stephan Moens, Advisor General at Statistics Belgium and nominee of the ESSC, was elected as Chairman. Given the relatively short period of time available for the preparation of the 5<sup>th</sup> report, the Committee decided to reduce the size of the report and to focus on some issues that are particularly relevant to its mandate rather than systematically reviewing all principles of the ESCoP. The Committee met subsequently on the 10/11th September 2018, and also on the 18th December 2018 to formally adopt the Fifth Annual Report of GPAC<sup>5</sup>.

In 2019, the Committee met on 7/8 May and 4/5 September when it considered a range of issues relevant to its mandate during a number of interactions with senior staff of ELSTAT and other ELSS authorities, as well as a number of external stakeholders. GPAC held its final meeting in 2019 on the 16th of December to formally adopt the Sixth Annual Report of GPAC.

The current report follows, in essence, the structure of the 3rd and 4th Annual Reports and gives a systematic review of the implementation of Principle 1 to 6, including 1bis, of the European Statistics Code of Practice in the Hellenic Statistical System.

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<sup>5</sup> [http://www.statistics.gr/documents/20181/1196143/GPAC\\_5th\\_Report\\_2018.pdf/f54e6c2b-b907-4f93-a008-5c0044bd373b](http://www.statistics.gr/documents/20181/1196143/GPAC_5th_Report_2018.pdf/f54e6c2b-b907-4f93-a008-5c0044bd373b)

# **Review of the implementation of the European Statistics Code of Practice in the Hellenic Statistical System**

## **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.**

ELSTAT is now approaching the tenth anniversary of its establishment in March 2010 as an independent Authority. The circumstances of its establishment were linked to issues with the accuracy and objectivity of the Government Finance Statistics produced over the previous decade, which were largely attributed to undue political influence on its predecessor, the National Statistical Service of Greece (NSSG). Therefore, it was decided to establish the new authority in such a way as to ensure that it could operate in a professionally independent manner. Accordingly, full compliance with Principle 1 of the ESCoP was seen as an overriding and core objective for ELSTAT from the outset. GPAC, since its inception in January 2013, has paid close attention to the implementation of Principle 1 in its annual reports and addressed a number of issues that were brought to its attention. In this report the Committee provides an assessment of the current situation with regard to compliance with Principle 1 and reflects on relevant developments over the ten years of ELSTAT's existence.

From its interactions with a range of ELSTAT's stakeholders (i.e. senior management, the media, academia, public officials, international agencies, etc.), and from its monitoring of how ELSTAT performs its core functions of producing and disseminating official statistics, GPAC is satisfied that the Authority 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.

In its first report for 2013, GPAC concluded that 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 and the Commitment on Confidence in Statistics signed on behalf of the Hellenic Government in February 2012 by the then Prime Minister, Mr Lucas Papademos were both comprehensive and commendable in ensuring professional independence. Since then the Law has been amended on a number of occasions, to further strengthen the independence of ELSTAT. These measures have included:

- the requirement that ELSTAT should be consulted in advance regarding any draft legal provisions that might concern ELSTAT or official statistics or any proposals to create or amend administrative data sources;

- the redefinition of the procedure for the selection of the President of ELSTAT with a view to further enhancing transparency and independence from political interventions;
- the establishment of the Independent Office of the President of ELSTAT to support the incumbent in the discharge of his/her duties and responsibilities;
- the adoption of measures to reduce the potential loss of competent staff due to the non-payment of certain bonuses to recently recruited staff;
- the assignment of new competences to the President in respect of the assignment of staff and in the specification of requirements for the recruitment of specialised scientific staff; and
- the indemnification of the President and other senior officials (acting on his authority) against any legal costs arising from challenges to professional decisions taken in the course of undertaking their duties.

