

PEER REVIEW REPORT

ON COMPLIANCE WITH THE CODE OF PRACTICE AND
THE COORDINATION ROLE OF THE NATIONAL STATISTICAL INSTITUTE

GREECE

RICHARD ALLDRITT
MICHELLE JOUENAL
JAUME GARCIA VILLAR

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1. EXECUTIVE SUMMARY

The Hellenic Statistical Authority (ELSTAT) was established in its current form by legislation in 2010. According to the wording of the Law 'ELSTAT enjoys operational independence, administrative and financial autonomy, and it is not subject to the control of any governmental body or other administrative authority.' The same Law defines the Hellenic Statistical System (ELSS) as being 'the set of rules, activities and agencies responsible for the conduct of statistical operations aiming at the development, production and dissemination of the country's official statistics, which are used for the decision and policy making at local, national, European and international level.' It defines 'official statistics' as being 'those statistics, which are developed, produced and disseminated by ELSTAT and the other ELSS agencies, provided they have been certified by ELSTAT.'

Since 2010 ELSTAT has been implementing the Joint Overall Statistical Greek Action Plan (JOSGAP). This action plan was drawn up by the European Commission and the Greek authorities, on the basis of the findings of the Commission's report of January 2010 on Greek government deficit and debt statistics. Its goal was to address the problems in Greek government finance statistics and, more generally, to help restore the reliability of Greek official statistics. The actions of the plan are being implemented in close cooperation with Eurostat and with the assistance of experts from across Europe.

In March 2012, the European Commission approved Greece's Commitment on Confidence in Statistics (CoC), which was endorsed by the Greek Parliament and signed by the Prime Minister of Greece. This followed a proposal a year earlier that all Member States should sign up to such Commitments. In the Greek Commitment, the government makes a number of pledges with a view to ensuring that official statistics are reliable, credible and independently compiled. These include ensuring that Greek statistics meet European and international quality standards and defending the professional independence of the ELSS, and in particular the independence of ELSTAT. An annex to the Commitment lists areas for improvement. Some of these were subsequently incorporated into the Greek Statistical Law as envisaged in the Commitment. An independent statistical advisory board - the Good Practice Advisory Committee (GPAC) - was established to report annually on the application of Principles 1-6 (institutional environment) of the European statistics Code of Practice (CoP) by the ELSS.

The findings of this Peer Review have been informed by reports relating to progress in implementing the JOSGAP action plan, and the first annual report of GPAC which was published in September 2013. Although this report focuses on the challenges facing the ELSS it also identifies many positive observations. The commitment of the top management of ELSTAT to professional independence and European standards is very strong, and rooted in a closely reasoned interpretation of the principles of the CoP. This explicit commitment has greatly enhanced ELSTAT's reputation among leading external commentators and stakeholders.

More generally, the substantial progress made by ELSTAT since the Statistical Law of 2010 was introduced was commented on by almost everyone to whom the Peer Review team spoke. Whilst the capacity to achieve rapid progress of this kind is not of itself a CoP indicator, it may be seen in the case of ELSTAT as having been a pre-condition for future CoP compliance, and ELSTAT has clearly demonstrated that capacity.

Another strength is the range and scope of the statistical legislation and related regulations now in place, including the CoC. There are still some significant problems to be overcome in relation to the implementation of the provisions in these legal instruments but their existence is nonetheless an important strength.

There are also a number of innovative features of the arrangements now in place or under development (see Section 4.1) and this capacity and willingness to innovate is itself a strength.

Despite the generally strong statutory framework, the resolute commitment of top management to European standards and cooperation, and the rapid progress seen in recent years, there remain some major challenges.

The most important recommendations of this report are those addressed to the relevant authorities within the Greek Government and they mostly relate to implementation of commitments and statutory requirements that already exist. In making these recommendations, the Peer Review team are echoing, almost exactly, the conclusions of GPAC and the progress reports relating to JOSGAP. The CoP implicitly assumes that when something is written in to national law, or is otherwise the subject of a formal commitment, it will happen. That there are still delays and obstacles, at the end of 2014, to the realisation of the model set out clearly in the 2010 legislation and the 2012 CoC cannot be regarded as compliant with the CoP.

There is one specific aspect of the 2010 Statistical Law that the Peer Review team concluded needs to be amended as a matter of priority. This relates to the arrangements for the appointment of the President of ELSTAT, which as described in the Law, seem insufficient in terms of the skills and experience required of candidates, and too much open to negotiation between the political parties in terms of process. The role of the President is fundamental to the sustainability of the rapid progress that ELSTAT has made since 2010 and with the current term of the President approaching its end date, the process for future appointments needs to command wide acceptance. The CoP requires that the appointment be based on 'professional competence only'.

The other issues addressed in the recommendations are more typical of the challenges facing many European national statistical offices. With perhaps one third of the statistical work contributing to European statistics carried out by national authorities other than ELSTAT itself, the need to build coherence and co-operation across the ELSS is evident and there is still a long way to go in that regard.

There are also a range of steps that could be taken over time to further enhance both the external reputation and internal processes of both ELSTAT and the ELSS. These are the subject of the remaining recommendations and, in the view of the Peer Review team, would further enhance compliance with the CoP.

The recommendations are grouped under four headings. The first three (Sustainability, Co-ordination of the ELSS and Building reputation) deal with the relevance of the external environment to compliance with the Code of Practice and with ELSTAT's engagement with the external environment. The fourth group 'Subsidiary issues' mostly relate to developments that ELSTAT already has in view but with additional emphasis on particular aspects.

Implementation of recommendations 1-4 and 6 below, addressed to the relevant authorities within the Greek Government, is essential before the ELSS can be regarded as compliant with the European statistics Code of Practice. The other recommendations will enhance compliance.

RECOMMENDATIONS

Sustainability

1. The relevant authorities in the Greek government must ensure that the Hellenic Statistical Authority has the practical authority to spend its budget on staff resources and contracts for services, in line with the commitments to financial and administrative independence already enshrined in law. (European statistics Code of Practice, Principles 1 and 3)
2. The relevant authorities must fulfil the commitments set out in the Commitment on Confidence signed by the Prime Minister of Greece, most urgently as regards the provision of adequate and stable resources. (European statistics Code of Practice, Principles 1 and 3)
3. The relevant authorities must provide the Hellenic Statistical Authority with access to administrative data in accordance with the requirements of the Statistical Law and related memoranda of understanding and agreements. (European statistics Code of Practice, Principles 1,2, 8 and 10)
4. Specifically, the relevant authorities must, without further delay, provide the Hellenic Statistical Authority with access to tax records to support the production of business statistics, as required by the Statistical Law and agreed between the parties in memoranda. (European statistics Code of Practice, Principles 1, 2, 8 and 10)
5. The Hellenic Statistical Authority should put proposals to the relevant authorities to amend the Statistical Law to give the Hellenic Statistical Authority the right to be consulted on the design of, and validation of, any administrative data system elsewhere in the public sector that has the potential to produce statistical data of public value. The amendments should also create an obligation on all public authorities to invite the Hellenic Statistical Authority to advise on these matters. (European statistics Code of Practice, indicators 8.7 and 8.9)
6. The relevant authorities, on the advice of the Hellenic Statistical Authority, should propose to Parliament amendments to the Statistical Law in respect of the arrangements for the appointment of the President - specifically to change the stated selection criteria to better reflect the skills required and to reduce to an absolute minimum political involvement in the selection process. (European statistics Code of Practice, indicator 1.2)
7. The Hellenic Statistical Authority should put proposals to the relevant authorities for an amendment to the Statistical Law such that the Good Practice Advisory Committee shall continue to operate. (European statistics Code of Practice, Principles 1-6)

Co-ordination of the Hellenic Statistical System

8. Bearing in mind the recommendation above relating to the Good Practice Advisory Committee, and informed by international consultation with experts in statistical governance, the Hellenic Statistical Authority and the other relevant authorities should review the membership and chairmanship of the Council of the Hellenic Statistical System to ensure the future effectiveness and coherence of the advisory functions. (European statistics Code of Practice, Principles 1, 10, 11-15 and coordination)

9. The Hellenic Statistical Authority should give increased priority to the formal certification of those Hellenic Statistical System agencies responsible for the development, production and dissemination of European statistics (“national authorities”), to fulfil as soon as practicable the requirements of the Statistical Law and the Regulations. (European statistics Code of Practice, Principle 1)
10. The national authorities within the Hellenic Statistical System should give greater priority to developing the internal quality procedures associated with their statistical processes and the statistical products - and as part of this should make sure that adequate process documentation exists as soon as possible, and not wait on the certification process requiring it. (European statistics Code of Practice, Principles 4 and 8)
11. Each of the other national authorities producing European statistics should nominate the most appropriate senior, statistically qualified, individual in that organisation as the ‘Senior Statistical Professional’ and delegate to that individual (on the authority of the relevant Minister) practical authority for all statistical decisions relating to the Code of Practice. The Hellenic Statistical Authority should also put forward proposals for this requirement to be included in the Regulation on the Statistical Obligations of the Agencies of the Hellenic Statistical System. (European statistics Code of Practice, Principle 1)
12. The Hellenic Statistical Authority should establish a Coordination Committee of the Hellenic Statistical System chaired by the President of the Hellenic Statistical Authority. (Coordination)
13. Each of the other national authorities should identify those published statistical reports and press releases that relate to official statistics (those statistics that will be official once certified) and include in each a prominent statement that the publication forms part of the output of the Hellenic Statistical System and is required to comply with the Code of Practice. (European statistics Code of Practice, Principles 14 and 15)

Building reputation

14. The Hellenic Statistical Authority should aim to develop its current system of statistical press releases to provide more guidance and advice to users of statistics. (European statistics Code of Practice, Principle 15)
15. The Hellenic Statistical Authority should aim to develop its existing good relationships with the academic community to further promote the use of microdata and encourage the analysis of official statistics, and thus further enhance its public reputation. (European statistics Code of Practice, Principles 7 and 15)
16. The Hellenic Statistical Authority should aim to develop its organisational culture to put more emphasis on service to users and the value of open dialogue with different user communities, so as to support statistical planning, to understand and stimulate use, and to further build external and internal confidence in itself as an institution. (European statistics Code of Practice, Principle 11)

Subsidiary issues

17. The Hellenic Statistical Authority should complete the work to adopt a new organisational chart describing responsibilities and functions within the institution to improve long term efficiency. Special attention should be paid to how to fit within the organisational structure the proposed Research and Studies Department. (European statistics Code of Practice, Principles 3 and 10)

18. The Hellenic Statistical Authority should aim over time to delegate more routine decision-making to middle managers in order to enhance efficiency and ease the current burden on senior managers. (European statistics Code of Practice, Principles 3 and 10)
19. The Hellenic Statistical Authority and the agencies of the Hellenic Statistical System should take further steps to ensure that their criteria and decision-making processes in relation to the provision of microdata and other data for research are well understood both internally and externally. (European statistics Code of Practice, Principles 11 and 15)
20. The Hellenic Statistical Authority and the agencies of the Hellenic Statistical System should examine international best practice with a view to further improving the accessibility of microdata by academic researchers in the longer term. (European statistics Code of Practice, Principles 11 and 15)
21. The Hellenic Statistical Authority should incorporate into the 'Regulation on the Operation and Administration of the Hellenic Statistical Authority': a) the recently established process of systematic assessment of each division of the Hellenic Statistical Authority against the Code of Practice and b) the ongoing existence and functions of the Group for Supervision and Management of Quality. (European statistics Code of Practice, Principle 4)
22. The Hellenic Statistical Authority should ensure that the documentation of statistical processes is given high priority within all its divisions. (European statistics Code of Practice, indicators 4.2, 12.2 and 15.5)
23. The Hellenic Statistical Authority should seek to improve its human resource management and financial accounting systems to allow more detailed allocation of resources to the different statistical processes and products. (European statistics Code of Practice, Principle 10)
24. The Hellenic Statistical Authority should seek to make further improvements to its website making use of new methods for data presentation and handling in order to make it more user-friendly. (European statistics Code of Practice, Principle 15)
25. The Hellenic Statistical Authority should devote more efforts to develop a coherent and public system for assessing response burden and use it to track efficiency gains as it increasingly obtains access to administrative data. (European statistics Code of Practice, Principle 9)
26. The Hellenic Statistical Authority should seek to prepare analyses comparing statistics from different sources relating to the same phenomenon in order to improve the coherence and completeness of the statistical message. (European statistics Code of Practice, Principle 14)

2. INTRODUCTION

This Peer Review report is part of a series of assessments, the objective of which is to evaluate the extent to which National Statistical Institutes (NSIs) and the European Statistical System (ESS)¹ comply with the European statistics Code of Practice (CoP).

