

# Single Integrated Metadata Structure (SIMS)

**Country:** Greece

**Compiling agency:** ELSTAT

**Domain name:** SURVEY ON ROAD ACCIDENTS

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## 2. Introduction

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### 2.1 Introduction

Pursuant to the joint Ministerial Decision 3894/B-77/26-4-1978 issued by the Ministers of Coordination, Justice, Transport and Public Order on the “definition of a statistical work programme of the Statistical Service of the Ministry of Public Order”, which was published in the Government Gazette No 445/B/10-5-78, the Statistical Service of the Ministry of Public Order undertook the task to collect, process and present statistical data referring to Greece total on Road Accidents.

The purpose of the survey is to record the number of Road Accidents by fatal and/or non-fatal accident, as well as the number of persons injured by categories (drivers, passengers, pedestrians).

The survey has been producing results since 1962; it is a census survey and is conducted through the monthly collection of data from the local Police and Port Authorities of Greece. The data are checked for completeness and accuracy, are codified and are further processed in order to produce tables. The survey results are presented on a yearly basis in the printed publications of ELSTAT and are also posted on the portal of the Hellenic Statistical Authority ([www.statistics.gr](http://www.statistics.gr)) at the link: <<Statistical Themes > Health Social Protection > Accidents > Road Accidents>>.

The annual primary data are transmitted to the Statistical Office of the European Communities (SOEC) in a predefined format, not later than nine months after the end of the reference year in question (article 2.2 of the Decision 704/93/EC on the creation of a Community database on road accidents).

## 3. Metadata update

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3.1 Metadata last certified	October 2014
3.2 Metadata last posted	October 2014
3.3 Metadata last update	October 2014

## 4. Statistical presentation

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### 4.1 Data description

The survey on road accidents is conducted on a monthly basis through the collection of statistical questionnaires filled in by the Police and Port Authorities of Greece. It is a census survey and it records, for each Department (NUTS 3) of Greece and for each month separately, the number of accidents by fatal and/or non-fatal accident, as well as the number of persons injured by categories (drivers, passengers, pedestrians). On a yearly basis, road accidents are further analyzed.

The survey does not take into consideration any filled in questionnaires referring to incidents that took place in areas which are not used for the circulation of the public (e.g., accidents in fields, yards, industrial sites or vehicle depot of enterprises, private parking places) and to incidents where the vehicles were not in motion (e.g. a pedestrian falling on a parked vehicle). The share of the above incidents does not exceed 0.4% of the surveyed population.

### 4.2 Classification system

The place where the accident took place is classified in accordance with the Register of Settlements of the 2001 Population Census broken, down by 8-digit geographical codes in line with the statistical classification

NUTS.

The type of road where the accident took place is classified as: "New National Highway", "National Highway", "Rural or Municipal Road", in accordance with a specific classification used for the Survey on Road Accidents.

Citizenship of drivers and persons injured is classified in accordance with Regulation (EC) No 3079/1994.

#### 4.3 Sector coverage

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#### 4.4 Statistical concepts and definitions

- 1) **Road accident** (injury accident): any accident involving at least one road motor vehicle in motion on a public road or square to which the public has access (excluding yards, industrial sites or vehicle depot of public transport enterprises), resulting in at least one injured or killed person.
- 2) **Person killed**: any person killed immediately or dying within 30 days as a result of an injury accident.
- 3) **Person injured**: any person who sustained an injury as result of an injury accident, and who normally needs medical treatment.
- 4) **Seriously injured**: any person who sustained an injury as result of an injury accident, such as brain damages, mutilation, multiple injuries, which may result in lack of awareness or which are life-threatening.
- 5) **Slightly injured**: any person injured who sustained minor and not life-threatening injuries.
- 6) **Vehicle**: for the purposes of road accidents statistics, vehicles include motor vehicles, trolleybuses, motorcycles, bicycles, motorbikes, agricultural and road making machines, animal and hand-drawn vehicles. Railway vehicles are excluded, unless the road accident involves one of the aforementioned types of vehicles and therefore, railway vehicles are considered vehicles

#### 4.5 Statistical unit

The number of road accidents and the number of injured persons.

#### 4.6 Statistical population

All the road accidents and the total number of injured persons by category (drivers, passengers, pedestrians).

#### 4.7 Reference area

All the Departments (NUTS 3) of Greece are covered.