The first two amendments were introduced under Law 4334/2015, while the remaining four were included in Law 4484/2017. GPAC welcomes these measures as serving, both individually and collectively, to strengthen the professional independence of ELSTAT and its President. It is also pleased to note that a number of these measures were adopted in response to recommendations made in earlier GPAC reports. The Committee also notes that the professional independence of ELSTAT and other NSIs throughout the EU was strengthened by amendments to the Regulation (EU) 223/2009 on European statistics, which were adopted under Regulation (EU) 2015/759. These amendments include explicit provisions regarding the duties and responsibilities of the Heads of NSIs in respect of the production of European statistics, including sole responsibility for statistical methodology and the timing and content of statistical releases and the power to coordinate the statistical activities of all national authorities involved in the production of European statistics. While many of these EU provisions replicated similar provisions already in the Greek Statistical Law, it is nevertheless worthwhile that EU law and common legal interpretations will now also have to be taken into account in the event of any legal proceedings.

While welcoming the new legal measures and acknowledging the progress made in this respect, GPAC remains, however, concerned that some measures may not sufficiently result in corresponding changes to the practices that they were intended to address. Accordingly, GPAC would recommend that efforts be intensified to ensure that the provisions of the Statistical Law are respected to the fullest extent in practice and in spirit.

The long running court proceedings against the former President of ELSTAT, Andreas Georgiou, and two senior colleagues for allegedly artificially inflating the 2009 Government Debt and Deficit figures, and thereby causing damages in excess of €200 billion to the Greek economy, reached a final and welcome conclusion in early 2019. On the 8th of March the Council of the Appeals Court recommended for the third time that the defendants be acquitted. On the two previous occasions that the Council recommended that the charges be dropped (in mid-2015 and May 2017) the Supreme Court, acting on recommendations from its Chief Prosecutor, annulled the acquittal decisions and ordered the Appeals Court to re-examine the charges. On this occasion there was no reaction by the Supreme Court, or its Chief Prosecutor, to the annulment decision within the allotted time for such a response and the proceedings are therefore considered to be finally closed.

GPAC welcomes this as an excellent result, not only for Mr. Georgiou and his co-defendants, but also for ELSTAT, the Hellenic Statistical System, EUROSTAT and the European Statistical System, all of whose credibility and integrity were open to question while the proceedings continued. In particular, the decision of ELSTAT and EUROSTAT to continue to publish the disputed figures for 2009, and to use the disputed methodology on which they were based for the compilation of comparable figures for subsequent years, is now no longer being challenged and the professionalism and integrity of Mr Georgiou and his co-defendants in discharging their statistical duties to the highest standards have been confirmed.

GPAC recommends that the Greek Government, in accordance with the Commitment on Confidence in Statistics adopted in 2012, reflect on what actions might be taken to address the exposure of the statistical system and its senior managers to any recurrence of the type of unsubstantiated allegations that led to these proceedings. Furthermore, any outstanding legal proceedings or investigations, related to the substantive charges that have now been rejected should be brought to a formal conclusion without further delay. Finally, the defendants, and in particular Mr Georgiou, incurred substantial legal costs in defending themselves against the unsubstantiated charges. These have been only partly covered by the indemnification system that was put in place somewhat belatedly in 2017. The latter would appear to have been slow in responding to requests for assistance and the limits on the fees refundable would not appear to have reflected the real costs of defending actions of this nature in the Greek courts. Accordingly, GPAC would recommend that the current indemnification system be reviewed and improved so that the President and other senior officials in ELSTAT can be confident that they will be fully supported in the event of any legal challenges to their professional independence.