The CoP, which sets out a common quality framework for the ESS, was first adopted in 2005 by the Statistical Programme Committee and updated in 2011 by its successor, the European Statistical System Committee. The CoP - 15 principles and related indicators of good practice - covers the institutional environment, the statistical production process and the output of European statistics. The ESS is committed to fully complying with the CoP and is working towards its full implementation. Periodic assessments review progress towards reaching this goal.

The first global assessment, a round of peer reviews in 2006 – 2008, explored how the NSIs and Eurostat were progressing in implementing the parts of the CoP relating to the institutional environment and dissemination of statistics (principles 1 – 6 and 15). This resulted in reports for each NSI and Eurostat, available on the Eurostat website². These reports also include a set of improvement actions covering all the principles of the CoP; these informed the annual monitoring of the implementation of the CoP in the ESS in the period 2009-2013.

The scope of this second round of peer reviews is broader: the assessment of CoP compliance covers all principles; the CoP compliance of selected other national producers of European statistics (as well as the NSI) in each country is being assessed; and the way in which statistical authorities coordinate the production and dissemination of European statistics within their statistical systems is being explored.

It should be underlined that there is a fundamental difference between the reports in the previous round of peer reviews conducted in 2006-2008 and the reports from this round. In the 2006-2008 round compliance with principles 1 to 6 and 15 of the CoP was assessed by means of a four-level scale (fully met; largely met; partly met and not met) and improvement actions were agreed on all 15 principles. After five years of continuous development most of the improvement actions have been implemented and significant progress towards full compliance with the CoP has been made. Therefore, rather than stating the state of play for all principles of the CoP, the reports from the 2013-2015 round mainly focus on issues where full compliance with the CoP has not been found or further improvements are recommended by the Peer Review team.

In order to gain an independent view, the peer review exercise has been externalised and an audit-like approach, where all the answers to the self-assessment questionnaires have to be supported by evidence, has been applied. As in 2006-2008, all EU Member States and EFTA/EEA countries and Eurostat are subject to a peer review.

Each peer review in the Member States and EFTA/EEA countries is conducted by three reviewers and has four phases: completion of self-assessment questionnaires by a country; their assessment by Peer Reviewers; a peer review visit; and the preparation of reports on the outcomes. The peer review of Eurostat has been conducted by the European Statistical Governance Advisory Board (ESGAB).

¹The ESS is the partnership between the Union statistical authority, which is the Commission (Eurostat), and the national statistical institutes (NSIs) and other national authorities responsible in each Member State for the development, production and dissemination of European statistics. This Partnership also includes the EEA and EFTA countries.

²<http://ec.europa.eu/eurostat/web/quality/first-round-of-peer-reviews>

To test and complete the methodology, it was piloted in two countries, Iceland and Slovakia, over the summer of 2013.

The Peer Review of Greece was conducted by Richard Alldritt (chair), Jaume Garcia Villar and Michelle Jouvenal, and included a Peer Review visit to Athens on 17-21 November 2014. The programme of the visit is in Annex A and a list of participants in Annex B.

This report focuses on compliance with the CoP and the coordination of European statistics within the Greek statistical system. The report highlights some of the strengths of the Hellenic Statistical Authority (ELSTAT) in these contexts and contains recommendations for improvement. Improvement actions developed by ELSTAT and other relevant authorities on the basis of this report will be published within the four-week period starting when the final report is sent to the NSI.

3. BRIEF DESCRIPTION OF THE NATIONAL STATISTICAL SYSTEM

The Hellenic Statistical Authority (ELSTAT) was established in its current form by legislation in 2010. Law 3832/2010 states that ELSTAT ‘enjoys operational independence, administrative and financial autonomy, and it is not subject to the control of any governmental body or other administrative authority’. The Law defines the Hellenic Statistical System (ELSS) as being ‘the set of rules, activities and agencies responsible for the conduct of statistical operations aiming at the development, production and dissemination of the country’s official statistics, which are used for the decision and policy making at local, national, European and international level.’ The Law defines ‘official statistics’ as ‘those statistics, which are developed, produced and disseminated by ELSTAT and the other ELSS agencies, provided they have been certified by ELSTAT’ (the process of certification is set out elsewhere in the legislation).

Objectives

The statutory objectives of ELSTAT are ‘the systematic production of official statistics and the conduct of scientific research and studies which: a) concern all public and private sector activities, b) support the decision-making procedure, the preparation and evaluation of the policies of the Government and of the public sector agencies (evaluation indices), c) are submitted to international agencies pursuant to the country’s obligations, and d) apply to the general public or to specific categories of statistical data users in Greece or abroad.’

ELSTAT’s stated mission is ‘to safeguard and continuously improve the quality of the country’s statistics.’ In pursuit of this it seeks to follow the highest European and international standards of statistical practice. ELSTAT commits itself to observe the following principles:

- Be and remain, beyond any doubt, an independent Statistical Authority, and always function in a way that reflects this very principle;
- Produce statistics that are useful –relevant– for public policy, the economy, and more broadly the life of the people;
- Earn and continuously renew the confidence of users of statistics in their credibility and reliability;
- Obtain and safeguard the confidence of the statistical reporting units –the households, enterprises, and other entities– which provide confidential information for the production of statistical data.

ELSTAT also commits to strive for full cooperation with Eurostat and the other Services of the European Commission, as well as with the National Statistical Institutes of the other member states.

Structure

As well as the President’s Office there are 2 General Directorates covering 13 Divisions. There are also 50 Regional Offices. Of a total of 780 staff some 216 work in Regional Offices.

The General Directorate of Administration and Organization has the following Divisions: Administrative Support; Financial Management; Informatics; Organization, Methodology and International Relations; and Statistical Information and Publications.

The General Directorate of Statistical Surveys covers: National Accounts; Primary Sector Statistics; Secondary Sector Statistics; Trade and Services Statistics; Population and Labour Market Statistics; Social Statistics; Economic and Short-Term Indices.

Legislation

The main Laws and Regulations are:

- Statistical Law 3832/2010: the national statistical law establishing the Hellenic Statistical System (ELSS), and the Hellenic Statistical Authority (ELSTAT) as an independent Authority.
- Regulation on the Statistical Obligations of the Agencies of ELSS: This Regulation defines the criteria for an agency being a part of the ELSS, the obligations arising, and the role of ELSTAT in the ELSS.
- Regulation on the Operation and Administration of ELSTAT: Apart from issues of internal operation this regulation also determines the special issues related to ELSTAT's competencies in compliance with the European Union (EU) and national legislation in force, the rules of deontology and the methodology of ELSS.
- Presidential Decree 226/2000: This concerns the Organization of the General Secretariat of the former National Statistical Service of Greece, which will be replaced by the new Organization of ELSTAT to be established.
- Law 4051/2012: This Law authorises the Greek Prime Minister to represent the Hellenic Republic and co-sign with the European Commission the Greek Commitment on Confidence in Statistics (CoC).

Under the 2010 Law, the President of ELSTAT is selected by the Conference of the Presidents of the Hellenic Parliament by a four-fifths majority, at the proposal of the Minister of Finance, following a public call for applications for the position. Following his selection by the Conference of the Presidents, the President of ELSTAT is appointed for a five-year term. That term in office may be renewed once only, by a similar decision and by following the same procedure.

Statistical programme

The Hellenic Statistical Program (ELSP) covers a three year period. It sets out the work priorities of the ELSS under EU and international obligations. These priorities take account of the human and financial resources required as well as the administrative burden involved. The ELSP is the basis on which the authorities belonging to ELSS (thereafter referred as to ELSS agencies) compile their annual statistical programs. The ELSP is approved every three years by ELSTAT, after obtaining the opinion of the Council of the Hellenic Statistical System (SYELSS). It is then submitted to the Hellenic Parliament and to the Minister of Finance, and is published.

ELSTAT's annual Statistical Work Program includes information on:

- New statistics planned; and planned changes (improvements, revisions etc.);
- Planned actions aimed at ensuring and improving quality, including the use of administrative data and the use of technology;
- Planned actions aimed at reducing the burden of respondents;
- Planned actions aimed at enhancing the accessibility of produced statistics;
- Conferences planned, which are addressed to users and producers of statistics;
- The estimated costs of implementation of the Statistical Work Program.

The Work Program is submitted to the Hellenic Parliament and the Minister of Finance. It is accompanied by the annual evaluation report of the Statistical Work Program of the previous year, and is published on ELSTAT's website.

4. COMPLIANCE WITH THE CODE OF PRACTICE AND THE COORDINATION ROLE WITHIN THE NATIONAL STATISTICAL SYSTEM

4.1 STRENGTHS OF THE NATIONAL STATISTICAL INSTITUTE IN RELATION TO ITS COMPLIANCE WITH THE CODE OF PRACTICE AND TO ITS COORDINATION ROLE

This section of the report identifies some aspects of the CoP in relation to which ELSTAT or the ELSS is regarded by the Peer Review team as particularly strong, and further identifies some practices within the ELSS that are seen as innovative in the sense of potentially being of wider application within the ESS.

The commitment of the top management of ELSTAT to the concept of professional independence is very strong, and firmly rooted in both personal conviction and a closely reasoned interpretation of the principles and indicators under Principle 1 of the CoP. This commitment to internalise the full meaning of professional independence has greatly enhanced ELSTAT's reputation among some of the leading stakeholders to whom the Peer Review team spoke. External observers are in no doubt that ELSTAT will do all it can to fulfil all aspects of the CoP and, in terms of both the perception and the reality, this is a real strength.

Another strength in relation to Principle 1 of the CoP is the range and scope of the statistical legislation and related regulations now in place, including the Commitment on Confidence (CoC) signed by the Prime Minister of Greece in 2012. As is explained later in this section of the report, there are still some significant problems to be overcome in relation to the implementation of the provisions in these legal instruments but their existence is nonetheless an important strength in that their intent is both clear and helpful.

More generally, the substantial progress made by ELSTAT since the Statistical Law of 2010 was introduced was commented on by almost everyone to whom the Peer Review team spoke. Whilst the capacity to achieve rapid progress of this kind is not of itself a CoP indicator, it may be seen in the case of ELSTAT as having been a pre-condition for future CoP compliance, and ELSTAT has clearly demonstrated that capacity.

In relation to Principle 3 of the CoP, although ELSTAT's resources are undoubtedly stretched, and this is a source of concern to both staff and external observers, it is also true that ELSTAT has many able experts among its staff (actively supported by international expertise in some cases) who work exceptionally hard to meet the demands placed on them. The recent practice of recruiting staff by transfer from other parts of the public administration in Greece has also brought some additional strength and experience to the organisation. The more recent recruits to whom the Peer Review team spoke contrasted positively the principled and progressive culture of ELSTAT with other places they had worked. Thus, despite the resource pressures there are also strengths in relation to Principle 3.

In the context of statistical processes, the CoP demands that "European and other international standards, guidelines and good practices are fully observed...". ELSTAT has a highly developed approach to engagement with other national and international statistical offices and expertise. This has given it confidence in its own practices and enabled it to make progressive changes, building on external advice. ELSTAT not only observes standards, guidelines and good practice, but seeks the active involvement of the wider statistical community in helping it to interpret them in the national context.