#### 4.8 Time coverage

The survey on road accidents is conducted on a monthly base and has been producing results since 1962.

#### 4.9 Base period

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### 5. Unit of measure

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1. The number of road accidents by fatal and/or non-fatal accident
2. The number of injured persons by category (drivers, passengers, pedestrians)

## 6. Reference period

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The survey on road accidents is conducted on a monthly basis. On a yearly basis, accidents are further analyzed.

## 7. Institutional mandate

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### 7.1 Legal acts and other agreements

The legal framework concerning the organization and operation of ELSTAT is as follows:

- **Law 3832/2010** (Government Gazette No 38, Issue A): "*Hellenic Statistical System Establishment of the Hellenic Statistical Authority (ELSTAT) as an Independent Authority*", as amended by article 90 paragraphs 8 and 9 of the Law 3842/2010 (Government Gazette No 58, Issue A): "*Restoration of fiscal justice, confrontation of tax evasion and other provisions*", by article 10 of the Law 3899/2010 (Government Gazette No 212, Issue A): "*Urgent measures for the implementation of the assistance program of the Greek Economy*", by article 45 of the Law 3943/2011 (Government Gazette No 66, Issue A): "*Combating tax evasion, staffing of auditing services and other provisions falling within the competence of the Ministry of Finance*", by article 22 paragraph 1 of the Law 3965/2011 (Government Gazette No 113, Issue A): "*Operations Reform of the Consignment and Loan Fund, Public Debt Management Agency, Public Enterprises and Government bodies, the establishment of the General Secretary of Public Property and other provisions*", by article first of the Law 4047/2012 (Government Gazette No 31, Issue A): "*Ratification of the Act of Legislative Content "Very urgent measures for the implementation of the Medium-term Fiscal Strategy 2012-2015 and of the State Budget for 2011" and of the Act of Legislative Content "Regulation of very urgent issues for the implementation of law 4024/2011 "Pension provisions, uniform pay scale - grading system, labour reserve and other provisions for the implementation of the Medium-term Fiscal Strategy Framework 2012-1015" and of issues falling within the competence of the Ministries of Administrative Reform and E-Governance, Interior, Finance, Environment, Energy and Climate Change, and of Education, Lifelong Learning and Religious Affairs and related to the implementation of the Medium-term Fiscal Strategy Framework 2012-2015" and other provisions*", by article 323 of the Law 4072/2012 (Government Gazette No 86, Issue A): "*Improvement of the business environment New corporate form - Trade Marks - Realtors - Regulating maritime, port and fishing matters and other provisions*" and by article 7 paragraph 1 of the Act of Legislative Content dated 18/11/2012 (Government Gazette No 228, Issue A): "*Financial rules and other provisions*", by Article 93 of the Law 4182/2013 (Government Gazette No 185, Issue A): "*Code of charitable estate, inheritances in abeyance and other provisions*", by Article 6 paragraph 8 of the Law 4244/2014 (Government Gazette 60, Issue A): "*Integration in Greek law of the Council Directive 2013/1/EU of 20 December 2012 amending Directive 93/109/EC as regards certain detailed arrangements for the exercise of the right to vote and stand as a candidate in elections to the European Parliament for citizens of the Union residing in a Member State of which they are not nationals and amendment of law 2196/1994 (A' 41) and other provisions*", by Article first subparagraph C.3 of the Law 4254/2014 (Government Gazette No 85, Issue A): "*Measures for the support and development of the Greek economy, in the context of the implementation of Law 4046/2012, and other provisions of law*" and by Article 33, paragraphs 5a and 5b of the Law 4258/2014 (Government Gazette No 94, Issue A): "*Demarcation process and arrangements of matters for streams - arrangements of Urban Planning legislation and other provisions*".
- **Regulation on the Operation and Administration of the Hellenic Statistical Authority (ELSTAT)**, 2012, (Government Gazette No 2390, Issue B, 28-8-2012)
- **Regulation (EC) No 223/2009 of the European Parliament and of the Council**, on the European statistics (Official Journal of the European Union L 87/164).
- **Article 14 of the Law 3470/2006** (Government Gazette No 132, Issue A): "*National Export Council, tax regulations and other provisions*".
- **Article 3, paragraph 1c, of the Law 3448/2006** (Government Gazette No 57, Issue A): "*For the further use of information coming from the public sector and the settlement of matters falling within the responsibility of the Ministry of Interior, Public Administration and Decentralization*".
- **European Statistics Code of Practice**, adopted by the Statistical Programme Committee on 24 February 2005 and promulgated in the Commission Recommendation of 25 May 2005 on the

independence, integrity and accountability of the national and Community statistical Authorities, after its revision, which was adopted on 28 September 2011 by the European Statistical System Committee.