## **Principle 1bis – Coordination and Cooperation**

**National Statistical Institutes and Eurostat ensure the coordination of all activities for the development, production and dissemination of European statistics at the level of the national statistical system and the European Statistical System, respectively. Statistical authorities actively cooperate within the partnership of the European Statistical System, so as to ensure the development, production and dissemination of European statistics.**

This new principle was introduced into the ESCoP in November 2017 and envisages that the NSI is enabled legally, and in practice, to coordinate the work of Other National Authorities (ONAS) in the production and dissemination of official statistics. GPAC notes that 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 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. A multi-stage certification process has been underway since 2015 and GPAC has reported on progress in previous reports. In May 2019 GPAC was informed that ELSTAT was working with 17 Ministries and 4 other national authorities, which had been identified as part of the ELSS, in order to certify their statistical procedures and outputs. As mentioned in previous reports, the certification process is very comprehensive and intensive and is, therefore, both onerous and time consuming on both the Agencies and ELSTAT. Nevertheless, steady progress continues to be observed, particularly in relation to the completion of the first stage relating to the institutional environment. This 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. GPAC was, however, informed that the change of Government in Greece in mid-2019 has given rise to some difficulties. First, the composition and structure of a number of Ministries and public authorities has 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 has meant that a number of senior officials, who were nominated as Statistical Heads, are no longer in position. ELSTAT will have to adjust the certification process to take account of these changes. Not all the certification work that has been undertaken up to now has to be repeated from scratch but a pragmatic and efficient response will be required. With regard to the appointment of new Statistical Heads, GPAC would encourage 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 can be made quickly in a manner that does not compromise the professional independence of the new appointees.

The Advisory Committee of the Hellenic Statistical Committee (SYEPELSS), which was provided for in an amendment to Article 3 of the Law in 2015 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, is now fully operational. The Advisory Committee is composed of nominees of fourteen national and three EU institutions that have been identified as major users of official statistics produced by the ELSS. The principal function of the committee is to provide a formal opinion on the draft Annual Work Programme and to oversee its implementation. GPAC met with the Chairman of SYEPELSS, Mr. Lekkos, and was informed about its work and plans to make it more effective in fulfilling its mandate to the greatest extent. GPAC welcomes the fact that SYEPELSS is now in operation and believes that, through its widely-drawn membership, it has the potential to strongly support ELSTAT in meeting users' needs through a well-coordinated ELSS.

Specifically, SYEPELSS could work on a more strategic perspective by considering more long term statistical actions, not immediately covered by the upcoming Annual Programme. To this end, the efficiency of SYEPELSS could increase through the operation of internal dedicated working groups on more technical or long-term issues. Furthermore, the establishment of a formal outlet for its opinions could increase its prestige and its outreach towards society.

In addition to its legal mandate, ELSTAT has also bolstered its coordination role through an active engagement with the development and dissemination of indicators for monitoring the achievement of the Sustainable Development Goals (SDGs) established for the UN 2030 Agenda for Sustainable Development. While ELSTAT does not have a designated formal role in relation to the SDGs, 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 produced across the system. 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 encouraged them to join the system (the Ministry of Foreign Affairs has already responded positively). GPAC considers that this is a good 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. ELSTAT has also developed 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 welcomes ELSTAT's active engagement with the SDGs. The indicators have a political priority in most countries and hence active engagement with their production in a coordinated manner will enhance the profile and relevance of both ELSTAT and the ELSS. Furthermore, GPAC recommends that the appropriate procedures should be put in place to strengthen and make sustainable the system for the compilation of SDG indicators.



## **Principle 2 – Mandate for Data Collection and Access to Data**

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

In its 5<sup>th</sup> Report, the Committee did not include a separate item on Principle 2 of the ESCoP. In general, it was assumed that the situation had not substantially changed since the publication of the 4<sup>th</sup> Report. However, it was noted that in the revised ESCoP, a new indicator was added to Principle 2 stating that access for statistical purposes to other (i.e. non-administrative) data, such as privately held data, should be facilitated. The present report takes this new indicator into account.

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. It is, however, a well-known fact that such a legal basis is a necessary but not always a sufficient condition to obtain access to all relevant data that might be used for statistical purposes.