In terms of innovative practices, some of the arrangements put in place by the 2010 legislation and subsequently are, in the view of the Peer Review team, of a kind that might well have wider application in Europe. Among these are:

- The establishment of a Good Practice Advisory Committee (GPAC), with expert international membership, to report formally and openly on compliance with the Institutional Environment parts of the CoP. This body has clearly been both influential and supportive.
- The 'Regulation on the Statistical Obligations of the ELSS Agencies' is innovative in setting out in a statutory document the expectations on those parts of the statistical system that lie outside ELSTAT, in more detail than just a general requirement to conform to the CoP.
- The certification scheme, set out in the Regulations, under which the statistical work of each of the 19 ELSS agencies is subject to a formal certification review and report against the standards of the CoP, is a powerful device to build a cohesive statistical service and ensure compliance with the European standards. As yet it is at an early stage in development but it can still be seen as an innovation.
- The systematic internal reviews against the CoP recently established within ELSTAT, involving teams of six trained staff (2 for each main section of the CoP) reviewing in a structured way the work of each division against the CoP. The details of this approach have innovative features.

4.2 ISSUES AND RECOMMENDATIONS

In considering the compliance of the ELSS with the CoP, the Peer Review team concluded that there were two possible approaches. One would be simply to look at a snapshot – a cross-sectional view – of how the arrangements and procedures currently in place comply with the standards of the CoP at the time of the Peer Review. However, this would tend to ignore some of the more important aspects of the wider picture. The alternative approach would be to look at the dynamics of the current position; what is changing that will enhance compliance and why; what should be changing and what obstacles are in the way of such change. This is a more complex approach and gives rise to more substantive recommendations. The first three sections below (4.2.1 Sustainability, 4.2.2 Co-ordination of the ELSS and 4.2.3 Building reputation) deal with these big picture issues. The remaining section (4.2.4 Subsidiary issues) deals with more specific cross-sectional matters; that is those issues that also need to be addressed but which the Peer Review team recognises as likely to be achieved as ELSTAT and the ELSS continue their rapid development.

4.2.1 SUSTAINABILITY

The ELSS, and in particular ELSTAT as the National Statistical Institute (NSI), and the central institution of the ELSS, has made impressive progress since the Statistical Law of 2010 came into force. There have been numerous and important developments in relation to statistical methods, the scope and outputs of the work, and the practical implementation of many aspects of the CoP. However, it is also clear that some key elements of the legislation are yet to be fully implemented and that this is both an obstacle to sustainable progress and a drain on ELSTAT resources, particularly affecting senior management.

The external environment

The CoP does not say anything directly about the political and administrative environment in which NSIs operate. However, there is a clear assumption that governments and other institutions at the national level will actively support the independence of the National Statistical System (NSS) and adherence to the CoP. Regulation EC 223/2009 on European statistics defines professional independence to mean that statistical production shall be “free from any pressures from political or interest groups or from Community or national authorities, without prejudice to institutional settings, such as Community or national institutional or budgetary provisions or definitions of statistical needs.”

The first GPAC annual report (September 2013) states that “there are still a number of serious negative cultural and other factors in the wider external environment that must be addressed. The most important of these is the ongoing legal proceedings against the President and two senior officials of ELSTAT, which in the view of the Committee is seriously undermining the professional independence of ELSTAT in practice.” GPAC further states that it is “surprised that statistical methodological decisions, which have been formally validated in accordance with EU regulations, are the subject of legal proceedings.” In addition, it expresses the opinion “that there is a significant political context to the proceedings and that there is therefore an urgent need for an appropriate intervention, in line with the Commitment on Confidence, by Government and/or Parliamentary leaders to defend and support the professional independence of ELSTAT and its management.”

There is also a perception within ELSTAT itself that some stakeholders within the Greek political and administrative environment do not want to recognise the independence of the NSI, or do not accept the principle that statistical production should be independent from policy structures and political goals. One external interviewee to whom the Peer Review team spoke suggested that the value of an independent statistical system had not been internalised within Greek public administration and wider culture.

The Peer Review team considered afresh the evidence underlying these strong expressions of concern and concluded that the external environment in which ELSTAT and the ELSS operate appears at times to be passively resistant to ELSTAT’s operational independence as part of the ESS (Principle 1 of the CoP) and at times appears to be actively hostile to it. There are a number of documented examples and cases that might be noted to illustrate this observation but the Review team was particularly concerned about the following:

- a) The legal proceeding against the President and two senior officials of ELSTAT: the methodological issues contested in the legal proceedings are subject to mandatory EU rules which make the legal challenge appear perverse to the international statistical community and to conflict with the statutory duty to observe the CoP. The heads of all the NSIs of the EU Member States unanimously signed a letter expressing serious concerns. Differences of opinion on methodological matters do arise, but in the case of the public finance statistics these differences are conclusively addressed through the relevant EU regulation.

ELSTAT management has identified the court proceedings as a major area of weakness with regard to managers maintaining professional independence over the long term. The prolonged nature of the proceedings will inevitably distract ELSTAT managers from the implementation of the CoP. Moreover, as long as the court proceeding continue, ELSTAT’s professional reputation remains at risk. GPAC noted the ‘virtual silence’ of the Government and Parliamentary leaders on the proceedings despite the frequent political comments on the matter and observed that this ‘appears to be at variance with’ the

commitment in the CoC to guarantee and defend the professional independence of the ELSS, and to promote it to the public through appropriate communication actions.

- b) Statements made at national level: there have been examples of public statements by prominent organisations, the media and individuals that point to a wider antagonism towards statistical independence. One example was in August 2013, when a Parliamentary spokesperson for one of the major political parties openly called for “*curtailment of the powers of the under-trial-for-manipulating-the-deficit-figures president of ELSTAT*”. Another example arose in a letter from the President of the Bar Associations of Greece to the Chief Prosecutor of the Supreme Court which referred to “*the possible commitment of serious criminal offences mostly due to lack of any resistance by means of negotiation on the basis of the practice that had invariably been adopted previously, swelling of the revised deficit of 2009 to 15.4%.*” (English translations provided by ELSTAT). The latter statement seems to indicate a belief that the practice of ‘negotiating’ deficit statistics was acceptable and had been established practice.
- c) The decision by the highest administrative court in Greece that a particular institution should be removed from ELSTAT’s statistical Register of General Government Entities, despite the fact that the decision to include it was taken by ELSTAT in accordance with EU Regulations, and that it had been examined and validated repeatedly by Eurostat. This is a decision which should be made solely by the statistical authorities in line with the professional independence required by the CoP.
- d) A written submission to the Peer Review team by the Panhellenic Association of National Statistical Service of Greece Employees. Among other statements, the letter accuses the Troika of interference in the legal framework in contradiction of the principle of professional independence, and the President of ELSTAT of being unable to inspire a ‘sense of independence and credibility’ due to his former role at the International Monetary Fund (IMF). It also questions the integrity of Greek statistics, partly on the ground that the President is not subject to clear accountability. The Peer Review team was grateful for the written submission but does not find the main arguments persuasive. The tone and content of the submission point to tensions within ELSTAT as a result of changes to the legal and administrative framework, and the severe pressures on resources, that have been evident in recent years. The Peer Review team noted these concerns.

Taking all these observations together, and bearing in mind that they are only examples, it is apparent that the environment, both external and internal, in which ELSTAT operates is in some respects distrustful and tense, and therefore not conducive to sustainable progress towards full compliance with the CoP. Several of the recommendations of the Peer Review team are intended to help address this.

Administrative and financial autonomy

The Statistical Law (3832/2010) refers to ELSTAT as ‘an Independent Administrative Authority’ and states that it ‘enjoys operational independence, administrative and financial autonomy and it is not subject to the control of any government body or other administrative authority’. Of course, the autonomy of any public body within a democratic system of government is subject to the normal constraints relating to respect for the law, and probity in respect of its expenditure and a wide range of policies relating to all government institutions. So, in the context of ELSTAT, words such as ‘administrative and financial autonomy’ are subject to interpretation. There are, quite properly, many limits and controls and those controls are determined and exercised by other bodies within the Greek government, Parliament and judiciary. The Peer Review team thus needed to consider whether the current level of administrative and financial autonomy available to ELSTAT

could reasonably be seen to correspond with the intention of the legislation and the requirements of the CoP Principle 1 in respect of professional independence. This matter was addressed in the September 2013 report of the GPAC and the Peer Review team's conclusions closely reflect those of the Committee.

There is an important link between budgetary autonomy and professional independence. Without effective budgetary autonomy ELSTAT will be vulnerable to potential interference from external bodies. Any lack of clarity in terms of budgetary autonomy needs to be addressed with this in mind. It is evident from the drafting of the Statistical Law and the CoC that the link between professional independence and budgetary autonomy was clearly understood.

For ELSTAT to be able to deliver its statutory mandate in a cost-effective and professionally independent manner, it requires clarity about the availability of the necessary budgetary resources to implement the agreed statistical programme. It also needs operational independence in the use of such resources. Full budgetary autonomy from 2013 onwards was envisaged under the Statistical Law and in the CoC but, despite some progress, obstacles appear to remain to its full achievement in practice. GPAC recommended in its 2013 report that "the remaining obstacles to full budgetary autonomy be removed without delay."

As the Joint Overall Statistical Greek Action Plan (JOSGAP) report for Quarter 1 of 2013 noted, a number of administrative issues between the Ministry of Finance and ELSTAT needed to be resolved as a matter of urgency. ELSTAT reported in June 2013 to GPAC that progress had been made on resolving some of these issues but others remained to be addressed in a satisfactory manner. One of these is a demand from the Ministry of Finance that ELSTAT should sign a Memorandum of Understanding whereby it would accept in-year ex ante control by the Ministry over its budgetary planning and execution. The conclusion of both the JOSGAP report and GPAC was that such a measure would be at variance with the objective of ELSTAT being independent in regard to the execution of its agreed annual budget.

Anticipating the potential argument that ELSTAT should be subject to tighter than normal budgetary control to ensure full accountability, the GPAC report responds as follows:

"Under the law ELSTAT is required to report regularly to the Parliament, and all expenditures (and revenues) are controlled and approved by the Court of Auditors. Furthermore, budgetary approval is based on the prior submission well in advance of detailed annual work programmes that include information on the related budgetary implications. These work programmes consist in the main of highly measurable activities which are also, under the requirements of the Code of Practice, subject to full transparency and the application of a comprehensive range of quality measures."

The evidence available to the Peer Review team reinforces the opinion noted in the GPAC report that a lack of effective budgetary autonomy leaves ELSTAT and the wider ELSS vulnerable to potential external interference in internal decision-making – beyond that appropriate to the normal accountability of a public body to government and parliament. Moreover, the consumption of large amounts of management time in contesting external interventions (for example in relation to staff appointments or the tendering of contracts for new technology) compounds the loss of efficiency and effectiveness arising directly from the interventions. Thus, the sufficiency of resources (Principle 3 of the CoP) is doubly impacted, first by excessive external control and secondly by the distraction of senior management effort.

Bearing in mind all these considerations, in order so that the Hellenic Statistical System can be regarded as compliant with the CoP, **the Peer Reviewers recommend that:**

- 1. The relevant authorities in the Greek government must ensure that the Hellenic Statistical Authority has the practical authority to spend its budget on staff resources and contracts for services, in line with the commitments to financial and administrative independence already enshrined in law. (European statistics Code of Practice, Principles 1 and 3.)**

Commitment on Confidence

The Commitment on Confidence in Statistics (CoC) was formally signed by the Prime Minister on behalf of the Greek Government in February 2012. It is also enshrined fully in Greek law by virtue of Law 4051/2012. Agreement to prepare the CoC was included in the Memorandum of Understanding on Specific Economic Policy Conditionality. Among the ‘solemn commitments’ included in the CoC are the following (the use of capital letters is as per the text of the Commitment):

- “...to fully RESPECT international and European standards for statistical data quality, in particular the principles of the European Statistics Code of Practice”;
- “to GUARANTEE and DEFEND the professional independence of the Hellenic Statistical System, in particular of the Hellenic Statistical Authority (ELSTAT), and to PROMOTE it through appropriate communication actions”;
- “to SUPPORT the Hellenic Statistical Authority in upholding public confidence in Greek statistics and to DEFEND them against efforts to undermine their credibility”;
- “to SECURE adequate and stable resources necessary to maintain and further improve the quality and coverage of Greek statistics”.