- **Presidential Decree 226/2000** (Government Gazette No 195, Issue A): "*Organization of the General Secretariat of the National Statistical Service of Greece*".
- **Articles 4, 12, 13, 14, 15 and 16 of the Law 2392/1996** (Government Gazette No 60, Issue A): "*Access of the General Secretariat of the National Statistical Service of Greece to administrative sources and administrative files, Statistical Confidentiality Committee, settlement of matters concerning the conduct of censuses and statistical works, as well as of matters of the General Secretariat of the National Statistical Service of Greece*".

Moreover, the Survey on Road Accidents is conducted pursuant to Decision No 704/93 of the Council of the European Union concerning the creation of a Community database on road accidents.

## 7.2 Data sharing

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## 8. Confidentiality

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### 8.1 Confidentiality policy

The issues concerning the observance of statistical confidentiality by the Hellenic Statistical Authority (ELSTAT) are arranged by articles 7, 8 and 9 of the Law 3832/2010 as in force, by Articles 8, 10 and 11(2) of the Regulation on Statistical Obligations of the agencies of the Hellenic Statistical System and by Articles 10 and 15 of the Regulation on the Operation and Administration of ELSTAT.

More precisely:

ELSTAT disseminates the statistics in compliance with the statistical principles of the European Statistics Code of Practice and in particular with the principle of statistical confidentiality.

### 8.2 Confidentiality – data treatment

- ELSTAT protects and does not disseminate data it has obtained or it has access to, which enable the direct or indirect identification of the statistical units that have provided them by the disclosure of individual information directly received for statistical purposes or indirectly supplied from administrative or other sources. ELSTAT takes all appropriate preventive measures so as to render impossible the identification of individual statistical units by technical or other means that might reasonably be used by a third party. Statistical data that could potentially enable the identification of the statistical unit are disseminated by ELSTAT if and only if:
  - a) these data have been treated, as it is specifically set out in the Regulation on Statistical Obligations of the agencies of the Hellenic Statistical System (ELSS), in such a way that their dissemination does not prejudice statistical confidentiality or
  - b) the statistical unit has given its consent, without any reservations, for the disclosure of data.
- The confidential data that are transmitted by ELSS agencies to ELSTAT are used exclusively for statistical purposes and the only persons who have the right to have access to these data are the personnel engaged in this task and appointed by an act of the President of ELSTAT.
- ELSTAT may grant researchers conducting statistical analyses for scientific purposes access to data that enable the indirect identification of the statistical units concerned. The access is granted provided the following conditions are satisfied:
  - a) an appropriate request together with a detailed research proposal in conformity with current scientific standards have been submitted;

- b) the research proposal indicates in sufficient detail the set of data to be accessed, the methods of analyzing them, and the time needed for the research;
  - c) a contract specifying the conditions for access, the obligations of the researchers, the measures for respecting the confidentiality of statistical data and the sanctions in case of breach of these obligations has been signed by the individual researcher, by his/her institution, or by the organization commissioning the research, as the case may be, and by ELSTAT.
- Issues referring to the observance of statistical confidentiality are examined by the Statistical Confidentiality Committee (SCC) operating in ELSTAT. The responsibilities of this Committee are to make recommendations to the President of ELSTAT on:
    - the level of detail at which statistical data can be disseminated, so as the identification, either directly or indirectly, of the surveyed statistical unit is not possible;
    - the anonymization criteria for the microdata provided to users;
    - the granting to researchers access to confidential data for scientific purposes.
  - The staff of ELSTAT, under any employment status, as well as the temporary survey workers who are employed for the collection of statistical data in statistical surveys conducted by ELSTAT, who acquire access by any means to confidential data, are bound by the principle of confidentiality and must use these data exclusively for the statistical purposes of ELSTAT. After the termination of their term of office, they are not allowed to use these data for any purpose.
  - Violation of data confidentiality and/or statistical confidentiality by any civil servant or employee of ELSTAT constitutes the disciplinary offence of violation of duty and may be punished with the penalty of final dismissal.
  - ELSTAT, by its decision, may impose a penalty amounting from ten thousand (10,000) up to two hundred thousand (200,000) euros to anyone who violates the confidentiality of data and/or statistical confidentiality. The penalty is always imposed after the hearing of the defense of the person liable for the breach, depending on the gravity and the repercussions of the violation. Any relapse constitutes an aggravating factor for the assessment of the administrative sanction.