ELSTAT has in recent years made many efforts, through building trust at all levels, to establish a good cooperation with authorities and their officials who control access to administrative data. This was, for instance, the case for the tax authority, who had to be persuaded by ELSTAT before finally giving access to non-anonymised individual tax data on enterprises. It has also been noted that the regular and timely transmission by the tax authority of administrative data to ELSTAT may rely on the availability and cooperation of a limited number of officials. This may create delays in the smooth provision of the data. GPAC would, therefore, advise ELSTAT to intensify contacts on the technical level in order to solve problems of this nature, which may also apply in other authorities.

Some other issues remain open. The production of statistics on Housing Prices is not compliant with the relevant European Regulation since 2011. The fact that this situation remains unsolved is partly related to the non-availability of administrative data. Furthermore, the Ministry of Energy and Environment has developed a new system for the recording of waste. Some quality issues were identified in the first round of recording the data, which it is anticipated will be handled in the second round in the framework of a reorganisation of the system. These are examples of issues that merit ongoing and lasting attention by ELSTAT in order to ensure that access to relevant administrative sources, with the necessary quality, is achieved and maintained.

In general, however, GPAC notes that ELSTAT is now at a good level as regards its access to the administrative data it needs in different statistical domains. The establishment of the new Division for Primary Data Collection (in line with the new organigram of ELSTAT) should be seen as an opportunity for ELSTAT to enhance both the access to, and quality of, administrative data.

From a confidentiality and privacy point of view, it would be even more efficient if ELSTAT had direct access to every administrative database it requires for statistical purposes, instead of relying on data treatments performed upon demand by the organisation hosting the data. This approach would increase agility and also lead to a reduction in the storage and computational power required by

ELSTAT. It will be a challenge to build the necessary trust with administrative data holders to gain acceptance for this form of direct access.

The same goes, as in almost all EU Member States, for the access to and use of other data, such as Big Data and other privately held data. This data could be useful not only as primary input into statistical products, but also for quality control or achieving efficiency gains. It will be a major challenge for the coming years to negotiate with the holders of this data the conditions of access. GPAC recommends that, where appropriate, specific legislation should be put in place to cover access and to ensure full adherence to statistical confidentiality and data protection requirements, as stipulated in indicator 2.4 of the ESCoP.

### **Principle 3 – Adequacy of Resources**

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

In its 2018 report, GPAC mentioned the opportunity created by the proposed new organisational structure of ELSTAT and encouraged ELSTAT to do the utmost to obtain its timely approval. The Committee is therefore pleased that this approval was obtained during the last days of the former Government, thus avoiding an unpredictable process, had this file been passed on to the new Government that took over after the June parliamentary elections. The Committee also welcomes the sense of urgency shown by the Greek Government to ensure that adequate resources are available to the Hellenic Statistical System, in accordance with the Commitment on Confidence in Statistics adopted in 2012.

The Committee thus welcomes ELSTAT's new Organisation (formally adopted under Presidential Decree No 73/2019) along with the planning for recruiting a sufficient number of new highly-specialised staff. The new Organisation provides several advantages to ELSTAT:

Firstly, it permits the adaptation of the Office's structure to the evolving needs of modern statistical processes. In particular, the integration of data capture activities (be they based on administrative sources, Big Data, or traditional surveys) under the control of a single entity will provide important synergies. Similar benefits should also be obtained by a more rational composition of the sectoral divisions, such as is already the case with the new directorate of Business Statistics; and, finally, by the reinforcement of the capacity to certify statistical operations of other agencies of the ELSS.

Secondly, it establishes a net increase of about 370 permanent posts over the next few years, representing an increase close to 50 % on existing levels. A significant proportion of these posts will be used to reclassify certain contracted posts as permanent positions. Additional staff resources will also be available to ELSTAT to allocate to priority areas, including those that are important for driving change.

Thirdly, the ability to replace, in a timely manner, the significant number of permanent officials who will retire in the coming months and years will be improved.

Furthermore, it is worth highlighting that all necessary resources required for conducting the Censuses (Agricultural Census, Population and Housing Census) are put in place in advance within the agreed budget, as this is a key prerequisite for implementing ELSTAT's work efficiently and independently.