Improvement action (3) of the CoC refers directly to resources and places on the government a requirement that “agencies of the ELSS will be provided with sufficient financial and human resources to produce high quality statistics”. These expressions reinforce the statements of principles 3 and 10 of the CoP which indicate that resources available to statistical authorities should be sufficient and used effectively to meet the requirements for European statistics. However, of course, the recent economic and financial crisis has produced both an increase in the demand for new and timelier statistics and a substantial reduction in the resources of the statistical authorities.

ELSTAT has lost approximately 25% of its human resources, and salaries have decreased around 30%, and a similar situation applies to some of the other national authorities in Greece. There is also evidence of an unhelpful age structure among ELSTAT staff caused by intermittent and inadequate recruitment: only 8% of the personnel of ELSTAT are less than 40 years old and 30% are more than 55 years old.

The CoC also includes a commitment “to take all the actions necessary to effectively and rapidly achieve compliance of the Hellenic Statistical System with the European Statistics Code of Practice”, in particular those actions listed in the Annex to the CoC. One of those actions is “Entrusting the President of ELSTAT with sole responsibility for deciding on processes, statistical methods, standards and procedures, and on the content and timing of statistical releases as well as with the necessary autonomy and flexibility in the use of allocated human and financial resources.”

The Peer Review team considers that there is still some way to go in terms of the government entrusting the President of ELSTAT with the necessary autonomy and flexibility in the use of human

and financial resources and, more generally, that the Greek government is not yet fully implementing the commitments identified above. The specific evidence for this conclusion is contained in the State of Implementation Report (as of 30 June 2014) relating to the JOSGAP. This is a long document and it would be impracticable to quote here every relevant aspect of it. However, a few examples:

- A0.3.1 – “significant problems continue” in relation to allowing ELSTAT to use its allocated financial resources, as well as in relation to the provision of sufficient resources to deliver high quality statistics in accordance with formal obligations.
- A0.3.2 – “obstacles, reversals, and very long delays” in relation to the provision of human resources sufficient to deliver high quality statistics in accordance with all obligations.
- A0.4 – “delays and obstacles continue” in relation to access to administrative data sources.

It is implicit in Principle 1 of the CoP that independence, and observation of the CoP more generally, must not only be specified in law but that the law must then be fully implemented and respected. In the case of Greece, the provisions of the Statistical Law and the CoC are in most respects adequate to meet the CoP but there is still some way to go in bringing the government’s operational relationship with ELSTAT into line with those legal provisions.

In order so that the Hellenic Statistical System can be regarded as compliant with the CoP, **the Peer Reviewers recommend that:**

- 2. The relevant authorities must fulfil the commitments set out in the Commitment on Confidence signed by the Prime Minister of Greece, most urgently as regards the provision of adequate and stable resources. (European statistics Code of Practice, Principles 1 and 3.)**

Access to administrative data

The Statistical Law of 2010 states that “The services and agencies of the public sector are obliged to grant ELSTAT access to all the administrative sources, public registers and files they keep, in printed, electronic or other form, and provide ELSTAT with primary statistical data and information.”

The right of access of statistical agencies to administrative sources is also covered by the European Statistical Law (Regulation No 223/2009) which states that “In order to reduce the burden on respondents, the NSIs and other national authorities and the Commission (Eurostat) shall have access to administrative data sources, from within their respective public administrative system, to the extent that these data are necessary for the development, production and dissemination of European statistics.”

ELSTAT considers the availability of a comprehensive and up to date statistical register of businesses as being essential to ensuring that survey results are representative of the target population. In this regard, ELSTAT’s statistical business register could be greatly improved through ready access to the administrative registers maintained by the taxation and other public authorities. Moreover, the availability of tax and other administrative data is seen by ELSTAT as essential for upgrading the entire production of business statistics in Greece and effecting needed improvements in timeliness and overall quality of such statistics. GPAC noted in its 2013 report that this was a key priority under the JOSGAP action plan and that ELSTAT has signed a Memorandum of Cooperation with the Ministry of Finance and the Social Security Fund (IKA).

ELSTAT has signed Memoranda of Cooperation with all the Greek Ministries (covering also their supervised bodies), with the Bank of Greece and with the General Accounting Office for the provision of data for the compilation of Government Finance Statistics required under the

Excessive Deficit Procedure. It also has signed Memoranda of Cooperation for the provision of data more generally covering the private sector. However, there are still a lot of difficulties as regards the practical implementation of the law and the various memoranda. The GPAC report notes “refusals on the part of certain agencies to provide access to the administrative data sources they control”. These problems are also noted in the progress reports of JOSGAP.

ELSTAT has also proposed the introduction of a Single Entry Point System whereby enterprises could provide their data in response to various official bodies simultaneously. However, the Peer Review team was informed that to date there has been relatively little interest in this proposal among the various Ministries.

It is clear that access to administrative sources for statistical purposes is well covered under Greek and EU legislation. However, progress towards its achievement in practice is relatively slow. In some cases the delays in granting full access persist despite the signing of explicit Memoranda of Cooperation, which address in detail the issues involved. In some cases there appears to be reluctance on the part of authorities to take the necessary steps while, in other cases, there may be a need to amend other legislation to bring it into line with the statistical legislation.

The Peer Review team shares the conclusion of GPAC in its report that “despite the provisions of national and EU statistical legislation, the achievement in practice of access to administrative sources for statistical purposes is relatively slow”. Moreover, that “such access, particularly to taxation data, is a key factor in improving the overall quality and cost-effectiveness of Greek statistics”. Principle 1 of the CoP requires, in effect, that the law that exists should be observed; Principle 2 requires a clear legal mandate (i.e. one that is not in practice open to different interpretations) to collect the information needed for European statistical purposes; Principle 8 requires a shared commitment to the use of administrative data for statistical purposes; and Principle 10 requires that all resources are used cost-effectively.

Thus, before the Hellenic Statistical System can be regarded as compliant with the CoP, **the Peer Reviewers recommend that:**

- 3. The relevant authorities must provide the Hellenic Statistical Authority with access to administrative data in accordance with the requirements of the Statistical Law and related memoranda of understanding and agreements. (European statistics Code of Practice, Principles 1,2, 8 and 10)**
- 4. Specifically, the relevant authorities must, without further delay, provide the Hellenic Statistical Authority with access to tax records to support the production of business statistics, as required by the Statistical Law and agreed between the parties in memoranda. (European statistics Code of Practice, Principles 1, 2, 8 and 10)**

Development of administrative data

In recent years, statistical offices and governments have recognised that the exploitation of administrative data for statistical purposes provides a cost-effective way of compiling official statistics, in both economic and social spheres. It is widely accepted now that to strengthen this approach, the statistical agencies should have an input to the design of administrative forms and systems.

It is also widely agreed that the statistical authorities should be able to fully check and control the quality of the administrative data they are using. The UN Fundamental Principles of Official Statistics indicate that statistical authorities should have the right to choose source data with regard to quality, timeliness, costs and the burden on respondents. This means in practice that the statistical authorities should have the right to link survey data and administrative data in order to choose the optimum design and quality of their data collection system. Strict

confidentiality rules exist to prevent any unlawful release or misuse of these data by statistical offices. The Peer Review team considers that ELSTAT has already demonstrated that it is capable of adequately protecting confidentiality in this respect.

To further enhance compliance with the Code of Practice **the Peer Reviewers recommend that:**

- 5. The Hellenic Statistical Authority should put proposals to the relevant authorities to amend the Statistical Law to give the Hellenic Statistical Authority the right to be consulted on the design of, and validation of, any administrative data system elsewhere in the public sector that has the potential to produce statistical data of public value. The amendments should also create an obligation on all public authorities to invite the Hellenic Statistical Authority to advise on these matters. (European statistics Code of Practice, indicators 8.7 and 8.9)**

Appointment of the President

The CoC included an action to amend the Statistical Law with a view to ‘specifying the rules for the appointment and dismissal of the President of ELSTAT based on professional criteria only’. Article 13 of the Law as subsequently amended states that “the President of ELSTAT shall be selected by the Conference of Presidents of the Hellenic Parliament by a four-fifths majority, at the proposal of the Minister of Finance, following a public call for applications for the position”. It also states that ‘the sole criterion in selecting a person for the post is that he has a high level of specialised training, with academic or professional expertise in the field of statistics or similar fields or in any other field relevant to that of statistical research and studies. Furthermore the President of ELSTAT must be a holder of a Ph.D degree’.

The Peer Review team regards these provisions as being unsatisfactory; both in relation to the process of selection and the criteria that shall be applied. The process is too open to political influence. The Minister of Finance selects the preferred candidate and then the leaders of the various political parties in the Parliament endorse the candidate on the basis of a four-fifths majority. The sole constraint on the appointment being that the candidate shall hold a Ph.D in some broadly relevant field.

The most appropriate professional criteria for a top management post in the field of official statistics is not a Ph.D in a relevant field, beneficial as that could be in some contexts. What is more required is a deep understanding of, and demonstrable competence in, the direction and management of the functions associated with a modern NSI. The President of ELSTAT, as with any head of a European NSI, must be able to command personal respect and authority across all the European statistics functions of the various national authorities, not just those of the office he or she manages directly, and also demonstrate to the international statistical community the professional independence from political influence that underpins international confidence. These are special qualities and imply a significantly more exacting standard than just a relevant Ph.D – which is not in fact essential to the role.

The President of ELSTAT plays a pivotal role in defining the standards and direction of both ELSTAT and the ELSS, and thus the Peer Review team regards the arrangements for his or her appointment as one of the most important aspects in ensuring sustainable progress.

With that in mind, and having regard to the CoP which requires that the head of the NSI shall be of the highest professional calibre, **the Peer Reviewers conclude that** before the ELSS can be regarded as compliant with the CoP:

- 6. The relevant authorities, on the advice of the Hellenic Statistical Authority, should propose to Parliament amendments to the Statistical Law in respect of the arrangements for the appointment of the President - specifically to change the stated selection criteria to better reflect the skills required and to reduce to an absolute minimum political involvement in the selection process. (European statistics Code of Practice, indicator 1.2)**

Good Practice Advisory Committee

GPAC was established under the terms of the 2012 CoC – in particular four of the improvement actions in the CoC variously require that the pre-existing collective body of ELSTAT be replaced with a new statistical advisory body providing independent reporting on the implementation of the CoP with regard to the institutional environment; that the new body shall have a duration of 2 years and that its role and effectiveness shall be reviewed after that period; that it shall report annually to the Greek Parliament after informing ESGAB and that its report shall be published; and that its membership shall represent ‘national and international expertise and stakeholders’. Article 4 of the Statistical Law was subsequently introduced to give legal force to all these requirements.

At the time of the Peer Review, the first annual report of GPAC had been published (September 2013) but the Review team did not have access to the second which was still in preparation. On the basis of the report itself and the views of senior managers in ELSTAT and relevant external experts to whom the team spoke, the Peer Review team concluded that GPAC, as currently established, had been influential and effective.

GPAC’s creation was clearly intended to support the development of an institutional environment that meets the expectations of the CoP. In that sense GPAC is an advisory body designed to monitor and report on the implementation of principles 1-6 of the CoP in the ELSS. Article 4 of the Statistics Law is explicit that “the committee’s report shall be advisory in nature”. Thus its role should be seen as being to monitor on an ongoing basis adherence to those principles, and to offer published advice, addressed to any relevant institution, as it sees fit.

The Peer Review team did not form a specific view on how long GPAC in its current form was likely to be needed but did conclude that the original period of two years was not long enough and that the legislation should be amended to remove the reference to a two-year duration. The continuing need for GPAC as a distinct entity may, in any case, need to be reviewed in the context of the other advisory arrangements that exist (see Recommendation 8 below).