<b>9. Release policy</b>	<a href="#">Top</a>
<b>9.1 Release calendar</b>	
In September of each year, ELSTAT publishes its 12-month release calendar, which outlines the release dates (Press Releases) for all statistics that are planned for next year.	
<b>9.2 Release calendar access</b>	
The release calendar is disseminated to the media and it is available to users for free. The release calendar is also posted on the webpage of ELSTAT ( <a href="http://www.statistics.gr">www.statistics.gr</a> ) under: "Release Calendar".	
<b>9.3 User access</b>	
The data are released simultaneously to all users through the relevant Press Release entitled "Road Traffic Accidents" which is posted on the webpage of ELSTAT ( <a href="http://www.statistics.gr">http://www.statistics.gr</a> ) on the predefined date. Moreover, all users have equal access to the annual tables which are posted on the webpage of ELSTAT, <a href="http://www.statistics.gr">http://www.statistics.gr</a> , at the link "Statistical Themes > Health > Social Protection > Road Accidents". Equal access of all users to data is governed by the European Statistics Code of Practice by respecting scientific independence and in an objective, professional and transparent manner in which all users are treated equitably.	

## 10. Frequency of dissemination

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The provisional results of the survey are published 2 months after the end of the reference month and the final results are released 9 months after the end of the reference year. At the same time, the annual primary data are transmitted to the Statistical Office of the European Communities (SOEC) in a predefined format, not later than nine months after the end of the reference year in question (article 2,2 of the Decision 704/93/EC).

## 11. Dissemination format

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### 11.1 News release

The relevant Press Release is posted on the portal of ELSTAT the last working day of every month.

### 11.2 Publications

A. The “**Statistical Yearbook of Greece**” is available for a fee to subscribers and upon request to the Hellenic Statistical Authority.

Final annual results are published pertaining to the following:

- a. Road accidents
- b. Persons injured in road accidents
- c. Persons injured in road accidents by age groups
- d. Persons injured in road accidents by categories of injured persons (drivers, passengers, pedestrians)

B. The “**Concise Yearbook of Greece**” is available for a fee to subscribers and upon request to the Hellenic Statistical Authority.

Final annual results are published pertaining to the following:

- a. Road accidents and persons injured
- b. Road accidents and persons injured by month
- c. Road accidents and persons injured by day of the week
- d. Persons injured by categories of injured persons (drivers, passengers, pedestrians) and age groups

C. The “**Monthly Statistical Bulletin**” is available for a fee to subscribers and upon request to the Hellenic Statistical Authority.

Final monthly results are published pertaining to road traffic accident and to injured persons.

All the above publications are available at:

Statistical Information and Publications Division

46, Pireos & Eponiton str, P.O. BOX 80847, Postal Code 18510 Piraeus

Tel. (+30) 213-135 2022, 2023, 2308, 2346,

FAX: (+30) 213-135 2819, 2312

E-mail: [library@statistics.gr](mailto:library@statistics.gr), [data.dissem@statistics.gr](mailto:data.dissem@statistics.gr)

### 11.3 On-line database

There is not any on-line database.

#### 11.3.1 Data tables - consultations

Total access to the website as regards the above survey for the year 2013 amounts to 10.235 hits.

### 11.4 Micro-data access

Microdata are made available to users after their submitting a request to the:  
Division of Statistical Information and Publications

46, Peireos and Eponiton Str.,  
18510 Piraeus  
Tel. (+30) 213-135 2022, 2023, 2308, 2346,  
FAX: (+30) 213-135 2819, 2312  
E-mail: [library@statistics.gr](mailto:library@statistics.gr), [data.dissem@statistics.gr](mailto:data.dissem@statistics.gr)

Confidentiality of data is always ensured (see field 8). For confidentiality reasons, access to microdata is granted only under stringent conditions and by fully observing the relevant procedure.