GPAC believes that the resources offered to the statistical authorities, in terms of sanctioned posts, are sufficient to satisfy the national and European statistics' requirements. However, it will be important to ensure that prioritised vacancies are filled, in a timely manner, with competent and qualified staff. In this regard, GPAC is concerned that the recruitment and mobility procedures in the Greek public service are somewhat inflexible and can give rise to long delays.

Among other challenges that could arise, GPAC would point out:

Concerning the promotion procedures of the organisational units' supervisors, the margin ELSTAT has in this regard is subject to the limits that the specific legal framework establishes.

ELSTAT is now finalising the job descriptions for all existing and new posts. A quick progress is needed in order to avoid unnecessary delays.

Finding professionals with the adequate skills for a modern statistical office may prove to be difficult, especially in some domains where expertise evolves very quickly, as is the case of IT functions. GPAC suggest that in this, and perhaps other cases, outsourcing may prove to be a possibility to ensure the availability of staff with the capacity to quickly adapt to constantly changing technology. Therefore, the Committee recommends 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.

In relation to JOSGAP, the 5<sup>th</sup> report of GPAC pointed out the risks of discontinuing this source of financing that has permitted progress to be made in the past in specific domains, mainly in Government Finance Statistics. It is now acknowledged, following interviews with Eurostat and ELSTAT senior managers, that the time has come to bring the JOSGAP program to a conclusion. For that purpose, ELSTAT should prepare a report to be sent to Eurostat in order to start the procedure for a formal closure that has to receive the agreement of the relevant ECOFIN Committee.

Furthermore, and in order to cope with the reduction of resources that will ensue after JOSGAP, the Committee recommends the study of alternative sources of financing, in particular the Structural Reform Support Programme of the European Commission, a programme that is handled by a central entity in each Member State.

## **Principle 4 – Commitment to Quality**

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

### **New quality system of ELSTAT**

The 4<sup>th</sup> report of GPAC welcomed the plans presented to deal with the compliance with the ESCoP on quality issues under the guidance of the newly created High Level Group (HLG) for monitoring and managing the quality of statistical works. The report encouraged further the enabling of the Group to play an encompassing role in providing proactive leadership on quality issues throughout the Authority. In particular, this Group would be involved in several activities such as monitoring self-assessment processes; developing a programme of quality audits; and producing follow up reports on the quality of data sources.

However, GPAC was informed in discussions with the President and other senior officials during the last two years that ELSTAT has experienced a lack of effectiveness in the functioning of this HLG. The officials stressed that this structure could not address specific and specialised issues, thus challenging the efficiency of the Group that, according to them, seemed to operate on the basis of a corrective approach rather than on a preventive/proactive one.

GPAC was informed that ELSTAT is now considering to rely for quality issues on a more decentralised bottom-up approach, where each quality issue will be discussed in an ad hoc group led by a Director and including senior officials involved in the specific domain. ELSTAT expects that this new quality system will permit more flexibility, featuring a quality control system based on the establishment of mid and top management committees, as well as on the operation of ad-hoc groups including the participation of one Director General, one Director and one data handler, depending on the statistical domain to be addressed. These committees will have regular meetings with the President of ELSTAT, while more frequent follow up meetings will be held between the President and the two Directors General. The official process for the setup of these committees and groups is yet to be decided, but the most important issue is considered to be the drafting of an initial map providing for flexibility and interoperability.

The areas for improvement could be identified after taking into consideration Eurostat's indications, users' feedback and the outcome of the internal self-assessment procedure conducted by ELSTAT for the compliance of its Divisions with the ESCoP. An early warning system could also be put into place not only for European but for other statistics as well, in order to have a proactive approach for addressing specific issues. This new approach is expected to facilitate going down to the details and identifying specific shortcomings in the statistical production processes, while at the same time integrating expert opinion from ELSTAT managers.