With these considerations in mind, to further enhance and maintain compliance with Principles 1-6 of the CoP **the Peer Reviewers recommend that:**

- 7. The Hellenic Statistical Authority should put proposals to the relevant authorities for an amendment to the Statistical Law such that the Good Practice Advisory Committee shall continue to operate. (European statistics Code of Practice, Principles 1-6)**

4.2.2 Co-ORDINATION OF THE HELLENIC STATISTICAL SYSTEM

In the final recommendation of the preceding section of the report, the Peer Review team recommends the continuation of the Good Practice Advisory Committee (GPAC). This recommendation needs to be seen in relation to two other recommendations that have a bearing on the governance and coordination of the ELSS which are discussed in this section. The three pillars of advice and coordination envisaged by the Peer Review team are: GPAC, operating much as it currently does; a new Coordination Committee of the Hellenic Statistical System, chaired by the President of ELSTAT, to provide and channel leadership to the ELSS (Recommendation 12); and the existing Council of the Hellenic Statistical System (SYELSS) operating as a more general advisory committee but with its membership reviewed to take account of the existence of the other two committees (Recommendation 8).

According to the Statistical Law of 2010, the ELSS is identified by the rules, activities and agencies responsible for the different statistical operations relating to the country's official statistics. The agencies include ELSTAT itself and the services and agencies of the public and private sectors which are responsible for collecting data and which are included in a list determined and maintained by ELSTAT as provided for in Article 11.5 of the Statistical Law. Following the further specification of the Statistical Law through the Regulation on the Statistical Obligations of the Agencies of the Hellenic Statistical System, those agencies that are responsible for the development, production and dissemination of European statistics are referred to as 'national authorities'. For consistency with other Peer Review reports, this report will refer to the ones other than ELSTAT itself as Other National Authorities (ONAs).

Currently there are 19 agencies in the ELSS, of which 10 are identified as 'national authorities': comprising ELSTAT and 9 ONAs. Although ELSTAT is the primary agency in terms of statistical surveys and the production of European statistics, the ONAs account for almost one third of the data collections (measured by EU Regulations implemented by different agencies). When looking at the number of European statistical series produced, ELSTAT is directly responsible for less than half. These figures illustrate that responsibility for production of European statistics is relatively widely shared across the ELSS.

As stated in Article 1.5 of the Statistical Law, when developing, producing and disseminating statistics, ELSS agencies are required to implement the CoP and, similarly, in the preamble of the CoP it is noted that all the national authorities, not just NSIs, commit themselves to adhere to the CoP. Also, as mentioned in Article 2.1 of the Law, ELSTAT is responsible for co-ordinating all the activities of the other ELSS agencies associated with the development, production and dissemination of the country's official statistics.

The Regulation on the Operation and Administration of ELSTAT establishes in its first article that for this coordinating role, ELSTAT may use a range of instruments: consultations, briefings and other meetings and also memoranda of cooperation with the other ELSS agencies, which are obliged by the same regulation to fulfil all of their commitments specified in these agreements. Article 1.4 of the Regulation specifies that ELSTAT can give general instructions to all agencies, or targeted instructions to one agency or a group of agencies.

The preparation and approval of the three-year statistical program, the Hellenic Statistical Program (ELSP) and the annual programs are one example of the cooperation and coordination of the national authorities. According to Article 5.2 of the Statistical Law, the ELSP sets out the major fields and objectives of the actions scheduled by the ELSS agencies for a three-year period. It is approved every three years by ELSTAT after obtaining the opinion of the Council of the Hellenic Statistical System (SYELSS). The Annual statistical work program is compiled on the basis of the

ELSP and in the case of ELSTAT takes into consideration the annual work programs of ELSS agencies.

In the response to the self-assessment questionnaire (SAQ) on the coordination role of the NSI, ELSTAT states that this task is fulfilled through the meetings of the SYELSS in which all the ONAs are represented, and also through bilateral meetings. Clearly, the coordination role is intrinsic to the compilation of the Hellenic Statistical Program, and needs to be as effective as possible.

However, according to Article 3 of the Greek Statistical Law, SYELSS gives an advisory opinion to ELSTAT on several issues, including the ELSP, but is not directly responsible for actually coordinating the ELSS - although, as mentioned in core documents provided for the Peer Review, SYELSS has in practice a role to encourage dialogue and cooperation between ELSS agencies.

The Peer Review team concluded that there was some uncertainty about the effectiveness of SYELSS as an advisory body. There is no specific requirement in the CoP that bears on the role or operation of bodies such as SYELSS but, accepting the importance of widely drawn advice and support (for ELSS and ELSTAT) and the value of collective dialogue with external stakeholders, and in pursuance of all aspects of the CoP, **the Peer Reviewers recommend that:**

- 8. Bearing in mind the recommendation above relating to the Good Practice Advisory Committee, and informed by international consultation with experts in statistical governance, the Hellenic Statistical Authority and the other relevant authorities should review the membership and chairmanship of the Council of the Hellenic Statistical System to ensure the future effectiveness and coherence of the advisory functions. (European statistics Code of Practice, Principles 1,10, 11-15 and coordination)**

Certification and quality in the ELSS

The Statistical Law provides a clear statement about which statistics are considered “official”. In particular, “official statistics of ELSS are those developed, produced and disseminated by ELSTAT and the other ELSS agencies, provided they have been certified by ELSTAT”. Articles 4 and 5 of the Regulation on the Operation and Administration of ELSTAT establish the requirements and procedure for the certification of official statistics. In particular, it is explicitly stated that official statistics must meet the requirements in Article 2 of the Regulation (EC) 223/2009 and the ELSS agencies must apply the criteria for the evaluation of quality as expressed in Article 12 of the (EC) Regulation 223/2009. More generally, the ELSS agencies must implement the CoP in full. Additionally, the procedure for certification should be based on the annual reports of the ELSS agencies, the quality reports for the statistics they are responsible and the own observations by ELSTAT and, in particular, of the team assigned to carry out the certification.

According to the actions in the JOSGAP report relating to the certification process, ELSTAT was expected to develop the methodology for the certification process (Sub-action B17.1) with a target date at the end of 2014 and to proceed to the certification of statistics produced by ELSS agencies with a target date at the end of 2015.

The first sub-action was completed by October 2013, when a document containing a statement of principles and procedures for certification of ELSS statistics was produced by ELSTAT. The section describing the aims of the certification states explicitly that: “ELSTAT assesses and determines whether the CoP has been complied with in relation to any official statistics. If ELSTAT determines that the CoP has been complied with, it certifies the statistics as ‘official’”. The document establishes also the composition and tasks of the certification teams, the eight stages of the certification process and the details of two core documents in this process: the quality report and the Written Evidence Questionnaire for Certification.

The quality report concentrates on the principles of the CoP relating to the quality of the statistical output, asking for detailed information (quantitative and qualitative) about different aspects of compliance with these principles. On the other hand, the Written Evidence Questionnaire for Certification asks for information corresponding to all aspects of the CoP.

Two pilot certification exercises were undertaken in 2013 and 2014, one covering some parts of the Ministry of Rural Development and Food and the other one relating to statistical work of the Ministry of Finance. The Peer Review team was informed that the President of ELSTAT had sent (in November 2014) a letter to the Ministry of Rural Development and Food, setting out the essential steps that the Ministry needed to take for the certification to be completed. The compilation of the second pilot certification report was in progress at the time of the Peer Review. On the basis of the findings of this report a similar letter will be sent by the President of ELSTAT to the Ministry of Finance.

As mentioned in the JOSGAP report, the experience obtained in these first two pilot exercises should improve the initial version of the Statement of Principles and Procedures, helping to finalise the certification methodology.

Significant progress has clearly been made in the development of the certification process and some pilot exercises have been conducted. However, as yet no draft certification report has been made available to any of the agencies. Given the importance of the certification procedure for the consolidation of the ELSS system and compliance with the CoP, and given the tight timetable for certification of the other agencies, **the Peer Reviewers recommend that:**

- 9. The Hellenic Statistical Authority should give increased priority to the formal certification of those Hellenic Statistical System agencies responsible for the development, production and dissemination of European statistics (“national authorities”), to fulfil as soon as practicable the requirements of the Statistical Law and the Regulations. (European statistics Code of Practice, Principle 1)**

Under the legislation, ELSTAT is responsible for coordinating all the activities of the other ELSS agencies which concern the development, production and dissemination of the country’s official statistics. The single most powerful mechanism for this co-ordination is likely to prove to be the certification process when it is fully operational. The list of items and questions included in the quality report and in the Written Evidence Questionnaire for Certification are very demanding in terms of compliance with the CoP, which of course includes requirements that each agency have satisfactory arrangements for internal quality assurance. However, the Peer Review team gained the strong impression, in discussion with both ELSTAT staff and staff from agencies that the current position is that at least some of the agencies are currently some distance from what ELSTAT itself would judge to be full compliance with the CoP. With that in mind, **the Peer Reviewers recommend that:**

- 10. The national authorities within the Hellenic Statistical System should give greater priority to developing the internal quality procedures associated with their statistical processes and the statistical products - and as part of this should make sure that adequate process documentation exists as soon as possible, and not wait on the certification process requiring it. (European statistics Code of Practice, Principles 4 and 8)**

Although the certification process is a potentially powerful mechanism, there are other aspects of building a coherent and self-aware statistical system that are likely to require other instruments and other approaches. This is illustrated by an answer in the SAQ about whether ELSTAT was routinely consulted when administrative data sources are developed or changed. ELSTAT refers in its answer to the meetings of SYELSS as the most relevant forum but notes a non-uniform approach among ministries in consulting ELSTAT on possible areas of cooperation. Also, ELSTAT

mentions as a weakness the fact that there is no clear demarcation of the statistical functions within the ELSS agencies.

ELSTAT has already addressed this issue with the ELSS agencies, including at a SYELSS meeting in 2014 where it proposed that all ELSS agencies should identify a senior statistical professional who would have authority for statistical decisions. However, the Peer Review team did not get the impression that agencies were doing much to address this, arguing in some cases that because statistical functions were spread across the agency, it would not be practicable to have a senior statistical professional. This is certainly an obstacle but as long as the relevant Minister has agreed that the most appropriate senior statistician should be given the authority of approving statistical decisions across the organisation, there is not so much need to change line management arrangements.

Although Principle 1 of the CoP does not make any explicit reference to the mechanisms by which an NSI should achieve its co-ordination role, it is clear in the case of Greece that strong coordination and cooperation to build the ELSS into a meaningful entity, working to a shared set of values, and with a definite public identity, is going to be required. In the opinion of the Peer Review team, SYELSS is not, as it stands, a sufficient mechanism to achieve that. The Peer Review team therefore suggests that once senior professionals within each ELSS agency have been appointed, a 'Coordination Committee' for the ELSS, chaired by the President of ELSTAT could be established. The membership of this body would include the statistical heads of each of the ONAs and collectively could help to provide and channel leadership to the ELSS. This proposal needs to be seen in conjunction with Recommendation 8 about the advisory functions. GPAC and SYELSS should be tailored to provide coordinated (external) advisory support whilst the Coordination Committee takes on the (internal) statistical management role within the ELSS.

Whether or not a Coordination Committee is established, the CoP creates a need to ensure a common understanding of, and respect for, its principles across the ELSS and a consequent requirement for mechanisms to identify and resolve any difficulties in CoP implementation. Such a Committee might also address more specific matters such as harmonisation of release practices, sharing data, working together on new statistical outputs and building a strong public identity for ELSS as a whole. There are also some specific requirements already established for the certification of ELSS statistics that might benefit from further discussion in such a forum: including the existence of a quality assurance framework, the elaboration and publication of statistical methods and procedures, the documentation of the use of statistics and users' needs and the publication in the website of all official statistics and the corresponding metadata.