## 11.5 Other

A number of tabulated data are available to all users on the portal of ELSTAT at the following link:  
[http://www.statistics.gr/portal/page/portal/ESYE/PAGE-themes?p\\_param=A2102](http://www.statistics.gr/portal/page/portal/ESYE/PAGE-themes?p_param=A2102)

Furthermore, more tabulated data are made to users after their submitting a request to the:

Division of Statistical Information and Publications

46, Peireos and Eponiton Str.,

18510 Piraeus

Tel. (+30) 213-135 2022, 2023, 2308, 2346,

FAX: (+30) 213-135 2819, 2312

E-mail: [library@statistics.gr](mailto:library@statistics.gr), [data.dissem@statistics.gr](mailto:data.dissem@statistics.gr)

Confidentiality of data is always ensured (see field 8).

### 11.5.1 Metadata – consultations

Data on metadata consultations are included in paragraph 11.3.1.

## 12. Accessibility of documentation

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### 12.1 Documentation on methodology

Not compiled.

#### 12.1.1 Metadata completeness - rate

Metadata completeness rate is 100% (number of metadata elements provided/total number of metadata elements applicable).

### 12.2 Quality documentation

Not compiled.

## 13. Quality management

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### 13.1 Quality assurance

Quality controls and validation of data are carried out during the whole process of the compilation of statistics, from the data collection stage to the final compilation of the tables and more specifically:

- During the stage of data collection, the number of incoming questionnaires by month is cross-checked with the number of accidents resulting from the monthly reports for the compilation of the press release.
- During the stage of checking/processing of the questionnaires, the number of accidents is cross-checked with the number of accidents in the press release.

During the stage of the compilation of the tables, the final monthly results and the annual results are cross-checked with the monthly results of the press releases and with the final annual results of the previous year.

## 13.2 Quality assessment

After all the above checks, cross-checks and comparisons taking place in every stage, the correction of any errors and the necessary adjustments, the produced results are considered high quality results.

## 14. Relevance

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### 14.1 User needs

The main users of the survey data are, inter alia, the following: the Ministry of Citizen's Protection, the Ministry of Infrastructure, Transport and Networks, the University of Thessaloniki, the National Technical University, the National School of Public Health, the Transport Institute, the Technical Chamber of Greece, students researchers, construction enterprises, Eurostat, the UN, OECD, etc.

Once users' needs are identified, the questionnaire is re-designed, when necessary, very carefully so as not to compromise the comparability of data over time.

### 14.2 User satisfaction

A Users Satisfaction Survey is conducted by the Section of Statistical Dissemination. The survey results are available at : <http://www.statistics.gr/portal/page/portal/ESYE/PAGE-conferences>

### 14.3 Completeness

On the basis of users' needs, completeness is considered satisfactory.

## 15. Accuracy and reliability

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### 15.1 Overall accuracy

Since the survey is a census survey, any non-sampling errors (non-response or processing errors) are identified by means of appropriate checking and are duly corrected, in cooperation with the administrative data sources, thus producing high accuracy results.

### 15.2 Sampling errors

No sampling errors, because the survey is a census survey and data are collected from administrative sources.

### 15.3 Non-sampling errors

Non-response errors are due to non-transmission of questionnaires and in these cases there is a contact with the data sources either by phone or by a reminder letter. Non-response errors may also be due to the fact that some of the variables of the questionnaire are not filled in or are erroneously filled in; in these cases, after the checks carried out by the competent employees of ELSTAT the errors are duly corrected in cooperation with the involved authorities, namely the Police and the Port Police.

#### 15.3.1 Coverage error

The filled in questionnaires of the survey are collected from all the Police and Port Authorities and, when necessary, reminders (by post or telephone) are used on a regular basis.

##### 15.3.1.1 Over-coverage – rate

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#### **15.3.1.2 Common units – proportion**

No common statistical processes are implemented.

#### **15.3.2 Measurement error**

During data collection, no measurement errors are observed.

#### **15.3.3 Non response error**

During the phase of codification, the collected questionnaires are checked in order to confirm that they are correctly filled in. Cases of non-response are addressed directly by the staff of the competent Sections of ELSTAT, after having contacted with the administrative sources involved.

#### **15.3.4 Processing error**

No errors are observed in the final results of the data collection-data processing phases.