However, GPAC remains concerned that the absence of a top-level corporate structure in ELSTAT, in contrast with many other NSIs, could make it difficult to have a corporate management approach to quality. Such a structure would ensure top-level decision making and prioritising, and, at the same time, the steering of all quality processes. It was in this context that the Committee had welcomed

the establishment of the High-Level Group on Quality in ELSTAT in 2014. It felt that a top-down approach to quality would ensure an encompassing approach to quality for all issues in the NSI as well as facilitating the implementation of decisions.

GPAC is not entirely convinced that the new proposal will guarantee a proactive and exhaustive approach to identifying the quality actions and establishing priorities for improvement actions. Consequently, it recommends that a right balance should be sought between the new “bottom-up” approach proposed for the quality system and the hitherto followed “top-down” approach.

The Committee urges ELSTAT to deliver a time frame and procedures for the new quality system in order to be able to evaluate it as regards its capacity to guarantee overall quality in the ELSS.

### **User satisfaction survey**

The User Satisfaction Survey of ELSTAT, which runs on its website, is voluntary and is addressed to users who have requested data from ELSTAT. The questionnaire of the survey includes, among others, questions concerning the website. Users who only visit the website of ELSTAT without requesting data do not participate in the survey. In case the coverage of the User Satisfaction survey is extended to include such visitors, a modified (shorter and more focused on the website) version of the questionnaire needs to be created and used.

GPAC considers that the commissioning of this survey by SYEPELSS would increase its credibility and transparency.

Furthermore, the Committee considers that ELSTAT should set targets in measuring and assessing the satisfaction of users. This is a practice that has been applied by other European countries and has proven to motivate positively the staff of the NSIs.

## **Principle 5 - Statistical Confidentiality and Data Protection**

**The privacy of data providers, the confidentiality of the information they provide, its use only for statistical purposes and the security of the data are absolutely guaranteed.**

In its 5<sup>th</sup> report, GPAC recommended that ELSTAT should take appropriate steps to adapt its processes regarding the development of new information systems and applications to the GDPR principle of data protection by design and default, as well as to pursue the inclusion of legal provisions to facilitate the compilation of official statistics. Moreover, GPAC expressed its concerns about the longstanding pending issue regarding the signing of the statistical declaration by the staff. In all these issues, there has been significant progress.

In particular, the principle of data protection by design and default was taken into account in the census and justice statistics. GPAC welcomes the way ELSTAT has organised the implementation and compliance monitoring of GDPR, as well as the initiative to use the method ‘Bring Your Own Device (BYOD)’ in the pilot survey of the agricultural census. Also, the organised internal training seminars on GDPR intended for personnel at headquarters and Regional Offices are very useful in increasing the degree of employee awareness about GDPR compliance requirements.

The Committee is pleased to note that ELSTAT's procedures relating to the release of personally identifiable data for research purposes, supported by data disclosure control technology, are aligned with GDPR requirements. Requests for tailor-made data are treated by the Statistical Confidentiality Committee, involving also the DPO in case of personal data.

A further development was the adoption of the national law for the introduction of the necessary specific provisions and derogations implementing Regulation (EU) 2016/679 (GDPR), as well as the incorporation of Directive 680/2016 in the Greek legal order, taking under consideration ELSTAT's suggestions to facilitate its official statistical work. The Committee takes a positive view of the abovementioned legislative developments and urges ELSTAT to further pursue the inclusion of provisions in the statistical law or other relevant laws that may facilitate its work. GPAC will follow up closely the drafting of specific national legislation concerning the facilitation of ELSTAT's statistical work.

The signing of the confidentiality declaration by all the employees of ELSTAT is welcomed as a very positive development, which resolves a pending issue since 2013. The confidentiality declaration was signed by the entirety of its personnel.

As in the previous year's report, the Committee welcomes ELSTAT's constantly expressed vision to pursue the development of organisational and technical solutions that allow data handling at the sources where appropriate, thus limiting the threats relating to transfer, storage and processing of the data in ELSTAT's information and network infrastructure. Such an approach would preserve statistical confidentiality and personal data protection in particular, since the risks to the rights and freedoms of natural persons are widely eliminated.