Bearing in mind the implications of the CoP and given the importance of enhancing coordination within the ELSS, **the Peer Reviewers recommend that:**

- 11. Each of the other national authorities producing European statistics should nominate the most appropriate senior, statistically qualified, individual in that organisation as the 'Senior Statistical Professional' and delegate to that individual (on the authority of the relevant Minister) practical authority for all statistical decisions relating to the Code of Practice. The Hellenic Statistical Authority should also put forward proposals for this requirement to be included in the Regulation on the Statistical Obligations of the Agencies of the Hellenic Statistical System. (European statistics Code of Practice, Principle 1)**
- 12. The Hellenic Statistical Authority should establish a Coordination Committee of the Hellenic Statistical System chaired by the President of the Hellenic Statistical Authority. (Coordination)**

In the context of ELSS co-ordination, the ELSTAT's initiative of creating a web page for the ELSS (as mentioned in the responses to the SAQ on the coordination role of NSIs (point 16)) goes in the right direction, but, as yet, it only refers to the basic statistical legislation and some documents about quality. One issue that might be considered by the Coordination Committee would be how to make more active use of such web pages to increase awareness of, and a shared identity for, the ELSS - including guidance on access to all the statistical press releases relating to European statistics.

The statistical press releases and reports are the public face of the ELSS. Bearing in mind the requirements of the CoP in relation to coherence, comparability and accessibility, **the Peer Reviewers recommend that:**

- 13. Each of the other national authorities should identify those published statistical reports and press releases that relate to official statistics (those statistics that will be official once certified) and include in each a prominent statement that the publication forms part of the output of the Hellenic Statistical System and is required to comply with the Code of Practice. (European statistics Code of Practice, Principles 14 and 15)**

4.2.3 BUILDING REPUTATION

There are aspects of the CoP that are relevant to building public support and a strong public image for a NSI. The Peer Review team considers that in seeking to deal with the pressures and challenges outlined in preceding sections of this report, ELSTAT and the ELSS would both benefit from any cost-effective steps that serve to stimulate and expand external appreciation of, and support for, the work that they already do. The recommendations in this section are intended to enhance compliance with the CoP.

Press releases

The press releases available on the ELSTAT website have many good features including, or with links to, helpful advice and metadata on sources and methods. The Peer Review team was told by various external users of the statistics that there had been a lot of improvements in recent years, that the content was generally helpful and that if one needed to follow up enquiries by telephone, ELSTAT staff were always ready to provide helpful and knowledgeable support. However, it was noted by users and confirmed by ELSTAT that, as a matter of policy, only selective commentary is included in press releases on the likely reasons for trends and patterns seen in the published statistics or the uses typically made of the statistics (to guide users).

This cautious approach to publicly guiding the user is partly driven by concern that comments made by the statistics office about the relevance, or strengths and weaknesses, of the statistics in relation to particular applications, no matter how objective and defensible, might give rise to public criticism. In the case of ELSTAT and the ELSS, such criticism could be particularly damaging due to the difficult environment in which they are working.

However, the CoP (Principle 15) does require that statistics are presented in a clear and understandable way with supporting guidance and 'in a form that facilitates proper interpretation and meaningful comparisons'. One virtue of doing so - in effect adding value to the data -, is to increase the utility of the statistical product and reduce the risk of misunderstanding or misuse. It also has the virtue of better supporting the news media and other commentators and by so doing building a reputation for openness and impartial comment. In addition, developing the practice of impartial comment on the substance of the statistical message has the benefit of increasing staff understanding and expertise in relation to the statistics they are publishing.

With these points in mind, to further enhance compliance with the CoP the Peer Reviewers recommend that:

- 14. The Hellenic Statistical Authority should aim to develop its current system of statistical press releases to provide more guidance and advice to users of statistics. (European statistics Code of Practice, Principle 15)**

Relations with academia

The senior members of the academic community interviewed as part of the Peer Review visit were very positive about the professionalism and helpfulness of the staff of ELSTAT. They noted that great progress had been made in recent years and that they had confidence in the impartiality and methodological robustness of the statistical product. There were some comments to the effect that ELSTAT was very cautious in how it took decisions in relation to providing access to microdata, but overall there was a strong and clear message of support for the current management.

The Peer Review team concluded that there was scope to build on the natural synergy between ELSTAT's own work and that of the subject experts within the academic community who were enthusiastic and supportive users of their service. In discussion with ELSTAT managers it was noted that there are some risks associated with working closely with particular academics that need to be navigated. Nonetheless, the CoP requires 'co-operation with the scientific community' and more generally requires close engagement with users of statistics. Given the potential benefit to ELSTAT's public reputation of supportive voices at senior levels in the academic community, to further enhance compliance with the CoP, the Peer Reviewers recommend that:

- 15. The Hellenic Statistical Authority should aim to develop its existing good relationships with the academic community to further promote the use of microdata and encourage the analysis of official statistics, and thus further enhance its public reputation. (European statistics Code of Practice, Principles 7 and 15)**

Developing a service culture

ELSTAT has a number of arrangements in place to gather user views, including an annual user conference (for invited users) with published minutes, and an ongoing User Satisfaction Survey accessed via its website, the results of which are also published. It also aims to organise one-day conferences for specific categories of users to familiarise them with the statistical products and promote the sound use of data. It is organising a conference in 2015 for teachers and one for the press. It has also organised a conference on poverty and social exclusion. It was also evident from the users to whom the Peer Review team spoke that ELSTAT staff are very helpful when approached directly by telephone.

ELSTAT informed the Peer Review team that it also has contact with users through its user conferences, user groups (e.g. of journalists, various domestic policy users, international policy users), and has frequent requests for cooperation in the production of new data (e.g. at regional level) and for provision of tailored data. Whilst these things are commendable, the Peer Review team gained the impression that dialogue with users was mostly focused on those who engage via the website or who are in direct contact with staff.

Given its history, it is not surprising that the culture of ELSTAT gives high priority to the production and release of statistics required under EU legislation. This may tend to lessen the focus on the potential benefits of actively recognising, and active dialogue with, representatives of different user communities in Greece.

Among those wider user communities are all those who take important decisions informed by the statistical message - including the general public (as part of the democratic process), business,

academia and local institutions as well as major government bodies. A good understanding of the use made of the statistics, well documented, can strengthen the rational case for ongoing public funding for the statistical functions. It can also help to stimulate and extend the use made of the statistical products and build the reputation of, and support for, the institution itself.

With these points in mind, to further enhance compliance with the CoP, **the Peer Reviewers recommend that:**

- 16. The Hellenic Statistical Authority should aim to develop its organisational culture to put more emphasis on service to users and the value of open dialogue with different user communities, so as to support statistical planning, to understand and stimulate use, and to further build external and internal confidence in itself as an institution. (European statistics Code of Practice, Principle 11)**

4.2.4 SUBSIDIARY ISSUES

This section addresses a number of issues that are less fundamental to the future direction of the ELSS but are nonetheless matters that are relevant to CoP compliance. The recommendations mostly relate to developments that ELSTAT already has in view, but place additional emphasis on particular aspects.

Organisational issues

The JOSGAP report makes explicit reference to the adoption of a new organisation chart for ELSTAT. The additional information contained in the JOSGAP report related to this action makes clear that the implementation of the new organisational chart has been delayed several times but that a new presidential decree is expected to be adopted in 2015. It is clearly not ideal for an institution to be under the expectation of organisational changes for a long time; and having organisational change pending must tend to increase uncertainty in relation to various other developments.

Article 20.2 of the Statistical Law refers to the creation of a new Research and Studies Department within ELSTAT. Its responsibilities, defined in the law, are very broad and may - at least at first sight - seem to overlap with existing functions. This needs to be resolved in the context of the new organisation chart.

The Statistical Law contains an odd mix of content relating to ELSTAT's internal organisation. There is one very general requirement that the organisation of ELSTAT is determined by a presidential decree but then there is a detailed description of the responsibilities and staffing of one specific unit, the Research and Studies Department. There are references to specific positions or units in the current organisation despite those posts not being defined in legislation. The Peer Review team formed the view that it would be helpful if the Statistical Law was developed in the future to take a more consistent approach to the description of the organisation.

The Peer Review team also noted that, partly because of the sensitivity of ELSTAT's public reputation and relationships with external stakeholders, many issues and decisions within the organisation are currently referred to the top management. This cautious approach is understandable but adds to the pressures and burden on top management. It may therefore be helpful for at least more routine decisions - for example on how to respond to individual requests for unpublished data - to be systematically delegated to the middle management level.

Given the importance of an appropriate internal structure and delegations for the effective use of resources and cost-effectiveness more generally **the Peer Reviewers recommend that:**

- 17. The Hellenic Statistical Authority should complete the work to adopt a new organisational chart describing responsibilities and functions within the institution to improve long term efficiency. Special attention should be paid to how to fit within the organisational structure the proposed Research and Studies Department. (European statistics Code of Practice, Principles 3 and 10)**
- 18. The Hellenic Statistical Authority should aim over time to delegate more routine decision-making to middle managers in order to enhance efficiency and ease the current burden on senior managers. (European statistics Code of Practice, Principles 3 and 10)**

One example of routine decision-making of the kind mentioned in the recommendation above is individual decisions (as opposed to policy) in relation to access to microdata and whether to undertake analysis in response to specific requests from researchers. The Peer Review team gained the impression that users, both academic and professional, regarded other national and international statistical offices as having more clear-cut processes.

Building good relationships with users and addressing their statistical needs are important elements in relation to the CoP. In order to build external reputation and acknowledging that some efforts have been put in place (such as a particular part of ELSTAT's website for making statistical data requests), **the Peer Reviewers recommend that:**

- 19. The Hellenic Statistical Authority and the agencies of the Hellenic Statistical System should take further steps to ensure that their criteria and decision-making processes in relation to the provision of microdata and other data for research are well understood both internally and externally. (European statistics Code of Practice, Principles 11 and 15)**
- 20. The Hellenic Statistical Authority and the agencies of the Hellenic Statistical System should examine international best practice with a view to further improving the accessibility of microdata by academic researchers in the longer term. (European statistics Code of Practice, Principles 11 and 15)**

Quality framework

The primary process for assessing and ensuring the quality of the European statistical work undertaken by the ELSS agencies is the certification process, and the consequential requirements for effective internal quality management within each agency, that are a prerequisite for CoP compliance and thus for certification. However, under the legislation, certification applies only to the external agencies, not ELSTAT itself. This creates a potential anomaly in that ELSTAT's own statistics are not formally subject to the same type of review. However, ELSTAT has recently introduced an internal practice to assess the compliance of the statistical divisions of ELSTAT with the principles of the CoP, in a very similar way to the certification process.

Initially, seven assessments teams have been created, one for each division in the General Directorate of Statistical Surveys. Each team is composed of six members organised in three two-member groups in charge of the assessment against one of the three main parts of the CoP: institutional environment, statistical processes and statistical output. The steps of this internal assessment process are standardised and based on the completion of a self-assessment questionnaire by the Division, meetings between the team and the Division, the writing of a consolidated report by the coordinator of each team and the finalisation of the assessment report once the comments of the Division have been considered. It is expected to expand this assessment exercise to cover the other divisions of ELSTAT in due course.

According to the Update note about recent developments regarding the implementation of principles 2-6 of the CoP provided by ELSTAT, three of the seven divisions of the General Directorate of Statistical Surveys have so far had an assessment carried out and the reports corresponding to the other four divisions have been finalised and the further steps in the assessment process of these divisions have been scheduled to be completed by January 2015.

This internal review procedure is a key input to assessing the quality of the work of ELSTAT's divisions, which is one of the aims of the Group for Supervision and Management of Quality (GSMQ), which was established in 2011. GSMQ is one of the pillars of the ELSTAT Quality Management Structure and its mandate is to discuss the progress of statistical surveys and work carried out by each division of ELSTAT, with an explicit emphasis on quality monitoring since 2013. The permanent members of this group include the most senior staff of the office. The group has frequent meetings with the aim of reviewing progress and monitoring results in statistical surveys and related work, to identify risks, to discuss solutions, to set improvement actions and to define milestones and deadlines, as well as to ensure the compliance of ELSTAT with the CoP.