Quality checks are conducted throughout the production process of the statistical output, from data collection until the compilation of tables. More specifically, during the data processing phase, in cooperation with the Division of Informatics, all the necessary logical-electronical checks are carried out in order to eliminate any errors during the processing of microdata.

#### **15.3.5 Model assumption error**

No model is required to be implemented for this survey.

### **16. Timeliness and punctuality**

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#### **16.1 Timeliness**

The provisional results are published 60 days after the end of the reference month and the final results are published 270 days after the end of the reference year.

#### **16.2 Punctuality**

No delays in the release of the results.

### **17. Comparability**

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#### **17.1 Comparability - geographical**

The results are characterised by geographical comparability.  
Common definitions and units of measure are used in all the EU Member States.

##### **17.1.1 Asymmetry for mirror flows statistics – coefficient**

Not applicable.

#### **17.2 Comparability over time**

From 1-1-1996, dead person is considered any person killed immediately or dying within 30 days as a result of an injury accident. Before 1-1-1996 dead person was considered any person killed immediately or dying within 3 days as a result of an injury accident.

With the aim of ensuring comparability of results, over time, for the years 1963 - 1995, a corrective factor (+18%) is applied on the number of dead persons. In this way, a common definition for “dead person” is established since 1963 according to which: “dead person is considered any person killed immediately or dying within 30 days as a result of an injury accident”.

Moreover, in 1998 the Register of National Highways and Rural Roads was established.

<b>18. Coherence</b>	<a href="#">Top</a>
<b>18.1 Coherence cross-domain</b>	
<p>There are no differences between the results of the survey on road accidents and other relevant statistical results.</p> <p><b>18.1.1 Coherence – sub annual and annual statistics</b> The main aggregates of the survey are coherent as regards monthly and annual statistics.</p> <p><b>18.1.2 Coherence – National Accounts</b> Not applicable. There are no common variables with National Accounts.</p>	
<b>18.2 Coherence – internal</b>	
<p>There are not significant differences between the common variables of the survey and the variables of other surveys.</p>	
<b>19. Cost and burden</b>	<a href="#">Top</a>
<p>Not estimated.</p>	
<b>20. Data revision</b>	<a href="#">Top</a>
<b>20.1 Revision policy</b>	
<p>For population weights, the results of the latest population census are used. The weights of the data are revised once the latest population census results are made available so as the new information is better reflected in the population groups.</p> <p>The Revision Policy of ELSTAT is implemented for the survey.  <a href="http://www.statistics.gr/portal/page/portal/ESYE/BUCKET/General/ELSTAT_Revisions_Policy_22_5_2013_EN.pdf">http://www.statistics.gr/portal/page/portal/ESYE/BUCKET/General/ELSTAT_Revisions_Policy_22_5_2013_EN.pdf</a></p>	
<b>20.2 Revision practice</b>	
<p>The Revision Policy of ELSTAT is implemented.</p>	
<b>21. Statistical processing</b>	<a href="#">Top</a>
<b>21.1 Source data</b>	
<p>Primary data derive from administrative sources (Police, Port Authorities) through the completion of a specially designed statistical questionnaire providing information on the place of the accident (conditions of the road surface, type of the road, geometrical characteristics of the road and weather conditions during the accident) the type of the first collision, any maneuvers which caused the accident, specific data on the vehicles involved in the accident, data on the driver and persons injured, as well as data on the use of safety equipment.</p>	
<b>21.2 Frequency of data collection</b>	
<p>Data are collected on a monthly basis.</p>	

### 21.3 Data collection

The questionnaires after having been duly filled in by the competent employees of the Police/Port Police are transmitted to the Section of Justice and Public Order Statistics of ELSTAT.

### 21.4 Data validation

Data are validated by means of a series of qualitative and quantitative checks which are mainly based on:

1. Cross-checking of final survey aggregates with the corresponding provisional monthly data.
2. Comparisons between the main aggregates of the survey with the corresponding aggregates of the main administrative source (Police/Port Police).
3. Checks in terms of their consistency over time (significant year-on year fluctuations).

### 21.5 Data compilation

The data after having been collected undergo logical checks, they are codified, imported in the electronic database, tabulated and finally they are published.

#### **21.5.1 Imputation – rate**

Not applicable.

### 21.6 Adjustment

No adjustment.

#### **21.6.1 Seasonal adjustment**

No statistical techniques or seasonal adjustment tools are used in order to eliminate any seasonal impacts on data.

## 22. Comment

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