Finally, GPAC urges ELSTAT to continue its GDPR compliance efforts and recommends that ELSTAT should cooperate and exchange views on complying with GDPR at a technical level with other European NSIs.

## **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 the present report, GPAC will focus its review of Principle 6 on dissemination and communication aspects, including actions for fostering statistical literacy, as well as on pre-release access and the timeliness of publication.

### **Communication**

In meetings with members of academia and the press, GPAC was able to form an opinion on the quality, transparency and equitability of ELSTAT's communication.

Researchers are in general satisfied with the variety and quality of the data ELSTAT provides, as well as with the services it offers. The cooperation of the staff of ELSTAT and the support they provide

was widely praised. On the other hand, some users pointed out some data lacunae that need to be addressed (e.g. in cross-border labour statistics).

GPAC encourages ELSTAT to continue engaging with power users from academia in order to extend its range of products, refine and modernise its methodology and continue to assist users and to provide information and expert advice.

### **Actions on statistical literacy**

In recent years, ELSTAT has undertaken a project with multiple actions for fostering statistical literacy in Greece. The overall aim is to create long term relationships with users and in this way keep public close to the world of official statistics. The project is based on four pillars:

- actions addressed to students
- actions addressed to high ranking public administrators and civil servants
- actions designed for policy makers
- actions designed for journalists

The actions of the first and the fourth pillar are in the implementation phase, while those of the second and the third pillar are at the design phase.

Actions undertaken until now include thematic conferences addressed to journalists, speeches of the President to school and university students, academics and professional journalists, creation and dissemination of a video in the framework of the UN campaign “better data – better lives”, and promotion on social media under the hash-tag “Greek data matter”.

ELSTAT was actively involved in the creation and operation of the first EMOS awarded postgraduate university programme in Greece, where the President will teach not only statistical production but also aspects such as dissemination, statistical disclosure, comparability of data based on common methodologies, tracing authenticity of data provided by ELSTAT, fundamental principles of official statistics etc.

GPAC recognises the importance of the engagement of ELSTAT with students and other stakeholders. The Committee was impressed by the actions and the plans of ELSTAT in the framework of fostering statistical literacy in Greece as well as by the high response to these actions. GPAC encourages ELSTAT to intensify these actions and extend them to new audiences. To this end, increasing the number of officials who participate in this activity would be necessary and useful as a motivation and appropriation factor.

### **Pre-release access**

ELSTAT operates very clearly as regards pre-release access; it has a no pre-release policy. No breaches of this policy in 2019 were brought to the attention of the Committee. GPAC recommends the adoption of a similar no pre-release policy as good practice by other members of the Greek Statistical System. Such a general rule would be an example of good practice for adoption by other national statistical systems.

### **Timely publication of data**

ELSTAT publishes an annual release calendar in advance (for example, the calendar for 2020 was already on the website in September 2019) that gives the expected dates of release for all statistical outputs. This is in line with indicator 6.5 of the ESCoP. Most data are published on time, in line with the release calendar. Whenever a postponement is needed, this is notified. Major revisions are announced, in line with indicator 6.6.

The maintenance of regularity and consistency in terms of content, time of release, format, etc. in ELSTAT's press releases is very important for the automated electronic press outlets. It is equally important that any change in these be well indicated and flagged. However, for the important statistics produced by ELSTAT, such as EDP and GDP, there have been no delays in their release.

It was brought to the attention of the Committee that some users, especially from the press, would prefer certain figures to be published earlier. In this respect, GPAC would advise the striking of the right balance between the legitimate wishes of users and a realistic use of the release calendar, in order to avoid unnecessary postponements.



## 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*
- *Gerry O' Hanlon, former Director General of the Irish Central Statistics Office, nominee of the European Statistical Governance Advisory Board (ESGAB), 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*