Apart from the GSMQ there are two other elements that play an important role in the Quality Management Structure: the support from external experts from Eurostat and other EU Member States and the adoption of best practices of other NSIs. This is explicitly mentioned in the answers to the SAQ when discussing how ELSTAT approaches the assessment of quality. There are a large number of visits by external experts and there is continuous collaboration remotely. This support from external experts is understood as an integral part of the quality assurance strategy and it is explicitly recognised in the 2013 GPAC report. That report notes the strong commitment to quality in ELSTAT and offers an evaluation of the approach to quality management and assurance:

“In effect, many of the elements for the implementation of a more formal and structured approach towards quality management and assurance are already in place in ELSTAT. The Committee notes that a comprehensive Quality Policy Statement was finalised in June 2013 and it would recommend that this should be complemented in due course by the preparation, inter alia, of Quality Guidelines on the implementation of quality management and a comprehensive Quality Assurance Plan to cover the systematic review of statistical outputs. Documentation of all quality aspects of the statistical production process and of statistical products is essential, as is the availability of appropriate training programmes for all the staff on quality issues. The Committee would recommend that a number of internal auditors be trained in auditing techniques and quality management procedures...”

Since then, Quality Guidelines have been prepared and the work of the internal committees for assessing the compliance with the CoP has started. The Peer Review team agrees with the observations by GPAC. The innovative practices started at ELSTAT have to be consolidated in normative terms in order to define a comprehensive Quality Assurance Framework. In this context, and with reference to the CoP, **the Peer Reviewers recommend that:**

- 21. The Hellenic Statistical Authority should incorporate into the ‘Regulation on the Operation and Administration of the Hellenic Statistical Authority’: a) the recently established process of systematic assessment of each division of the Hellenic Statistical Authority against the Code of Practice and b) the ongoing existence and functions of the Group for Supervision and Management of Quality. (European statistics Code of Practice, Principle 4)**

In addition to these normative modifications, efforts need to be maintained in relation to producing more complete documentation covering all aspects of the statistical production process and statistical products, as well as relating staff training. As noted in the responses to the SAQ, ELSTAT is aware of this lack of documentation in some areas. For instance, it is mentioned that coverage of metadata is not yet complete; in relation to Principle 12, the non-availability of quality reports

for some of the surveys conducted by ELSTAT is mentioned as an area of weakness; and it is noted that documentation associated with sampling and non-sampling errors is not yet completed. Bearing in mind the requirements of the CoP, **the Peer Reviewers recommend that:**

- 22. The Hellenic Statistical Authority should ensure that the documentation of statistical processes is given high priority within all its divisions. (European statistics Code of Practice, indicators 4.2, 12.2 and 15.5)**

Infrastructure

The need for the Greek government to deliver on the commitment to provide 'adequate and stable resources' which is contained in the CoC is addressed in Section 4.2.1 above but there are some specific aspects that are more within ELSTAT's control. **The Peer Reviewers recommend that in the interests of cost effectiveness of the CoP:**

- 23. The Hellenic Statistical Authority should seek to improve its human resource management and financial accounting systems to allow more detailed allocation of resources to the different statistical processes and products. (European statistics Code of Practice, Principle 10)**

In order to fulfil this recommendation, the execution of one of the subprojects of the project on Information and Communication Technologies (ICT) (action B7 of JOSGAB) is needed. In particular, the last of the eight subprojects refers to a human resources management system which in the most recent JOSGAB report includes a time reporting system module to better manage the limited resources of ELSTAT. The project covers several crucial areas of ELSTAT activity and there are signs that its development is not proceeding as fast as planned, in part because of the issues addressed in Recommendation 2 of this report about ELSTAT not being provided in some cases with adequate resources.

Additionally, one of the areas of the ICT project (subproject 2) refers to the upgrading of the dissemination services provided through the ELSTAT website. As mentioned in the Update note about recent developments regarding the implementation of principles 2-6 of the CoP provided during the Peer Review visit, ELSTAT continued working on uploading user oriented quality reports, quality reports and metadata to the website, although the work is still not completed for all the statistical outputs. Some external users interviewed in the course of the Peer Review visit commented that the website – whilst improving - was not easy to navigate: the front page is difficult to read, no system for making customised analyses was available and some inconsistencies existed in the titles and the symbols used in tables. Whilst these are just individual comments, they do lend support to the need for further development.

Moreover, the statistical database is not up to best standards regarding user friendliness and the ICT project will help to develop the necessary mechanisms to allow data users to produce tailor-made tables adapted to their needs. However, the ELSTAT website is probably the dissemination channel through which the organisation is best known to many users of statistics, and thus has a significant bearing on the credibility of the institution. It is also relevant to compliance with the CoP and so **the Peer Reviewers recommend that:**

- 24. The Hellenic Statistical Authority should seek to make further improvements to its website making use of new methods for data presentation and handling in order to make it more user-friendly. (European statistics Code of Practice, Principle 15)**

Response burden

As noted in the response to indicator 9.1 of the SAQ, ELSTAT has actively contributed to the implementation of a project for measuring and reducing administrative burdens in Greece, although the production of official statistics is not of itself a major source of administrative burdens. The GSMQ is undertaking periodic reviews of the needs for statistical information with special emphasis on the response burden generated by the data collection.

In that sense, although ELSTAT is estimating the costs to respondents in various exercises and some questions about the time needed to answer the questionnaire are included in some surveys, for compliance with the CoP, there is a need for a more complete picture of the response burden generated by ELSTAT activities. This is the reason why **the Peer Reviewers recommend that:**

- 25. The Hellenic Statistical Authority should devote more efforts to develop a coherent and public system for assessing response burden and use it to track efficiency gains as it increasingly obtains access to administrative data. (European statistics Code of Practice, Principle 9)**

Other observations

ELSTAT fully recognises the potential value of making greater use of administrative data in terms of improving the quality of statistical data, reducing response burden and increasing the effectiveness of its financial and human resources. Moving away from reliance on sample surveys may also help to reduce the problem of low response rates in business surveys. The strategy of increasingly using administrative data requires the development of various quality indicators and also requires particular attention to be paid to how survey and administrative data are integrated. According to the response to indicator 10.3 of the SAQ, ELSTAT has not yet developed this type of indicators but they will be important once full access to tax records is secured.

With respect to the quality of the statistical output, apart from the considerations made above about accessibility (Principle 15 of the CoP), two other aspects may require attention: timeliness (Principle 13 of the CoP) and coherence (Principle 14 of the CoP). ELSTAT's response to Indicator 13.1 of the SAQ says: "there are some cases where timeliness standards are not met if ELSTAT is not satisfied with the quality of the statistical output and further checking or validation have to take place". This is partly a consequence of the low response rates mentioned above and better access to administrative data will help. It is also due in part to the large contraction of staff numbers since 2009. As problems with achieving consistent timeliness have a negative effect on the reputation of a statistical office and on confidence in the statistics themselves, it is important that the necessary conditions are created by the Greek authorities so that ELSTAT can comply fully with timeliness requirements.

One consequence of reliance on a range of separate sample surveys to produce statistics is that it can give rise to problems of coherence – more so than when robust administrative sources provide the core data. ELSTAT mentions the following as a weakness "the lack of adequate consistency between certain ELSTAT's statistics providing information for the same domain/phenomenon, such as some data of SBS, STS and SBR".

The analysis of the consistency of different data sources about the same phenomenon is one of the areas where NSIs can add value to existing statistics. This type of work is sometimes necessary to build confidence in statistics because the users can be confused when apparently different messages from (apparently) the same variable are given from different sources. ELSTAT has been engaging in such work over the past four years and there have been improvements. However, as ELSTAT management indicates, more work needs to be done, including in cooperation with other ELSS agencies.

To further enhance compliance with the CoP, the Peer Reviewers recommend that:

26. The Hellenic Statistical Authority should seek to prepare analyses comparing statistics from different sources relating to the same phenomenon in order to improve the coherence and completeness of the statistical message. (European statistics Code of Practice, Principle 14)

4.3 NATIONAL STATISTICAL INSTITUTE VIEWS WHERE THEY DIVERGE FROM PEER REVIEWERS' ASSESSMENT

Recommendation 8

The Hellenic Statistical Authority (ELSTAT) would agree with the recommendation that the membership and chairmanship of the Council of the Hellenic Statistical System (SYELSS) be reviewed, as long as the current mandate of the SYELSS is also reviewed so as to focus the latter's advice on the needs of the users of official statistics and on whether these needs and their prioritisation are being met and reflected in the annual work programs of SYELSS agencies and in the three-year Hellenic Statistical Program. In this way, the SYELSS, with its membership revised to represent users of the official statistics produced by the Hellenic Statistical System (ELSS), could potentially support further improvements in the ELSS' applying Principle 11 of the European statistics Code of Practice on "Relevance".

ELSTAT would strongly disagree with recommendation 8 if there was no change of the mandate of the SYELSS in tandem with the review of the latter's membership and chairmanship. Such an approach could potentially undermine the efforts of ELSTAT to comply with several Principles of the Code of Practice, such as Principles 1, 5, 6, 7 and 8. In the absence of an appropriate focusing of the mandate of the SYELSS there would also be overlap and conflict with the mandate of the existing Good Practice Advisory Committee of the ELSS.

Recommendation 14

The Hellenic Statistical Authority disagrees with recommendation 14 as it firmly believes that in recent years it has achieved the right balance in the content of its statistical press releases. It has done so by meeting Principle 15 of the European statistics Code of Practice and at the same time avoiding risks of noncompliance (and/or the appearance of noncompliance) with Principle 1 (in particular indicator 1.6) and Principle 6 of the Code. Following indicator 15.1 of the Code of Practice, ELSTAT has uploaded on its website statistical tables and metadata presented in an easily understandable way so as to facilitate proper interpretation and meaningful comparisons of its statistics by the users. However the interpretation of statistics – i.e. the identification and analysis of the economic, sociological or other meaning of the statistics – is explicitly left to the users as such interpretations can actually vary depending on the vantage point and paradigm used by the user/analyst.

Recommendation 15

The Hellenic Statistical Authority partly agrees with recommendation 15.

ELSTAT will aim to further advertise more rigorously the availability and procedures of access to its microdata and enhance, through new communication vehicles, its outreach to the scientific community. However, it should be noted that the current practices of ELSTAT are already very supportive of the academic community's scientific work. These practices are carefully spelled out in the (publicly available) procedures that ELSTAT uses, which also safeguard the privacy of data providers and ensure the equality of access of different (scientific) users.

ELSTAT will also continue to seek close collaboration with the academic and research community in the context of statistical development projects that ELSTAT undertakes and in the framework of engagements with the scientific community as users of ELSTAT's statistics. However, these collaborations can only take place to the extent that relationships of dependency, privileged access of some users to data, and pressures to ELSTAT's professional independence and impartiality do not arise from such arrangements.

Recommendation 16

The Hellenic Statistical Authority currently gives high priority to the production and release of European statistics required under EU legislation as full adherence of any EU member state to Union Law constitutes a sine qua non. Moreover, emphasis on the production of European statistics according to the EU regulations ensures that the most widely recognised and prioritised user needs for European statistics – depicted and codified in the regulations through the European Union legislative process – are met. Thus, ELSTAT does not see the need to change these priorities.

However, it should also be noted that ELSTAT already devotes significant resources to the collection of user views for its statistical output and services. These views are taken into account by ELSTAT for the improvement of the quality of statistics produced and the services provided as well as for deciding on new statistics to be produced and on those to be discontinued. To this end, ELSTAT conducts a user satisfaction survey on an ongoing basis, receives views from the Council of the Hellenic Statistical System, organises annual User Conferences, and carries out thematic conferences and many ad hoc meetings with specific categories of users. Thus, ELSTAT productively and appropriately engages users in order to comply with Principle 11 while safeguarding compliance with Principles 1 and 6.

In light of the above, ELSTAT considers that recommendation 16 is by and large not applicable. However, there is the potential for further improvement in the application of Principle 11 of the European Statistics Code of Practice if recommendation 8 is appropriately implemented (see ELSTAT's comments on recommendation 8).

Recommendation 18

The Hellenic Statistical Authority does not see recommendation 18 as applicable, given that there is already delegation to middle management, and the senior management of ELSTAT is involved in decisions only when there is clear evidence for a need to do so. The view of ELSTAT is that delegation of routine decision making can and does take place to the extent that there are sufficient human resources and standardisation of statistical processes, so that quality and adherence to the Code of Practice are effectively assured. Progress in increasing the numbers of ELSTAT staff with well qualified staff and improving the capacity of existing staff through the ongoing capacity building efforts, in tandem with the standardisation and improved documentation of statistical processes, are envisaged to result in further delegation of decisions from senior management. It should be noted that as Principle 1 of the Code of Practice assigns the responsibility for decisions on statistical methods, standards and procedures, and on the content and timing of statistical releases solely to the head of the National Statistical Institute, and accountability for the quality of statistics reaching the users remains with the head of the NSI under all circumstances, appropriate delegation has to take also the above into account.

ANNEX A - PROGRAMME OF THE VISIT

PEER REVIEW VISIT TO GREECE

17 – 21 November 2014

AGENDA

Time	Programme	Organisation	Participants
Day 1 – Monday 17 November 2014			
09.00 – 11.30	PR team discussion to finalise the preparation of the visit.		PR team
11.30 – 11.45	PR team meeting		PR team
11.45 – 12.30	Preparatory meeting with the NSI coordinator team and, possibly, other national participants to discuss practical aspects of the visit: introduction of programme, organisational matters.	ELSTAT	Andreas Georgiou, Ioannis Tzougas, Athanassia Xenaki, Ioannis Moschakis, Nektaria Tsiligkaki, Christina Pierrakou, Christina Karamichalaku
12.30 – 13.30	Lunch		
13.30 – 14.30	General information session with a description of how the national statistical system is organised.	ELSTAT	Andreas Georgiou, Ioannis Moschakis, Christina Pierrakou
14.30 – 15.00	PR team meeting		PR team
15.00 – 16.30	The statistical law and related legislation (CoP principles 1, 2, 5 and 6)	ELSTAT	Andreas Georgiou, Ioannis Moschakis, Christina Karamichalaku, (Nikolaos Kipouros for IT matters),
16.30 – 17.15	Cooperation / level of integration of the ESS	ELSTAT	Andreas Georgiou, Ioannis Moschakis
Day 2 – Tuesday 18 November 2014			
09.00 – 09.45	PR team meeting & travel to IMF office	Hotel and travel	PR team
09.45 – 10.30	Meeting with Troika representatives	IMF Resident Representative' Office	Wes McGrew, Zenon Kontolemis, Stephanie Eble, George Gatopoulos, Niki Kalavrezou, Maria Kalimeri
10.30 – 11.00	Travel to ELSTAT		
11.00 – 12.30	Programming, planning and resources, including training (CoP principles 3, 9 and 10)	ELSTAT	Andreas Georgiou, Ioannis Tzougas, Athanassia Xenaki, Ioannis Moschakis, Ekaterini Moutafidou, Vassiliki Benaki, Christina Pierrakou
12.30 – 13.30	Lunch		
13.30 – 14.30	Meeting with main users – Ministries and other public/private institutions (including Central Bank as a user)		Markos Kapiris (Center for Renewable Energy Sources and Saving), Nikolaos Paizis (Centre for the Development of Educational Policy of the Greek General Confederation of Labour), Stylianos Kokkidis (Ministry of Rural Development and Food), Stylianos Alexiadis (Ministry of Rural Development and Food), George Paleodimos (Bank of Greece), Dimitris Emmanouil (National Centre for Social

Time	Programme	Organisation	Participants
			Research), Irene Staggel (Bank of Piraeus), Christina Paleologou (British Embassy)
14.30 – 15.00	PR team meeting		PR team
15.00 – 16.00	Meeting with main users – Media		Kerin Hope (Financial Times), Lefteris Papadimas (Reuters)
16.00 – 17.00	Meeting with Other National Authority (Ministry of Labour, Social Security and Welfare)	Ministry of Labour, Social Security and Welfare	Ioanna Palla (Ministry of Labour, Social Security and Welfare), Ioannis Keramaris (Hellenic Labour Inspectorate), Chryssanthi Stavrianakou (Social Insurance Organization of Freelance Professionals), Chryssa Tsitsa (Social Insurance Institute (IKA))
Day 3 – Wednesday 19 November 2014			
09.00 – 11.00	Quality (organisational structure, tools, monitoring, practical application), methodology, data collection, data processing and administrative data, including confidentiality (CoP principles 2, 4, 5, 7, 8 and 11 to 15)	ELSTAT	Andreas Georgiou, Ioannis Tzougas, Athanassia Xenaki, Ioannis Moschakis, Maria Stavropoulou, Andreas Vellas, Anna Ampatzoglou, Kostas Molfetas, Maria Economopoulos, Christina Pierrakou
11.00 – 11.45	PR team meeting		PR team
11.45 – 13.00	Dissemination, including users' role (CoP principles 6, 11 and 15)	ELSTAT	Andreas Georgiou, Ioannis Tzougas, Athanassia Xenaki, Ioannis Moschakis, Andreas Vellas
13.00 – 14.00	Lunch		
14.00 – 15.00	Meeting with Junior staff	ELSTAT	Menelaos Kloumbas, Christina Griva, Anna Antoniou, Georgia Kartzi, Stergios Spyroulis, Emmanouil Skopelitis, Anastasia Katsika, Christina Karamichalakov
15.00 – 17.00	PR team meeting		PR team
Day 4 – Thursday 20 November 2014			
09.00 – 10.00	Meeting with main users – Scientific community		Thomas Maloutas (Harokopio University), Renata Micha (Agricultural University of Athens), Prodromos Prodromidis (Centre of Planning and Economic Research)
10.00 – 10.15	PR team meeting		PR team
10.15 – 11.15	Meeting with Other National Authority (Ministry of Finance)	Ministry of Finance	George Manolas (Ministry of Finance), Dimitris Karatzas (General Accounting Office)
11.15 – 11.30	PR team meeting		PR team
11.30 – 12.30	Meeting with Other National Authority (Ministry of Environment, Energy and Climate Change)	Ministry of Environment, Energy and Climate Change	Eleni Gratsia
12.30 – 13.30	Lunch		
13.30 – 14.30	Coordination role of the NSI	ELSTAT	Andreas Georgiou, Ioannis Moschakis, Christina Pierrakou
14.30 – 15.00	PR team meeting		PR team
15.30 – 16.30	Meeting with main data providers/respondents		Sofia Papayianni (Directorate of Customs Procedures of the Ministry of Finance), Konstantinos Kataghis (Directorate of Customs Procedures of

Time	Programme	Organisation	Participants
			the Ministry of Finance), Vassiliki Zavlagka (General Secretariat for Energy and Climate Change of the Ministry of Environment, Energy and Climate Change), Sofia Sechperidou (General Secretariat for Public Revenue of the Ministry of Finance), Christos Dimos (General Accounting Office)
16.30 – 17.00	PR team meeting		PR team
Day 5– Friday 21 November 2014			
09.00 – 12.45	PR team meeting		PR team
12.45 – 13.30	Lunch		
13.30 – 15.00	Meeting with senior management: conclusions and recommendations	ELSTAT	Andreas Georgiou, Ioannis Tzougas, Athanassia Xenaki, Ioannis Moschakis
15.30 – 17.00	PR team meeting - preparation of the report: task sharing		PR team

ANNEX B - LIST OF PARTICIPANTS

	Peer reviewers
1	Mr Richard Alldritt (chair)
2	Ms Michelle Jouvenal
3	Prof Jaume Garcia
	Observer
1	Mr Michail Skaliotis, Eurostat, Head of the Task Force Big Data
	Participants from Hellenic Statistical Authority (ELSTAT)
	Management of ELSTAT
1	Mr Andreas Georgiou, President
2	Mr Ioannis Tzougas, Head of the General Directorate of Administration and Organization
3	Ms Athanassia Xenaki, Head of the General Directorate of Statistical Surveys
4	Ms Ekaterini Moutafidou, Head of the Financial Administration Division
5	Ms Maria Stavropoulou, Head of the National Accounts Division
6	Ms Vassiliki Benaki, Head of the Trade and Services Statistics Division
7	Ms Anna Ampatzoglou, Head of the Population and Labour Market Statistics Division
8	Mr Kostas Molfetas, Head of the Economic and Short-Term Indices Division
	National coordination team of ELSTAT
9	Mr Ioannis Moschakis, Head of the Organization, Methodology and International Relations Division
10	Ms Nektaria Tsiligkaki, Head of the International Relations Section
11	Ms Christina Pierrakou, Head of the Coordination and Programming Section
12	Ms Christina Karamichalakov, National Accounts Division
	Other participants of ELSTAT
13	Ms Maria Economopoulos, Head of Methodology, Analysis and Research Section
14	Mr Andreas Vellas, Head of Applications Development Section
15	Mr Nikolaos Kipouros, Informatics Division
	Junior staff of ELSTAT
16	Ms Anna Antoniou, Organization, Methodology and International Relations Division
17	Ms Christina Griva, Economic and Short-Term Indices Division
18	Ms Christina Karamichalakov, National Accounts Division
19	Ms Anastasia Katsika, National Accounts Division
20	Ms Georgia Kartzi, Population and Labour Market Statistics Division
21	Mr Menelaos Kloumbas, Population and Labour Market Statistics Division

22	Mr Emmanouil Skopelitis, Organization, Methodology and International Relations Division
23	Mr Stergios Spyroulis, Primary Sector Statistics Division
	Participants from other organisations
	Main users – Ministries and other public/private institutions (including Central Bank as a user)
1	Mr Markos Kapiris, Center for Renewable Energy Sources and Saving
2	Mr Nikolaos Paizis, Centre for the Development of Educational Policy of the Greek General Confederation of Labour
3	Mr Stylianos Kokkidis, Ministry of Rural Development and Food
4	Mr Stylianos Alexiadis, Ministry of Rural Development and Food
5	Ms Irene Staggel, Bank of Piraeus
6	Ms Christina Paleologou, British Embassy
7	Mr Dimitris Emmanouil, National Centre for Social Research
8	Mr George Paleodimos, Bank of Greece
	Main users – Media
9	Mr Lefteris Papadimas, Correspondent at Thomson Reuters
10	Ms Kerin Hope, Correspondent at Financial Times
	Main users – Scientific community
11	Mr Thomas Maloutas, Professor, Harokopio University
12	Ms Renata Micha, Agricultural University of Athens
13	Mr Prodromos Prodromidis, Centre of Planning and Economic Research
	Main users – Troika representatives
14	Mr Wes McGrew, International Monetary Fund (IMF) Resident Representative Office
15	Ms Stephanie Eble, International Monetary Fund (IMF) Resident Representative Office
16	Mr Zenon Kontolemis, Representative of European Commission (DG-ECFIN) in Athens
17	Mr George Gatopoulos, International Monetary Fund (IMF) Resident Representative Office
18	Ms Niki Kalavrezou, International Monetary Fund (IMF) Resident Representative Office
19	Ms Maria Kalimeri, International Monetary Fund (IMF) Resident Representative Office
	Data providers
20	Ms Sofia Papayianni, Directorate of Customs Procedures of the Ministry of Finance
21	Mr Kostantinos Kataghis, Directorate of Customs Procedures of the Ministry of Finance
22	Ms Vassiliki Zavlagka, General Secretariat for Energy and Climate Change of the Ministry of Environment, Energy and Climate Change
23	Mr Christos Dimos, General Accounting Office

24	Ms Sofia Sechperidou, General Secretariat for Public Revenue of the Ministry of Finance
	Participants of ONAs
25	Ms Ioanna Palla, Ministry of Labour, Social Security and Welfare
26	Ms Chryssanthi Stavrianakou, Ministry of Labour, Social Security and Welfare / Social Insurance Organization of Freelance Professionals
27	Ms Chryssa Tsitsa, Ministry of Labour, Social Security and Welfare / Social Insurance Institute (IKA) Economics
28	Mr Ioannis Keramaris, Ministry of Labour, Social Security and Welfare / Hellenic Labour Inspectorate
29	Mr George Manolas, Ministry of Finance
30	Mr Dimitris Karatzas, Ministry of Finance / General Accounting Office
31	Ms Eleni Gratsia, Ministry of Environment, Energy and Climate Change